| APPENDIX 1 | | | | | | |
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| **OBJECTIONS TO BILLING ENTRIES IN "EXHIBIT 1" MCMILLAN DECLARATION** | | | | | | |
| **ATTY** | **DATE** | **DESCRIPTION** | **Time Challenge** | **Reduce By** | **Objection** | **REASON FOR OBJECTION** |
| SAM | 10/30/14 | Meeting with Client re: Class Action | 1.00 | 1.00 | Excessive | Renewed fee motion fails to articulate how time spent planning for class certification was a necessary step for her ultimate victory of the underlying claims. |
| SAM | 11/12/14 | Review, edit, revise proposed complaint | 2.37 | 0.00 | No Objection | No Objection. |
| DBA | 1/28/15 | Prepared 827 documents for service on County of Riverside | 3.15 | 3.15 | Vague | Vague as to what these 827 or so documents relate to. |
| SAM | 2/25/15 | Meeting with co-counsel after meeting with Opposing counsel to discuss strategy going forward, and best approach for class issues | 1.53 | 1.53 | Excessive; Vague | Vague as to who the co-counsel was; and what the meeting was for. |
| SAM | 2/25/15 | Meet with Doug Smith, Jeb Brown, Mark Anckorn for dinner and to discuss case/class issues | 2.50 | 2.50 | Excessive; Vague | Renewed fee motion fails to articulate why meeting was a necessary step to Plaintiff's limited victory on underlying claims. |
| DBA | 2/26/15 | Prepared ex parte application for appointment of Guardian ad litem, proposed Order, filed both in USDC Central, Riverside Division | 2.38 | 0.00 | No Objection | No Objection. |
| SAM | 4/3/15 | Rule 26 Conference | 1.02 | 0.00 | No Objection | No Objection. |
| DBA | 4/7/15 | Prepared Initial Disclosures under FRCP 26(a) | 1.37 | 0.00 | No Objection | No Objection. |
| SAM | 4/7/15 | Phone with Mark regarding Rule 26 report. | 0.53 | 0.00 | No Objection | No Objection. |
| SAM | 4/7/15 | Review draft Rule 26 Report, edit, revise same, check on prospective cut off dates | 2.52 | 0.00 | No Objection | No Objection. |

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| SAM | 4/8/15 | Review, revise, edit Initial Disclosures for A.A. | 0.90 | 0.00 | No Objection | No Objection. |
| SAM | 4/8/15 | Document review for production to opposing counsel in relation to initial disclosures. | 0.77 | 0.00 | No Objection | No Objection. |
| SAM | 4/10/15 | Review revisions to Rule 26(F) Conference report. Make changes as requested by Doug. | 1.95 | 0.00 | No Objection | No Objection. |
| SDD | 4/20/15 | Draft discovery and reconfigure Tonita's discovery to Defendant Torres for warrantless seizure | 1.35 | 1.35 | Vague; Duplicative; Excessive | Vague as to failing to articulate what specific discovery drafted. Vague as to "Tonita's discovery." Vague as to "reconfigure" and what work was actually performed. Potentially duplicative of discovery already obtained in related *Rogers* case; Fee motion fails to articulate why time spent propounding discovery already obtained in related Rogers case was necessary to Plaintiff's limited victory on her individual claims. |
| SAM | 4/27/15 | Travel to, from, and attend scheduling hearing. | 5.93 | 0.00 | No Objection | No Objection. |
| SAM | 4/27/15 | Prepare for Hearing/Scheduling Conference | 0.72 | 0.00 | No Objection | No Objection. |
| DBA | 5/4/15 | Reviewed 827 documents for names of witnesses to be included in Plaintiff's Initial Disclosure | 0.38 | 0.00 | No Objection | No Objection. |
| DBA | 5/5/15 | Continued preparation of initial disclosures under FRCP Rule 26(a) | 1.55 | 0.00 | No Objection | No Objection. |
| DBA | 5/5/15 | Completed preparation of initial disclosures under FRCP Rule 26(a) | 0.57 | 0.00 | No Objection | No Objection. |
| DBA | 5/6/15 | Edited Rule 26(a) initial disclosures | 0.58 | 0.00 | No Objection | No Objection. |
| SDD | 5/21/15 | Draft discovery from AA to the County | 1.68 | 1.68 | Vague | Vague as to failing to articulate what specific discovery drafted. |

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| SDD | 5/22/15 | Continue to draft discovery from AA to the Torres | 0.90 | 0.90 | Vague | Vague as to failing to articulate what specific discovery drafted. |
| SDD | 5/26/15 | Continue to draft discovery from AA to the County | 3.55 | 3.55 | Vague | Vague as to failing to articulate what specific discovery drafted. |
| SDD | 5/27/15 | Continue to draft ROGs to propound on the County | 0.55 | 0.55 | Vague | Vague as to failing to articulate what specific discovery drafted. |
| SDD | 5/27/15 | Continue to draft RPDs to propound on County | 1.63 | 1.63 | Vague | Vague as to failing to articulate what specific discovery drafted. |
| SDD | 5/27/15 | Continue to draft RFAs to propound on County | 1.05 | 1.05 | Vague | Vague as to failing to articulate what specific discovery drafted. |
| SAM | 7/16/15 | Review, edit, revise proposed joint discovery motion re: Class Identification Discovery | 0.85 | 0.85 | Excessive | Fee motion fails to articulate why a discovery motion re: Class Identification Discovery was a necessary step to Plaintiff's limited victory on her individual claims. |
| SDD | 7/17/15 | Continue to draft RFAs to Torres | 0.32 | 0.32 | Vague | Vague as to failing to articulate what specific discovery drafted. |
| SDD | 7/20/15 | Continue to draft RFAs to Torres | 2.27 | 2.27 | Vague | Vague as to failing to articulate what specific discovery drafted. |
| SDD | 7/20/15 | Meet with Mark and Shawn to discuss direction of case and discovery | 2.23 | 2.23 | Excessive; Vague | Vague as to "direction of case and discovery." Renewed fee motion fails to articulate why obtaining expertise from class action attorney Mark Ankcorn and conducting meeting with three attorneys was a necessary step to Plaintiff's limited victory on underlying claims. |
| SAM | 7/20/15 | Meet with Mark Ankcorn re: discovery and strategy moving forward | 2.53 | 2.53 | Excessive; Vague | Vague as to "discovery and strategy." Renewed fee motion fails to articulate why obtaining expertise from class action attorney Mark Ankcorn and conducting meeting with three attorneys was a necessary step to Plaintiff's limited victory on underlying claims. |
| SDD | 7/20/15 | Continue to draft ROGs to serve upon Torres | 0.60 | 0.60 | Vague | Vague as to failing to articulate what specific discovery drafted. |
| SDD | 7/21/15 | Draft Request for Production of Documents to Torres | 1.30 | 1.30 | Vague | Vague as to failing to articulate what specific discovery drafted. |

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| SAM | 7/22/15 | Review, edit, revise, draft joint discovery stipulation. | 0.62 | 0.62 | Vague; Duplicative; Excessive | Vague as to what specific discovery stipulation task relates. Stipulation sent to Defendant on 7/23/15 pertained to interrogatories #1-4 which sought information regarding all potential class members. Renewed fee motion fails to articulate why discovery regarding all potential class members was a necessary step for her ultimate victory. |
| SAM | 7/22/15 | Conference call with opposing counsel | 0.28 | 0.28 | Excessive; Vague | Vague as to what the conference call concerned. Fails to indicate SDD and Mark Ankcorn also present and why having three plaintiff attorneys present was a necessary step to Plaintiff's limited victory. |
| SDD | 7/22/15 | Conference call with opposing counsel, Mark and Shawn | 0.28 | 0.28 | Excessive; Vague | Vague as to what the conference call concerned. Fails to articulate why having three plaintiff attorneys present was a necessary step to Plaintiff's limited victory. |
| SDD | 8/7/15 | Make edits to discovery to Torres re: Mark's edits. | 0.47 | 0.47 | Vague; Excessive | Vague as to failing to articulate what specific type and set of discovery drafted. Fee motion fails to articulate why this discovery, reviewed and edited by a class action attorney was necessary to Plaintiff's limited victory on her individual claims. |
| SAM | 8/21/15 | Review moving papers on motion to compel in preparation for comments on reply. Research cases cited there. Review opposing memorandum and declarations. Begin drafting reply. | 4.12 | 4.12 | Vague; Excessive | Vague as to which Motion to Compel work relates. MTC filed around this date pertained to interrogatories 1-4 which sought information on all potential class members. Renewed fee motion fails to articulate why work primarily related to class certification was a necessary step to Plaintiff's victory on her individual claims. |
| SAM | 8/22/15 | Continue research and drafting Reply in support of motion to compel | 1.88 | 1.88 | Vague; Excessive | Vague as to which Motion to Compel work relates. MTC filed around this date pertained to interrogatories 1-4 which sought information on all potential class members. Renewed fee motion fails to articulate why this work for work primarily related to class certification was a necessary step to Plaintiff's victory on her individual claims. |

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| SAM | 8/24/15 | Continue drafting enhanced version of Ps and As on Kerr, Keith, etc. | 0.73 | 0.73 | Vague; Excessive | Vague as to "enhanced version" and "Kerr, Keith, etc." MTC filed around this date pertained to interrogatories 1-4 which sought information on all potential class members. Renewed fee motion fails to articulate why this work for work primarily related to class certification was a necessary step to Plaintiff's victory on her individual claims. |
| SAM | 8/24/15 | Review, revise, Kerr and Keith arguments. Return to Mark to fold into Reply brief. | 0.45 | 0.45 | Vague; Excessive | Vague as to "Kerr and Keith". MTC filed around this date pertained to interrogatories 1-4 which sought information on all potential class members. Renewed fee motion fails to articulate why this work for work primarily related to class certification was a necessary step to Plaintiff's victory on her individual claims. |
| SAM | 8/25/15 | Review, edit, revise Reply in support of motion to compel. Return to Mark with my comments. | 0.62 | 0.62 | Vague; Duplicative; Excessive | Vague as to which Motion to Compel work relates. MTC filed around this date pertained to interrogatories 1-4 which sought information on all potential class members. Renewed fee motion fails to articulate why this work for work primarily related to class certification was a necessary step to Plaintiff's victory on her individual claims. |
| DBA | 9/1/15 | Prepared WIC 828 Petition and supporting papers | 1.10 | 0.00 | No Objection | No Objection. |
| SDD | 9/2/15 | Draft/revise discovery to propound upon the County | 0.67 | 0.67 | Vague; Excessive | Vague as to failing to articulate what specific discovery drafted. |
| SAM | 9/8/15 | Hearing on: AA's Motion to Compel Class Identity | 4.00 | 4.00 | Vague; Excessive | Vague as to which Motion to Compel work relates. MTC heard on this date pertained to interrogatories 1-4 which sought information on all potential class members. Renewed fee motion fails to articulate why this work for work primarily related to class certification was a necessary step to Plaintiff's victory on her individual claims. |

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| SDD | 9/8/15 | Draft Interrogatories (Set Two) to the County | 0.52 | 0.52 | Vague; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Ankcorn's billing. |
| SDD | 9/8/15 | Review the documents provided in Rogers' case to formulate discovery | 0.68 | 0.00 | No Objection | No Objection. |
| SDD | 9/8/15 | Draft RPDs to propound on County | 1.08 | 1.08 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFP's served on 10/20/15 sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/8/15 | Continue to draft/revise RFAs to propound on County | 2.07 | 2.07 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFA's served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/15/15 | Continue to draft RFA, RPD, and ROG to serve on County | 1.58 | 1.58 | Vague | Vague as to what sets of discovery this task relates. Entry contains block billing. |

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| SDD | 9/16/15 | Continue to draft request for production of documents to propound on the county | 0.58 | 0.58 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFP's served on 10/20/15 sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/16/15 | Continue to draft RFAs to propound on County | 2.12 | 2.12 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFA's served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/17/15 | Continue to draft Interrogatories to County | 0.88 | 0.88 | Vague; Duplicative; Excessive | Vague as to which set of discovery the task relates.<br>ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 9/18/15 | Continue to draft the request for production of documents to County | 1.07 | 1.07 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFP's served on 10/20/15 sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 9/18/15 | Review, edit, revise discovery for AA (RFAs, ROGs, and RPDs). | 1.48 | 1.48 | Vague | Vague as to what set of discovery this task relates and which defendant it relates. Entry contains block billing. |
| SDD | 9/21/15 | Draft discovery to Butler; modify the discovery served in Rogers | 0.82 | 0.82 | Vague; Duplicative; Excessive | Vague as to what specific discovery requests the task relates. Vague as to what discovery in *Rogers* was modified. Renewed fee motion fails to articulate why additional information than what was already obtained in *Rogers* from defendant Butler was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SAM | 9/21/15 | TC to Riverside County DPSS re progress in preparing 827 records for production to Plaintiffs. | 0.38 | 0.38 | Vague; Duplicative; Excessive | Vague as to whom the 827 documents relate. Fee motion fails to articulate why seeking records was a necessary step to Plaintiff's limited victory on underlying claims. |
| SDD | 9/21/15 | Continue to draft RPDs, make Shawn's suggested changes | 0.57 | 0.57 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFP's served on 10/20/15 sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/21/15 | Continue to draft RPDs, make Shawn's suggested changes | 0.55 | 0.55 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFP's served on 10/20/15 sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 9/25/15 | Review RFAs from County in Rogers and from September 24 meeting to copy to AA | 1.50 | 1.50 | Vague; Duplicative; Excessive | Vague as to what set of discovery drafted and which reviewed this task relates and to which defendant. Vague as to what work was actually performed. RFA's served on 10/15/15 to County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/28/15 | Research caselaw re FRCP 72 | 0.70 | 0.70 | Vague; Excessive | Vague as to purpose of research. Attorney identities task as primarily related to class certification. Renewed fee motion fails to articulate why task was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/28/15 | Research for federal law preemption of 827 | 1.22 | 1.22 | Vague | Vague as to purpose of research and whether it relates to global 827 petition. |
| SDD | 9/28/15 | Review the County's motion for review and reconsideration of Magistrate's ruling on AA's motion to compel; research cases cited by County | 1.65 | 1.65 | Vague; Excessive | Vague as to which MTC the attorney is referring. Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this class discovery was a necessary step for the underlying claims. |
| SDD | 9/28/15 | Research filing and procedure requirements for opposing the objection to the magistrate's ruling | 0.60 | 0.60 | Clerical; Excessive; Vague | Includes time spent on clerical or simple tasks. Vague as to which objection and ruling the attorney is referring. Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this class discovery was a necessary step for the underlying claims. |

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| SDD | 9/28/15 | Continue to draft RFAs to the County | 0.28 | 0.28 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFA's served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/29/15 | Begin to draft the Opposition to Defendant's Motion for Review and Reconsideration. | 1.37 | 1.37 | Excessive | Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this class discovery was a necessary step for the underlying claims. |
| SDD | 9/30/15 | Research for case law or statute regarding municipal department not being a separate legal entity. | 0.70 | 0.70 | Vague | Vague as to purpose of research and to what aspect of the case it relates. Attorney identifies task as related primarily to underlying claims yet Renewed motion fails to articulate why this research topic was a necessary step for the underlying claims. |
| AMP | 9/30/15 | Review discovery responses (RFAs, ROGs, RPDs) from Torres for possible M&C disputes | 0.38 | 0.38 | Vague; Duplicative; Excessive | Entry contains block billing. Vague as to what sets of discovery to Torres this task relates. Discovery propounded to Torres in August 2015 for AA case contains overlapping and identical requests as discovery propounded to Torres in March and April of 2015 in related *Rogers* case. Renewed motion fails to articulate why duplicative and additional discovery from Torres was a necessary step for Plaintiff's victory on the underlying claims. |
| SDD | 9/30/15 | Continue to draft oppo to the motion for reconsideration of the magistrates ruling. | 4.70 | 4.70 | Excessive | Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. |

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| SDD | 10/1/15 | Continue to draft opposition to the motion to reconsider Magistrate Pym's ruling | 5.42 | 5.42 | Excessive | Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. |
| SDD | 10/2/15 | Draft proposed order re: denial of Defendant's objection to the magistrate's order | 0.35 | 0.35 | Vague; Excessive | Vague as to what order the task relates. Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1 4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. |
| SDD | 10/2/15 | Two phone calls with Mark, re: Opposition to County's objection | 0.35 | 0.35 | Excessive | Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. Time spent seeking expertise from class action attorney unnecessary to individual claims. |
| SDD | 10/2/15 | Continue to draft Opposition to Defendant's Objection to Discovery Order; draft table of contents and authorities; file with court | 1.55 | 1.55 | Clerical; Vague; | Time spent on noncompensable clerical work. Entry contains block billing. |
| SDD | 10/5/15 | Final review of discovery to propound on the County, i.e. RFA, RPD, and ROG | 0.35 | 0.35 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. Entry contains block billing. |

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| AMP | 10/6/15 | Review discovery responses from Torres for M&C, comparing results of M&C efforts from Rogers case | 0.60 | 0.60 | Vague; Duplicative; Excessive | Vague as to which discovery responses were reviewed. Duplicative nature of requests in A.A. evidenced by attorney considering M&C efforts in related Rogers case. Renewed fee motion fails to articulate why seeking duplicative and overlapping information from defendant Torres was a necessary step to Plaintiff's limited victory in the underlying claims. |
| AMP | 10/8/15 | Start draft of M&C letter for Defendant Torres' responses to ROGs Set One | 0.42 | 0.42 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December 18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| SDD | 10/8/15 | Email to Mark Ankcorn, re RPD to County | 0.32 | 0.32 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFP's served on 10/20/15 sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. Also fails to articulate why obtaining expertise from class action attorney was necessary for discovery now claimed to be related primarily to the individual claims. |

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| AMP | 10/8/15 | Start draft of M&C letter for Defendant Torres' responses to RFAs Set One; research re improper qualifications, previous discovery responses of Defendant in related case, evasive answers, "without waiving" objections | 3.68 | 3.68 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 10/8/15 | Continue review of discovery responses from Torres for M&C, comparing to results of M&C efforts from Rogers case, start outlines for M&C letters | 1.15 | 1.15 | Vague; Excessive | Vague as to which discovery responses were reviewed. Duplicative nature of requests in A.A. evidenced by attorney considering M&C efforts in related Rogers case. Renewed fee motion fails to articulate why seeking duplicative and overlapping information from defendant Torres was a necessary step to Plaintiff's limited victory in the underlying claims. |
| AMP | 10/9/15 | Continue draft of M&C letter for Defendant Torres' responses to ROGs Set One | 3.13 | 3.13 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December 18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 10/9/15 | Continue draft of M&C letter for Defendant Torres' responses to RFA's Set One; research re: expert medical opinions, improper qualification, previous discovery responses of Defendant in related case, evasive answers, "without waiving" objections | 4.90 | 4.90 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 10/12/15 | Start second run-through of M&C letter for Defendant Torres' responses to RFAs Set One; reorganizing by topic and consolidating similar requests | 1.32 | 1.32 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those at-issue eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SAM | 10/12/15 | Review, edit, revise Meet and Confer letter to Karla Torres regarding Further responses to Request for Admission # l. Return to Adrian with edits and suggestions. | 0.70 | 0.70 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those at-issue eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 10/12/15 | Finish draft of M&C letter for Defendant Torres' responses to RFAs Set One | 1.07 | 1.07 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SAM | 10/13/15 | Review, edit, revise, meet and confer letter to Torres on Requests for admission (Set One) | 0.78 | 0.78 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those at-issue eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 10/13/15 | Continue second runthrough ofM&C letter for Defendant Torres' responses to RF As Set One; reorganizing by topic and consolidating similar requests | 1.47 | 1.47 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those at-issue eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SDD | 10/13/15 | Review the Reply Brief to the Defendants' Motion for Review of the Magistrate's order. | 0.17 | 0.17 | Vague; Excessive | Vague as to for what purpose review was done.<br>Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Attorney identifies task as related primarily to class cert and Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. |

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| AMP | 10/14/15 | Continue draft of M&C letter for Defendant Torres' responses to ROGs Set One; research re: immaterial portions in answer, evasive answers; references to documents in answers | 0.78 | 0.78 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| DBA | 10/14/15 | Receipt/Review Welfare & Institutions Code §828 documents from Riverside County Sherriff's produced by County of Riverside | 2.00 | 2.00 | Vague; Excessive | Vague as to whom the 828 petition relates. Fee motion fails to articulate why seeking records was a necessary step to Plaintiff's limited victory on underlying claims. |
| AMP | 10/14/15 | Start third runthrough of M&C letter for Defendant Torres' responses to RFAs Set One; reorganizing by topic and consolidating similar requests | 0.68 | 0.68 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| SDD | 10/15/15 | Recraft RPDs to serve portion Mark has reviewed. Serve on Defendant. | 0.42 | 0.42 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFP's served on 10/15/15 sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims, and fails to articulate why obtaining expertise from class action attorney Mark Ankcorn was necessary for discovery now claimed to be primarily for the merits. |
| SDD | 10/15/15 | Call Mark. re: RPDs to the County. | 0.10 | 0.10 | Vague; Duplicative; Excessive | Vague as to what set of discovery this task relates. RFP's served on 10/15/15 sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims, and fails to articulate why obtaining expertise from class action attorney Mark Ankcorn was necessary for discovery now claimed to be primarily for the merits. |
| AMP | 10/16/15 | Continue draft of M&C letter for Defendant Torres' responses to ROGss Set One; research re: attorney-client privilege, attorney work product, equally available information | 2.20 | 2.20 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December 18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| SDD | 10/16/15 | Steve - Draft RPD to the County for the Juvenile Case File for A.A.; draft proof of service; serve on the Defendant. | 0.98 | 0.98 | Clerical; Vague | Time spent on noncompensable clerical work; and, fails to articulate which set of RPD drafted, no such RPD served to the County. |
| AMP | 10/19/15 | Review and edit draft of M&C Letter for Defendant Torres' responses to ROGs Set One, consolidate similar Issues wherever Possible | 0.72 | 0.72 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December 18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| SAM | 10/20/15 | Research class certification issue re: Monell | 1.30 | 1.30 | Excessive; Vague | Vague as to issue. Renewed fee motion fails to articulate why research on a class certification issue was a necessary step to Plaintiff's limited victory on underlying claims. |
| AMP | 10/20/15 | Continue review and edit of draft of M&C letter for Defendant Torres' responses to ROGs Set One | 0.48 | 0.48 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December 18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 10/20/15 | Final review of draft of M&C letter for Defendant Torres' responses to RFAs Set One; comparing letter to responses received from Burkhart on October 19 in Rogers | 1.22 | 1.22 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 10/21/15 | Adrian - Start draft of Set Two of RFAs to Torres, recraft old RFAs from Set One removing 2103 error from Set One | 0.80 | 0.80 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 10/21/15 | Finish review and edit of draft of M&C letter for Defendant Torres' responses to ROGs Set One | 1.25 | 1.25 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| SDD | 10/23/15 | Review moving and opposition papers, re: reconsider magistrate's ruling; prepare for the hearing. | 1.70 | 1.70 | Duplicative; Excessive | Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Attorney identifies task as related primarily to class cert and Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims.<br><br>Event also billed by attorney Mark Anckorn. Renewed motion fails to articulate why it was necessary for two attorneys to prepare for and attend a discovery hearing. |
| AMP | 10/26/15 | Review Defendant Torres' responses to RPDs Set One and start M&C Letter research | 1.40 | 1.40 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| SDD | 10/26/15 | Attend the Motion for reconsideration of the Magistrate's decision. | 5.50 | 5.50 | Duplicative; Excessive | Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Attorney identifies task as related primarily to class cert and Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims.<br><br>Event also billed by attorney Mark Anckorn. Renewed motion fails to articulate why it was necessary for two attorneys to prepare for and attend a discovery hearing. |

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| SDD | 10/26/15 | Review the moving and Opposing papers and casealw in preparation for the hearing in the magistrate's ruling. | 1.57 | 1.57 | Duplicative ; Excessive | Per docket, ultimate ruling in favor of Defendant on 11/2/15 to Motion for Review and Reconsideration is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Attorney identifies task as related primarily to class cert and Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims.<br><br>Event also billed by attorney Mark Anckorn. Renewed motion fails to articulate why it was necessary for two attorneys to prepare for and attend a discovery hearing. |
| AMP | 10/27/15 | Continue draft of M&C Letter for Defendant Torres' responses to RPDs Set One; research equally availabie documents as response, research attorney-client privilege and reveiwing documents to respond | 3.10 | 3.10 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 10/27/15 | Start draft of M&C Letter for Defendant Torres' responses to RPDs Set One; research equally available documents as response | 0.42 | 0.42 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |

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| AMP | 10/28/15 | Finish first draft of M&C Letter for Defendant Torres' responses to RPDs Set One; research equally available documents as response, research attorney-client privilege and reviewing documents to respond | 1.57 | 1.57 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 10/29/15 | Review first draft of M&C Letter for Defendant Torres' responses to RPDs Set One | 0.38 | 0.38 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 10/30/15 | Start second runthrough of M&C letter for Defendant Torres' responses to ROGs Set One | 1.48 | 1.48 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December 18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 11/2/15 | Start second runthrough of M&C Letter for Defendant Torres' responses to RPDs Set One | 0.62 | 0.62 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 11/2/15 | Continue secood runthrough ofM&C letter for DelendantTorres' responses to ROGs Set One | 0.35 | 0.35 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December 18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 11/3/15 | Continue second runthrough ofM&C Letter for Defendant Torres' responses to RPDs Set One; research promising to send responses at a later date | 0.88 | 0.88 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |

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| AMP | 11/3/15 | Finish second runthrough of M&C letter for Defendant Torres' responses to ROGs Set One | 0.52 | 0.52 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December 18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| DBA | 11/3/15 | Phone calls to and from Juvenile Court clerk Clerk Clark re order on Welfare & Institutions Code §827 order in Tonita Rogers v. COR and this case. | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 11/4/15 | Start research on timing rules on motion for reconsideration | 0.68 | 0.68 | Vague; Clerical | Vague as to what the motion for reconsideration relates to. Includes time spent on simple research. Motion to Review and Reconsider heard on October 30, 2015. |
| AMP | 11/4/15 | Finish second runthrough of M&C Letter for Defendant Torres' responses to RPDs Set One; lack of production of documents to be added | 0.65 | 0.65 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |

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| DBA | 11/4/15 | Reviewed documents produced by Riverside County Sherift's Department, phone call to Theresa Garcia re obtaing recordings (if phone calls and photos taken by investigating officers. | 0.53 | 0.53 | Vague; Excessive | Vague as to what aspect of the case the documents relate. Renewed fee motion fails to articulate why these documents were necessary to Plaintiff's limited victory of the underlying claims. |
| AMP | 11/5/15 | Start research on subpoena for state CWS/CMS Administrator for PMK Depo | 0.93 | 0.93 | Excessive | Attorney identifies work as primarily related to individual claims, yet scheduling order required discovery to be related to class certification and is inconsistent with 11/23/15 designation regarding the same task. Renewed fee motion fails to articulate why deposing the state CWS/CMS Administrator was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 11/6/15 | Review M&C Response e-mail from Burkhart and provide e-mail response | 0.32 | 0.32 | Vague | Vague as to which discovery set the M&C email pertained. Vague as to what was discussed in the emails. |
| AMP | 11/9/15 | Start review and editing of M&C Letter for Defendant Torres' responses to ROGs Set One; editing based on comments received from review | 0.53 | 0.53 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 11/9/15 | Start review and editing of M&C Letter for Defendant Torres' responses to RPDs Set One; editing based on comments received from review | 0.77 | 0.77 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| SAM | 11/9/15 | Review draft meet and confer letter for Torres Responses to lnterrogatroies, Set One. | 0.95 | 0.95 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| SAM | 11/9/15 | Review draft meet and confer letter on Torres Request for Production set number one. | 0.32 | 0.32 | Duplicative; Excessive | Attorney identifies task as related primarily to individual claims, yet per ultimate MTC heard on March 14, 2016, plaintiff argued related to class cert. Out of 15 disputed requests, defendant only ordered to respond to five which related to class cert. Thus, time spent drafting meet and confer letter excessive given many of the requests were improperly related to the merits. Fee motion fails to articulate why the obtained class related discovery was a necessary step to the underlying claims, especially given Plaintiff already propounded similar RFPs Set One and Two on Torres in the related *Rogers* case. |

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| AMP | 11/9/15 | Start preparing and drafting notices of depositions for PMKs for County and State re CWS / CMS system | 1.73 | 1.73 | Vague Excessive | Entry contains block billing. Vague as to "preparing". Includes time spent on noncompensable clerical work. Vague as to PMK topics for the county. |
| SAM | 11/10/15 | Final review on Meet and Confer letter to Torres, on Request for Production (Set One). | 0.25 | 0.25 | Duplicative ; Excessive | Attorney identifies task as related primarily to individual claims, yet per ultimate MTC heard on March 14, 2016, plaintiff argued related to class cert. Out of 15 disputed requests, defendant only ordered to respond to five which related to class cert. Thus, time spent drafting meet and confer letter excessive given many of the requests were improperly related to the merits. Fee motion fails to articulate why the obtained class related discovery was a necessary step to the underlying claims, especially given Plaintiff already propounded similar RFPs Set One and Two on Torres in the related *Rogers* case. |
| AMP | 11/10/15 | Continue review and editing of M&C Letter for Defendant Torres' responses to RPDs Set One; editing based on comments received from review | 0.53 | 0.53 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| DBA | 11/10/15 | Telephone call to clerk Clinton Clark re 827 records, left VM, wec 11/12 | 0.23 | 0.23 | Vague | Fails to articulate what the voicemail was regarding and who the 827 records relate. |

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| AMP | 11/10/15 | Continue review and editing of M&C Letter for Defendant Torres' responses to ROGs Set One; editing based on comments received from review | 0.57 | 0.57 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| SAM | 11/10/15 | Final review on Meet and Confer letter to Torres, on Interrogatories (Set One), | 1.15 | 1.15 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 11/17/15 | Review and edit draft of notice of deposition for PMKs for County; add contributions from co-counsel and comments | 0.68 | 0.68 | Vague; Excessive | Vague as to what category of PMKs the entry relates. Vague as to what section of notice was edited. Vague as to "contributions…and comments." |
| SDD | 11/23/15 | Research issue of limitation on class discovery. | 0.27 | 0.27 | Excessive | Research regarding limitation on class discovery unnecessary to Plaintiff's success on the underlying claims. |
| AMP | 11/23/15 | Continue drafting subpoena and notice of deposition for State re CWS/CMS system | 0.52 | 0.52 | Excessive | Renewed fee motion fails to articulate why deposing the state CWS/CMS Administrator was a necessary step to Plaintiff's limited victory on her underlying claims. |

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| AMP | 11/23/15 | Review Burkhart's response to M&C Letter re: Torres responses to RP'Ds Set One | 0.25 | 0.25 | Duplicative; Excessive | Attorney identifies task as related primarily to individual claims, yet per ultimate MTC heard on March 14, 2016, plaintiff argued related to class cert. Out of 15 disputed requests, defendant only ordered to respond to five which related to class cert. Thus, time spent drafting meet and confer letter excessive given many of the requests were improperly related to the merits. Fee motion fails to articulate why the obtained class related discovery was a necessary step to the underlying claims, especially given Plaintiff already propounded similar RFPs Set One and Two on Torres in the related *Rogers* case. |
| SAM | 11/24/15 | Research re: Function of Berkely Child Abuse Statist:ical reference | 0.32 | 0.32 | Vague; Excessive | Renewed fee motion fails to articulate why this information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SAM | 11/24/15 | Review, edit, revise Deposition Notice to CA PMK regarding CWS/CMS | 0.18 | 0.18 | Excessive | Renewed fee motion fails to articulate why deposing the state CWS/CMS Administrator was a necessary step to Plaintiff's limited victory on her underlying claims. |
| SAM | 11/24/15 | Review, edit, revise meet and confer letter (Final/Final) Karla Torres' Responses to Interrogatories, set one. | 1.00 | 1.00 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 11/25/15 | Reyiew and edit subpoena and notice of deposition for State: re CWS/CMS system based on Ankcorn's comments and suggestions, adding categories of inquiry | 0.22 | 0.22 | Excessive | Renewed fee motion fails to articulate why deposing the state CWS/CMS Administrator and obtaining expertise from class action attorney Ankcorn was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 11/25/15 | Start drafting subpoena and notice of deposition for Berkley researchers re CWS/ CMS system | 0.73 | 0.73 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 12/2/15 | Continue draft of M&C Letter for Defendant Torres' responses to RFAs Set Two; showcasing October 21 e-mail explaining differences between Set Two and Set One | 1.13 | 1.13 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 12/2/15 | Add matter to subpoena and notice of deposition for State re CWS / CMS system; based on Steve's comments and suggestions, adding categories of inquiry | 0.20 | 0.20 | Excessive | Renewed fee motion fails to articulate why deposing the state CWS/CMS Administrator was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 12/3/15 | Start research into class certification objection; looking specifially at scope of discovery related to commonality, typicality, numerosity, and adequacy | 0.27 | 0.27 | Excessive | Research regarding class discovery related to commonality, typicality, numerosity, and adequacy unnecessary to Plaintiff's success on the underlying claims. |

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| DBA | 12/3/15 | Begin to prepare Motion to Compel further responses to requests for admission, (set two) propounded to defendant County of Riverside | 0.70 | 0.70 | Vague | Vague as to which set of RFA's work performed as there was no labelled RFA - Set Two propounded to defendant County. |
| AMP | 12/3/15 | E.mail to Burkhart re: supplemental responses for Torres RFAs Set One | 0.20 | 0.20 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 12/3/15 | Continue dtaft of M&C Letter for Defendant Torres' responses to RFAs Set Two: elaborating on typicality of claims and actual injury to class rep | 0.45 | 0.45 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 12/4/15 | Continue research into class certification objection; looking specifically at scope of discovery related to commonality, typicality, numerosity, and adequacy | 0.30 | 0.30 | Excessive | Attorney claims work primarily related to individual claims, yet research regarding scope of discovery related to commonality, typicality, numerosity, and adequacy completely unnecessary to the underlying claims. |

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| SAM | 12/4/15 | Review meet and confer letter re: RFAs Set two, propounded on Torres | 0.18 | 0.18 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 12/4/15 | Continue research into class certification objection; looking specifically at scope of discovery related to blurred lines between class certification and merits | 0.68 | 0.68 | Excessive | Attorney claims work primarily related to individual claims, yet research regarding scope of discovery related to commonality, typicality, numerosity, and adequacy completely unnecessary to the underlying claims. |
| AMP | 12/4/15 | Start draft of outline related to class certification discovery objection; section specifically addressing scope of discovery related to commonality, typicality, numerosity, and adequacy | 1.28 | 1.28 | Excessive | Attorney claims work primarily related to individual claims, yet outlining research regarding scope of discovery related to commonality, typicality, numerosity, and adequacy completely unnecessary to the underlying claims. |
| AMP | 12/4/15 | Meet with Dennis to discuss outline for attack on discovery objection related to relevance for class cetification | 0.37 | 0.37 | Excessive | Attorney claims work primarily related to individual claims, yet meeting regarding scope of discovery related to commonality, typicality, numerosity, and adequacy completely unnecessary to the underlying claims. |
| SAM | 12/4/15 | Research breadth of class discovery in monell case for inclusion in discussion in the meet and confer letter io Torres. | 0.55 | 0.55 | Excessive | Research regarding breadth of class discovery unnecessary to underlying claims. Vague as to which meet and confer letter the task relates. |

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| DBA | 12/4/15 | Researching Motion to Compel issues regarding class certification and County of Riverside's objection to discovery | 2.32 | 2.32 | Excessive | Attorney claims work primarily related to individual claims, yet research regarding class certification discovery issues completely unnecessary to the underlying claims. |
| AMP | 12/4/15 | Continue research into class certification objection; looking specifically at scope of discovery related to typicality and adequacy, burden of bifurcating scope of discovery | 1.03 | 1.03 | Excessive | Attorney claims work primarily related to individual claims, yet research regarding scope of discovery related to commonality, typicality, numerosity, and adequacy completely unnecessary to the underlying claims. |
| AMP | 12/4/15 | Final review of M&C Letter for Defendant Torres' responses to RFAs Set Two and preparation for delivery | 0.25 | 0.25 | Clerical; Excessive | Entry includes noncompensable clerical work. Attorney identifies work as primarily "individual" yet MTC argued related to class certification. At April 1, 2016 MTC hearing, Court found most disputed requests were not sufficiently related to class and ordered defendant to respond to just two requests. Renewed fee motion fails to articulate why the class related discovery actually obtained was a necessary step to Plaintiff's limited success on the underlying claims. |
| SAM | 12/4/15 | Review, edit, revise: Meet and Confer on Torres responses to Interrogatories, Set One. Conference with Steve and Adrian regarding class certification issue arising in the context of these responses. | 0.80 | 0.80 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 12/7/15 | Meeting regarding outline related to class certification discovery objection | 1.05 | 1.05 | Excessive | Attorney claims work primarily related to individual claims, yet meeting regarding class certification discovery issues completely unnecessary to the underlying claims. |
| AMP | 12/7/15 | Review notices of subpoena in preparation for meeting tomorrow with Ankcorn | 0.35 | 0.35 | Vague; Excessive | Vague as to what notices of subpoena were reviewed and the purpose of the meeting. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step to Plaintiff's victory on the underlying claims. |
| SAM | 12/7/15 | Research class discovery issues in preparation for meeting with Dennis, Steve; and Adrian. | 0.70 | 0.70 | Excessive | Meeting regarding class certification discovery issues completely unnecessary to the underlying claims. Attorney's designation of "enmeshed" inconsistent with earlier entries categorized as "individual" regarding the same topic. |
| SDD | 12/7/15 | Review the outline, re: class discovery, and review prepare question regarding the main issues | 0.97 | 0.97 | Excessive | Work regarding class certification discovery issues completely unnecessary to the underlying claims. Attorney's designation of "enmeshed" inconsistent with earlier entries categorized as "individual" regarding the same topic. |
| AMP | 12/7/15 | Draft discovery outline in preparation for meeting with Ankcom tomorrow | 0.73 | 0.73 | Vague; Excessive | Vague as to what notices of subpoena were reviewed and the purpose of the meeting. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 12/7/15 | Research re discovery guidelines for class certification, looking at evidentiary standards for class certification, predominance of issues and commonality | 0.63 | 0.63 | Excessive | Research regarding class certification discovery issues completely unnecessary to the underlying claims. Attorney's designation of "enmeshed" inconsistent with earlier entries categorized as "individual" regarding the same topic. |
| AMP | 12/7/15 | Review and editing of discovery objection issue outline relating to enmeshing of factual issues between class certification and the merits | 1.20 | 1.20 | Excessive | Work regarding class certification discovery issues completely unnecessary to the underlying claims. |

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| DBA | 12/7/15 | Further editing to outline re Bifurcation of Discovery | 1.77 | 1.77 | Excessive | Work regarding class certification discovery issues completely unnecessary to the underlying claims. |
| AMP | 12/7/15 | Third runthrough and edit of issue outline related to class certification discovery objection | 0.97 | 0.97 | Excessive | Work regarding class certification discovery issues completely unnecessary to the underlying claims. |
| AMP | 12/7/15 | Start research regarding app for certification for interlocutory appeal | 0.23 | 0.23 | Vague | Vague as to what the interlocutory appeal concerns. Vague as to "app". |
| dBA | 12/7/15 | Revising issue outline re bifufcation of discovery in class action cases | 1.98 | 1.98 | Excessive | Work regarding class certification discovery issues completely unnecessary to the underlying claims. |
| AMP | 12/7/15 | Edit issue outline related to class certification discovery objection | 1.62 | 1.62 | Excessive | Work regarding class certification discovery issues completely unnecessary to the underlying claims. |
| DBA | 12/7/15 | Mtg, re issue outline for bifurcation of discovery in class actions | 1.05 | 1.05 | Excessive | Work regarding class certification discovery issues completely unnecessary to the underlying claims. |
| SAM | 12/7/15 | Meeting re: Issues division and outline on Bifurcation question | 1.05 | 1.05 | Excessive | Work regarding class certification discovery issues completely unnecessary to the underlying claims. |
| SDD | 12/8/15 | review the Notice of Depo for the County's PMK, re: CWS System | 0.53 | 0.53 | Vague | Vague as to purpose of review. |
| AMP | 12/8/15 | Review and edit subpoena and notice ofsubpoena for Berkeley PMK re CWS / CMS system; based on December 8 strategy meeting, expanding categories of inquiry | 0.52 | 0.52 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 12/8/15 | Review and edit subpoena and notice of subpoena for State PMK re CWS/CMS system; based on December 8 strategy meeting, expanding categories of inquiry | 0.48 | 0.48 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |

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| SAM | 12/8/15 | Research through our old cases, Donnie Cox and Bob Powell's old cases, and compile of list of social workers who seized kids without a warrant. Include the supervisors in the list. Also, | 1.83 | 1.83 | Vague | Vague as entry is incomplete Vague as to not indicating purpose of research and what aspect of the case this work relates. |
| AMP | 12/8/15 | Review and edit notice of deposition for County PMKs re CWS / CMS system; based on Decentber 8 strategy meeting, expanding categories of inquiry | 0.38 | 0.38 | Vague | Vague as to what categories of inquiry were added. |
| SAM | 12/8/15 | Case organization meeting wiht Mark Anckorn. Steve; Dennis, and Adrian were also in attendence. | 1.95 | 1.95 | Vague; Excessive | Vague as to what the meeting concerned. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step to Plaintiff's victory on the underlying claims. |
| DBA | 12/8/15 | Attended calendar meeting re class discovery | 1.95 | 1.95 | Vague; Excessive | Vague as to what the meeting concerned and who was in attendance given other attorneys were also in attendance per other entries.. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 12/8/15 | Meeting to discuss the status of A.A., and how to ptooeed, re: discovery, meet &. confer efforts, and research | 1.95 | 1.95 | Vague; Excessive | Vague as to who was in attendance given other attorneys were also in attendance per other entries.. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 12/8/15 | Meeting with Ankcorn r.e: discovery strategy | 1.95 | 1.95 | Vague; Excessive | Vague as to who was in attendance given other attorneys were also in attendance per other entries. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 12/8/15 | Review the case outline for AA,, make comments that should also be dicussed with Mark at the meeting. | 0.23 | 0.23 | Excessive | Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 12/9/15 | Edit notice of depo for County PMK re CWS / CMS; addressing comments from Shawn and Steve | 0.58 | 0.58 | Vague | Vague as to what section of notice the task relates and what edits were actually made. Vague as to what comments were addressed. |
| SAM | 12/9/15 | Phone with Donnie to go over facts of his riverside cases and specifically identify the seizing social workers. | 0.20 | 0.20 | Vague | Vague as to who Donnie is, the purpose of conversation and what aspect of the case it pertains. |
| AMP | 12/9/15 | Start expanding on issue outline related to class certification discovery objection; research seminal cases from Supreme Court and 9th Circuit | 1.23 | 1.23 | Excessive | Attorney identifies work as primarily related to individual claim yet clearly related to class certification, unnecessary to underlying claims. |
| AMP | 12/9/15 | Prepare notice of depo for County PMK re CWS / CMS to send to Doug Smith | 0.32 | 0.32 | Vague; Clerical | Vague as to "prepare". Includes time spent on noncompensable clerical work. |
| SDD | 12/9/15 | Draft Interrogatory (Set One) to Butler, re: identify her subordinate social wotkers. | 0.32 | 0.32 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 12/9/15 | Edit notice of subpoena for Berkeley PMK re CWS / CMS; changing to match form and content of other notices | 0.33 | 0.33 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |

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| AMP | 12/9/15 | Edit notice of subpoena for State PMK re CWS/CMS;changjng to match form and content of other notices | 0.30 | 0.30 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 12/9/15 | Start drafting notice of deposition for Felicia Butler | 0.45 | 0.00 | No Objection | No Objection. |
| AMP | 12/9/15 | Start drafting notice of deposition for Karla Torres | 0.92 | 0.00 | No Objection | No Objection. |
| SAM | 12/9/15 | Continue to locate additional unwarranted seizure complaints against County of Riverside, add CSWs to lndex | 1.17 | 1.17 | Vague | Vague as to purpose of task and what aspect of the case it relates. Renewed fee motion fails to articulate why work was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 12/10/15 | Continue expanding on issue outline related to class certification discovery objection; research cases related to rigorous analysis and enmeshing of certification and merits | 0.85 | 0.85 | Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. |
| AMP | 12/10/15 | Continue expanding on issue outline related to class certification discovery objection; cases related to numerosity, commonality, typicality and adequacy | 0.92 | 0.92 | Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. |
| DBA | 12/10/15 | Began drafting meet and confer letter to counsel for County of Riverside regarding production of entire juvenile court case file. | 2.55 | 2.55 | Vague; Excessive | Vague as to what set of discovery and which juvenile case file the task relates. Time spent on seeking production of records protected under WIC 827. |
| DBA | 12/11/15 | continuing to research case law regarding allowing discovery on merits prior to class certification | 0.27 | 0.27 | Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. |

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| DBA | 12/11/15 | Researching orders bifurcating discovery in class actions | 0.80 | 0.80 | Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. |
| AMP | 12/14/15 | Continue expanding on issue outline related to class certification discovery objection; cases related to analysis of court of evidence for class certification | 0.47 | 0.47 | Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. |
| AMP | 12/14/15 | Continue expanding on issue outline related to class certification discovery objection; cases related to FRCP23(b) and requirements for satisfaction | 0.52 | 0.52 | Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. |
| AMP | 12/14/15 | Research for issue outline related to class certification discovery objection; cased related to rigorous 'analysis and Court's analysis of evidence on the merits | 0.47 | 0.47 | Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. |
| AMP | 12/14/15 | Continue expanding on issue outline related to class certification discovery objection; cases related to Monell issues and commonility | 0.55 | 0.55 | Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. |
| SAM | 12/15/15 | Work on augmenting index of complaints against COR | 0.20 | 0.20 | Vague | Vague as to purpose of task and what aspect of the case it relates. Renewed fee motion fails to articulate why work was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 12/15/15 | Review depo notice for County PMK re CWS/CMS; check all categories of inquiry and requests for production | 0.23 | 0.23 | Vague | Vague as to what constitutes "check" of categories of inquiry and requests for production and what the review was for. |

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| SAM | 12/15/15 | Continue to assmble depositions for Index of other cases against CSWs and SCSWs in Riverside County. Finished collecting and processing initial documents from Bob Powell | 0.30 | 0.30 | Vague | Vague as to purpose of task and what aspect of the case it relates. Renewed fee motion fails to articulate why work was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 12/16/15 | Review index of County of Riverside social workers for future depo notices | 0.18 | 0.18 | Vague | Vague as to what work was actually performed. Renewed fee motion fails to articulate why work was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 12/16/15 | Research place of deposition issue raised by Defendant re: entity's PMK must be deposed at place of business | 0.73 | 0.73 | Vague | Vague as to which entities PMK the task relates. |
| AMP | 12/16/15 | Research for M&C Letter responding to November 20 Burkhart lefter using research material gathered re class certification; relationship to requests for documents reviewed in response to discovery and FRE 612. | 0.42 | 0.42 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |
| AMP | 12/16/15 | Continue draft of M&C Letter responding to November 20 Burkhart letter using research material gathered re class certification; relating to requests for documents reviewed in response to discovery | 0.18 | 0.18 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |

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| AMP | 12/16/15 | Continue draft of M&C Letter responding to November 20 Burkhart letter using research material gathered re class certification; issues relating to commonality and typicality | 0.45 | 0.45 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |
| AMP | 12/16/15 | Start draft of M&C Letter responding fo November 20 Burkhart letter using research matetial gathered re class certification | 1.05 | 1.05 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |
| AMP | 12/16/15 | Draft notice of depo for County of Riverside social worker Thomas Hall from Ziegler case | 0.20 | 0.20 | Excessive | Renewed fee motion fails to articulate why seeking multiple depositions of social workers from previous cases necessary to Plaintiff's victory in underlying claims. Further, no such deposition took place. |
| AMP | 12/16/15 | Draft notice of depo for County of Riverside social worker Blanco Alonso from Ziegler case | 0.30 | 0.30 | Excessive | Renewed fee motion fails to articulate why seeking multiple depositions of social workers from previous cases necessary to Plaintiff's victory in underlying claims. Further, no such deposition took place. |
| AMP | 12/17/15 | Review and edit draft of M&C letter for Defendant Torres' responses to ROGs Set One; fold in material from research and issue outline for class certification objection | 0.33 | 0.33 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 12/17/15 | Continue draft of M&C Letter responding to November 20 Burkhart letter using research material gathered re class certification; relating to lack of bifurcation of discovery | 0.35 | 0.35 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |
| AMP | 12/17/15 | Continue expanding section of issue outline regarding bifurcation of discovery between merits and class certification in class actions; section relating to good cause for bifurcation | 0.55 | 0.55 | Excessive | Task identified as primarily related to individual claims, yet clearly related to class certification and unnecessary to underlying claims. |
| AMP | 12/17/15 | Expanding section of issue outline regarding bifurcation of discovery between merits and class certifications in class actions | 0.77 | 0.77 | Excessive | Task identified as primarily related to individual claims, yet clearly related to class certification and unnecessary to underlying claims. |
| AMP | 12/17/15 | Researching bifurcation of discovery between merits and class certification in class actions | 0.68 | 0.68 | Excessive | Task identified as primarily related to individual claims, yet clearly related to class certification and unnecessary to underlying claims. |
| AMP | 12/17/15 | Prepare M&C letter for Defendant Torres' responses to RFAs Set Two for delivery | 0.20 | 0.20 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Requests also duplicative of RFAs served on Torres in related *Rogers* case. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| SAM | 12/17/15 | Review, edit, revise new draft of meet and confer letter re: Torres responses to Request for Admissions set two. | 0.20 | 0.20 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Requests also duplicative of RFAs served on Torres in related *Rogers* case. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 12/17/15 | Second runthrough of M&C letter for Defendant Torres' responses to RFAs Set Two; reorganize to address comments from review, add in subheadings | 0.32 | 0.32 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SAM | 12/17/15 | Review meet and confer letter re: Torres' responses to Request for Admissions Set Two. | 0.28 | 0.28 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 12/17/15 | Continue review and edit of draft of M&C letter for Defendant Torres' responses to ROGs Set One; fold in material from research and issue outline for class certification objection | 0.28 | 0.28 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 12/17/15 | Review and edit draft of M&C letter for Defendant Torres' responses to RFAs Set Two; fold in material from research and issue outline for class certifieation objection | 0.22 | 0.22 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 12/18/15 | Prepare M&C letter for Defendant Torres' responses to ROGs Set One for delivery | 0.20 | 0.20 | Duplicative; Excessive; Clerical | Entry includes time spent on noncompensable clerical work. Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 12/18/15 | Second runthrough of draft of M&C Letter re Torres responses to ROGs I (21 pages); addressing comments from review; final read-aloud; and making necessary edits | 0.82 | 0.82 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| SAM | 12/18/15 | Review, edit, revise, meet and confer letter re: Torres Interrogatories Set One (21 pages.). | 0.45 | 0.45 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 12/18/15 | Continue review and edit of draft ofM&C letter for Defendant Torres' responses to ROGs Set One | 0.87 | 0.87 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 12/21/15 | Start draft of notice of depo for County, Debra Christian | 0.28 | 0.28 | Vague; Excessive | Vague as who Debra Christian is and how she is related to the County. Renewed fee motion fails to articulate why seeking multiple depositions of County employees were necessary to Plaintiff's victory in underlying claims. Further, no such deposition took place. |
| SDD | 12/21/15 | Review, edit, and revise the meet and confer letter, re: Torres RPD (Set 1) Response | 1.02 | 1.02 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 12/21/15 | Review first draft of M&C Letter responding to November 20 Burkhart letter using research material gathered re class certification | 0.25 | 0.25 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |

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| SDD | 12/21/15 | Draft interrogatories set one to butler; re: identify all social workers that she knows participated in removals of children. | 0.85 | 0.85 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 12/23/15 | Continue draft of M&C Letter responding to November 5 e-mail Burkhart letter using research material gathered re class certification; applying research to specific requests | 0.28 | 0.28 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |
| AMP | 12/23/15 | Continue draft of M&C Letter responding to November 5 e-mail Burkhart letter using research material gathered re class certification; section re failure to respond to communications | 0.42 | 0.42 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |
| AMP | 12/23/15 | Start draft of M&C Letter responding to November 5 e-mail Burkhart letter using research material gathered re class certification | 0.38 | 0.38 | Vague; Excessive | Vague as to which set of discovery this task relates. Research clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |

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| SDD | 12/23/15 | Final review of ROGS to Butler; re: identification of social worker defendants that seized children; serve on the Defendants; log the dates into abicus. | 0.38 | 0.38 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 1/4/16 | Continue to review, edit; and revise the meet and con:rer letter, re: Torres RPD (Set I) Response. Focus on drafting and revising the class certification section. | 0.82 | 0.82 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| SDD | 1/4/16 | Review, edit, and revise the meet and confer letter, re: Torres RPD (Set 1) Response. Focus on drafting and revising the class certification section | 1.63 | 1.63 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| SDD | 1/4/16 | Review, edit, and revise the Berkeley Subpoena: re: CWS/CMS documents. | 0.42 | 0.42 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |

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| SDD | 1/5/16 | Continue to draft, edit, and revise the meet and confer letter, re: Torres RPD (Set I) Response. Focus on drafting and revising the class certification section. | 1.08 | 1.08 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as enmeshed which conflicts with other designations regarding the same task. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| SDD | 1/5/16 | Continue to draft, edit, and revise the meet and confer letter; re: Torres RPD (Set 1) Response. Focus on drafting and revising the class certification section. | 0.37 | 0.37 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as enmeshed which conflicts with other designations regarding the same task. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| SDD | 1/6/16 | Continue to draft, edit, and revise the meet and confer letter, re: Torres RPD (Set 1) Response, Focus on drafting and revising the class certification section | 1.05 | 1.05 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as enmeshed which conflicts with other designations regarding the same task. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 1/6/16 | Edit notice of subpoena for Berkeley PMK re CWS/CMS; add category of inquiry and request for production | 0.22 | 0.22 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |

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| DBA | 1/6/16 | Drafting meet and confer letter to defense counsel re production of entire juvenile court file | 1.08 | 1.08 | Vague | Vague as to which set of discovery and which juvenile court file the task relates. Time spent seeking records protected by WIC 827. |
| AMP | 1/6/16 | Continue edit and revisions of the meet and confer letter re: Torres RPD (Set 1 ) Response | 0.50 | 0.50 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 1/6/16 | Research for the meet and confer letter re: Torres RPD (Set l) Response; section relating to propriety of raising objections to avoid waiver | 0.43 | 0.43 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 1/6/16 | Drafting section for the meet and confer letter re: Torres RPD (Set l) Response; section relating to propriety of raising objections to avoid waiver | 0.35 | 0.35 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |

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| AMP | 1/6/16 | Prepare meet and confer letter re: Torres RPD (Set 1) Response for delivery | 0.28 | 0.28 | Duplicative ; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 1/7/16 | Depo Prep for mid-February depo of County PMK re CWS/CMS; gathering relevant information for possible exhibits, gathering documents from similar depo prep in attother case | 0.40 | 0.40 | Vague | Vague as to "relevant information." Vague as to what documents "gathered". Vague as to what makes the other case similar. |
| AMP | 1/7/16 | Continue depo Prep for mid-February depo of County PMK re CWS / CMS; look through electronic records for, Riverside County references to CWS / CMS | 0.28 | 0.28 | Vague | Vague as to where "electronic records" are coming from. Vague as to "Riverside County references to CWS..". |
| AMP | 1/7/16 | Continue depo prep for County PMK re CWS/CMS; search and analyze CA DPSS website for possible exhibits | 0.37 | 0.37 | Vague | Vague as to results of search, vague as to what topics of "possible exhibits" attorney was looking for. |
| AMP | 1/7/16 | Continue depo prep for County PMK re CWS / CMS; search and analyze records and documents from related case Rogers v. County of Riverside | 0.32 | 0.00 | No Objection | No Objection. |

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| AMP | 1/7/16 | Continue depo prep for County PMK te CWS/CMS; search and analyze records, and documents from RPDs in related case Rogers v. County of Riverside | 0.97 | 0.00 | No Objection | No Objection. |
| AMP | 1/7/16 | Depo prep for County PMK re CWS / CMS; analyze documents from large RPD mass (21,000 pages) in related case Rogers v. County of Riverside for possible exhibits | 1.67 | 0.00 | No Objection | No Objection. |
| AMP | 1/7/16 | Continue depo prep for mid-February depo of County PMK re CWS / CMS; gathering exhibits from similar dcpo in another case | 0.72 | 0.72 | Vague | Vague as to "similar depo in another case." Vague as to "gathering."Potentially includes time spent on noncompensable clerical work. |
| AMP | 1/11/16 | Continue depo prep for County PMK re CWS / CMS; analyze All County Letters and All County Information Notices cited in current depo prep exhibits | 0.60 | 0.60 | Vague | Vague as to "all county letters and all county information notices". Vague as to "current depo prep exhibits." Unclear whether attorney has documents or not. |
| AMP | 1/11/16 | Continue depo prep for County PMK re CWS / CMS; analyze Children's Services Handbook received in related case Rogers v. County of Riverside for possible exhibits | 1.52 | 1.52 | Vague | Vague as to type of exhibits were being analyzed and relevancy to depo prep. |

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| AMP | 1/11/16 | Continue,depo peep for County PMK re CWS / CMS; analyze documents from large RPD mass (21,000 pages) in related case Rogers v. County of Riverside for possible exhibits | 1.18 | 0.00 | No Objection | No Objection. |
| AMP | 1/13/16 | Edit notice of deposition for County PMK re CWS/CMS; adding date and time | 0.18 | 0.18 | Clerical | Time spent on noncompensable clerical work. |
| AMP | 1/14/16 | Review Meet and Confer Letters re Torres' response (RFA 1 and 2, RPD 1) in preparation for conference with Burkhart tomorrow | 0.17 | 0.17 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 1/14/16 | Continue depo prep for County PMK. re CWS/CMS; looking through additional documents found on California Child Welfare Indicators Project website relating to dissemination of information contained in CWS/CMS | 0.30 | 0.00 | No Objection. | No Objection. |

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| AMP | 1/14/16 | Continue depo prep for County PMK re CWS / CMS; looking through additional documents found on California Department of Social Services website relating to dissemination of information contained in CWS/CMS | 0.30 | 0.00 | No Objection. | No Objection. |
| AMP | 1/14/16 | Continue depo prep for County PMK re CWS / CMS; looking for County of Riverside references to the CWS/CMS 19-digit client ID numbers | 0.60 | 0.60 | Vague | Vague as to how the 19 digit client ID numbers relate to deposition. Vague as to what documents are being reviewed for references. |
| AMP | 1/15/16 | Continue drafting notice of deposition for Felicia Butler, adding new document requests | 0.17 | 0.00 | No Objection | No Objection. |
| AMP | 1/15/16 | Continl.ie drafting notice of deposition for Karla Torres, adding new document requests | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 1/27/16 | Continue drafting notice of deposition for Debra Christian, adding new document requests | 0.17 | 0.17 | Vague; Excessive | Vague as who Debra Christian is and how she is related to the County. Renewed fee motion fails to articulate why seeking multiple depositions of County employees were necessary to Plaintiff's victory in underlying claims. Further, no such deposition took place. |
| AMP | 1/29/16 | Review and edit drafted sections of Meet and Confer template letter for Defendant County's discovery responses re class certification objection | 0.47 | 0.47 | Vague; Excessive | Vague as to which set of discovery this task relates. Task clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |

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| AMP | 1/29/16 | Start drafting Meet and Confer template letter for Defendant County's discovery responses re class certification objection | 1.40 | 1.40 | Vague; Excessive | Vague as to which set of discovery this task relates. Task clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims. |
| AMP | 2/1/16 | Research ·case lawand local rules regarding failure to meet and confer | 0.35 | 0.35 | Vague | Vague as to reason and purpose research performed and what discovery the task relates. |
| AMP | 2/2/16 | Research propriety of Butler's objections to Rogs served to us on January 25, 2016, reviewing previous M&C efforts | 0.27 | 0.27 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 2/2/16 | Review Butler's responses to Rogs served to us on January 25, 2016, check for problems that need a meet and confer | 0.43 | 0.43 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 2/2/16 | Continue drafting Meet and Confer template letter for Defendant County's discovery responses re class certification objection | 0.83 | 0.83 | Vague; Excessive | Vague as to which set of discovery this task relates. Task clearly connected to class certification despite attorney categorizing task as work related primarily to individual claims and is unnecessary to underlying claims. |
| SDD | 2/3/16 | Review, revise, and edit the production request for the Subpoena for the State PMK; re: CWS/CMS. | 0.27 | 0.27 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |

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| AMP | 2/3/16 | Continue draft of joint stipulation for discovery responses; draft notice of motion | 0.20 | 0.20 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/3/16 | Continue draft ofjoint stipulation for discovery responses; create initial version of declaration in support of motion | 0.55 | 0.55 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/3/16 | Continue draft of joint stipulation for discovery responses | 0.58 | 0.58 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/3/16 | Start draft of joint stipulation for discovery responses; initial formatting and section relating to class certification objection | 0.85 | 0.85 | Vague | Vague as to what discovery responses and motion the task relates. |
| SDD | 2/3/16 | Review RPD to Torres (Set 1) and the M&C letter to indentify which responses we want to compel on. | 0.22 | 0.22 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 2/4/16 | Continue draft of Joint stipulation for discovery responses.; start drafting introduction. | 0.33 | 0.33 | Vague | Vague as to what discovery responses and motion the task relates. |
| DBA | 2/4/16 | Bookmarking WIC§827 documents from County of Riverside DPSS | 0.65 | 0.65 | Clerical | Time spent on noncompensable clerical work or basic tasks. |
| AMP | 2/4/16 | Continue draft of joint stipulation for discovery responses; draft summary of meet and confer efforts for joint stip | 0.37 | 0.37 | Vague | Vague as to what discovery responses and motion the task relates. |

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| AMP | 2/4/16 | Continue draft of joint stipulation for discovery responses; compile meet and confer efforts | 0.43 | 0.43 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/4/16 | Review disputed responses from Defendant Torres and Meet and Confer letters in preparation for phone conference tomorrow | 0.38 | 0.38 | Vague | Vague as to which disputed responses the task refers, which meet and confer letters, and who the phone conference was with. |
| AMP | 2/4/16 | Research issue of propriety in federal law of asserting only objections without responsive material for joint stipulation | 0.28 | 0.28 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/4/16 | Finish first draft of declaration in support of joint stipulation for compelling RPD responses | 0.30 | 0.30 | Vague | Vague as to which set (number and to whom) of RPD's the task relates |
| SDD | 2/4/16 | Draft and edit the class certifciation Meet and Confer; re County's Request for Production of Docuemnts (Set Three). | 1.12 | 1.12 | Vague; Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. Vague as to what set of discovery the task relates as the County did not propound a set three of RFPs. |
| AMP | 2/4/16 | Continue draft of joint stipulation for discovery responses; governing law section | 0.48 | 0.48 | Vague | Vague as to what discovery responses and motion the task relates. |
| SDD | 2/4/16 | Draft and edit the class certifciation Meet and Confer; re County's Request for Pr:oduction of Docuemnts (Set Three). | 1.35 | 1.35 | Vague; Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. Vague as to what set of discovery the task relates as the County did not propound a set three of RFPs. |
| AMP | 2/4/16 | Draft disputed request section for joint stipulation for discovery responses | 0.32 | 0.32 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/4/16 | Draft proposed order for joint stipu lation for discovery responses | 0.30 | 0.30 | Vague | Vague as to what discovery responses and motion the task relates. |

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| SDD | 2/4/16 | Review, revise, and edit the class certifcation Meet and Confer; re County's Request for Production of Documents (Set Three). | 0.58 | 0.58 | Vague; Excessive | Task clearly related to class certification yet categorized as work primarily towards the individual claims. Task unnecessary to the underlying claims. Vague as to what set of discovery the task relates as the County did not propound a set three of RFPs. |
| AMP | 2/4/16 | Continue draft of Joint stipulation for discovery responses | 0.22 | 0.22 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/5/16 | Review and edit first draft of joint stipulation for discovery responses | 0.52 | 0.52 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/5/16 | E-mail Burkhart summarizing results of 90-minute Meet and Confer re Torres RPD, Rogs, and RFA responses | 0.45 | 0.45 | Vague; Duplicative; Excessive | Vague as to which set of discovery responses the task relates.<br>Attorney identifies work as primarily "individual" yet MTC re RFA's Set Two argued related to class certification. At April 1, 2016 MTC hearing, Court found most disputed requests were not sufficiently related to class and ordered defendant to respond to just two requests. RPDs and ROGs duplicative of discovery already served in related *Rogers* case. Renewed fee motion fails to articulate why time spent trying to obtain discovery that was not related to class as was required per the Scheduling Order and how obtaining the class related discovery was a necessary step to Plaintiff's limited success on the underlying claims. |

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| AMP | 2/5/16 | Burkhart called back for scheduled Meet and Confer re Torres RPD, Rogs, and FRA responses | 1.50 | 1.50 | Duplicative; Excessive | Vague as to which set of discovery responses the task relates. Attorney identifies work as primarily "individual" yet MTC re RFA's Set Two argued related to class certification. At April 1, 2016 MTC hearing, Court found most disputed requests were not sufficiently related to class and ordered defendant to respond to just two requests. RPDs and ROGs duplicative of discovery already served in related *Rogers* case. Renewed fee motion fails to articulate why time spent trying to obtain discovery that was not related to class as was required per the Scheduling Order and how obtaining the class related discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 2/5/16 | Continue review and edit of first draft of joint stipulation for discovery responses | 0.17 | 0.17 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/5/16 | Continue draft of joint stipulation, add in citations to declaration and exhibits | 0.63 | 0.63 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/8/16 | Review and edit Joint Stip to compel Request for Production of Documents Set One from Karla Torres; final rcadthrough before preparation for service | 0.43 | 0.43 | Duplicative; Excessive | Attorney identifies task as related primarily to individual claims, yet per ultimate MTC heard on March 14, 2016, plaintiff argued related to class cert. Out of 15 disputed requests, defendant only ordered to respond to five which related to class cert. Thus, time spent seeking MTC excessive given many of the requests were improperly related to the merits. Fee motion fails to articulate why the obtained class related discovery was a necessary step to the underlying claims, especially given Plaintiff already propounded similar RFPs Set One and Two on Torres in the related *Rogers* case. |

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| AMP | 2/8/16 | Draft section for declaration in support of joint stipulation highlightfug identical objection to every discovery request | 0.28 | 0.28 | Vague | Vague as to what discovery responses and motion the task relates. |
| SAM | 2/8/16 | Review, edit, revise, final draft of joint stip to compel Request For Production Set One | 0.52 | 0.52 | Vague | Vague as to which defendant the RFP Set One relates. |
| AMP | 2/8/16 | Corttinuereview, edit,and revisions of Joint Stip to compel Request for Production of Documents Set One from Karla Torres based on comments received | 0.85 | 0.85 | Duplicative; Excessive | Attorney identifies task as related primarily to individual claims, yet per ultimate MTC heard on March 14, 2016, plaintiff argued related to class cert. Out of 15 disputed requests, defendant only ordered to respond to five which related to class cert. Thus, time spent seeking MTC excessive given many of the requests were improperly related to the merits. Fee motion fails to articulate why the obtained class related discovery was a necessary step to the underlying claims, especially given Plaintiff already propounded similar RFPs Set One and Two on Torres in the related *Rogers* case. |
| AMP | 2/8/16 | Review, edit, revise Joint Stip to compel Request for Production of Documents set One from Karla Torres based on comments received | 0.63 | 0.63 | Duplicative; Excessive | Attorney identifies task as related primarily to individual claims, yet per ultimate MTC heard on March 14, 2016, plaintiff argued related to class cert. Out of 15 disputed requests, defendant only ordered to respond to five which related to class cert. Thus, time spent seeking MTC excessive given many of the requests were improperly related to the merits. Fee motion fails to articulate why the obtained class related discovery was a necessary step to the underlying claims, especially given Plaintiff already propounded similar RFPs Set One and Two on Torres in the related *Rogers* case. |
| SAM | 2/8/16 | Review, edit, revise, Joint Stip to compell Request for Production of Documents, set one. | 0.53 | 0.53 | Vague | Vague as to which defendant the RFP Set One relates. |

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| AMP | 2/8/16 | Review; revise, and edit of first draft of joint stipulatfon for discovery responses, add in recent phone conference for Meet and Confer as well as results | 0.83 | 0.83 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/9/16 | Prepare copy of joint stipulation for their portion to be returned within a week to be sent by mail | 0.25 | 0.25 | Vague; Clerical | Vague as to "their". Vague as to "prepare". Vague as to what discovery and motion the task relates. Time includes noncompensable clerical work. |
| AMP | 2/9/16 | Prepare joint stipulation and declaration for service to opposing counsel | 0.18 | 0.18 | Vague | Vague as to what discovery responses and motion the task relates. |
| AMP | 2/9/16 | Prepare exhibits to declaration in support of joint stipulation | 0.43 | 0.43 | Vague | Vague as to what discovery responses and motion the task relates. |
| DBA | 2/10/16 | Reviewing Template for Bifurcation issue to be included in M&C letter to Counsel for C.O.R | 0.35 | 0.35 | Vague | Vague as to what discovery responses and M&C letter the task relates. Clearly related to class certification and unnecessary to underlying claims despite being categorized as work primarily towards the individual claims. |
| AMP | 2/15/16 | Continue draft of M&C Letter re: Butler's responses to Plaintiff A.A.'s Rogs (Set One); section addressing privacy objection | 0.23 | 0.23 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 2/15/16 | Research for M&C Letter; privacy objection relating to identity of social workers | 0.52 | 0.52 | Vague | Vague as to what discovery set the M&C letter relates. |

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| AMP | 2/15/16 | Start draft of M&C Letter re: Butler's responses to Plaintiff A.A.'s Rogs (Set One) | 0.47 | 0.47 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 2/15/16 | Continue to draft the class certification Meet and Confer; re County's Request for Production of Documents (Set Three). | 0.77 | 0.77 | Excessive | Task identified as related to class and work clearly unnecessary to the individual claims. |
| AMP | 2/15/16 | Review first draft of M&C Letter re: Butler's responses to Plaintiff A.A.'s Rogs (Set One) | 0.28 | 0.28 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 2/15/16 | Continue draft of M&C Letter re: Butler's responses to Plainttff A.A."s Rogs (Set One); section addressing definition of "seized" as Defendant has objected to it as vague and ambiguous | 0.22 | 0.22 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 2/15/16 | Continue draft of M&C Letter re: Butler's responses to Plaintiff A.A.'s Rags (Set One); sections addressing remaining objections to interrogatories and their inapplicability | 0.35 | 0.35 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 2/15/16 | Continue draft of M&C Letter re: Butler's responses to Plaintiff A.A.'s Rogs (Set One); section addressing class certification objection and la.ck of applicability to these specific interrogatories | 0.32 | 0.32 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 2/17/16 | Review the County's Responses to Interrogatories (Set 2) to determine which objections need to be meet and conferred on. | 0.15 | 0.15 | Excessive | Discovery sought identities of all social workers between 1995 and 2014 that meet certain enumerated criteria. Attorney identifies task as related primarily to individual claims yet clearly related to class cert. Renewed fee motion fails to articulate why seeking extensive information was a necessary step to Plaintiff's victory on the individual claims. |
| AMP | 2/17/16 | Review and fold in Defendant's portions of joint stipulation | 0.37 | 0.37 | Vague | Vague as to what discovery and motion the task relates. |
| AMP | 2/17/16 | Continue draft of the Meet and Confer letter, re: A.A.'s RFAs (Set One) to the County, sections eddressing Defendant's various objections | 0.38 | 0.27 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 2/17/16 | Drafting M&C letter to County re its responses to RPD 2. | 1.38 | 0.38 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 2/17/16 | Continue draft of the Meet and Confer letter, re: A.A's RFAs (Set One) to the County, sections addressing Defendant's obligations when responding to RFAs | 0.48 | 0.48 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/17/16 | Start to draft the Meet and Confer letter, re: A.A.'s RFAs (Set One) to the County, | 0.40 | 0.40 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/17/16 | Review the County's Responses to RFAs (Set 1) to determine which objections need to be met and conferred on. | 0.22 | 0.22 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 2/17/16 | Begin to draft the Meet and Confer letter, re: A.Aa Interrogatories to the County, Modify the class cert section to address the specific interrogatories. | 1.57 | 1.57 | Vague; Excessive | Vague as to which set of Interrogatories to the County the task relates. Work clearly related to class cert. unnecessary to the individual claims, despite attorney identifying work as primarily related to individual claims. |
| DBA | 2/18/16 | Revising M&C RFP, Request No. 2 | 0.33 | 0.33 | Vague | Vague as to which defendant the RFP Request No. 2 relates. |

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| AMP | 2/18/16 | Continue draft of joint stipulation for motion to compel Torres to provide Responses to RFAs Set Two, Ps & As | 0.70 | 0.70 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SDD | 2/18/16 | Review Dennis' M&C letter, re: County's Responses to RPD (Set2) - Entire Case File | 0.82 | 0.82 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 2/18/16 | Start draft of joint stipulation for motion to compel Torres to provide responses to RFAs Set TWO | 0.63 | 0.63 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/18/16 | Continue review, proofread, and edit of Meet and Confer letter to County of Riverside re RFAs Set One before sending for peer review | 0.30 | 0.30 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/18/16 | Continue draft of the Meet and Confer letter, re: A.A.'s RFAs (Set One) to the County | 0.45 | 0.45 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 2/18/16 | Drafting M&C letter to C,O.R. attorneys re County's Responses to RPD,Set 1 | 1.03 | 1.03 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 2/18/16 | Continuing to draft M&C re COR.'s respcnse to RPD 2. | 0.17 | 0.17 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 2/18/16 | Continue draft of the Meet and Confer letter, re: A.As RFAs (Set One) to the County, sections relating to equally available objection and argumentative | 0.60 | 0.60 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/18/16 | Draft section for Meet and Confer letter to Counly of Riverside re RFAs Set One; section re vague and ambiguous as to the word "knew | 0.22 | 0.22 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/18/16 | Continue review, proofread, and edit of Meet and Confer letter to County of Riverside re RFAs Set One based on comments received from Steve for review | 0.68 | 0.68 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SAM | 2/18/16 | Review, edit, revise W:\wpdocs\CA A.A. v. County ofRiverside\Law & Motion\MTC - Torres\RFA Set 2\Joint Stip-v.l.wpd. Return to Adrian with comments. | 0.40 | 0.40 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SAM | 2/18/16 | Research addidonal cases where Rlverside CSW has been sued for unwarranted seizure | 0.22 | 0.22 | Vague | Vague as to purpose of research and what aspect of the case it relates. Clearly related to class cert. yet attorney identifies work as primarily related to individual claims. |
| SDD | 2/18/16 | Review, revise, and edit Adrian's M&C letter te; County's RFAs (Set One). | 0.77 | 0.77 | Duplicative ; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/18/16 | Review, proofread, and edit joint stipulation for motion to compel Torres to provide responses to RFAs, Set Two before sending for peer review | 0.23 | 0.23 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 2/18/16 | Continue draft of joint stipulation for motion to compel Torres to provide responses to RFAs, Set Two, proposed order | 0.28 | 0.28 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| DBA | 2/18/16 | Preparing final revisions to M&C re County response to RPD, set one | 0.50 | 0.50 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SAM | 2/18/16 | Continue work on Index ofRiverside CPS cases. Fold in new case materials from Donnie Cox. | 1.28 | 1.28 | Vague | Vague as to who Donnie Cox is. Vague as to purpose of task. Clearly related to class certification yet identified as primarily towards individual claims. |
| SDD | 2/19/16 | Review, revise, and edit Adrian's M&C letter, re: County's responses to RFA (Set 1 ). | 0.77 | 0.77 | Duplicative; Excessive | RFA's Set One served on 10/15/15 sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/19/16 | Draft section of joint stipulation for motion to compel Torres to provide responses to RFAs Set Two based on comments received from Shawn's review; avoiding duplicate citations to law | 0.22 | 0.22 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| SDD | 2/19/16 | Continue to draft the M&C letter, re: County's Responses to ROGS (Set 1) - Possession, custody, and control objection and couunty's own social workers have access to the info. | 0.53 | 0.53 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| AMP | 2/19/16 | Review, proofread, and edit joint stipulation for motion to compel Torres to provide responses to RFAs Set Two based on comments received from Shawn's review | 0.55 | 0.55 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SDD | 2/19/16 | Continue to draft the M&C letter, re: County's Responses to ROGS (Set l ). | 0.72 | 0.72 | Vague; Excessive | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| AMP | 2/19/16 | Second review, proofread, and edit of Meet and Confer letter to County of Riverside re RF As Set One based on second set of comments received from Steve for review | 0.63 | 0.63 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 2/19/16 | Continue second review, prooftead, and edit joint stipulation for motion to compel Torres to provide responses to RFAs Set Two based on comments received from · Shawn's second review | 0.22 | 0.22 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/19/16 | Second review, proofread, and edit joint stipulation for motion to compel Torres to provide responses to RFAs Set Two based on comments received from Shawn's second review | 0.20 | 0.20 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 2/19/16 | Add exhibits from County of Orange fur depo prep for County of Riverside PMK for CWS/CMS and make sure all necessary exhibits are present | 0.48 | 0.48 | Vague | Vague as to what exhibits from County of Orange are being added and how it relates to County of Riverside. |
| SAM | 2/19/16 | Review, edit, revise, W:\wpdocs\CA A.A. v. County ofRiverside\Law & Motion\MTC - Torres\RFA Set 2\Joint Stip- v.3.wpd. Return to Adrian with comments and suggested edits. | 0.60 | 0.60 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 2/19/16 | Review compiled depo prep for County of Riverside PMK for CWS/CMS and make sure all necessary exhibits are present | 0.23 | 0.23 | Vague | Vague as to "compiled depo prep". |
| SAM | 2/19/16 | Review, edit revise, W:\wpdocs\CA A.A. v. County of Riverside\Correspondence\Meet and Confer\County\ROG\M&C - ROG - Set 2 - v.3.wpd. Return to Steve with comments and corrections. | 0.38 | 0.38 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 2/23/16 | Review depo transcript of CWS/CMS PMK Lynda Ross from Orange County to determine if anything else is needed for deposition of County of Riverside's PMKs on CWS/CMS | 0.17 | 0.17 | Vague | Vague as to results of review and determinations. |
| AMP | 2/23/16 | Review depo transcript of CWS/CMS PMK Bob Abair from Orange County to detennine if anything else is needed for deposition of County of Riverside's PM.Ks on CWS/CMS | 0.28 | 0.28 | Vague | Vague as to results of review and determinations. |

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| AMP | 2/24/16 | Start draft of reply supplemental declaration of law for joint stip to compel Torres RPDs Set one | 0.30 | 0.30 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 2/24/16 | Review Defendant's arguments from joint stip to compel Torres RPDs Set One-and analyze for arguments to make in reply supplemental declaration of law | 0.20 | 0.20 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 2/25/16 | Prepare and print courtesy copy of joint stip to compel Torres RPDs Set One to be mailed to courthouse | 0.28 | 0.28 | Clerical | Time spent on noncompensable clerical work. |
| AMP | 2/25/16 | Continue draft of reply supplemental declaration of law for joint stip to compel Torres RPDs Set One; section relating to Defendant not providing citations to authority in joint stip | 0.23 | 0.23 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |

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| AMP | 2/25/16 | Research federal law regarding arguments without citations to legal authority for reply sllpplemental dedarati on of law for joint stip to compel Torres RPDs Set One | 0.45 | 0.45 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 2/25/16 | Continue draft of reply supplemental declaration of law for joint stip to compel Torres RPDs Set One | 0.67 | 0.67 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| SDD | 2/25/16 | Review, revise and edit Joint Stip, re: Torres RFA #2. | 1.68 | 1.68 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 2/26/16 | Continue draft of reply sµppletntntal declaration of law for Joint stip to compel Torres RPDs Set One; section relating to Defendant not disputing case law cited by Plaintiff | 0.35 | 0.35 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 2/26/16 | Continue draft of reply supplemental declaration of law for joint stip to compel Torres RPDs Set One; section relating to Defendant not meeting burden of supportfog objections | 0.32 | 0.32 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| AMP | 2/26/16 | Continue draft of replysupplemental declaration of law for joint stip to compel Torres RPDs Set One; section relating to Defendant's bad faith in M&C efforts | 0.35 | 0.35 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |

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| DBA | 2/29/16 | Preparing final revisions to M&C letter re County of Riverside's :responses to Request for Production, (Set One) propounded by A.A. | 0.17 | 0.17 | Duplicative; Excessive | RFP's Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/1/16 | Review and edit draft of reply supplemental memorandum of law for joint stip to compel Torres RPDs Set One; based on Steve's second set of comments from review | 0.23 | 0.23 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| SDD | 3/1/16 | Review, revise; and edit Supp. memo in support of Plaintift's joint stipulation to compel, Torres RPD. | 0.97 | 0.97 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |

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| SDD | 3/1/16 | Review, revise, and edit Supp. memo in support of Plaintiffs joint stipulation to compel, Torres RPD. | 1.13 | 1.13 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 3/1/16 | Continue review and edit draft of reply supplemental memorandum of law for joint stip to compel Torres RPDs Set One; based on Steve's comments from review | 0.37 | 0.37 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 3/1/16 | Review and edit draft of reply supplemental memorandum of law for joint stip to compel Torres RPDs Set Orte; based on Steve's comments from review | 0.72 | 0.72 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |

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| SDD | 3/1/16 | Review, revise, and edit Supp. memo in support of Plaintifl's joint stipulatio'n to compel, Torres RPD. | 0.78 | 0.78 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| DBA | 3/2/16 | Letter to counsel for County of Riverside re his response to M&C letter sent on 2/ 18/16 | 0.23 | 0.23 | Vague | M&C letter sent on 2/18/16 regarding RFPs - Set Two to County. Letter argues request is class related. Request sought A.A.'s juvenile case file which is protected by WIC 827. Attorney should not bill for pursuing incorrect avenue to obtain records. |
| AMP | 3/2/16 | Prepare joint stipulation for motion to compel Torres RFAs Set Two for delivery to opposing counsel | 0.55 | 0.55 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/2/16 | Edit draft of joint stipulation for motion to compel Torres to provide responses to RFAs Set Two based on second set of comments received from Steve's review | 0.17 | 0.17 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| SDD | 3/2/16 | Review, revise, and edit Joint Stip Support decl., re: Torres RFA 2 | 0.32 | 0.32 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SDD | 3/2/16 | Review, revise, and edit Joint Stip re: Torres RFA #2 | 0.97 | 0.97 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/2/16 | Edit draft of joint stipulation for motion to compel Torres ta provide responses to RfAs Set Two based on comments received from Steve's review | 1.25 | 1.25 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| DBA | 3/2/16 | Drafting M&C letter follow up to attorney for Riverside County | 0.30 | 0.30 | Vague | Vague as to what the task relates. Vague as to which M&C letter task relates. |
| SDD | 3/7/16 | Begin to draft the Joint Stipulation, re: County's RPD's (Set Three). | 0.70 | 0.70 | Duplicative; Excessive | Requests duplicative and overlapping of RPD's sought in related *Rogers* case. Over 20000 records produced in *Rogers* case. Renewed fee motion fails to articulate why seeking duplicative discovery was a necessary step to Plaintiff's victory on the individual claims. |

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| AMP | 3/8/16 | Start draft of supplemental declaration highlighting change in Defense Counsel's position re MCLE seminar | 0.80 | 0.80 | Vague | Vague as to what pleading the declaration pertains. |
| SDD | 3/8/16 | Draft M&C response to County, re: Interrogatory (Set 2). | 0.65 | 0.65 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 3/8/16 | Preparing Reply to Defendants' oppo to meet and confer re RPD (Set 2) | 0.97 | 0.97 | Vague | Vague as to which defendant the discovery and task relates. |
| SDD | 3/8/16 | Research issues raised in Defendant County's M&C response,and case law documenting Defendant's obligations. | 0.43 | 0.43 | Vague | Vague as to which M&C and discovery the task relates. |
| AMP | 3/9/16 | Review responses of Defendant Torres to Rogs (Set One) to determine which ones would need court order for further response | 0.45 | 0.45 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| SDD | 3/9/16 | Continue to Draft the Joint Stipulation, re: County's RPD's (Set Three); meet & confer efforts. | 0.97 | 0.97 | Duplicative; Excessive | Requests duplicative and overlapping of RPD's sought in related *Rogers* case. Over 20000 records produced in *Rogers* case. Renewed fee motion fails to articulate why seeking duplicative discovery was a necessary step to Plaintiff's victory on the individual claims. |
| DBA | 3/9/16 | Drafting Notices of depositions of PMK witnesses in March 2016 | 0.17 | 0.17 | Excessive; Vague | Vague as to which categories of PMK the task relates as multiple PMK depositions taken; County, State, Juvenile Crt. Renewed fee motion fails to articulate why seeking and taking depositions of multiple PMKs was a necessary step to Plaintiff's victory on the underlying claims. |
| DBA | 3/9/16 | Emails to Doug Smith re scheduling of PMK depositions in March 2016 | 0.17 | 0.17 | Excessive; Vague | Vague as to which categories of PMK the task relates. Renewed fee motion fails to articulate why seeking and taking depositions of multiple PMKs was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/10/16 | Review and fold in Defcndant's portions of joint stipulation re Torres. RFAs Set Two | 0.28 | 0.28 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 3/11/16 | Continue draft of joint stipulation for Defendant Karla Torres to provide further responses to Rogs Set One, start Plaintiff's portion of joint stipulation | 0.47 | 0.47 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 3/11/16 | Continue draft of joint stipulation for Defendant Karla Torres to provide further responses to Roes Set One, declaration in support of joint stipulation | 0.35 | 0.35 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| SDD | 3/14/16 | Review; revise, and edit Plaintiffs M&C letter, re: County RFA (Set One). | 0.25 | 0.25 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 3/14/16 | Continue draft of joint stipulation for Defendant Karla Torres to provide further responses to Rogs Set One, continue Plaintiffs portion of joint stipulation, governing law section | 0.38 | 0.38 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 3/14/16 | Continue draft of joint stipulation for Defendant Karla Torres to provide further responses to Rogs Set One, continue Plaintiffs portion of joint stipulation, section relating to privilege | 0.27 | 0.27 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 3/14/16 | Continue draft of joint stipulation for Defendant Karla Torres to provide funher responses to Rogs Set One, continue Plaintiffs portion of joint stipulation, meet and confer efforts | 0.25 | 0.25 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 3/14/16 | Start draft of new sections of M&C Letter re County RFA Set One addressing Judge Pym's order relating to MTC | 0.43 | 0.43 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/14/16 | Prepare joint stipulation to compel Torres to provide responses to RFA Set Two for e-filing; publish to .pdf and compile all portions of stipulation | 0.25 | 0.25 | Clerical; Excessive | Entry includes time spent on noncompensable clerical work. Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 3/14/16 | Continue draft of joint stipulation for Defundant Karla Torres to provide further responses to Rogs Set One, specific requests in dispute section | 0.33 | 0.33 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 3/14/16 | Prepare M&C Letter re County RFA Set One for delivery to opposing counsel; print, sign, scan and mail | 0.23 | 0.23 | Duplicative; Excessive; Clerical | Entry includes noncompensable clerical work.<br>RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/14/16 | Continue draft of.new sections of M&C Letter re County RFA Set One addressing Judge Pym's order relating to MTC; sections relating to individual RFAs | 0.32 | 0.32 | Duplicative; Excessive | Conflicting of 3/14/16 entry indicating the M&C letter was mailed.<br>RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims |

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| SDD | 3/15/16 | Review, revise,and edit the M&.C letter; re: deadline for Torres to produce documents pursuant to Pym's Order. | 0.20 | 0.20 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 3/15/16 | Start draft of meet and confer letter re deadline for Defendant to produce documents pursuant to Judge Pym's order | 0.37 | 0.37 | Vague | Vague as to which defendant the task relates. Vague as to which set of discovery the task relates. |
| SDD | 3/15/16 | Begin to draft a reply meet and confer letter to reflect the Judge Pym's order, re: County RPD (Set 3). | 0.92 | 0.92 | Duplicative; Excessive | Requests duplicative and overlapping of RPD's sought in related *Rogers* case. Over 20000 records produced in *Rogers* case. Renewed fee motion fails to articulate why seeking duplicative discovery was a necessary step to Plaintiff's victory on the individual claims. |
| SDD | 3/15/16 | Review Judge Pym's Discovery Order, examine for points to modify further meet and confer letters re County's RPD's (Set 3) and ROGs (Set One). | 0.22 | 0.22 | Duplicative; Excessive | Requests duplicative and overlapping of RPD's sought in related *Rogers* case. Over 20000 records produced in *Rogers* case. Renewed fee motion fails to articulate why seeking duplicative discovery was a necessary step to Plaintiff's victory on the individual claims. |
| AMP | 3/16/16 | Start draft of new sections of M&C Letter re Butler Rogs Set One addressing Judge Pym's order relating toMTC | 0.33 | 0.33 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 3/16/16 | Continµe draft of new sections of M&.C Letter re County RFA Set One then send to Steve for review | 0.37 | 0.37 | Duplicative; Excessive | Conflicting of 3/14/16 entry indicating the M&C letter was mailed. RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| SDD | 3/17/16 | Continue to draft a reply meet and confer letter to reflect the Judge Pym's order re: County ROG (Set 2). | 0.52 | 0.52 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 3/17/16 | Draft the request for production of documents that will accompany the Depo notices to the individual social workers. | 0.62 | 0.62 | Vague | Vague as to "individual social workers." Entry contains block billing. |
| SDD | 3/17/16 | Phone call with Mark, re: deposition rescheduling and how to proceed with depo notices | 0.25 | 0.25 | Excessive | Time spent seeking expertise from class action attorney. Renewed fee motion fails to articulate why seeking such expertise was a necessary step to Plaintiff's victory on the individual claims. |

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| AMP | 3/18/16 | Start drafting follow up Meet and Confer letter for responses to Torres Rogs Set One re Judge Pym's Order | 0.30 | 0.30 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| DBA | 3/21/16 | Drafting revisions to M&C letter re RPD (Set 1) to reflect Magistrate Pym's recent order. | 0.88 | 0.88 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/21/16 | Start drafting follow up Meet and Confer letter for responses to Torres RFAs Set One re Judge Pym's Order | 1.02 | 1.02 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 3/21/16 | Review, proofread, and edit follow up Meet and Confer letter for responses to Torres Rogs Set One re Judge Pym's Order before giving to Steve for review | 0.22 | 0.22 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| SDD | 3/21/16 | Review the CMS/CWS depositions in B.R. in preparation for the County of Riverside's PMK on the identical issue. | 1.68 | 1.68 | Vague | Vague as to "in B.R." and how it relates to depo prep here. |
| SDD | 3/21/16 | Continue to draft the Joint Stipulation to Continue the Class Certification Datess; re: explain the discovery issues and the need for a continuance | 0.87 | 0.87 | Excessive | Task clearly related to class certification issues. Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 3/21/16 | Start draft of supplemental declaration for joint stip for Torres RFAs Set Two | 0.30 | 0.30 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 3/21/16 | Start draft of supplemental memorandum for joint stip fur Torres RFAs Set Two | 1.12 | 1.12 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SDD | 3/22/16 | review, revise, and edit the Supp. Memo in support of Plaintiffs motion to compel Torres' RFAs (Set One). | 0.50 | 0.50 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| DBA | 3/22/16 | Finished drafting M&C ltr to County re RPD set one | 0.95 | 0.95 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 3/22/16 | Attend depo in Temecula, CA for the County's PMK, re: CWS/CMS. Record of non-appearance taken. | 3.38 | 0.00 | No Objection | No Objection. |

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| AMP | 3/22/16 | Phone M&C with Burkhart re Production Deadline for Torres Compelled Production, production by April 14, also discussed possible production of Torres RFA 2 responses by March 31 | 0.27 | 0.27 | Vague; Duplicative; Excessive | Attorney identifies work as primarily "individual" yet MTC re RFA's Set Two and RFPs argued related to class certification. At March 14, 2016 MTC hearing, court ordered defendant to respond to only 5 requests for production that were related to class certification out of the 15 disputed requests. At April 1, 2016 MTC hearing, Court found most disputed requests were not sufficiently related to class and ordered defendant to respond to just two requests. Additionally, discovery duplicative of discovery served on Torres in the related *Torres* case. Renewed fee motion fails to articulate why time spent trying to obtain discovery that was not related to class as was required per the Scheduling Order and how obtaining the class related discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 3/22/16 | Review, revise, and edit the Supp. Memo and Declaration in support of Plaintiff's motion to compel Torres' RFAs (Set Two) based on Steve's second edits | 0.42 | 0.42 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/22/16 | Review, revise, and edit the Supp. Memo in support of Plaintiff's motion to compel Torres' RFAs (Set two) based ,on Steve's edits | 0.70 | 0.70 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 3/23/16 | Continue review, revise, and edit M&C, re: County's responses to RFAs (Set One) based on Steve's comments | 0.15 | 0.15 | Duplicative; Excessive | Conflicting of 3/14/16 entry indicating the M&C letter was mailed. RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/23/16 | Review, revise, and edit M&C, re: County's responses to RFAs (Set One) based.on Steve's comments. | 0.28 | 0.28 | Duplicative; Excessive | Conflicting of 3/14/16 entry indicating the M&C letter was mailed. RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/23/16 | Review, revise, and edit M&C, re: Butler's responses to ROGS (Set One) based on Steve's comments | 0.75 | 0.75 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| DBA | 3/23/16 | Draftins revisions to M&C letter, RPD 1 to C.O.R. | 2.25 | 2.25 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 3/23/16 | Review, revise, and edit M&C letter to the County, re: RPD Set One. | 0.97 | 0.97 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/23/16 | Final review and proofread of the M&C letter, re: County's responses to RFA (Set One) | 0.32 | 0.32 | Duplicative; Excessive | Conflicting of 3/14/16 entry indicating the M&C letter was mailed. RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/23/16 | Start draft of RPD Set One to Defendant Butler | 0.28 | 0.28 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP's relate. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 3/23/16 | Review, revise, and edit the M&C letter, re: County's responses to RFA (Set One) | 0.82 | 0.82 | Duplicative; Excessive | Conflicting of 3/14/16 entry indicating the M&C letter was mailed. RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 3/23/16 | Drafting depo. ntc. of witnesses Holland, Cordova from Oshita v. COR, Gauley, from Cole V. COR, Biddle, Ballier and Atkins from Pedroza v. COR | 0.55 | 0.55 | Excessive | Entry contains block billing. Only Atkins deposition went forward.Renewed fee motion fails to articulate why seeking depositions of multiple witnesses from previous lawsuits was a necessary step for Plaintiff's victory on the individual claims and why Atkins deposition was necessary. |
| AMP | 3/23/16 | Start draft of RFA Set One to Defendant Butler | 1.05 | 1.05 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 3/24/16 | Review, revise and edit the M&C letter; r:e: Butler's Responses to Rog (Set Ope) based on Steve's comments from review | 0.38 | 0.38 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| DBA | 3/24/16 | Drafting deposition notices of Witnesses Atkins, Carranza, Pettet | 0.33 | 0.33 | Excessive | Entry contains block billing. Carranza and Pettit depositions never took place.Renewed fee motion fails to articulate why seeking depositions of multiple witnesses from previous lawsuits was a necessary step for Plaintiff's victory on the individual claims and why Atkins deposition was necessary. |

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| SDD | 3/24/16 | Review, revise, and edit the M&C letter re: Butler's Responses to Rog (Set One). | 1.33 | 1.33 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 3/24/16 | Review, revise, and edit the Notice of Deposition fo Karen Atkins. | 0.15 | 0.15 | Excessive | Renewed fee motion fails to articulate why seeking and taking depositions of multiple witnesses from previous lawsuits was a necessary step for Plaintiff's victory on the individual claims. |
| DBA | 3/24/16 | Furtber drafting of M&C letter re RPD l | 0.42 | 0.42 | Duplicative; Excessive | Vague as to which defendant the RPDs relate. RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 3/24/16 | Review, revise, and edit the M&C letter; re: County's Responses to RPD (Set One). | 0.47 | 0.47 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 3/24/16 | Drafting Ntc. of Deposition/Ntc. to Produce to witness Karin Atkins | 0.23 | 0.23 | Excessive | Renewed fee motion fails to articulate why seeking and taking depositions of multiple witnesses from previous lawsuits was a necessary step for Plaintiff's victory on the individual claims. Facts in Separate Statement includes support from several other sources, including deposition of Atkins in another case. |

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| AMP | 3/24/16 | Continue draft of RPD Set One to Defendant Butler; adding in requests recently compelled for Defendant Torres and requests relating to commonality and typicality | 1.03 | 1.03 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set One related to typicality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| AMP | 3/24/16 | Continue draft of interrogatories to Felecia Butler, Set Two, questions related to numerosity | 0.37 | 0.37 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Entry clearly related to class certification and renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 3/24/16 | Start draft of interrogatories to Felecia Butler:, Set Two | 0.67 | 0.67 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 3/24/16 | Continue review, revise, and edit the M&C letter, re: Butler's Responses to Rog (Set One); look to add more to sections involving relevancy to class cert | 0.67 | 0.67 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 3/24/16 | Review Felecia Butler's previous discovery sets and responses in related case Rogers v. County of Riverside, et al. to draft a second set of interrogalortes | 0.55 | 0.55 | Duplicative; Excessive | Requests clearly overlapping of discovery conducted in related *Rogers* case. Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| DBA | 3/24/16 | Drafting revisions to M&C ltr. To Defense counsel re County's response to RFP No. 1 | 1.75 | 1.75 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/25/16 | Continue draft of RPDs (Set Two) to Defendant Torres; requests relating to remaining trainings and any discipline | 0.43 | 0.43 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 3/25/16 | Start draft of RPDs (Set Two) to Defendant Torres | 0.57 | 0.57 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 3/25/16 | Continue draft of requests for admission to Karla Torres, Set 3,focusing on admissions related to prior discovery from Rogers | 0.43 | 0.43 | Duplicative; Excessive | RFA Set Three seeks admissions on actions taken by Torres. Requests duplicative and overlapping of discovery sought and obtained from Torres in the related *Rogers* case. Renewed fee motion fails to articulate why seeking additional information was a necessary step for Plaintiff's victory on the individual claims. |

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| DBA | 3/25/16 | Drafting RFAs to County of Riverside re warrantless removals | 2.02 | 2.02 | Vague; Excessive | Vague as to which set of RFA's the entry relates. Vague as to "re warrantless removals". RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| AMP | 3/25/16 | Continue draft of requests for admission to Karla Torres, Set 3, focusing on requests pertaining to numerosity and typicality | 0.53 | 0.53 | Duplicative; Excessive | RFA Set Three seeks admissions on actions taken by Torres. Requests duplicative and overlapping of discovery sought and obtained from Torres in the related *Rogers* case. Additionally task clearly relates to focusing on class related issues. Renewed fee motion fails to articulate why seeking class-based discovery and additional information was a necessary step for Plaintiff's victory on the individual claims. |
| AMP | 3/25/16 | Start draft of requests for admission to Karla Torres, Set 3 | 0.78 | 0.78 | Duplicative; Excessive | RFA Set Three seeks admissions on actions taken by Torres. Requests duplicative and overlapping of discovery sought and obtained from Torres in the related *Rogers* case. Renewed fee motion fails to articulate why seeking additional information was a necessary step for Plaintiff's victory on the individual claims. |
| AMP | 3/25/16 | Continue draft of RFAs Set One to Butler; ensuring all possible class certification topics have been covered as well as Monell questions | 0.70 | 0.70 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Task clearly relates to class certification topics and renewed fee motion fails to articulate why the information was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 3/28/16 | Review and edit draft of request for admissions to Karla Torres, Set Three, make sure all necessary elements, of class certification addressed | 0.48 | 0.48 | Duplicative; Excessive | RFA Set Three seeks admissions on actions taken by Torres. Requests duplicative and overlapping of discovery sought and obtained from Torres in the related *Rogers* case. Additionally task clearly relates to focusing on class related issues. Renewed fee motion fails to articulate why seeking class-based discovery and additional information was a necessary step for Plaintiff's victory on the individual claims. |
| AMP | 3/28/16 | Review and edit draft of interrogatories to Felecia Butler, Set Two, make sure ail relevant prongs of class certification addressed | 0.28 | 0.28 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Entry clearly related to class certification and renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 3/28/16 | Continue draft ofRPDs (Set Two) to Defendant Torres | 0.43 | 0.43 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| DBA | 3/28/16 | Continuing to draft RFAs to County of Rivers:ide re warrantless removals by social workers from Donnie/Dennis cases | 1.27 | 1.27 | Vague; Excessive | Vague as to which set of RFA's the entry relates. Vague as to "re warrantless removals". RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |

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| DBA | 3/28/16 | Continuing drafting M&C to County of Riverside attorneys re RPD, set 1 from A.A. | 1.25 | 1.25 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 3/28/16 | review, revise, and edit discovery to Butler; re: RFA (Set 2). | 0.18 | 0.18 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| SDD | 3/28/16 | review, revise, and edit discovery to Butler; re: RFA (Set l). | 0.37 | 0.37 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 3/28/16 | Review and edit draft of requests for production to Karla Torres, Set Two, make sure all necessary elements of class certification addressed | 0.13 | 0.13 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |

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| DBA | 3/28/16 | Preparing deposition notices of Riverside County social workers Alvina Holland, Steve Cordova, Debbie Biddle Marie Gauley, and Danielle Ballier. | 0.65 | 0.65 | Excessive | Entry contains block billing. These depositions never took place. Renewed fee motion fails to articulate why seeking depositions of several county employees was a necessary step to Plaintiff's victory on the individual claims. |
| SDD | 3/28/16 | review, revise, and edit the M&C letter; re: County's Responses toRPD (Set One). | 0.73 | 0.73 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 3/29/16 | Draft Joint Stipulation to Compel County Supplemental responses to ROG (Set 2). | 1.03 | 1.03 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 3/29/16 | Drafting revisions to M&C letter to County Attorneys re RPD 1 | 1.57 | 1.57 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 3/30/16 | Review and edit draft of request for admissions to Butler Set Two based on Steve's comments from review | 0.35 | 0.35 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| AMP | 3/30/16 | Review and edit draft of request for admissions to Butler Set One based on Steve's comments from review | 0.43 | 0.43 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 3/30/16 | review, revise, and edit the M&C letter; re: County's Responses to RPD (Set One). | 1.03 | 1.03 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/30/16 | Draft additional RFAs for Butler RFA Set Two relating to County discipline or training regarding removals without a warrant approved by Butler | 0.45 | 0.45 | Excessive | Renewed fee motion fails to articulate why seeking such information from Butler was a necessary step to Plaintiff's victory in the individual claims. Plaintiff sought extensive discovery from the County seeking the same information. |

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| AMP | 3/31/16 | Review rough draft of Defendant Torres' supplemental responses to RFAs Set Two sent by Burkhart by e-mail | 0.17 | 0.17 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| SDD | 3/31/16 | Make modifications to the Stipulation to Continue the Class Certification dates. | 0.37 | 0.37 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| AMP | 3/31/16 | Continue draft of RFA Set 4 to Butler relating to Defendant Butler's statements and inconsistencies with appellate opinion | 0.35 | 0.35 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. |
| DBA | 3/31/16 | Drafting revisions to M&C letter to County of Riverside re responses to RPD, Set One | 1.70 | 1.70 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/31/16 | Start draft of RFA Set 4 to Butler relating to Defendant Butler's prior actions with the Rogers family and typicality | 1.22 | 1.22 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. If related to typicality as alleged in entry, renewed fee motion fails to articulate why those specific requests were a necessary step to Plaintiff's victory of the individual claims, given the extensive information obtained through other means. |

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| AMP | 3/31/16 | Final review and edit of request for admissions to Butler Set Two based on Steve's comments from review | 0.48 | 0.48 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| DBA | 3/31/16 | Drafling revisions to M&C letter re County's responses to RPD (Set:One) | 0.77 | 0.77 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 3/31/16 | Draft additional RFAs for Butler RFA Set One relating to Butler's December 4, 2012 interaction with A.A.'s family | 0.08 | 0.08 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 3/31/16 | review, revise, and edit the M&:C letter; re:County's Responses to RPD (Set One). | 1.33 | 1.33 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 4/1/16 | Completing drafting revisions to M&C letter to County of Riverside re its response to RPD l, propounded by A.A. | 1.13 | 1.13 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 4/1/16 | Continue to draft the Joint Stipulation in support of the motion to compel County Rog (Set Two). | 0.92 | 0.92 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 4/1/16 | Drafting revision to M&C RPD 1, to include Pym's ruling at Docket 63 | 0.53 | 0.53 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP's relate. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 4/1/16 | Continue to review, revise, and edit the RPDs to butler (Set One). | 0.25 | 0.25 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set One related to typicality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |

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| SDD | 4/1/16 | Review, revise, and edit the RPDs to butler (Set One). | 0.25 | 0.25 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. |
| AMP | 4/4/16 | Review and proofread first draft of RPDs (Set Two) to Defendant Butler | 0.27 | 0.27 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| AMP | 4/4/16 | Start draft of RPDs (Set Two) to Defendant Butler | 0.60 | 0.60 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| AMP | 4/4/16 | Review and edit draft of request for production to Butler Set One based on Steve's comments from review | 0.53 | 0.53 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 4/4/16 | Review Judge Pym's 04/01/16 order and edit discovery to send out to Butler re any requests denied for Torres | 0.30 | 0.30 | Vague | Vague as to what discovery was edited. |

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| AMP | 4/4/16 | Re:view and proofread draft of meet and confer letter re deadline for Defendant Torres to answer RFAs from Set Two pursuant to Judge Pym's order | 0.22 | 0.22 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| DBA | 4/4/16 | Drafting further revisions to M&C letter re Defendant's response to RPD, Set One | 1.57 | 1.57 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP's relate. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 4/4/16 | Review and proofread first draft of RPD Set 2 to Torres | 0.37 | 0.37 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| DBA | 4/4/16 | Drafting further revisions to M&C re Defendant's Response to RPD, Set One | 0.37 | 0.37 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP's relate. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 4/4/16 | Start draft of meet and confer letter re deadline for Defendant Torres to answer RFAs from Set Two pursuant to Judge Pym's order | 0.23 | 0.23 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 4/4/16 | Review and proofread first draft of RFA Set 4 to Butler | 0.37 | 0.37 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. |
| DBA | 4/4/16 | Reviewing supplemental responses of County to RPD No. 2 for possible M&C letter | 0.62 | 0.62 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| SDD | 4/4/16 | Review, revise, and edit the M&C letter; re: County Responses RPD (Set 1). | 0.98 | 0.98 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 4/5/16 | Completed drafting revisions to M&C letter re RPD 1 | 1.00 | 1.00 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP's relate. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 4/5/16 | Finished drafting revisions to M&C letter re defendant's response to RPD l | 0.33 | 0.33 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP's relate. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 4/5/16 | Finished drafting work product section ofM&C letter to County attorney re responses to RPD, set one | 1.62 | 1.62 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 4/6/16 | Continue draft ofoutline for federal privacy, objection related to disciplinary records | 0.40 | 0.40 | Vague | Vague as to what pleadings or discovery the task relates and purpose of the outline. |
| AMP | 4/6/16 | Start draft of outline for federal privacy objection related to disciplinary records | 0.55 | 0.55 | Vague | Vague as to what pleadings or discovery the task relates and purpose of the outline. |
| AMP | 4/6/16 | Continue research re federal privacy obje:ction and disciplinary records of social workers; focus on balancing test and disciplinary records | 0.67 | 0.67 | Vague | Vague as to purpose of research and to what pleadings or discovery the task relates. |
| AMP | 4/6/16 | Start research re federal privacy objection and disciplinary records of social workers | 0.50 | 0.50 | Vague | Vague as to purpose of research and to what pleadings or discovery the task relates. |

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| AMP | 4/7/16 | Review supplemental responses to Torres RFA Set Two, analyze issues for Meet and Confer re Judge Pym' s Order at Dkt 63 | 0.53 | 0.53 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 4/8/16 | Stai:t draft of meet and confer letter to Doug Smith re discoverability of personnel issues at deposition | 0.87 | 0.87 | Excessive; Vague | Vague as to which depositions the task relates. No such meet and confer letter located as having been received. |
| AMP | 4/8/16 | Continue research re federal privacy objection and disciplinary records of social workers; looking for case law specific to social workers' records rather than police officer records | 0.70 | 0.70 | Vague | Vague as to purpose of research and to what pleadings or discovery the task relates. |
| DBA | 4/8/16 | Email to attorney Smith re depos of percipient witnesses week of April 11 | 0.23 | 0.23 | Vague | Vague as to which depositions the email relates to. Vague as to purpose of email. |
| AMP | 4/8/16 | Continue draft of,outline for federal privacy objection related to disciplinary records | 0.52 | 0.52 | Vague | Vague as to purpose of research and to what pleadings or discovery the task relates. |
| SDD | 4/8/16 | Review, revise, and edit the M&C letter, re: Torres RFA (Set 2) - production date. | 0.20 | 0.20 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 4/8/16 | Research whether "yes or no" questions are sufficient to trigger privacy rights | 0.62 | 0.62 | Vague | Vague as to purpose of research and to what pleadings or discovery the task relates. |
| AMP | 4/8/16 | Continue draft of meet and confer letter to Doug Smith re discoverability of personnel issues at deposition; sections to relevance generally and relevance to commonality | 0.60 | 0.60 | Vague | Vague as to which depositions the task relates. |
| AMP | 4/11/16 | Review and edit first draft of meet and confer letter to Doug Smith re discoverability of personnel issues at deposition | 0.37 | 0.37 | Excessive; Vague | Vague as to which depositions the task relates. No such meet and confer letter located as having been received. Attorney should not bill for a letter that was never sent. |
| SDD | 4/11/16 | Continue to review County's response to request for production of documents for PMK CWS/CMS. Call out documents for exhibits. | 1.07 | 1.07 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 4/11/16 | Continue draft of meet and confer letter to Doug Smith re discoverability of personnel issues at deposition; section re predominance of common issues under FRCP 23(b)(3) | 0.58 | 0.58 | Excessive; Vague | Vague as to which depositions the task relates. No such meet and confer letter located as having been received. Attorney should not bill for a letter that was never sent. |
| SDD | 4/11/16 | Continue to review PMK depostions from B.R. in preparation for the PMK CWS/CMS deposition. | 0.52 | 0.52 | Vague | Vague as to "in B.R." and how it relates to depo prep here. |
| SDD | 4/11/16 | Continue to review PMK depostions from B.R in preparation for the PMK CWS/CMS deposition | 0.25 | 0.25 | Vague | Vague as to "in B.R." and how it relates to depo prep here. |

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| SDD | 4/11/16 | Review County's response to request for production of documents for PMK CWS/CMS. | 1.40 | 1.40 | Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |
| DBA | 4/12/16 | Continuing drafting of additional Requests for Admission to County of Riverside | 0.88 | 0.88 | Vague | Vague as to which set of RFAs the task relates. |
| DBA | 4/12/16 | Drafting additional requests for admission to County of Riverside | 2.02 | 2.02 | Vague | Vague as to which set of RFAs the task relates. |
| SDD | 4/12/16 | Attend the deposition for the County PMK's; re: CWS/CMS. Deposition was in Temecula; CA. Includes 2 hours round trip travel | 9.67 | 0.00 | No Objection | No Objection. |
| AMP | 4/13/16 | Rcview, revise, edit, and set date for the Notice of Deposition to Blanco Alonso based on Steve's review comments | 0.15 | 0.15 | Excessive | Deposition of Blanco Alonso never took place. Renewed fee motion fails to articulate why seeking depositions of multiple individuals that never took place was a necessary step to victory on individual claims. |
| AMP | 4/13/16 | Review and edit M&.C Letter for Torres ROGs (Set One) re Judge Pym's Order based on Steve's comments from review | 0.60 | 0.60 | Duplicative; Excessive | Duplicative and overlapping of ROGs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| DBA | 4/13/16 | Drafting final revisions to M&C letter re Defendant's responses to RPD, ( Set 1) propounded by A.A. | 2.02 | 2.02 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP's relate. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 4/13/16 | Continue to review, revise, and edit M&C letter to Torres, re: Rog (Set l). | 0.25 | 0.25 | Duplicative; Excessive | Duplicative and overlapping of ROGs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| SDD | 4/13/16 | Review, revise, and edit M&C letter to County, re: Responses to RPD (Set 1). | 0.77 | 0.77 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 4/14/16 | Drafting additional RFAs to County of Riverside re children seized by social Workers where lawsuits brought and settled. | 1.48 | 1.48 | Vague; Excessive | Vague as to which set of RFA's the entry relates. RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| SDD | 4/19/16 | Review, revise, and edit the M&C letter to County; re: RPD (Set 1). | 1.03 | 1.03 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 4/19/16 | Continue to draft Joint Stipulation, re: Countys Responses to Rog (Set 2). | 0.52 | 0.52 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 4/19/16 | D:raft Joint Stipulation, re: County's Responses to Rog (Set 2), | 0.92 | 0.92 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 4/20/16 | Continue to draft the Joint Stipulation, re: County's Responses to Rog's (Set 1). | 0.97 | 0.97 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| AMP | 4/20/16 | Review Defendant Torres' compelled supplemental responses to RFA Set Two to ensure the responses are compliant | 0.08 | 0.08 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| SDD | 4/20/16 | Continue to draft the Joint Stipulation, re: County's Responses to Rog's (Set l); re: incomplete responses. | 0.88 | 0.88 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| DBA | 4/20/16 | Drafting revisions to Meet & Confer letter to Defendants re Plaintiff's Request for Production, Set One | 1.63 | 1.63 | Vague | Vague as to which defendant the task relates. |
| SDD | 4/20/16 | Continue to draft the Joint Stipulatfon, re: County's Responses to Rog's (Set 1). | 0.92 | 0.92 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| AMP | 4/20/16 | Start reviewing Defendant Torres' compelled supplemental - responses to RPD Set One for adequacy and compliance | 0.42 | 0.42 | Duplicative ; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| SDD | 4/20/16 | Continue to draft the Joint Stipulation, re: County's Responses to Rog's (Set 1) - Confidential Section. | 0.32 | 0.32 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| DBA | 4/20/16 | Drafting revisions to Meet and Confer Letter to Defendant re its responses to Request for Production, (Set One). | 0.72 | 0.72 | Vague | Vague as to which defendant the task relates. |

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| SDD | 4/20/16 | Review, revise, and edit A.A.'s Meet and Confer letter; re; County's response to RPD Set l. | 1.13 | 1.13 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 4/20/16 | Continue to draft the Joint Stipulation, re: County's Responses to Rog's (Set l) - Objection Section. | 1.27 | 1.27 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| DBA | 4/20/16 | Drafting revisions to Meet & Confer letter re Defendant's Responses to Request for Production, Set One | 1.15 | 1.15 | Vague | Vague as to which defendant the task relates. |
| SDD | 4/20/16 | Continue to draft the Joint Stipulation, re: County's Responses to Rog's (Set I) - Objection Section | 0.45 | 0.45 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| SAM | 4/21/16 | Phone call with Doug Smith re: Meet and Confer on A.A. depo notices. | 0.40 | 0.40 | Vague | Vague as to what deposition notices the task relates. |
| AMP | 4/21/16 | Review documents provided in Defendant Torres' compelled supplemental responses to RPD Set One | 0.52 | 0.52 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |

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| SDD | 4/21/16 | Continue to draft the Joint Stipulation, re; County's Responses to Rog's (Set 1) control and Confidential Section | 1.43 | 1.43 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| DBA | 4/21/16 | Continuing drafting Meet and confer letter to defense counsel re County's responses to Plaintiffs Request for Production, (Set One) | 1.40 | 1.40 | Duplicative; Excessive | Meet and Confer letter dated 4/25/2016 plaintiff argues the documents are related to class issues. RFP Set One sought overlapping information sought in related Rogers case, and certain documents ranging from 1995-2014. By April 2016 defendants had produced over 6000 documents in this case, in addition to the over 20,000 documents produced in the *Rogers* case. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 4/21/16 | Review, revise; and edit draft of County PMK notices re: warrants, policies, training; additional requests for production of docunumts | 0.23 | 0.23 | Vague | Vague as to what additional requests of production being sought from what counsel had already obtained through document productions in this and Rogers case. |
| SDD | 4/21/16 | Review, revise, and edit A.A.'s Meet and Confer letter;· re: County's response to RPD Set 1 | 0.55 | 0.55 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 4/21/16 | Continue to draft the Joint Stipulation, re: County's Responses to Rog's (Set 1) - Access of juvenile case files and Confidential Section | 0.95 | 0.95 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |

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| AMP | 4/21/16 | Continue draft of County PMK notices re: warrants, policies, training; additional requests for production of documents | 1.30 | 1.30 | Vague | Vague as to what additional requests of production being sought from what counsel had already obtained through document productions in this and Rogers case. |
| AMP | 4/21/16 | Continue draft of County PMK notices re: wanants. policies, training; additional categories of inquiry | 0.70 | 0.70 | Vague | Vague as to what additional categories of inquiry required. |
| SDD | 4/21/16 | Continue to draft the Joint Stipulation, re: County's Responses to Rog's (Set l) ~ Access of juvenile case files and Confidential Section. | 1.22 | 1.22 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| AMP | 4/21/16 | Continue draft of County PMK notices re: warrants, policies, ttaining; requests for production for documents | 0.82 | 0.82 | Vague | Vague as to what additional requests of production being sought from what counsel had already obtained through document productions in this and Rogers case. |
| DBA | 4/21/16 | Drafting final revisions to Requests for Admission to County re former social workers sued for warrantless removals, discipline, etc. | 0.57 | 0.57 | Vague | Fails to articulate which set of RFAs to the County the task relates. Topic related to issues of class certification. |
| SDD | 4/21/16 | Continue to draft the Joint Stipulation, re: County's Responses to Rog's (Set 1 ) - Access of juvenile case files and Confidential Section. | 0.75 | 0.75 | Excessive; Vague | Vague as to which set of discovery task relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |
| AMP | 4/21/16 | Start draft of County PMK notices re: warrants, policies, training | 0.82 | 0.82 | Vague; Clerical | Vague as to what section of notice the task relates. May include time spent on noncompensable clerical work. |

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| SAM | 4/21/16 | Review, edit, revise, Joint Motion to Compel County Interrogatory Responses to lnterrogatories -set two. | 0.85 | 0.85 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 4/22/16 | Review and edit deposition notice for Karla Torres, update dates for request for production and deposition | 0.15 | 0.00 | No Objection | No Objection. |
| SDD | 4/22/16 | Draft the Notice of Joint Stipulation re: County's Responses to ROG (Set 2), | 0.93 | 0.93 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 4/22/16 | Continue to draft the Joint Stipulation, re: County's Responses to ROG (Set2), | 0.58 | 0.58 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 4/22/16 | Prepare Declaration of Adrian M. Paris in Support of Joint Motion to Compel County Responses to Interrogatories Set Two for e-filing; compile exhibits to declaration | 0.17 | 0.17 | Clerical | Time spent on noncompensable clerical work. |
| AMP | 4/22/16 | Review, edit, and revise Declaration of Adrian M. Paris in Support of Joint Motion to Compe1 County Responses to Interrogatories Set Two. | 0.27 | 0.27 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 4/22/16 | Drafting Requests for Admission to County of Riverside regarding being sued and settling | 0.08 | 0.08 | Vague | Fails to articulate which set of RFAs to the County the task relates. Topic related to issues of class certification. |
| SDD | 4/22/16 | Draft declar:ation in support of the Joint Stipulation to Compel supplemental responses to ROG (Set 2). | 1.47 | 1.47 | Vague | Fails to articulate which defendant the task relates. |

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| SDD | 4/22/16 | Continue to draft the Joint Stipulation. re: County's Responses to ROG (Set2). | 0.28 | 0.28 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 4/22/16 | Cotltinue to draft the Joint Stipulation re: County's Responses to ROG(Set 2). | 0.50 | 0.50 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 4/22/16 | Review and edit deposition notice for Debra Christian, update dates for request for production and deposition | 0.15 | 0.15 | Vague; Excessive | Vague as who Debra Christian is and how she is related to the County. Renewed fee motion fails to articulate why seeking multiple depositions of County employees were necessary to Plaintiff's victory in underlying claims. Further, no such deposition took place. |
| AMP | 4/22/16 | Review and edit M&C Letter for Torres RFAs (Set One) re Judge Pym's Orders based on Steve's comments from review | 0.38 | 0.38 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| SDD | 4/22/16 | Review, revise, and edit A.A,.'s Meet and Confer letter; re: County's response to RPD Set l. | 0.63 | 0.63 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 4/22/16 | Review and edit deposition notice for Felecia Butler, update dates for request for production and deposition | 0.17 | 0.00 | No Objection | No Objection. |
| SAM | 4/25/16 | Review prior deposition of Blanca Alonso to determine whether we have sufficient evidence to justify taking his deposition in this case. | 0.72 | 0.72 | Excessive | Deposition of Blanco Alonso never took place. Renewed fee motion fails to articulate why seeking depositions of multiple individuals that never took place was a necessary step to victory on individual claims. |
| DBA | 4/25/16 | Preparing revisions to Meet & Confer Letter to County attorney re its response to Request for Production, Set One | 0.62 | 0.62 | Duplicative; Excessive | Meet and Confer letter dated 4/25/2016 plaintiff argues the documents are related to class issues. RFP Set One sought overlapping information sought in related Rogers case, and certain documents ranging from 1995-2014. By April 2016 defendants had produced over 6000 documents in this case, in addition to the over 20,000 documents produced in the *Rogers* case. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SAM | 4/25/16 | Review; edit, revise, Meet and Confer on COR's response to plaintiffs Request for Production ofDocuemnts (Set One). | 0.35 | 0.35 | Duplicative; Excessive | Meet and Confer letter dated 4/25/2016 plaintiff argues the documents are related to class issues. RFP Set One sought overlapping information sought in related Rogers case, and certain documents ranging from 1995-2014. By April 2016 defendants had produced over 6000 documents in this case, in addition to the over 20,000 documents produced in the *Rogers* case. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 4/25/16 | Add additional categories of inquiry and requests for production of,documents to deposition notice for County of Riverside PMK. re: warrant policies, practice and training | 0.77 | 0.77 | Vague | Vague as to what additional requests of production and categories of inquiry being sought from what counsel had already obtained through document productions in this and Rogers case. |
| DBA | 4/25/16 | Completing edits to Meet & Confer letter to counsel for County of Riverside regarding its responses to Plaintiff's Request for Production, Set One | 0.47 | 0.47 | Duplicative; Excessive | Meet and Confer letter dated 4/25/2016 plaintiff argues the documents are related to class issues. RFP Set One sought overlapping information sought in related Rogers case, and certain documents ranging from 1995-2014. By April 2016 defendants had produced over 6000 documents in this case, in addition to the over 20,000 documents produced in the *Rogers* case. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SAM | 4/26/16 | Continue review of documents in preparation for CWS/CMS PMK depostion (areas 3 and 6.) | 1.62 | 1.62 | Vague | Vague as to which PMK re CWS/CMS the entry pertains. County PMK Depo re CWS took place on 4/12/16 per billing entry. |

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| DBA | 4/26/16 | Drafting revisions to Requests for Admission, (Set 3) to be propounded to County of Riverside | 1.68 | 1.68 | Excessive | RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, especially in light of RFA's Set One seeking 132 admissions. |
| SAM | 4/26/16 | Prepare for PMK Deposition on CWS/CMS Notice of depo. Specifically items 1; 3, and 6. | 1.30 | 1.30 | Vague | Vague as to which PMK re CWS/CMS the entry pertains. PMK Depo re CWS took place on 4/12/16 per billing entry. |
| AMP | 4/26/16 | Edit and revise Notice of Deposition of Defendant Felecia Butler based on comments from review | 0.32 | 0.00 | No Objection | No Objection. |
| AMP | 4/26/16 | Edit and revise Notice of Deposition of Defendant Karla Torres based on comments from review | 0.40 | 0.00 | No Objection | No Objection. |
| SAM | 4/26/16 | Review, edit, revise, PLAINTIFF A.A.'S REQUEST FOR ADMISSIONS TO DEFENDANT COUNTY OF RIVERSIDE, SET TWO. | 0.62 | 0.62 | Vague | Vague as to which set of discovery the task relates. No RFAs-Set Two were propounded on the County. RFA-Set One included 132 requests, Set Three began with request #133. |
| SAM | 4/27/16 | Deposition of PMK CWS/CMC: 9:00 AM - Lidia Maldonado· Cat. 6 and Liz Gravenburg - Cat. 3 04/12/2016 took Michele Kapp for Cat. 1 and 6. | 7.00 | 7.00 | Vague | Vague as to which PMK re CWS/CMS the entry pertains. Includes duplicative billing of deposition taken 4/12/2016 |

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| DBA | 4/27/16 | Drafting Meet and Confer letter re County of Riverside's response to Request for Production, (Set Two.) | 1.35 | 1.35 | Duplicative; Excessive | RPDs Set Two sought duplicative and overlapping records as sought in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why additional and duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| DBA | 4/27/16 | Drafting revisions to Requests for Admission (Set 3) propounded to County of Orange | 1.17 | 1.17 | Vague | Vague as to whom the discovery relates. Task refers to a nonparty, County of Orange. |
| AMP | 4/27/16 | Review and edit deposition notice for County PMK re Warrant Policies, Practices, Training, update dates for request for production and deposition | 0.43 | 0.43 | Vague; Clerical | Vague as to what sections were edited based on review other than dates. Includes time spent on noncompensable clerical work. |
| DBA | 4/28/16 | Drafting revisfons to Requests for Admission, Set 3 to County of Riverside | 1.20 | 1.20 | Excessive | RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, especially in light of RFA's Set One seeking 132 admissions. |
| AMP | 4/28/16 | Prepare M&C letter re Torres Responses to RFAs Set One in light of Judge Pym's order at Dkt. 60 for delivery | 0.17 | 0.17 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 4/28/16 | Edit and revise M&C Letter re Torres RFA 1 in light of Judge Pym's order at Dkt. 60 | 0.10 | 0.10 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification and most of the RFA's at issue were not sufficiently relevant to class certification. Renewed motion fails to articulate why this particular discovery dispute was necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 4/28/16 | Prepare M&C letter re Torres Responses to Rogs Set One in light of Judge Pym's order at Dkt. 60 for delivery | 0.15 | 0.15 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 4/29/16 | Create caption pages of eight (8) sets of discovery to be sent out by Dennis | 0.43 | 0.43 | Clerical | Time spent on noncompensable clerical work. |
| DBA | 4/29/16 | Completing revisions to Requests for· Admission, Sets 3 - 10 to County of Riverside | 2.72 | 2.72 | Excessive | RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, especially in light of RFA's Set One seeking 132 admissions. |

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| DBA | 4/29/16 | Drafting Requests fur Admission re older lawsuits against County of Riverside | 2.25 | 2.25 | Excessive | RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, especially in light of RFA's Set One seeking 132 admissions. |
| SDD | 5/2/16 | Convert the Joint Stipulation to a Motiton to Compel | 0.85 | 0.85 | Vague | Vague as to which Motion to Compel, which defendant, and which discovery the task relates. |
| SDD | 5/2/16 | Continue to convert the Joint Stipulation to a Motion to Compel. | 0.42 | 0.42 | Vague | Vague as to which Motion to Compel, which defendant, and which discovery the task relates. |
| SDD | 5/2/16 | Convert and add to the Declaration in Support of the Motion to Compel. | 0.40 | 0.40 | Vague | Vague as to which Motion to Compel, which defendant, and which discovery the task relates. |
| SDD | 5/2/16 | Continueio convert the Joint Stipulation to a Motion to Compel. | 0.75 | 0.75 | Vague | Vague as to which Motion to Compel, which defendant, and which discovery the task relates. |
| AMP | 5/3/16 | Review Defendant County's responses to RFA Set One for Meet and Confer phone call tomorrow at 2 p.m. | 0.18 | 0.18 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| SDD | 5/3/16 | Review the County's Supplemental Responses to Interrogatories (Set 2), re; Nos. 9-12. | 0.18 | 0.18 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 5/3/16 | Draft proposed order, re: Motion to Compel County to Respond to Interrogatories (Set 2). | 0.63 | 0.63 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 5/4/16 | Continue draft of RPDs Set Two to Felecia Butler | 0.27 | 0.27 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| AMP | 5/4/16 | Continue review and edit of deposition notice for County PMK re Warrant Policies, Practices, Training, update dates for request for production and deposition | 0.17 | 0.17 | Vague; Clerical | Vague as to what sections were edited based on review other than dates. Includes time spent on noncompensable clerical work. |
| SDD | 5/4/16 | Begin to draft the M&C response letter fo Defendant's demand letter. | 0.18 | 0.18 | Vague | Vague as to what the demand letter and response letter concerned. |
| AMP | 5/4/16 | Dratt reply e-mail to Burkhart's emaiI re summary of phone conference for discovery requests | 0.20 | 0.20 | Vague | Vague as to what set of discovery the conference relates. |
| SDD | 5/4/16 | Review Defendant County's Demand letter to withdraw Plainitfl's motion to compel. | 0.18 | 0.18 | Vague | Vague as to which Motion to Compel, which defendant, and which discovery the task relates. |

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| AMP | 5/4/16 | Draft email re 50-minute Phone Meet and Confer with Burkhart concerning Counties responses to RFA Set One and Butler's responses to Rog Set One | 0.55 | 0.55 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 5/4/16 | Phone Meet and Confer with Burkhart re County's responses to RFA Set One and Butler's responses to Rog Set One | 0.83 | 0.83 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions.<br><br>Per M&C letter dated March 28, 2016 re ROGs Set One to Butler, argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 5/4/16 | Review Defendant Butler's responses to Rogs Set One in preparation for Meet and Confer phone call at 2 pm | 0.20 | 0.20 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated March 28, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |

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| SDD | 5/5/16 | Draft Meet and Confer letter, re: County's responses to RPD 3. | 0.52 | 0.52 | Excessive | Time spent seeking documents from 1995-2013 regarding policies and procedures. Requests duplicative and overlapping of records sought in other RPD's and RFA's in the same case. Renewed fee motion fails to articulate why obtaining the same information from multiple different requests was a necessary step to Plaintiff's victory of the underlying claims. |
| AMP | 5/5/16 | Start to dratt Meet and Confer letter re inadequacy of Torres' compelled responses to RPD Set One | 0.32 | 0.32 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| SDD | 5/5/16 | Continue to draft tbe M&C response letter to Defendant's demand letter. | 1.37 | 1.37 | Vague | Vague as to what the demand letter and response letter concerned. |
| SDD | 5/5/16 | Continue to draft the M&C response letter to Defendant's demand letter. | 1.28 | 1.28 | Vague | Vague as to what the demand letter and response letter concerned. |
| SDD | 5/5/16 | Research futility law regarding meet and confer efforts. | 0.27 | 0.27 | Vague | Vague as to purpose of research and to what discovery the meet and confer efforts relate. |
| SDD | 5/6/16 | Continue to draft the Meet and Confer letter, re: County's responses to RPD 3. | 0.58 | 0.58 | Excessive | Time spent seeking documents from 1995-2013 regarding policies and procedures. Requests duplicative and overlapping of records sought in other RPD's and RFA's in the same case. Renewed fee motion fails to articulate why obtaining the same information from multiple different requests was a necessary step to Plaintiff's victory of the underlying claims. |

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| SDD | 5/6/16 | Continue to draft the Meet and Confer letter, re: County's responses to RPD 3. | 0.27 | 0.27 | Excessive | Time spent seeking documents from 1995-2013 regarding policies and procedures. Requests duplicative and overlapping of records sought in other RPD's and RFA's in the same case. Renewed fee motion fails to articulate why obtaining the same information from multiple different requests was a necessary step to Plaintiff's victory of the underlying claims. |
| AMP | 5/9/16 | Review of documents comprising Defendant Torres' compelled response to Request 8 in RPD Set One, identifying more issues to be addressed in M&C letter | 0.23 | 0.23 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 5/9/16 | Continue to draft Meet and Confer letter re inadeqμacy of Torres' compelled responses to RPD Set One;-section re Request 8 | 0.55 | 0.55 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |

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| AMP | 5/9/16 | Continue to draft Meet and Confer letter re inadequacy of Torres' compelled responses to RPD Set One; section re requests 1 and 2 | 0.37 | 0.37 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 5/9/16 | Continue to draft Meet and Confer letter re inadequacy of Torres' compelled responses to RPD Set One | 0.15 | 0.15 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| DBA | 5/9/16 | Drafting Subpoena for Deposition of Alvina Holland in Chicago Illlnois. | 0.57 | 0.57 | Excessive | Deposition of Alvina Holland never took place. Renewed fee motion fails to articulate why seeking depositions of multiple individuals that never took place was a necessary step to victory on individual claims. |
| SDD | 5/10/16 | Review the County's Opposition to Plaintifl's Motion to Compel, Interrogatories (Set 1). | 0.68 | 0.68 | Vague | Vague as to which defendant the ROGs-Set One relates given MTC re ROGS Set One to the County was heard on 9/11/15. ROGs-Set One sought identities and information of all potential class members, clearly related to class cert yet identified as related primarily to individual claims. |

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| AMP | 5/10/16 | Continue to draft Meet and Confer letter re inadequacy of Torres' compelled responscs to RPD Set One | 0.32 | 0.32 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 5/10/16 | Review of douments comprising Defendant Torres' compelled response to Request 4 in RPD Set One | 0.47 | 0.47 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 5/10/16 | Continue to draft Meet and Confer letter re inadequacy of Torres' compelled responses to RPD Set One, highlighting inadequacy of specific documents listed in responses | 0.98 | 0.98 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| DBA | 5/11/16 | Drafting depo summary of Karin Atkins taken 3.14.13 | 0.72 | 0.72 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of multiple County employees, PMKs, witnesses was a necessary step for Plaintiffs victory of the individual claims, especially in light of the extensive written discovery received in this case and the related Rogers case. |

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| AMP | 5/11/16 | Review prior discovery responses from Defendants looking for statements relating to independent risk of abuse or neglect | 0.32 | 0.32 | Vague | Vague as to what responses were reviewed, from which Defendant, and which set of discovery. Vague as to purpose of review and what aspect of the case it relates. |
| DBA | 5/11/16 | Drafting confirming email to attorney Burkhart re M&C phone call held today | 0.23 | 0.23 | Vague | Vague as to what was discussed during the phone call. |
| AMP | 5/11/16 | Continue to draft Meet and Confer letter re inadequacy of Torres' compelled responses to RPD Set One, continue section relating to RPD 8 | 0.42 | 0.42 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| DBA | 5/11/16 | M&C call from Burkhart re RPD l and 2 | 1.60 | 1.60 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One and Two to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why seeking such extensive and duplicative records was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 5/12/16 | Drafting deposition notice of Michael Puentes, Esq. | 0.73 | 0.73 | Vague; Clerical | Vague as to what sections of notice were drafted. Includes time spent on noncompensable clerical work. |
| SDD | 5/12/16 | Continue to draft the Reply in Support of Plaintiffs Motion to Compel Interrogatories (Set 2); modification of class certification objection, | 0.33 | 0.33 | Vague; Excessive | Vague as to which defendant the discovery and Motion to Compel relates. Task clearly focused on class certification issues which is unnecessary to the individual claims. |

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| AMP | 5/12/16 | Start research and review of previous meet and confer efforts for declaration in support of reply for MTC County Rogs Set Two | 0.52 | 0.52 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 5/12/16 | Start to draft declaration in support of Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2) | 0.23 | 0.23 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/12/16 | Coniinue to draft the Reply in Support of Plaintiff's Motion to Compel lnterrogatories (Set 2); numerosity section. | 1.42 | 1.42 | Vague; Excessive | Vague as to which defendant the discovery and Motion to Compel relates. Task clearly focused on class certification issues which is unnecessary to the individual claims. |
| AMP | 5/12/16 | Draft new requests for depo notice of Karla Torres based on information learned from May 12 phone conversation | 0.15 | 0.15 | Vague | Vague as to what phone conversation the task relates, who participated and what was discussed. |
| DBA | 5/12/16 | Drafting summary of deposition of Katin Atkins | 1.97 | 1.97 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of several county employees and PMKs was a necessary step to Plaintiff's victory on the individual claims, especially in light of extensive written discovery received and multiple other depositions taken. |
| AMP | 5/12/16 | Draft e-mail re 22-minute Phone Meet and Confer with Burkhart concerning Torres' responses to RFA Set One and Rog Set One | 0.28 | 0.28 | Duplicative; Excessive | Duplicative and overlapping of RFAs and ROGs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |

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| DBA | 5/12/16 | M&C phone call with Paul; re: County RPD (Set 3). | 0.07 | 0.07 | Excessive | Time spent seeking documents from 1995-2013 regarding policies and procedures. Requests duplicative and overlapping of records sought in other RPD's and RFA's in the same case. Renewed fee motion fails to articulate why obtaining the same information from multiple different requests was a necessary step to Plaintiff's victory of the underlying claims. |
| AMP | 5/12/16 | Phone Meet and Confer with Burkhart re Torres' responses to RFA Set One and Rog Set One | 0.37 | 0.37 | Duplicative; Excessive | Duplicative and overlapping of RFAs and ROGs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| SDD | 5/12/16 | Research issue re: past and former pafintifts count to numerosity | 0.62 | 0.62 | Vague; Excessive | Vague as to which defendant the discovery and Motion to Compel relates. Task clearly focused on class certification issues which is unnecessary to the individual claims. |
| AMP | 5/12/16 | Review and edit draft of Meet and Confer letter re inadequacy of Torres' compelled responses to RPD Set One | 0.47 | 0.47 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| SDD | 5/12/16 | Begin to draft the Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2). | 0.48 | 0.48 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| AMP | 5/12/16 | Reviewing Defendant Torres' responses to Rog Set 1 in preparation fur M&C phone conference at 2:00 p.m. | 0.62 | 0.62 | Duplicative; Excessive | Duplicative and overlapping of ROGs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |

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| SDD | 5/12/16 | Review Defendant's Opposition and opposing Declaration to determine how to respond in reply | 0.43 | 0.43 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| AMP | 5/12/16 | Reviewing Defendant Torres' responses to RFA Set l in preparation for.M&C phone conference at 2:00 p.m. | 0.60 | 0.60 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification thus supplemental responses related to class certification issue, not just individual claims. Renewed motion fails to articulate why this particular discovery dispute and supplemental responses were necessary to Plaintiff's limited victory on the underlying claims. |
| SDD | 5/13/16 | Cootinue to draft the Reply in Support of Plaintiffs Motion to Compel Interrogatories {Set 2); commonality section. | 0.95 | 0.95 | Vague; Excessive | Vague as to which defendant the discovery and Motion to Compel relates. Task clearly focused on class certification issues which is unnecessary to the individual claims. |
| SDD | 5/13/16 | Continue to draft the reply in Support of Plainliffs Motion to Compel Interrogatories (Set 2); commonality section. | 0.57 | 0.57 | Vague; Excessive | Vague as to which defendant the discovery and Motion to Compel relates. Task clearly focused on class certification issues which is unnecessary to the individual claims. |
| AMP | 5/13/16 | Continue to draft declaration in support of Reply in Support of Plaintiffs Motion to Compel Interrogatories (Set 2), A.A. M&C history | 0.53 | 0.53 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/13/16 | Continue to draft the Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2); Commonality section | 0.33 | 0.33 | Vague; Excessive | Vague as to which defendant the discovery and Motion to Compel relates. Task clearly focused on class certification issues which is unnecessary to the individual claims. |

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| AMP | 5/13/16 | Continue to draft declaration in support of Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2), Rogers M&C history | 1.15 | 1.15 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/13/16 | Continue to draft the Reply in Support of Plaintifi's Motion to Compel lnterrogatories (Set 2); discipline records | 0.63 | 0.63 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| AMP | 5/13/16 | Continue to draft declaration in support of Reply in Support of Plaintiffs Motion to Compel Interrogatories (Set 2) | 0.52 | 0.52 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/13/16 | Continue to draft the Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2); discipline records | 0.48 | 0.48 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/13/16 | Continue to draft the Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2); numerosity requirement | 0.52 | 0.52 | Vague; Excessive | Vague as to which defendant the discovery and Motion to Compel relates. Task clearly focused on class certification issues which is unnecessary to the individual claims. |
| SDD | 5/16/16 | Continue to draft the Reply in Support of Plaintiffs Motion to Compel Interrogatories (Set 2). | 1.53 | 1.53 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/16/16 | Continue the Reply in Support of Plaintiffs Motion to Compel Interrogatories (Set 2); no juvenile file disclosure. | 0.05 | 0.05 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |

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| AMP | 5/16/16 | Review and edit draft of declaration in support of Reply in Support.of Plaintiffs Motion .to Compel lnterrogatories (Set 2), ensure M&C history is accurately and adequately addressed | 0.32 | 0.32 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/16/16 | Continue to draft the· Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2); no juvenile file disclosure | 1.57 | 1.57 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/16/16 | Continue to draft the Reply in Support of Plaintiffs Motion to Compel Interrogatories (Set 2); no juvenile file disclosure. | 0.33 | 0.33 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/17/16 | Continue to draft Reply Declaration in Support of Plaintitl's Motion to Compel Interrogatories (Set 2). | 0.38 | 0.38 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/17/16 | Continue to draft the Reply in Support o.f Plaintiffs Motion to Compel Interrogatories (Set 2). | 1.35 | 1.35 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/17/16 | Draft Reply Declaration in Support of Plaintiff's Motion to Compel lnterrogatories (S~ 2). | 0.90 | 0.90 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |

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| SAM | 5/17/16 | Review, edit, revise REPLY IN SUPPORT OF PLAINTIFF'S MOTlON TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO INTERROGATORIES (SET TWO). | 0.47 | 0.47 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 5/17/16 | Continue to draft the Reply in Support of Plaintitl's Motion to Compel interrogatories (Set 2}. | 0.87 | 0.87 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/17/16 | Continue to draft the Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2). | 2.32 | 2.32 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/17/16 | Continue to draft the Reply in Support of Plaintiffs Motion to Compel Interrogatories (Set 2). | 0.60 | 0.60 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/17/16 | Continue to draft the Reply in Support of Plaintiff's Motion to Compel Interrogatories (Set 2). | 1.78 | 1.78 | Vague | Vague as to which defendant the discovery and Motion to Compel relates. |
| SDD | 5/18/16 | Print and assemble blue back chambers copies of the MTC County ROG (Set 2), Mail to the court. | 0.23 | 0.23 | Clerical | Time spent on noncompensable clerical work. |

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| DBA | 5/24/16 | Drafting RFAs to County of Riverside re settlements in earlier cases | 1.35 | 1.35 | Vague; Excessive | Vague as to which set of RFA's the entry relates. RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| DBA | 5/25/16 | Continuing to draft RFAs to County of Riveside re settled civil rights cases | 0.50 | 0.50 | Vague; Excessive | Vague as to which set of RFA's the entry relates. RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| SAM | 5/25/16 | Begin drafting meet and confer response to Doug Smith's letter regarding protective order for deposition of Michael Puentes | 2.15 | 2.15 | Vague | Vague as to topics of meet and confer. Vague as to date of letter. Vague as to what about a protective order the letter pertains. |
| SAM | 5/25/16 | Research cases cited by Doug Smith in his Meet and Confer letter regarding the deposition of Michael Puentes. | 0.65 | 0.65 | Vague | Vague as to purpose of research and what work the research was used for. |
| SAM | 5/25/16 | Review meet and confor letter from Doug Smith regarding deposition of Michael Puentes. | 0.25 | 0.25 | Vague | Vague as to any determinations made regarding review. Vague as to date of letter. |

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| DBA | 5/25/16 | Drafting RFAS to County re settled civil rights cases | 1.30 | 1.30 | Vague; Excessive | Vague as to which set of RFA's the entry relates. RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| AMP | 5/27/16 | Start review of supplemental responses of County of Riverside to RFA Set One, checking for adequacy ( 132 requests) | 0.23 | 0.23 | Duplicative ; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 5/27/16 | Preparing final revisions ofRFAs, sets 11 and 12 to County of Riverside re settled cases. | 0.33 | 0.33 | Excessive | RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| AMP | 5/31/16 | Edit and revise draft of Meet and Confer letter re Defendant Felecia Butler's supplemental responses to Rogs Set One based on Shawn's comments :from review | 0.60 | 0.60 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated June 1, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 5/31/16 | Start draft of Meet and Confer letter re Defendant Felecia Butler's responses to RFAs Set One | 0.70 | 0.70 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SAM | 5/31/16 | Review; edit, revise, meet and confer letter to County on Butler supplemental responses to interrogatories . | 0.65 | 0.65 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated June 1, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 5/31/16 | Start draft of Meet and Confer letter re Defendant County's supplemental responses to RFAs Set One | 0.65 | 0.65 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 5/31/16 | Continue draft of Meet and Confer letter re Defendant Felecia Butler's supplemental responses to Rogs Set One | 0.57 | 0.57 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated June 1, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 5/31/16 | Start draft of Meet and Confer letter re Defendant Felecia Butler's supplemental responses to Rogs Set One | 0.48 | 0.48 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated June 1, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 5/31/16 | Review of responses of Defendant Felecia Butler to RFAs Set One, checking for adequacy | 0.20 | 0.20 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 5/31/16 | Continue review of supplemental responses of County of Riverside to RFA Set One, checking for adequacy (132 requests) | 0.52 | 0.52 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 5/31/16 | Start review of supplemental responses of Defendant Felecia Butler to Rogs Set One, checking for adequacy | 0.22 | 0.22 | Excessive | Attorney identifies task as related primarily to individual claims, yet per M&C letter dated June 1, 2016 argues requests related to class certification. Requests consists of seeking identities of all social workers supervised by Butler from 1995-2015 that met certain criteria. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 6/1/16 | Continue draft of Meet and Confer letter re Defendant Felecia Butler's responses to RFAs Set Two | 0.33 | 0.33 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| DBA | 6/1/16 | Drafting Requests for Admission, Sets 13 and 14, to County of Riverside | 1.05 | 1.05 | Excessive | RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, especially in light of RFA's Set One seeking 132 admissions. |
| AMP | 6/1/16 | Continue draft of Meet and Confer letter re Defendant County's supplemental responses to RFAs Set One; section relating to vagueness and ambiguity objection | 0.38 | 0.38 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 6/1/16 | Continue draft of Meet and Confer letter re Defendant County's supplemental responses to RFAs Set One; section relating to unsupported privacy objection | 0.70 | 0.70 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 6/1/16 | Continue draft of Meet and Confer letter re Defendant County's supplemental responses to RFAs Set One | 0.47 | 0.47 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 6/1/16 | Review of responses of Defendant Felecia Butler to RPDs Set One, checking for adequacy | 0.23 | 0.23 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set One related to typicality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| AMP | 6/1/16 | Start draft of Meet and Confer letter re Defendant Felecia Butler's responses to RF As Set Two | 0.28 | 0.28 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |

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| AMP | 6/1/16 | Review of responses of Defendant Felecia Butler to RFAs Set Two, checking for adequacy | 0.30 | 0.30 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| AMP | 6/1/16 | Continue draft of Meet and Confer letter re Defendant Felecia Butler's responses to RFAs Set One | 0.80 | 0.80 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 6/2/16 | Start draft of Meet and Confer letter re Defendant County's supplemental responses to Rogs Set Two, 9 -12 | 0.52 | 0.52 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 6/2/16 | Meet and Confer phone call with Paul, re: County's responses to interrogatories (Set 2). | 0.68 | 0.68 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/2/16 | Review Defendant County's supplemental responses to Interrogatories 9 - 12 as well as previous Meet and Confer efforts | 0.25 | 0.25 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/2/16 | Review the Court's order, the discovery requests, and the moving papers in prepatation of the Meet and Confer phone call, re: County's interrogatories (Set 2). | 0.57 | 0.57 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| DBA | 6/2/16 | Drafting RFAs to County of Riverside, Set 14 | 0.75 | 0.75 | Excessive | RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| DBA | 6/2/16 | Drafting RFAs to County of Riverside re French and Williams cases | 0.57 | 0.57 | Vague; Excessive | Vague as to which set of RFAs this entry relates. RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |
| AMP | 6/3/16 | Continue draft of Meet and Confer letter re Defendant Countys supplemental responses to Rogs Set Two,9-12, section relating to incomplete responses and lack of content | 0.17 | 0.17 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/3/16 | Continue to draft RFAs to the County re compiled Berkeley data and authentication of number of removals, both long-term removals and short-term removals | 0.48 | 0.48 | Vague; Excessive | Vague as to which set of RFAs this entry relates. Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA's of this nature (Set 15) which resulted in the Court ordering defendant to respond to only three of the 30 requests. |

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| AMP | 6/3/16 | Continue to draft RFAs to the County re compiled Berkeley data and authentication of number of removals | 0.28 | 0.28 | Vague; Excessive | Vague as to which set of RFAs this entry relates. Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA's of this nature (Set 15) which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| AMP | 6/3/16 | Review Defendant Butler's responses to Rog Set 2, checking for adequacy and need for M&C | 0.28 | 0.28 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 6/3/16 | Review Defendant Torres' responses to RFA Set 3, checking for adequacy and need for M&C | 0.23 | 0.23 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 6/3/16 | Research re Berkeley CCWIP,and numbers,ofremovals for Riverside County over the specified class period | 0.50 | 0.50 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how obtaining this data was a necessary step for Plaintiff's victory of the individual claims. |

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| AMP | 6/6/16 | Continue draft of Meet and Confer letter responding to Defendants' M&C Letter re motion for protective order, section relating to Defendants' previous inadequate discovery responses | 0.20 | 0.20 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |
| AMP | 6/6/16 | Continue draft of Meet and Confer letter responding to Defendants' M&C letter re motion. for protective order | 0.68 | 0.68 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |

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| AMP | 6/6/16 | Research re burden of proof and standards for protective order restricting discovery | 0.53 | 0.53 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |
| AMP | 6/6/16 | Start draft of Meet and Confer letter responding to Defendants M&C Letter re motion for protective order | 0.45 | 0.45 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |

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| AMP | 6/6/16 | Review documents provided in supplemental respopses to County's RPDs looking for training and policy over specified class period for M&C Letter re interrogatories 9-12 | 0.25 | 0.25 | Vague | Vague as to which defendant the set of interrogatories relates. Task clearly related to class cert despite attorney identifying work as primarily related to individual claims. |
| AMP | 6/6/16 | Review County's supplemental responses to RFA Set One for denials related to County's supplemental responses to Interrogatories 9-12 re training and policies | 0.27 | 0.27 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/6/16 | Continue draft of Meet and Confer letter re Defendant County's supplemental responses to Rogs Set Two, 9 - 12 | 0.73 | 0.73 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SAM | 6/7/16 | Review, edit, revise, A.A. vs. County of Riverside, et al., Case No. 5: 14-cv-02556 VAP (SPx:) - Meet and Confer Response, re: Defendants' Motion for Protective Order. | 0.27 | 0.27 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |
| AMP | 6/7/16 | Continue draft of subpoena for Riverside County Juvenile Court P.MK, attachments to subpoena | 0.18 | 0.18 | Vague | Vague as to what attachments were drafted and topics contained within. |
| AMP | 6/7/16 | Start draft of subpoena for Riverside County Juvenile Court PMK | 0.13 | 0.13 | Vague; Clerical | Vague as to what sections of subpoena task relates. Includes time spent on noncompensable clerical work |
| AMP | 6/7/16 | Continue,draft of notice of subpoeoa for Riverside County Juvenile Court PMK continue RPDs | 0.45 | 0.45 | Vague | Vague as to what additional documents from Juvenile Court PMK were being sought, not already obtained. |
| AMP | 6/7/16 | Start draft of notice .of subpoena for Riverside County Juvenile Court PMK - notice, RPD, and set dates | 0.60 | 0.60 | Vague; Clerical | Includes time spent on noncompensable clerical work. Vague as to what documents were being sought not already obtained. |
| AMP | 6/7/16 | Start draft of deposition notice for Angelita Saldana notice, RPD, and set dates | 0.37 | 0.37 | Vague; Clerical | Includes time spent on noncompensable clerical work. Vague as to what documents were being sought not already obtained. |

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| SDD | 6/7/16 | Research law creating the paternship between berkeley and CDSS. | 1.62 | 1.62 | Vague; Excessive | Vague as to purpose of research and to which aspect of the case it relates.<br>Renewed fee motion fails to articulate why information from Berkeley was a necessary step to Plaintiff's limited victory on her underlying claims. |
| DBA | 6/7/16 | Adding complaints, depo transcripts to Karin Atkins deposition folder for her deposition 6/17/16 | 0.25 | 0.25 | Clerical | Time spent on noncompensable clerical work. |
| AMP | 6/7/16 | Continue draft of Meet and Confer response letter, section relating to Defendants' obstruction of necessary and relevant informatfon | 0.60 | 0.60 | Vague | Vague as to which M&C and discovery the task relates. |
| SDD | 6/7/16 | Begin to draft the joint supplemental briefing, re:Plaintiff's Motion to Compel Interrogatories (Set Two). | 0.48 | 0.48 | Vague | Vague as to which defendant the motion relates. |
| AMP | 6/7/16 | Continue draft of Meet and Confer letter responding to Defendants' M&C Letter re motion for protective order, continue section relating to Defendants' previous inadequate discovery responses | 0.85 | 0.85 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |

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| SAM | 6/7/16 | Review, edit, revise, A.A. vs. County of Riverside, et al., Case No. 5:14-cv-02556 VAP (SPx) - Meet and Confer, re: County's Responses to Plaintiff's .Request for Production of Documents (Set Three); Torres' Supplemental Responses· to Request for Admission. (Set One): Torres' Supplemental Responses to Interrogatories (Set One). | 0.27 | 0.27 | Excessive | Entry contains block billing.<br><br>Time spent seeking documents from 1995-2013 regarding policies and procedures. Requests duplicative and overlapping of records sought in other RPD's and RFA's in the same case and and duplicative of information already obtained in the related Rogers case.<br><br>Renewed fee motion fails to articulate why obtaining the same information from multiple different requests was a necessary step to Plaintiff's victory of the underlying claims. |
| AMP | 6/8/16 | Continue draft of M&C lettert re Defendant Torres' responses to RFA Set 3, section relating asked and answered objection to Requests 92-96 | 0.25 | 0.25 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 6/8/16 | Review Defendant Torres' Responses to Requests for Admission Set Three and compare to prior responses 'to other sets of discovery (RFA l, ROG 1) | 0.33 | 0.33 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 6/8/16 | Start draft of M&C letter r.e Defendant Torres' responses to RFA Set 3 | 0.67 | 0.67 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |

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| SDD | 6/8/16 | Continue to draft the joint supplemental briefing, re: County's lnterrogatories (Set 2). | 0.43 | 0.43 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/8/16 | Finish draft of Meet and Confer letter re Defendant County's supplemental responses to Rogs Set Two, 9-12 | 0.17 | 0.17 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/8/16 | Meet and Confer phone call, re: County Interrogatories (Set 2). | 0.57 | 0.57 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 6/8/16 | Review and edit draft of Meet and Confer letter re Defendant Countys supplemental responses to RFAs Set One | 0.27 | 0.27 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 6/8/16 | Research issue of percipient observations by a social worker | 0.42 | 0.42 | Vague | Vague as to purpose of research and what aspect of the case it relates. |
| AMP | 6/8/16 | Research on UC Berkeley CCWlP re number of allegations substantiated, unfounded, inconclusive | 0.27 | 0.27 | Vague; Excessive | Vague as to purpose of research and what aspect of the case it relates.<br>Renewed fee motion fails to articulate why information from Berkeley was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 6/8/16 | Review and edit draft of Meet and Confer response letter re Defendants' proposed motion for protective order, based on Shawn's comments and edits | 0.32 | 0.32 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |

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| SDD | 6/8/16 | Review, revise, and edit PLAINTIFF'S NOTICE OF DEPOSITION OF PERSON(S) MOST KNOWLEDGEABLE FOR DEFENDANT COUNTY OF RIVERSIDE REGARDING WARRANT POLICIES, PRACTICES, AND TRAINING ANO REQUEST FOR PRODUCTION OF DOCUMENTS | 0.22 | 0.22 | Vague | Vague as to what edits were made. Work potentially duplicative of the same work completed by AMP. Unclear how work is different. |
| AMP | 6/8/16 | Continue draft of notice of subpoena for Riverside County Juvenile Court PMK-continue categories of inquiry | 0.38 | 0.38 | Vague | Vague as to categories of inquiry and how they relate to case. |
| AMP | 6/8/16 | Review recently received discovery responses (Butler Rog2, Torres RFA3) for Meet and Confer response to Defendant's M&C for protective order | 0.40 | 0.40 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |

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| SDD | 6/8/16 | Meet and Confer letter, re Countys failure to provide supplemental responses on the agreed upon production date. | 0.72 | 0.72 | Vague | Vague as to which set of discovery the task relates. |
| SDD | 6/9/16 | Continue to draft the joint supplemental briefing, re: County's Interrogatories (Set 2). | 0.57 | 0.57 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/9/16 | Continue draft of M&C letter re Defendant Torres' responses to RFA Set 3, start section relating to Requests 83-87 and 89-91 | 0.68 | 0.68 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such M&C letter was located as having been received. Attorney should not bill for incomplete/unnecessary work. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 6/9/16 | Continue draft of M&C letter re Defendant Tones' responses fo RFA Set 3, section relating to use of the work "never" for Request 94 being vague and ambiguous | 0.18 | 0.18 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such M&C letter was located as having been received. Attorney should not bill for incomplete/unnecessary work. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |

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| AMP | 6/9/16 | Continue draft of M&C letter re Defendant Torres:' responses to RFA Set 3, section relating to improper qualification for Requests 92-96 | 0.55 | 0.55 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such M&C letter was located as having been received. Attorney should not bill for incomplete/unnecessary work. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| DBA | 6/9/16 | Drafted M&C letter re County's responses to RPD, Set 2 | 0.30 | 0.30 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 6/9/16 | Research re local rules relating to Meet and Confer requirements for FRCP, Rule 26(c) Protective Order | 0.12 | 0.12 | Vague | Vague as to which letter regarding seeking a protective order the task relates; the deposition of Mr. Puentes, or the excessive discovery requests propounded.<br><br>Renewed fee motion fails to articulate why taking the deposition of Michael Puentes was a necessary step to Plaintiff's victory on the individual claims, given the number of other depositions taken and written discovery obtained. The M&C for protective order regarding discovery related to extensive discovery requests during the class certification phase, thus related to class. Fee motion fails to articulate why propounding extensive class related discovery was a necessary step to Plaintiff's limited success on the underlying claims |

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| SDD | 6/9/16 | Continue to draft the supplemental briefing, re: County's Interrogatories (Set 2) and section 827 disclosure issue | 1.80 | 1.80 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 6/9/16 | Drafting M&C letter to Burkhart re Supplemental Responses to RFP, Set 2. | 0.57 | 0.57 | Vague | Vague as to which defendant the task relates. |
| AMP | 6/9/16 | Start draft of M&C letter re Defendant Butler's responses to Interrogatories Set 2 | 0.92 | 0.92 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. Additionally, unable to locate such letter sent. |
| AMP | 6/9/16 | Research re discovery obligations of former employees | 0.30 | 0.30 | Vague | Vague as to purpose of research and what discovery set the task relates. |
| SDD | 6/9/16 | Continue to draft the supplemental briefing, re: County's Interrogatories (.Set 2) and section 827 disclosure issue | 0.72 | 0.72 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 6/9/16 | Continue draft of M&C letter re Defendant Torres' responses to RFA Set 3, finish section relating to Requests 83-87 and 89-91, addressing WIC 827 objection | 0.27 | 0.27 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such M&C letter was located as having been received. Attorney should not bill for incomplete/unnecessary work. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| SDD | 6/9/16 | Continue to draft the supplemental briefing, re: County's Interrogatories (Set 2) and section 827 disclosure issue. | 0.18 | 0.18 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/9/16 | Continue to draft the joint Supplemental brieung, re: County's Interrogatories ,(set 2). | 0.70 | 0.70 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/9/16 | Continue draft of M&C letter re Defendant Torres' responses to RFA Set 3,continue section relating to Requests 83-87 and 89-91, addressing WlC 827 objection | 0.87 | 0.87 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such M&C letter was located as having been received. Attorney should not bill for incomplete/unnecessary work. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |

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| SDD | 6/9/16 | Make a public records request for the interagency data sharing agreement between Berkeley and CDSS. | 0.32 | 0.32 | Excessive | Renewed fee motion fails to articulate why information from Berkeley was a necessary step to Plaintiff's limited victory on her underlying claims. |
| SDD | 6/9/16 | Draft the supplemental briefing. re: County's Interrogatories (Set 2) and section 827 disclosure issue. | 0.28 | 0.28 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/10/16 | Print, assemble, e-file, mail chambers copy of the supplemental brief, re: County's Interrogatories (Set 2). | 0.50 | 0.50 | Clerical | Time spent on noncompensable clerical work. |
| SAM | 6/10/16 | Review, edit, revise PLAINTIFF'S SUPPLEMENT AL BRIEFING REGARDING PLAINTIFF'S MOTION TO COMPEL COUNTY OF RIVERSJDE TO PROVIDE RESPONSES TO INTERROGATORIES (SET TWO) | 0.32 | 0.32 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 6/10/16 | Dtaft Declaration in support of supp. briefing; re: County's interrogatories (Set 2). | 0.73 | 0.73 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/10/16 | Continue to draft the supplemenlal briefing, re: County Interrogatories (Set 2). | 1.37 | 1.37 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/10/16 | Continue to draft RFAs to the County re compiled Berkeley data and authentication of number of referrals substantiated of unfounded | 0.15 | 0.15 | Vague; Excessive | Vague as to which set of RFAs this entry relates. Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA's of this nature (Set 15) which resulted in the Court ordering defendant to respond to only three of the 30 requests. |

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| SDD | 6/10/16 | Continue to draft the supplemental briefing, re: County's Interrogatories (Set 2). | 1.52 | 1.52 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/10/16 | Continue to draft RFAs to the County re compiled Berkeley data and authentication of number of removals, agreements with CA DSS and. UC Berkeley to share data from CWS/CMS; | 0.43 | 0.43 | Vague; Excessive | Vague as to which set of RFAs this entry relates. Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA's of this nature (Set 15) which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| SDD | 6/10/16 | Continue to draft the supplmental briefing re: Countys Interrogatories (Set 2). | 1.03 | 1.03 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 6/10/16 | Continue draft of M&C letter re Defendant Torres' responses to RFA Set 3, section relating to Requests 82 and 88 and improper qualifications to responses | 0.42 | 0.42 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such M&C letter was located as having been received. Attorney should not bill for incomplete/unnecessary work. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| SDD | 6/10/16 | Continue to draft the supplemental briefing, re: County's Interrogatories (Set 2) and section 827 disclosure issue. | 0.32 | 0.32 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/10/16 | Research issue federal law for witness names not being privileged. | 0.65 | 0.65 | Vague | Vague as to purpose of research and what discovery set the task relates. |
| AMP | 6/10/16 | Continue draft ofM&C letter re Defendant Butler's responses to Interrogatories Set 2 | 0.72 | 0.72 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. Additionally, unable to locate such letter sent. |

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| AMP | 6/10/16 | Continue draft of M&C letter re Defendant Butler's responses to Interrogatories Set 2, section relating to asked and answered objection for Interrogatories 8 and 14 | 0.38 | 0.38 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. Additionally, unable to locate such letter sent. |
| SDD | 6/10/16 | Gather state and federal data regarding the County reporting requirements | 0.93 | 0.93 | Vague | Vague as to purpose of task and what aspect of the case the task relates. |
| AMP | 6/13/16 | Continue and edit draft of notice of deposition for Angelita Saldana - additional RPDs relating to SDM Tools and Delivered Service Logs | 0.18 | 0.18 | Vague | Vague as to what documents are being sought for which case as Saldana a defendant in a different case. |
| AMP | 6/13/16 | Continue and edit draft of notice of subpoena for Riverside County Juvenile Court PMK - additional RPDs relating to CWS/CMS | 0.22 | 0.22 | Vague | Vague as to what additional documents from Juvenile Court PMK were being sought, not already obtained. |
| AMP | 6/13/16 | Continue draft of M&C letter re Defandant Torres' responses to RFAs Set 3, continue drafting sections relating to supplemental briefing e•filed on June 10 | 0.42 | 0.42 | Duplicative ; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such M&C letter was located as having been received. Attorney should not bill for incomplete/unnecessary work. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| SAM | 6/13/16 | Continue review documents in preparation for deposition of Karen Atkins. | 0.52 | 0.52 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of several county employees and PMKs was a necessary step to Plaintiff's victory on the individual claims, especially in light of extensive written discovery received and multiple other depositions taken. |

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| AMP | 6/13/16 | Continue draft ofM&C letter re Defendant Torres' responses to RFAs Set 3, draft sections relating to supplemental briefing e•filed on June 10 | 0.20 | 0.20 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such M&C letter was located as having been received. Attorney should not bill for incomplete/unnecessary work. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 6/13/16 | Continue draft of M&C letter re Defendant Butler's responses to Interrogatories Set 2, draft section relating to ascertainability of identity of defendant class members | 0.17 | 0.17 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Clearly related to class cert yet renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. Additionally, unable to locate such letter sent. |
| AMP | 6/13/16 | Research re confidentiality and identification of potential class action defendants | 0.35 | 0.35 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| AMP | 6/13/16 | Continue draft of M&C letter re Defendant Butler's responses to Interrogatories Set 2, draft sections relating to supplementa1 briefing e-filed on June 10 | 0.25 | 0.25 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. Additionally, unable to locate such letter sent. |
| SAM | 6/13/16 | Continue preparation for deposition of Karen Atkins | 2.53 | 2.53 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of several county employees and PMKs was a necessary step to Plaintiff's victory on the individual claims, especially in light of extensive written discovery received and multiple other depositions taken. |

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| AMP | 6/13/16 | Start draft of M&C letter re Defendant Butler's responses to RPDs Set I | 0.82 | 0.82 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set One related to typicality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| SAM | 6/13/16 | Review, edit, comment on proposed NOTICE OF SUBPOENA lN A CIVIL CASE FOR DEPOSITION AND PRODUCTION OF DOCUMENTS; Subpoena | 0.58 | 0.58 | Vague | Vague as to what notice of subpoena the task relates |
| DBA | 6/13/16 | Drafting revisions to M&C letter re County's Supplemental Response to RPD, (set two) | 0.56 | 0.56 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 6/13/16 | Continue to draft RFAs to the County re compilied Berkeley data | 0.48 | 0.48 | Vague; Excessive | Vague as to which set of RFAs this entry relates. Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA's of this nature (Set 15) which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| SDD | 6/13/16 | Review, revise, and edit M&C letter, re; County's Response to .'Request for Production of Documents (Set Two) | 0.48 | 0.48 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| SDD | 6/14/16 | Begin to draft outline for Attachment 5 to the JV 570 form, re; global 827 petition.. | 0.57 | 0.57 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |

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| SDD | 6/14/16 | Recreate full training document from the shuffled file | 0.28 | 0.28 | Vague; Clerical | Vague as to the "shuffled file" and what training document the task relates. Time includes noncompensable clerical work or simple tasks. |
| SDD | 6/14/16 | Review the County's prior motions lo determine whether any concession of non-opposition was made regarding an 827 request | 0.23 | 0.23 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 6/14/16 | Continue edit of notice of subpoena based on Shawn's comments, final proofread and set date; time. and location | 0.10 | 0.10 | Vague | Vague as to which notice of subpoena the task relates. |
| AMP | 6/14/16 | Research re Rule 45 and how much advance time is required for party opponents for notice of subpoena | 0.17 | 0.17 | Vague | Vague as to what notice of subpoena the task relates. Attorney should not bill for simple research. |
| AMP | 6/14/16 | Edit draft of subpoena attachements for Riverside County Juvenile Court PMK based on Shawn's comments in review | 0.13 | 0.13 | Vague | Vague as to what the comments were and what edits were made and relevancy to case. |
| AMP | 6/14/16 | Edit draft of notice of subpoena for .Riverside County Juvenile Court PMK based on Shawn's comments from review | 0.18 | 0.18 | Vague | Vague as to what the comments were and what edits were made and relevancy to case. Entry potentially duplicative of work completed on the same day, does not articulate what changes. |
| SDD | 6/14/16 | Extract the training and policy documents identified in County's response in Rogers. | 0.68 | 0.68 | Excessive; Duplicative | Renewed fee motion fails to articulate why additional discovery was necessary in addition to the documents already produced in related Rogers case. |
| SDD | 6/14/16 | Check flights to Chicago for Depo of former social worker Holland | 0.20 | 0.20 | Clerical | Time includes noncompensable clerical work. |
| AMP | 6/14/16 | Finish notice of depo for Karla Torres, final proofread and set date, time, and location | 0.17 | 0.00 | No Objection | No Objection. |

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| SDD | 6/14/16 | Draft email to Berkeley, re: CWS/CMS data | 0.28 | 0.28 | Excessive | Renewed fee motion fails to articulate why data from Berkeley was a necessary step to Plaintiff's limited victory on her underlying claims. |
| SDD | 6/14/16 | Draft notice of deposition rescheduling for Michael Puentes | 0.22 | 0.22 | Clerical; Excessive | Excessive time expenditure for basic/routine tasks. |
| AMP | 6/15/16 | Continue draft of M&C letter re Defendant Butler's responses to RPDs Set 2, draft section relating to inappticability of class certification objection | 0.22 | 0.22 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| AMP | 6/15/16 | Continoe draft of M&C letter re Defendant Butler's responses to RPDs Set 2, draft section relating to inapplicability of prlvacy objection to social worker identities | 0.53 | 0.53 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| AMP | 6/15/16 | Start draft ofM&C letter re Defendant Butler's responses to RPDs Set 2 | 0.20 | 0.20 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |

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| SDD | 6/15/16 | Continue to review, revise, and edit PLAiNTlFF'S NOTICE OF DEPOSITION OF PERSON(S) MOST KNOWLEDGEABLE FOR DEFENDANT COUNTY OF RIVERSIDE REGARDING WARRANTS PRACTICES AND TRAlNlNG AND REQUEST FOR pROOUCTION OF DOCUMENTS; making edits and changes as necessary. | 0.57 | 0.57 | Vague | Vague as to "making edits and changes as necessary." Does not articulate what edits/changes required and based on what. |
| AMP | 6/15/16 | Continue draft of M&C. letter re Defendant Torres' responses to RPDs ,Set 2, start section relating to Requests 26 and 27 | 0.70 | 0.70 | Excessive | No such letter located as having been received. Attorney should not bill for incomplete and unnecessary work. |
| AMP | 6/15/16 | Continue draft of M&C letter te Defendant Torres' responses to RPDs Set 2, request 28 | 0.15 | 0.15 | Excessive | No such letter located as having been received. Attorney should not bill for incomplete and unnecessary work. |
| AMP | 6/15/16 | Continue draft of M&C letter re Defendant Torres' responses to RPDs Set 2, reasonable inquiry for requests 23 - 25 | 0.27 | 0.27 | Excessive | No such letter located as having been received. Attorney should not bill for incomplete and unnecessary work. |

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| SDD | 6/15/16 | Continue to review, revise, and edit PLAINTIFF'S NOTICE OF DEPOSITION OF PERSON(S) MOST KNOWLEDGEABLE FOR DEFENDANT COUNTY OF RIVERSIDE REGARDING WARRANT POLICIES, PRACTICES, AND TRAINING AND REQUEST FOR PRODUCTION OF DOCUMENTS; making edits and changes as necessary. | 1.05 | 1.05 | Vague | Vague as to "making edits and changes as necessary." Does not articulate what edits/changes required and based on what. Entry duplicative of entries of same day/same task - Does not articulate differences in billing. |
| AMP | 6/15/16 | Start draft of M&C letter re Defendant Torres' responses to RPDs Set 2 | 0.68 | 0.68 | Excessive | No such letter located as having been received. Attorney should not bill for incomplete and unnecessary work. |
| AMP | 6/15/16 | Review Defendant Butler's responses to RPD Set 2, checking for adequacy and need for M&C | 0.30 | 0.30 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| DBA | 6/15/16 | Drafting M&C ltr. re RFA. (Set 3) propounded to C.O.R. | 1.30 | 1.30 | Excessive; Vague | Vague as to which set of RFA's the entry relates. RFAs Set Three - Fourteen all served on 4/29/16, 5/6/16, 5/27/16, and 6/2/16 sought admissions regarding 12 previous lawsuits against the County. Renewed fee motion fails to articulate why in total 305 requests for admissions was a necessary step in Plaintiff's limited victory on the underlying claims, in light of RFA's Set One seeking 132 admissions. |

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| AMP | 6/15/16 | Review Defendant Torres' responses to RPD Set 2, checking for adequacy and need for M&C | 0.28 | 0.28 | Duplicative; Excessive | RPDs Set Two to Torress sought documents already produced and documents that were not in the possession, custody, or control of Torres and which were requested of defendant County. Renewed fee motion fails to articulate why seeking the same discovery from multiple avenues was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 6/15/16 | Continue to review, revise, and edit PLAINTIFF'S NOTICE OF DEPOSITION OF PERSON(S) MOST KNOWLEDGEABLE FOR DEFENDANT COUNTY Of RIVERSIDE REGARDING WARRANT POLICIES, PRACTICES, AND TRAINING AND REQUEST FOR PRODUCTJON OF DOCUMENTS; making edits and changes as necessary. | 0.17 | 0.17 | Vague | Vague as to "making edits and changes as necessary." Does not articulate what edits/changes required and based on what. Entry duplicative of entries of same day/same task - Does not articulate differences in billing. |
| AMP | 6/15/16 | Finish first draft of M&C letter re Torres compelled responses to RPDs Set One | 0.20 | 0.20 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |

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| SDD | 6/16/16 | Review, revise, and edit Meet and Confer, re: Defendant Felecia Butler's Responses to Plaintiff's Request for Admissions (Set One). | 0.75 | 0.75 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 6/16/16 | Continue draft of M&C Letter re County's Supplemental Responses to Interrogatories 9 - 12 re inconsistencies in sections cited in responses for training and policies | 0.63 | 0.63 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/16/16 | Continue to draft PLAINTIFF'S NOTICE OF DEPOSITION OF PERSON(S) MOST KNOWLEDGEABLE FOR DEFENDANT COUNTY OF RIVERSIDE REGARDING WARRANT POLICIES, PRACTICES, AND TRAINING AND REQUEST FOR PRODUCTION OF DOCUMENTS | 0.77 | 0.77 | Vague | Vague as to "making edits and changes as necessary." Does not articulate what edits/changes required and based on what. Entry duplicative of entries of same day/same task - Does not articulate differences in billing. |

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| AMP | 6/16/16 | Continue draft of M&C letter re Defendant Torres' responses to RPDs Set 2, section re 827 objection | 0.40 | 0.40 | Excessive | No such letter located as having been received. Attorney should not bill for incomplete and unnecessary work. |
| SDD | 6/16/16 | Continue to draft PLAINTIFF'S NOTICE OF DEPOSITION OF PERSON(S) MOST KNOWLEDGEABLE FOR DEFENDANT COUNTY OF RIVERSIDE REGARDING WARRANT POLICIES, PRACTICES, AND TRAINING AND REQUEST FOR PRODUCTION OF DOCUMENTS | 1.03 | 1.03 | Vague | Vague as to "making edits and changes as necessary." Does not articulate what edits/changes required and based on what. Entry duplicative of entries of same day/same task - Does not articulate differences in billing. |
| AMP | 6/16/16 | Continue draft ofM&C letter re Defendant Butler's responses to RPDs Set 2, draft section relating to inapplicability of 827 objection | 0.48 | 0.48 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| SAM | 6/16/16 | Complete preparation for deposition of Karin Atkins | 0.67 | 0.67 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of several county employees and PMKs was a necessary step to Plaintiff's victory on the individual claims, especially in light of extensive written discovery received and multiple other depositions taken. |

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| AMP | 6/17/16 | Continue edit, revise, and draft new sections for M&C Letter re Butler's responses to RF As Set One based on comments from review, reasonable inquiry re delivered service logs, detention report, and SDM tools | 0.23 | 0.23 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 6/17/16 | Continue edit, revise, and draft new sections for M&C Letter re Butler's responses to RFAs Set One based on comments from review, definitions relating to medical attention and vague and ambiguous objection | 0.67 | 0.67 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 6/17/16 | Research re need for medical attendtion immediately following a removal and relation to exigency | 0.30 | 0.30 | Vague | Vague as to reason research was completed and what it would be used for. |
| AMP | 6/17/16 | Continue edit, revise, and draft new sections for M&C Letter re Butler's rsponses to RFAs Set One based on comments from review, additional case law and definitions | 0.55 | 0.55 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| SDD | 6/17/16 | Review, revise, and edit Meet and Confer re: County's Supplemental Responses to Plaintiffs Interrogatories (Set Two), Numbers 9-12. | 0.47 | 0.47 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/17/16 | Edit, revise, and draft new sections for M&CLetter re Butler's responses to RF As Set One based on comments from review | 0.38 | 0.38 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 6/17/16 | Continue draft of M&:C letter r.e Defendant Butler.'s responses to RPDs Set2 | 0.17 | 0.17 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| SAM | 6/17/16 | Deposition of Karin Atkins, (Includes 1.5 hours round trip travel.) | 5.20 | 5.20 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of several county employees and PMKs was a necessary step to Plaintiff's victory on the individual claims, especially in light of extensive written discovery received and multiple other depositions taken. |

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| AMP | 6/17/16 | Continue draft ofM&C Letter re County's Supplemental Responses to Interrogatories 9 - 12 based on Steve's comments from review | 0.35 | 0.35 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/17/16 | Review, revise, and edit Meet and Confer, re: Defendant Felecia Butler's Responses to Plaintiff's Request for Admissions {Set One). | 0.97 | 0.97 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 6/17/16 | FinaJ proofread and edits of M&C letter re B.utler's responses to RFAs Set One | 0.18 | 0.18 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| AMP | 6/17/16 | Review M&C response letter received from Burkhart re Butler's supplemental responses to Rogs 1, 2, and 5 | 0.13 | 0.13 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 6/17/16 | Review, revise, and edit Meet and Confer re; Defendant Felecia Butler's Responses to Plaintiff's Request for Admissions (Set One). | 0.48 | 0.48 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 6/20/16 | Start draft ofM&C letter re Defendant Torres' supplemental responses fo Rogs Set l | 0.25 | 0.25 | Duplicative; Excessive | Duplicative and overlapping of ROGs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 6/20/16 | Continue draft of M&C letter re Defendant Torres' supplemental responses to RFAs Set 1 | 0.55 | 0.55 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification thus supplemental responses related to class certification issue, not just individual claims. Renewed motion fails to articulate why this particular discovery dispute and supplemental responses were necessary to Plaintiff's limited victory on the underlying claims. |

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| AMP | 6/20/16 | Start draft of M&C letter re Defendant Torres' supplemental responses to RFAs Set 1 | 0.35 | 0.35 | Excessive | No such letter was located as having been received after this date. Received M&C from atty DBA on 6/8/16 regarding Torres' Supplemental Responses to RFA Set One and Supplemental Responses to ROGs Set One. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 6/20/16 | Review of Defendant Torres' supplemental responses to Rogs Set One, checking for adequacy | 0.20 | 0.20 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 6/20/16 | Start review of Defendant Torres' supplemental responses to RFAs Set One, checking for adequacy | 0.28 | 0.28 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification thus supplemental responses related to class certification issue, not just individual claims. Renewed motion fails to articulate why this particular discovery dispute and supplemental responses were necessary to Plaintiff's limited victory on the underlying claims. |
| AMP | 6/20/16 | Edit draft of M&C Letter re Butler RPD Set Two, adding material from recent Meet and Confer efforts | 0.37 | 0.37 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set Two related to commonality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |

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| AMP | 6/20/16 | Continue draft of M&C letter re Defendant Torres' supplemental responses to Rogs Set 1, section relating to lack of confidentiality, federal court's ability to rule | 0.12 | 0.12 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |
| AMP | 6/20/16 | Continue draft of M&C letter re Defendant Torres' supplemental responses to Rags Set I, section relating to reasonable inquiry and access through other parties to litigation | 0.60 | 0.60 | Excessive | No such letter was located as having been received after this date. Received M&C from atty SDD on 6/8/16 regarding Torres' Supplemental Responses to RFA Set One and Supplemental Responses to ROGs Set One. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 6/20/16 | Continue draft of M&C letter re Defendant Torres' supplemental responses to Rogs Set 1, section relating to relevance of numerical data from CWS/CMS | 0.47 | 0.47 | Duplicative; Excessive | Attorney identifies task as related primarily to the individual claims, yet M&C letters dated December18, 2015 and April 28, 2016 indicate the information sought was relevant to class certification issues and responses were warranted. Renewed fee motion fails to articulate why responses to those particular discovery requests were necessary to Plaintiff's limited victory of the underlying claim and why additional responses above previous responses by Torres in the related *Rogers* case received on April 13, 2015 and July 21, 2015, and September 28, 2015 were necessary to A.A.'s underlying claims. |

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| AMP | 6/20/16 | Continue draft of M&C letter re Defendant Torres' supplemental responses to Rogs Set l, section relating to numerical data from CWS/CMS and lack of confidentiality | 0.27 | 0.27 | Duplicative; Excessive | Duplicative and overlapping of ROGs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 6/21/16 | Edit draft subpoena and attachments for Riverside County Juvenile Court PMK based on- Shawn's comments from review | 0.18 | 0.18 | Vague | Vague as to what the comments were and what edits were made and relevancy to case. Entry potentially duplicative of work completed on 6/14/16 , does not articulate what changes. |
| SDD | 6/21/16 | Continue to review, revise., and edit Meet and Confer, re: County's Supplemental Responses to .Plaintiff's Interrogatories (Set Two). Numbers 9 - 12. | 0.60 | 0.60 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/21/16 | Draft Meet and Confer letter, re: County's Initial Disclosures | 0.35 | 0.35 | Excessive | Letter indicated being unable to locate Defendants' Initial Disclosures and requested an electronic copy. Attorney should not charge for requesting lost documents. |
| AMP | 6/21/16 | Continue.draft ofM&C letter re Defendant Torres' supplemental responses to .RFAs Set 1, section re reasonable inquiry | 0.60 | 0.60 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification thus supplemental responses related to class certification issue, not just individual claims. Renewed motion fails to articulate why this particular discovery dispute and supplemental responses were necessary to Plaintiff's limited victory on the underlying claims. |

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| DBA | 6/22/16 | Drafting WlC §827 Petition in Oshita ·v. County of Riverside | 1.23 | 1.23 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 6/22/16 | Review the Court's Order re: Motion to Compel County Responses to Interrogatories (Set 2), appticabili1y to Meet and Confer letters already in progress for other sets of written discovery | 0.25 | 0.25 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/22/16 | Review the Court's Order; re: Motion to Compel Interrogatories (Set 2); discuss with Shawn how to proceed. | 0.75 | 0.75 | Vague | Vague as to which defendant the Motion to Compel relates. ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related Rogers case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. Further, Court granted motion as to one request only for Defendant to clarify its response. |
| AMP | 6/22/16 | Continue draft of M&C letter re Defendant Torres' supplemental responses to Rogs Set I, section re former employee status | 0.32 | 0.32 | Duplicative; Excessive | Duplicative and overlapping of ROGs served to Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |

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| AMP | 6/22/16 | Continue draft of M&C letter re Defendant Torres' supplemental responses to Rogs Set 1 | 0.28 | 0.28 | Duplicative; Excessive | Duplicative and overlapping of ROGs served to Torres in related Rogers case. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. Renewed fee motion fails to articulate why additional responses to responses by Torres in the related *Rogers* case were necessary to A.A.'s underlying claims. |
| AMP | 6/22/16 | Continue draft of M&C letter re Defendant Torres' supplemental responses to RFAs Set 1 | 0.25 | 0.25 | Excessive | Attorney identifies task as related primarily to the individual claims. Yet, Order on MTC to RFAs from Torres ordered defendant only to respond to those eight RFA's that relate to class certification thus supplemental responses related to class certification issue, not just individual claims. Renewed motion fails to articulate why this particular discovery dispute and supplemental responses were necessary to Plaintiff's limited victory on the underlying claims. |
| DBA | 6/23/16 | Preparing WlC §827 Petitions for former Plaintiffs v. County of Riverside | 1.78 | 1.78 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 6/23/16 | Drafting WIC §827 Petitions in casesc offormer Plaintiffs v. C,O.R. | 0.38 | 0.38 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 6/24/16 | Start compiling documents in preparation for July 25 deposition of Felecia Butler | 0.27 | 0.00 | No Objection | No Objection. |

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| DBA | 6/24/16 | Drafting attachments to WIC 827 Petitions in French v. C.O.R. | 0.32 | 0.32 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 6/24/16 | Continue compiling documents in preparation for July 20 deposition of Karla Torres | 0.33 | 0.00 | No Objection | No Objection. |
| AMP | 6/24/16 | Start compiling documents in prepatation for July 20 deposition of Karla Torres | 0.20 | 0.00 | No Objection | No Objection. |
| AMP | 6/24/16 | Edit M&CLetter re Butler Rogs Set 2 in light of Judge Pym's recent order | 0.25 | 0.25 | Excessive | Similar to ROGS Set One, Set Two sought identities for all social workers under Butler's supervision from 1995-2014 that removed a child without court order and the total number of times she approved the removals. Renewed fee motion fails to articulate why this particular discovery was a necessary step to Plaintiff's victory in the underlying claims. Additionally, unable to locate such letter sent. |
| AMP | 6/27/16 | Continue deposition preparation for July 20 deposition of Karla Torres, extracting pages from documents provided by Defendants through written discovery | 0.52 | 0.00 | No Objection | No Objection. |

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| AMP | 6/28/16 | Continue edits and revisions to Meet and Confer letter re County's responses to Rogs Numbers 9 - 12 per Steve's comments from review | 0.25 | 0.25 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/28/16 | Edits and revisions to Meet and Confer letter re County's responses to Rogs Numbers 9 - 12 per Steve's comments from review | 0.23 | 0.23 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/28/16 | Continue to draft, review, revise, and edit Meet and Confer, re: County's Supplemental Responses to Plaintiff's Interrogatories (Set Two), Numbers 9- 12. | 0.55 | 0.55 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 6/28/16 | Continue to draft, review, revise, and edit Meet and Confer-, re; County's Supplemental Responses to Plaintiff's Jnterrogatories (Set Two), Numbers 9 - I 2. | 0.35 | 0.35 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 6/28/16 | Continue to.draft, review, revise, and edit Meet and Confer, re: County's Supplemental Responses to Plaintiffs Interrogatories (Set Two), Numbers 9 - 12. | 0.55 | 0.55 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 6/29/16 | Continue outline for opposition to Defendants' motion for Protective Order re Puentes Deposition, research: re discoverability of government training | 0.80 | 0.80 | Excessive; Vague | Time spent on an outline excessive in light of time spent on actually drafting Joint Stipulation. |
| SDD | 6/29/16 | Review, revise, and edit Meet and Confer, re; Defendant County of Riverside's Second Supplemental Response to Plaititiff's.Request for Production of Documents (Set Two). | 1.02 | 1.02 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |

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| AMP | 6/29/16 | Start draft of outline for opposition to Defendants' motion for Protective Order re Puentes Deposition | 0.82 | 0.82 | Excessive; Vague | Time spent on an outline excessive in light of time spent on actually drafting Joint Stipulation. |
| DBA | 6/29/16 | Continuing to draft Joint Stip. re MTC C.O.R. to provide responses to RPD, (Set One) | 2.32 | 2.32 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 6/29/16 | Review revise, and edit PLAJNTIFF A.A. 'S REQUEST FOR ADMISSIONS TO DEFENDANT COUNTY OF RIVERSIDE (SET FIFTEEN). | 0.52 | 0.52 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. Renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 6/29/16 | Review, revise, and edit Meet and Confer, re: Coumy's Supplemental Rc:sponse to Request for Production of Documents (Set Two). | 0.30 | 0.30 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| SDD | 6/30/16 | Research issue regarding attorney-client privilege for County Counsel's general training. | 1.28 | 1.28 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| AMP | 6/30/16 | Reviewing social worker Atkins' prior deposition testimony in French v. County of Riverside for information relating to Puentes and supporting opposition of protective order | 0.23 | 0.23 | Vague | Vague as to what information was sought and gleaned from Atkins and how it relates to Puentes. Vague as to what protective order the task relates. |

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| AMP | 6/30/16 | Continue r:esearch re distinguishing cases cited by defendant in motion for protective order for Puentes depo | 0.72 | 0.72 | Excessive; Vague | Vague as to what was done with the research conducted. |
| SDD | 6/30/16 | Review, revise, and edit Meet and Confer, re: County's Second Supplemental Response to Request for Production of Documents (Set Two). | 0.15 | 0.15 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| AMP | 6/30/16 | Research re distinguishing cases cited by Defendant in motion :for protective order for Puentes depo | 0.23 | 0.23 | Excessive; Vague | Vague as to what was done with the research conducted. |
| DBA | 6/30/16 | Drafting revisions to M&C letter re Defendant Riverside's response to RPD2 | 0.47 | 0.47 | Duplicative; Excessive | RPDs Set Two sought duplicative and overlapping records as sought in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 6/30/16 | Continue drafting outline for opposition to Defendants' motion for Protective Order re Puentes Deposition, section re protective order burden and good cause | 0.78 | 0.78 | Vague | Vague as to what information was sought and gleaned from Atkins and how it relates to Puentes. Vague as to what protective order the task relates. |
| AMP | 6/30/16 | Research re burden on protective order and any specific cases involving proposed attorney depositions | 0.52 | 0.52 | Vague | Vague as to what work the research relates. Vague as to what attorney deposition the task relates. |

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| AMP | 6/30/16 | Continue drafting outline for opposition to Defendants' motion for Protective Order re Puentes Deposition, sections re different tests for attorneys as deponents | 1.25 | 1.25 | Vague | Vague as to what information was sought and gleaned from Atkins and how it relates to Puentes. Vague as to what protective order the task relates. |
| DBA | 6/30/16 | Drafting declaration of DBA in support of MTC Joint Stip re County of Riverside's responses to RPD 1 | 1.85 | 1.85 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 6/30/16 | Research re cases relating to limitations on Shelton v. America Motor Corp. | 0.70 | 0.70 | Vague | Vague as to purpose of research and to what aspect of the case it relates. |
| AMP | 7/1/16 | Start Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order | 0.70 | 0.70 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/1/16 | Start draft of Declaration re Defendants' Motion for Protective Order and Order at Dkt. 16 | 0.73 | 0.73 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| SDD | 7/1/16 | Draft Notice of rescheduling of Puentes depo. | 0.15 | 0.15 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/1/16 | Draft governing law section for Opposition to Defendants' Motion for Protective Order | 0.22 | 0.22 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/1/16 | Start draft of Opposition to Defendants' Motion 'for Protective Order | 0.43 | 0.43 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 7/1/16 | Continue to draft the global 827 petition; re: attachment 5. | 0.12 | 0.12 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/1/16 | Research relating to Defendants' violation of the Local Rules being ,grounds for denial of the motion | 0.32 | 0.32 | Vague | Vague as to what Local Rule was violated. Vague as to what Motion the task refers. |
| DBA | 7/1/16 | Drafting revisions to Joint Stip re County's response to RPD (Set One) | 0.77 | 0.77 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 7/1/16 | Finish drafting outline of issues for opposition to motion re protective order for Puentes Depo, section relating to Defendants' violation of the Local Rules | 0.77 | 0.77 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 7/1/16 | Phone call to Daniel Webster from Berkeley CCWlP, re: CWS/CMS Database attd Public data. | 0.55 | 0.55 | Excessive | Renewed fee motion fails to articulate why data from Berkeley was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 7/5/16 | Continue Plaintiffs portion of joint stipulation re Defendants; Motion for Protective Order | 0.83 | 0.83 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/5/16 | Drafting template for Declarations of former Plaintiffs identified in Plaintiff's Requests for Admission | 0.15 | 0.15 | Vague | Vague as to what filing the Declaration relates. Vague as to what set of discovery the task refers. |
| AMP | 7/5/16 | Cbntinue Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order, section re allowing deposition to occur and specific objections to questions to be lodged | 0.33 | 0.33 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/5/16 | Continue Plaintiffs portion of joint stipulation re Defendants' Motion fur Protective Order, section distinguishing Townsend | 0.47 | 0.47 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/5/16 | Continue Plaintifl's portion of joint stipulation re Defendants' Motion for Protective Order, continue section re attorncy client privilege, burden and standards | 0.53 | 0.53 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/5/16 | Continue Plaintitf's portion of joint stipulation re Defendants' Motion for Protective Order, continue section re attorney-client privilege | 0.27 | 0.27 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/5/16 | Research for Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order, meetings re training not protected by attorney-client privilege | 0.60 | 0.60 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/5/16 | Continue Plaintiffs portion of joint stipulation re Defendants' Motion for Protective Order, conclusion | 0.13 | 0.13 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 7/5/16 | Research issue for attorney client privilege for training by corporate counsel | 0.73 | 0.73 | Vague | Vague as to what research was performed and for what purpose. |
| AMP | 7/5/16 | Continue Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order, start introduction | 0.17 | 0.17 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/5/16 | Continue Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order. start section re attorney-client privilege | 0.18 | 0.18 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/5/16 | Continue Plaintiffs portion of joint stipulation re Defendants' Motion for Protective Order, section re class certification relevance | 0.62 | 0.62 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/5/16 | Continued drafting of Plaintiffs portion of Joint Stip, MTC responses to RPD, Set l to County of Riverside | 0.88 | 0.88 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 7/5/16 | Continue Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order, section distinguishing and analyzing Light Salt | 0.27 | 0.27 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/5/16 | Continue Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order, section re attorneys not automatically exempt from deposition, factors to consider | 0.63 | 0.63 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/5/16 | E-mail re phone conference with opposing counsel for Meet and Conrer re Defendant Butler's responses to RF As Set One ans Defendant's proposed motion for protective order, missed call | 0.08 | 0.08 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 7/5/16 | Continue to draft the global 827 petition; re: attachment 5. | 1.05 | 1.05 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/6/16 | Research for Plaintiffs portion of joint stipulation re Defendants' Motion for Protective Order, continue research on attorney work-product doctrine | 0.37 | 0.37 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/6/16 | Continue draft of RF A Set 16 to County re child welfare allegations: substantiated and unfounded | 0.43 | 0.43 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |

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| SDD | 7/6/16 | Dr:aft, review, revise, .and edit PLAINTIFF'S OPPOSJTION TO DEFENDANTS' MOtJON FOR PROTECTIVE OROER RE DEPOSlTJON OF MICHAEL PUENTES, ESQ. | 0.42 | 0.42 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 7/6/16 | Draft, review, revise, and edit PLAJNTJFF'S OPPOSITION TO DEFENDANTS' MOTION FOR .PROTECTIVE ORDER RE DEPOSITION OF MiCHAEL PUENTES, ESQ, | 0.07 | 0.07 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/6/16 | Start draft of RFA Set 16 to County re child welfare allegations: substantiated and unfounded | 0.07 | 0.07 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 7/6/16 | Review, revise; and edit County RFA Set 15 based on Steve's comments from review | 0.27 | 0.27 | Vague; Excessive | Vague as to which set of RFAs this entry relates. Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA's of this nature (Set 15) which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| SDD | 7/6/16 | Draft RFAs to the County, re: no exigency when child is in the hospital | 0.25 | 0.25 | Vague | Vague as to what set of discovery the task relates. |
| AMP | 7/6/16 | Research for Plaintiffs portion of joint stipulation re Defendants' Motion for Protective Order, attorney work-product doctrine | 0.35 | 0.35 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/6/16 | Final edits and revisions to Meet and Confer letter re County's responses to Rogs Numbers 9 - 12 per Steve's comments from review | 0.15 | 0.15 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 7/6/16 | Draft, review, revise, and edit PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES, ESQ. | 0.98 | 0.98 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/6/16 | Drafting exemplar declaration for former Plaintiffs who sued County of Riverside for warrantless non/exigent seizure of their children. | 0.88 | 0.88 | Vague | Vague as to what filing the declaration relates. |
| AMP | 7/6/16 | E-mail re summary of phone conference with opposing counsel for Meet and Confer re Defendant Butler's responses to RFAs Set One and Defendant's proposed motion for protective order | 0.48 | 0.48 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 7/6/16 | Review, revise, and edit PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MlCHAEL PUENTES, ESQ. | 0.72 | 0.72 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| SDD | 7/6/16 | Review Defendants' Motion for Protective Order, re; Puentes | 0.23 | 0.23 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/6/16 | Phone conference with opposing counsel for Meet and Confer re Defendant Butler's responses to RFAs Set One and Defendant's proposed motion for protective order | 0.90 | 0.90 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 7/6/16 | Review, revise, and edit Meet and Confer, re; Defendant Torres' Compelled Supplemental Responses to Requests for Production (Set One). | 0.15 | 0.15 | Excessive | No such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. Additionally, at the 3/14/2016 MTC the court found 10 of the 15 disputed requests related primarily to the merits. Defendant required to respond to only those five requests that were related to class certification. Renewed fee motion fails to articulate how the obtained class discovery was a necessary step to Plaintiff's victory on the underlying claims. Discovery also contained duplicative of RPDs served on Torres in the related Rogers case. |

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| SDD | 7/6/16 | Review, rvise, and edit JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE) | 0.70 | 0.70 | Duplicative; Excessive | RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 7/6/16 | Drafting Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order, adding fact analysis sections | 1.43 | 1.43 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/6/16 | Completing drafting of decl. DBA in suppport of Joint Stip - MTC responses to RPD, Set ONe. | 0.13 | 0.13 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 7/7/16 | Continue draft of RF A Set 16 to County re child maltreatment allegations | 0.27 | 0.27 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| SDD | 7/7/16 | Continue to draft the PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES, ESQ. | 1.02 | 1.02 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/7/16 | Drafting portion of joint stipulation re Defendants' Motion for Protective Order, finish section re waiver of work product | 0.48 | 0.48 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/7/16 | Drafting portion of joint stipulation re Defendants' Motion for Protective Order, continue section re waiver of work product | 0.25 | 0.25 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| SDD | 7/7/16 | Continue to draft, review, revise, and edit PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES, ESQ. | 0.52 | 0.52 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/7/16 | Drafting portion of joint stipulation re Defendants' Motion fur Protective Order, section re waiver of work product | 0.12 | 0.12 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 7/7/16 | Continue to draft, review, revise, and edit PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES, ESQ. | 0.47 | 0.47 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/7/16 | Drafting portion of joint stipulation re Defendants' Motion for Protective Order, section re Defendants' failure to prove applicability of work product | 0.60 | 0.60 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/7/16 | Drafting Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order, continue section re work product doctrine | 0.52 | 0.52 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/7/16 | Drafting Plaintiff's portion of joint stipulation re Defendants' Motion .for Protective Order start section re work ptoduct doctrine | 0.87 | 0.87 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/7/16 | Drafting subpoena for deposition of Alvina Holland on 9/23/16 in Bensenville, lllinois. | 0.73 | 0.73 | Excessive | Deposition of Alvina Holland never took place. Renewed fee motion fails to articulate why seeking depositions of multiple individuals that never took place was a necessary step to victory on individual claims. |
| AMP | 7/7/16 | Research for Plaintiff's portion of joint stipulation re Defendants' Motion for Protective Order, research on when material is prepared in anticipation oflitigatfon | 0.78 | 0.78 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 7/7/16 | Draft, review, revise, and edit PLAINTIFF'S OPPOSITION TO DEFENDATS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES,:ESQ. | 0.83 | 0.83 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| SDD | 7/8/16 | Continue to draft the PLAINTIFF'S OPPOSITION tO DEFENDANTS' MOTJON FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES, ESQ. | 0.82 | 0.82 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/8/16 | Continue draft of RF A Set 16 to County re child maltreatment allegations | 0.30 | 0.30 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 7/8/16 | Continue review of June 17, 2016 deposition transcript of Karin Atkins, specifically- as to warrant training | 0.60 | 0.60 | Excessive; Vague | Vague as to purpose of review and what work the review relates to.<br>Renewed fee motion fails to articulate why seeking and taking the deposition of several county employees and PMKs was a necessary step to Plaintiff's victory on the individual claims, especially in light of extensive written discovery received and multiple other depositions taken. |
| AMP | 7/8/16 | Drafting portion ofjoint stipulation re Defendants' Motion for Protective Order, adding to section re Defendants' burden of proof | 0.52 | 0.52 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/8/16 | Review June 17, 2016 deposition transcript of Karin Atkins for information for portion .of joint stipulation re Defendants' Motion for Protective Order | 0.73 | 0.73 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of several county employees and PMKs was a necessary step to Plaintiff's victory on the individual claims, especially in light of extensive written discovery received and multiple other depositions taken. |
| SDD | 7/8/16 | Continue to review, revise,, edit, and draft the PLAlNTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES, ESQ. | 0.60 | 0.60 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/8/16 | Drafting email responseto County's defective supplemental respanses to RPP 1. | 0.33 | 0.33 | Duplicative; Excessive | RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 7/8/16 | Sent confirming email re M&C phone call this day to attorney Burkhart re County's supplerneotal responses to RPDl. | 0.17 | 0.17 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 7/11/16 | Continue drafting joint stipulation re Butler's responses to RFAs Set One. start points and authorities | 0.48 | 0.48 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 7/11/16 | Drafting Revisions to decl. DBA re Joint Stip. MTC County's response to RPD 1, Request No. 6 | 0.57 | 0.57 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 7/11/16 | Continue to review, revise, edit, and draft the PLAINTLFF'S JOINT STIPULATION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES, ESQ. | 1.07 | 1.07 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/11/16 | Continue drafting joint stipulation re Butler's responses to RFAs Set One, start declaration | 0.38 | 0.38 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 7/11/16 | Drafting Joint Stip as to RPD 1, Response No. 6 | 0.75 | 0.75 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 7/11/16 | Continue to review, revise, edit, and draft the PLAINTIFF'S JOlNT STlPULA TlON TO DEFENDANTS' MOTION FOR PROTECTlVE ORDER RE DEPOSJTION OF MICHAEL PUENTES, ESQ. | 0.87 | 0.87 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/11/16 | Start drafting joint stipulation re Butler's responses to RFAs Set One | 0.65 | 0.65 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 7/11/16 | Drafting portion of joint stipulation re Defendants' Motion for Protective Order, adding to section re burden of proof on attorney work product | 0.20 | 0.20 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/11/16 | Drafting portion of joint stipulation re Defendants' Motion for Protective Order, adding to section re burden of proof on attorney-client privilege | 0.80 | 0.80 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/11/16 | Drafting revisions to Joint Stip re MTC further answers to RPD 1 from County of Riverside | 1.83 | 1.83 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 7/11/16 | Review Defendants' portion of Joint Stipulation re Protective Order to determine if any new arguments or statements have been added since withdrawn motion | 0.37 | 0.37 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/11/16 | Continue drafting joint stipulation re Butler's responses to RF As Set One, introductory statement | 0.38 | 0.38 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 7/11/16 | Continue drafting joint stipulation re Butler's responses to RFAs Set One, start argument section | 0.55 | 0.55 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 7/11/16 | Drafting declaration of Patricia Boyd re wrongful removal of her child. | 1.00 | 1.00 | Vague; Excessive | Vague as to what filing the declaration relates. Renewed fee motion fails to articulate why information obtained from Patricia Boyd was a necessary step to Plaintiff's victory on the underlying claims, given the extensive discovery already produced in this case and the related Rogers case. |

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| AMP | 7/11/16 | Continue drafting joint stipulation re Butler's responses to RF As Set One, proposed order | 0.28 | 0.28 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 7/11/16 | Continue drafting joint stipulation re Butler's responses to RFAs Set One | 0.72 | 0.72 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 7/11/16 | Drafting model declaration of former Plaintiffs re removal, suit, settlement | 1.15 | 1.15 | Vague | Vague as to what filing the Declaration relates. Vague as to what set of discovery the task refers. |
| DBA | 7/12/16 | Drafting M&C response to County'.s M&C letter dated 7/ 11/16 | 1.77 | 1.77 | Duplicative; Excessive | Letter relates to RFP (Set Two). RPDs Set Two |
| AMP | 7/12/16 | Start .drafting notice of rescheduling deposition of Angelita Saldana, | 0.17 | 0.17 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of several county employees and PMKs was a necessary step to Plaintiff's victory on the individual claims, especially in light of extensive written discovery received and multiple other depositions taken. |

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| AMP | 7/12/16 | Continue drafting joint stipulation re Butler's responses to RFAs Set One, expert medical opinion section | 0.40 | 0.40 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 7/12/16 | Continue drafting joint stipulation re Butler's. responses to RF As Set One. reasonable inquiry section | 0.55 | 0.55 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 7/12/16 | Drafting final revisions to Joint Stip re MTC County of Riverside to provide responses to RFP, (Set One) request no. 6 | 0.40 | 0.40 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 7/12/16 | Research re attorney-client privilege and possible lack of protection for information related to official policy positions | 0.87 | 0.87 | Vague | Vague as to purpose of research and what it was used for/relates to. |
| SDD | 7/12/16 | Research issue of attorney-client privilege for policies. | 0.28 | 0.28 | Vague | Vague as to purpose of research and what it was used for/relates to. |

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| DBA | 7/12/16 | Drafted Revisions fo M&C letter re MTC County Supplemental Responses to RPD l, No. 7 (Timer wouldn't allow entry of 59:57) | 0.98 | 0.98 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 7/12/16 | Contine to draft the Joint Sipulation, re: protective order. | 0.82 | 0.82 | Vague | Vague as to what protective order the task relates. |
| AMP | 7/12/16 | Continue draft of declaration of Adrian M. Paris for Joint Stipulation, re: protective order | 0.30 | 0.30 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/12/16 | Start,draft of declaration of Adrian M. Paris for Joint Stipulation, re: protective order. | 0.18 | 0.18 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/12/16 | Research re whether discovery request calls for medical opinion or common knowledge | 0.32 | 0.32 | Vague | Vague as to purpose of research and what it was used for/relates to. |
| SDD | 7/12/16 | Continue to draft the Joint Stipulation, re: protective order. | 1.93 | 1.93 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| SDD | 7/12/16 | Cantine to draft the Joint Stipulation, re: protective order | 0.85 | 0.85 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 7/12/16 | Contine to draft the Joint Stipulation, re: protective order; re; policy and dealings with the public not privileged. | 0.40 | 0.40 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/13/16 | Draft of section of declaration relating to lack of Mr. Puentes' involvement with underlying dependcncy case. | 0.13 | 0.13 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/13/16 | Drafting declaration of Meagan Walker, former Plaintiff against County of Riverside. | 0.20 | 0.20 | Vague; Excessive | Vague as to what filing the declaration was for. Renewed fee motion fails to articulate why obtaining a declaration from a former plaintiff was a necessary step to Plaintiff's victory on the individual claims. |
| AMP | 7/13/16 | Draft section of Joint Stipulation, re: protective order highlighting failure to provide privilege log to properly noticed RPDs for deposition | 0.20 | 0.20 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/13/16 | Continue draft of section of declaration relating to lack of Mr. Puentes' involvement with present case | 0.25 | 0.25 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/13/16 | Drafting revisions to declaration of former Plaintiff Patricia Oshita, Esq. | 0.15 | 0.15 | Vague; Excessive | Vague as to what filing the declaration was for. Renewed fee motion fails to articulate why obtaining a declaration from a former plaintiff was a necessary step to Plaintiff's victory on the individual claims. |
| SDD | 7/13/16 | Continue to draft the Joint Stipulation, re: protective order; re; distinguishing Shelton and Townsend. | 1.02 | 1.02 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/13/16 | Phone call to witness and former Plaintiff Patricia Oshita re her declaration | 0.08 | 0.08 | Vague; Excessive | Vague as to what filing the declaration was for. Renewed fee motion fails to articulate why obtaining a declaration from a former plaintiff was a necessary step to Plaintiff's victory on the individual claims. |
| AMP | 7/13/16 | Start draft of section of declaration relating to lack of Mr. Puentes' involvement with present case | 0.20 | 0.20 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| DBA | 7/13/16 | Drafting final revisions to Joint Stip - RPD l, Request No. 6 | 0.48 | 0.48 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 7/13/16 | Research re attorney-client privilege and lack of privilege log for notice of deposition and attached RPDs | 0.68 | 0.68 | Vague | Vague as to failing to articulate to which motion the Joint Stipulation relates and which deposition notice the task refers. |
| SDD | 7/13/16 | Contine to draft the Joint Stipulation, re; protective order; re; policy and dealings with the public not privileged. | 1.68 | 1.68 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/13/16 | Draft of section of declaration relating to lack of Mr. Puentes' involvement in any case involving Tonita Rogers | 0.10 | 0.10 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/13/16 | Continue draft of section of Joint Stipulation, re: protective order highlighting previous disclosure of all training documents and lack of privilege or work-product objections | 0.20 | 0.20 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/13/16 | Research re waiver of work product by previous production of related documents | 0.60 | 0.60 | Vague | Vague as to purpose of research and what work the research relates. |
| DBA | 7/13/16 | Drafting Declaration for Mr. and Mrs. Semrow re suit against County of Riverside for wrongful removal | 1.48 | 1.48 | Vague; Excessive | Vague as to what filing the declaration was for. Renewed fee motion fails to articulate why obtaining a declaration from a former plaintiff was a necessary step to Plaintiff's victory on the individual claims. |
| AMP | 7/13/16 | Start draft of section of Joint Stipulation, re: protective order highlighting previous disclosure of all training documents and lack of privilege or work-product objections | 0.77 | 0.77 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/13/16 | Draft section of Joint Stipulation, re: protective order highlighting failure to provide written objections to properly noticed RPDs for deposition | 0.23 | 0.23 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 7/13/16 | Drafting declaration of former plaintiff Syjvia Cole re wrongful removal by County of Riverside DPSS | 1.05 | 1.05 | Vague; Excessive | Vague as to what filing the declaration was for. Renewed fee motion fails to articulate why obtaining a declaration from a former plaintiff was a necessary step to Plaintiff's victory on the individual claims. |
| AMP | 7/13/16 | Continue to draft section of Joint Stipulation, re: protective order highlighting failure to provide privilege log to properly noticed RPDs for deposition | 0.52 | 0.52 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 7/14/16 | Start draft of Meet and Confer letter re County's 2nd supplemental responses to Interrogatories Set Two | 0.42 | 0.42 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/14/16 | Review County's supplemental responses to Interrogatories 5 - 8 and I 3 - 14 and court order at Docket 74 for Meet and Confer letter | 0.42 | 0.42 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/14/16 | Continue to draft the Plaintiffs portion of the joint stipulation. | 1.10 | 1.10 | Vague | Vague as to which set of discovery and which Motion to Compel the task relates |
| AMP | 7/14/16 | Draft section of declaration relating to lack of Mr. Puentes' involvement in related case Rogers v. County of Riverside | 0.20 | 0.20 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 7/14/16 | Assemble the evidence in support of the Joint Stipulation; cull out relevant transcript evidence. | 1.18 | 1.18 | Vague | Vague as to which set of discovery and which Motion to Compel the task relates |

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| AMP | 7/14/16 | Continue to review, proofread, and edit Plaintiff's portion of the joint stipulation | 0.70 | 0.70 | Vague | Vague as to which set of discovery and which Motion to Compel the task relates |
| SDD | 7/14/16 | review, revise, and edit DECLARATION OF ADRIAN M. PARIS IN OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER RE DEPOSITION OF MICHAEL PUENTES, ESQ, | 0.40 | 0.40 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 7/14/16 | Review, proofread, and edit Plaintiffs portion of the joint stipulation | 0.42 | 0.42 | Vague | Vague as to which set of discovery and which Motion to Compel the task relates |
| AMP | 7/14/16 | Continue draft of Meet and Confer letter re County's 2nd supplemental responses to Interrogatories Set Two, section re inadequate responses to 13 | 0.10 | 0.10 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/14/16 | Continue draft of Meet and Confer letter re County's 2nd supplemental responses to Interrogatories Set Two, section re inadequate responses to 7 and 8 | 0.27 | 0.27 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 7/14/16 | Continue to draft the Plaintifl's portion of the joint stipulation | 0.80 | 0.80 | Vague | Vague as to which set of discovery and which Motion to Compel the task relates |
| AMP | 7/14/16 | Continue draft of Meet and Confer letter re County's 2nd supplemental responses to lntertogatoties Set Two, section re reasonabie ·inquiry | 0.43 | 0.43 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/14/16 | Continue draft ofMeet and Confer letter 're County's 2nd supplemental responses to Interrogalorics Set Two, section re potential class members | 0.20 | 0.20 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/14/16 | Cootinue to draft the Plaintiff's portion of the joint stipulation. | 0.47 | 0.47 | Vague | Vague as to which set of discovery and which Motion to Compel the task relates |

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| AMP | 7/14/16 | Continue draft ofMeet and Confer letterre County's 2nd supplemental responses to Interrogatories Set Two, class certification objection section | 0.80 | 0.80 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/14/16 | Continue to draft the Plairttift's portion, of the joint stipulation. | 0.72 | 0.72 | Vague | Vague as to which set of discovery and which Motion to Compel the task relates |
| AMP | 7/14/16 | Draft small section relating to social worker Shannan Miller confirmining County Counsel performs warrant training | 0.18 | 0.18 | Vague | Vague as to what document is being drafted. |
| AMP | 7/15/16 | Continue draft of Meet and Confer letter re County's 2nd .supplemental responses to .Interrogatories Set Two, section re inadequate responses to 13 and 14 | 0.58 | 0.58 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/18/16 | Continue draft of joint stipulation to extend deadlines 180 days, continue sections relating to events occurring afler previous order | 0.63 | 0.63 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |

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| AMP | 7/18/16 | Continue draft of joint stipulation to extend deadlines 180 days, sections relating to events· occuning after previous order | 0.38 | 0.38 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 7/18/16 | Start draft ofjoint stlpulatien to extend deadlines l 80 days. | 0.57 | 0.57 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 7/18/16 | Compile list of discovery delays that' occurred after previous extension for stipulation to extend deadlines 180 days. | 0.47 | 0.47 | Excessive | Task related to seeking class discovery extensions, clearly related to class certification issues, not necessary to the individual claims. |
| AMP | 7/18/16 | Continue draft of joint stipulation to extend deadlines 180 days, discussion re County RPD Set 3 | 0.53 | 0.53 | Duplicative ; Excessive | Requests duplicative and overlapping of RPD's sought in related *Rogers* case. Over 20000 records produced in *Rogers* case. Renewed fee motion fails to articulate why seeking duplicative discovery was a necessary step to Plaintiff's victory on the individual claims. |
| AMP | 7/18/16 | Review Meet and Confer activities and disputes post-Docket 65 for joint stipulation to extend deadlines 180 da:ys | 0.35 | 0.35 | Excessive | Task related to seeking class discovery extensions, clearly related to class certification issues, not necessary to the individual claims. |
| AMP | 7/18/16 | Continue draft of joint stipulation to extend deadlines 180 days | 0.87 | 0.87 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| SDD | 7/18/16 | Continue to draft the Global 827 petition: re: Attachment 5. | 1.28 | 1.28 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |

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| AMP | 7/18/16 | Continue draft of joint stipulation to extend deadlines 180 days based on Steve's comments from review | 0.10 | 0.10 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 7/18/16 | Draft proposed order for joint stipulation to extend deadlines 180 days | 0.05 | 0.05 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 7/18/16 | ReView, revise, and determine if other issues need addressing for draft of joint stipulation to extend deadlines 180 days | 0.18 | 0.18 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| SDD | 7/18/16 | Review. revise; and edit Meet and Confer, re: Defendant County of Riverside's Second Supplemental Respon11e to Plaintiff's Req.uest for Production of'Documents (Set Two). | 0.42 | 0.42 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| AMP | 7/19/16 | Draft RFAs to County re training handouts and exigency | 0.28 | 0.28 | Vague | Vague as to which set of RFAs were drafted. Multiple sets propounded. |
| SDD | 7/19/16 | Continue to review, revise, and edit JOlNT STIPULATI0N AND MOTION TO EXTEND DEADLINES | 0.33 | 0.33 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 7/19/16 | Continue drafting lnterrogatories to County re Atkins deposition and identifying social workers in similar positions who received complaints | 0.32 | 0.32 | Vague | Vague as to which set of Interrogatories to the County the task relates. |

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| SDD | 7/19/16 | Continue to draft the Global 827 petition; re: Attachment 7. | 0.63 | 0.63 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/19/16 | Start drafting interrogatories to County re Atkins deposion and identifying social workers in similar positions | 0.68 | 0.68 | Vague | Vague as to which set of ROGs were being drafted |
| SDD | 7/19/16 | Continue to draft the Global 827 petition; re: Attachment 5. | 1.10 | 1.10 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/19/16 | Continue drafiing County RPD Set 4 re grand jury findings and DPSS responses, relating to documents referenced in findings and responses | 0.32 | 0.32 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 7/19/16 | Review proofread, and edit Joint Stipulation to Extend Deadlines before prcwiding to opposing counsel | 0.30 | 0.30 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |

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| AMP | 7/19/16 | Start drafting County RPD Set 4 re grand jury findings and DPSS responses | 0.48 | 0.48 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 7/19/16 | Review and analyze grand jury reports re Riverside County social workers for written discovery | 0.42 | 0.42 | Vague; Excessive | Vague as to what discovery was being drafted. Vague as to "re Riverside County social workers" and to what aspect of the case the task relates. Renewed fee motion fails to articulate why obtaining grand jury reports were a necessary step to Plaintiff's victory on the individual claims. |
| SDD | 7/19/16 | Continue to review, revise, and edit JOINT STIPULATION AND MOTION TO EXTEND DEADLlNES | 1.03 | 1.03 | Excessive | Task related to seeking class discovery extensions, clearly related to class certification issues, not necessary to the individual claims. |
| AMP | 7/20/16 | Start drafting RFAs to County re Atkins deposition | 0.70 | 0.70 | Vague | Vague as to which set of RFAs to the County the task relates |
| AMP | 7/20/16 | Draft Notice of Motion to Compel Further Responses to Interrogatories to County 9 - 12. based on L.R.37-2.4(a) | 0.12 | 0.12 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 7/20/16 | Continue drafting Motion to Compel Further Responses to Interrogatories to County 9-12 based on L.R.37-2,4(a); section re relevance to class certification | 0.38 | 0.38 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/20/16 | Research re incomplete answers to interrogatories for Motion to Compel Further Responses to Interrogatories to County 9 - 12, based on L.R.37-2.4(a) | 0.52 | 0.52 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery spanning two decades was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/20/16 | Continue to review Atkins depositions for use in the Global 827; cull out relevant deposition excerpts. | 0.28 | 0.28 | Excessive | Time spent seeking global 827 records. Renewed fee motion fails to articulate why seeking global 827 records was a necessary step to Plaintiff's victory of the individual claims. Further 827 petition was denied. |

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| AMP | 7/20/16 | Continue drafting Motion to Compel Further Responses to Interrogatories to Coupty 9 - 12, based on L.R.37-2.4(a) | 0.97 | 0.97 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery spanning two decades was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/20/16 | Start drafting Motion fo Compel Further Responses to Interrogatories to County 9-12, based on L.R.37-2.4(a) | 0.15 | 0.15 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/20/16 | Continue drafting RF As to County re Atkins deposition, warrant policies, practices, and training | 0.47 | 0.47 | Vague | Vague as to which set of RFAs to the County the task relates |
| SDD | 7/20/16 | Review Atkins depositions for use in the Global 827. | 0.80 | 0.80 | Excessive | Time spent seeking global 827 records. Renewed fee motion fails to articulate why seeking global 827 records was a necessary step to Plaintiff's victory of the individual claims. Further 827 petition was denied. |
| AMP | 7/20/16 | Review intragency data sharing agreement for written discovery requests to County | 0.32 | 0.32 | Vague | Vague as to what written discovery was being worked on. |

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| AMP | 7/20/16 | Start drafting RF As to County regarding Grand Jury Findings and DPSS' responses | 0.38 | 0.38 | Vague | Vague as to which set of RFA's the task relates. Renewed fee motion fails to articulate why seeking admissions on grand jury findings was a necessary step to Plaintiff's victory. |
| AMP | 7/20/16 | Continue drafting RFAs to County re Atkins deposition, warrant policies, practices, and training | 0.23 | 0.23 | Vague | Vague as to which set of RFAs to the County the task relates |
| AMP | 7/20/16 | Review depo transcripts of Karin Atkins for information for discovery requests relating to warrant procedures, practices, and training | 0.47 | 0.47 | Vague | Vague as to what discovery requests were being worked on. |
| SDD | 7/20/16 | Continue to draft the global 827, re: Attachment 7. | 0.52 | 0.52 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/20/16 | Continue drafting Motion to Compel Further Responses to Interrogatories to County 9 • 12, based on L.R.37-2.4(a); continue section re evasive responses | 0.40 | 0.40 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 7/21/16 | Continue drafting Motion to Compel Further Responses to Interrogatories to County 9 - 12, governing law section | 0.35 | 0.35 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/21/16 | Continue drafting Motion to Compel Further Responses to Interrogatories to County 9 - 12 | 0.23 | 0.23 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/21/16 | Research re reasonable inquiry and complete responses for Motion to Compel Further Responses to Interrogatories to County 9 • 12, based on L.R.37-2.4(a) | 0.43 | 0.43 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 7/21/16 | Continue to draft the global 827, re: Attachment 7 • Evidence showing no warrants as a matter of practice. | 0.35 | 0.35 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/21/16 | Continue drafting Motion to Compel Further Responses to Interrogatories to County 9 - 12, based on L,.8.37-2.4(a);:section re Inadequacy of current responses, citing to :excerpts | 0.55 | 0.55 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/21/16 | Continue to draft the global 827, re: Attachment 7 - seizure law | 1.22 | 1.22 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/21/16 | Continue drafting Motion to Compel Further Responses to lntertogatories to County 9 - 12, based on L.R,37-2.4(a); section re lack of Meet and Confer | 0.48 | 0.48 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 7/21/16 | Draft proposed order for Motion to Compel Further Responses to Interrogatoties to County 9 • 12 | 0.22 | 0.22 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/21/16 | Start drafting declaration in support of Motion to Compel Further Responses to lnterrogatories to 'County 9 - 12 | 0.92 | 0.92 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/21/16 | Continue to draft the global 827, re: Attachment 7 - reasons for the request. | 1.37 | 1.37 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |

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| AMP | 7/21/16 | Cootlnue drafting Motion to Compel Further Responses to Interrogatories to County 9 - 12, section re missing responses to specific years | 0.32 | 0.32 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/21/16 | Continue drafting Motion to Compel Further Responses to interrogatories to County 9 - 12., continue section re meet and confer efforts | 0.33 | 0.33 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/21/16 | Review, revise, and edit PLAJNTJFF A.A. 'S REQUEST FOR ADMISS'JONS TO DEFENDANT COUNTY OF RIVERSIDE (SET SIXTEEN). Fold in the Request for Admission Set Two that wa.s skipped over. | 0.78 | 0.78 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |

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| SDD | 7/21/16 | Review, revise, and edit Plaintiff A.A.'S REQUEST FOR ADMISSIONS TO DEFENDANT COUNTY OF RIVERSIDE (SET FlFTEEN), | 0.22 | 0.22 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 7/21/16 | Continue drafting declaration io support of Motion to ·Compel Further Responses to Interrogatories to County .9 -12 | 0.18 | 0.18 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/21/16 | Continue drafting Motion to Compel Further Responses to interrogatories to County 9 - l2 | 0.28 | 0.28 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 7/21/16 | Continue to draft the global 827, re: Attachment 7 - Evidence showing no warrants as a matter of practice. | 0.72 | 0.72 | Excessive | Renewed fee motion fails to articulate why obtaining global 827 records was a necessary step to Plaintiff's victory on the individual claims. |
| SDD | 7/22/16 | Continue to riew, revise; and edit: Meet and Confer, re: Defendant County of Riversides Second Supplemental Response to Plaintiff's Request fot Production. of .Documents (Set Two). | 1.02 | 1.02 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| AMP | 7/22/16 | Continue drafting declaration in support .of Motion to Compel Further Responses to Interrogatories to County 9 - 12, sections relating to prior declarations on similar topics | 0.67 | 0.67 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/22/16 | Continue drafting Motion to Compel Further Responses to Interrogatories to County .9 - 12 | 0.28 | 0.28 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 7/22/16 | Continue edit and draft seclfons fut Mee.t and Confer, re: Defendant Butler's Responses to Plaintiff's Request for Admissions (Set Two) based on Steve's comments ftom review | 0.30 | 0.30 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| SDD | 7/22/16 | Continue to draft the global 827, re:. Attachment 7 - prior lawsuit section. | 0.17 | 0.17 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/22/16 | Research for Meet and Confer, re: Defundant Butler's Responses to Plaintiff's Request .for Admissions (Set Two) re RF As relating to statements in d~uments | 0.52 | 0.52 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |

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| AMP | 7/22/16 | Edit and draft sections for Meet and Confer, re: Defendant Butler's Responses to Plaiotiff'as Request for Admissions (SetTwo) based on Steve;s comments from review | 0.50 | 0.50 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| SDD | 7/22/16 | Continue to draft the global 827, re: Attachment 7 • prior lawsuit section. | 0.25 | 0.25 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 7/22/16 | Continue to draft RFAs (Set Four) to Karla Torres | 0.18 | 0.18 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such letter was located as having been received. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |
| AMP | 7/22/16 | Continue edit and draft sections for Meet artd Confer, re; Defendant County of Riverside's Supplemental Responses to Plaintiffs Request for Admissions (Set One) based on Steve's comments from review | 0.63 | 0.63 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 7/22/16 | Draft RFA (Set 4) to propound upon Karla Torres. | 0.05 | 0.05 | Duplicative; Excessive | Duplicative and overlapping of RFAs served to Torres in related *Rogers* case. No such letter was located as having been received. Renewed fee motion fails to articulate why seeking and obtaining duplicative discovery was a necessary step to Plaintiff's limited success on the underlying claims. |

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| SDD | 7/22/16 | Review, revise, and edit Meet and Confer; re: Defendant .Felecia Butler's Responses to Plaintiff's Request for Admissions (Set Two). | 0.28 | 0.28 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 7/22/16 | Edit and draft sections for Meet and Confer, re: Defendant County of Riverside's Supplemental Responses to "Plaintiff's Request for Admissions (Set One) based on Steve's comments from review | 0.40 | 0.40 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 7/22/16 | Review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Supplemental Responses -to Plaintiff's Request fer Admissions (Set One), | 0.35 | 0.35 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 7/22/16 | Review, revise, and edit MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES 9-12 (SET TWO). | 0.32 | 0.32 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/22/16 | Continue edit and draft sections for Meet and Confer, re: Defendant Butler's Responses to Plaintiff's Request for Admissions (Set Two) based on Steve's comments from review | 0.43 | 0.43 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |

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| AMP | 7/22/16 | Proofread and edit First Draft of Motion to Compel Further Responses to Interrogatories to County 9- 12 | 0.35 | 0.35 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/25/16 | Continue to draft the global 827, re: Attachment 7 - necessary to support class action section | 0.27 | 0.27 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 7/25/16 | Discuss revisions and issues with MTC County, re: Rog 2, with Adrian. | 0.22 | 0.22 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 7/25/16 | Continue reviewing, editing, and drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 • 12 based on Steve's comments from review | 0.68 | 0.68 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/25/16 | Discuss revisions and issues with M&C letter to County, re: RPD 2, with Dennis. | 0.35 | 0.35 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 7/25/16 | Review, edit, and draft new sections of Motion to Compel Further Responses to Interrogatories to County 9 • 12 based on Steve's comments from review | 0.52 | 0.52 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 7/25/16 | Continue edit and draft sections for Meet and Confer, re: Defendant Butler's Responses to Plaintifrs Request for Admissions (Set Two) based on Steve's comments from review | 0.35 | 0.35 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| SDD | 7/25/16 | Continue to review, revise, and edit MEMORANDUM OF POINTS AND AUTHORJTJES IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORJES 9--12 (SET TWO). | 0.88 | 0.88 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/25/16 | Finish edit and draft sections for Meet and Confer, re: Defendfant County of Riversides Supplemental .Responses to Plaintiff's .Request for Admissions (,Set One) based on Steve's Comments from. review | 0.32 | 0.32 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 7/25/16 | Drafting further revisions to M&:C to County re its M&C letter dated 7/l l/16. | 1.13 | 1.13 | Duplicative; Excessive | Letter relates to RFP (Set Two). RPDs Set Two sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 7/25/16 | Research for Motion to Compel Further Responses to .Jnterrogatories to County. 9 • 12 for section telating to conclusory statement in responses | 0.38 | 0.38 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/25/16 | Discuss revisions and issues with M&C letter to County, re; RPD 2, with Dennis. | 0.62 | 0.62 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 7/25/16 | Drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 • 12 based on Steve's comments from review, section relating to conclusory statement in responses regarding policy | 0.72 | 0.72 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 7/25/16 | Review, revise, and edit Meet and Confer, re: Defendant County of ruverside's Second Supplemental Response to Plaintiff's Request for Production of Documents (Set Two). | 0.73 | 0.73 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| AMP | 7/25/16 | Drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 ~ 12 based on Steve's comments from review, section relating to irrelevant information provided in responses | 0.47 | 0.47 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/25/16 | Drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 - 12 based on Steve's comments from review, section relating to failure to access information | 0.57 | 0.57 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 7/25/16 | Drafting additional revisions to M&C response to County's M&C letter re its response to RPD, 2 | 0.72 | 0.72 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |

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| DBA | 7/25/16 | First entry re drafting revisions to M&C letter, County's response to M&C letter re RPD, Set two (Lost 'when server went out) | 1.10 | 1.10 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| SDD | 7/25/16 | Continue to draft the global 827, re: Attachment 7 necessary to support class action section. | 1.42 | 1.42 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/25/16 | Continue reviewing, editing, and drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 - 12 based on Steve's comments from review | 0.60 | 0.60 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 7/26/16 | Drafting revisions to Joint Stip re Defendant's Response to RPD (Set One) | 0.35 | 0.35 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP's relate. RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 7/26/16 | Drafting new sections of Declaration of Adrian M Paris in Support of Motion to Compel Further Responses to Interrogatories to County 9 • 12 based on Steve's comments from second reviev. | 0.38 | 0.38 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/26/16 | Continue drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 - 12 based on Steve's comments from second review, large expansion of prior meet and confer section | 0.13 | 0.13 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/26/16 | Continue drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 - 12 based on Steve's comments from second review | 0.53 | 0.53 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 7/26/16 | Drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 - 12 based on Steve's comments from second review | 0.57 | 0.57 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/26/16 | Continue to review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Second Supplemental Response to Plaintiffs Request fur Production of Documents (Set Two). | 0.27 | 0.27 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| DBA | 7/26/16 | Drafting template for declarations of former plaintiffs in support of Plaintiff's Class Certification Mtn. | 0.97 | 0.97 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| SDD | 7/26/16 | Continue to review, revise, and edit MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAJNTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURIBER RESPONSES TO INTERROGATORY NOS. 9-12 (SET TWO). | 0.73 | 0.73 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| DBA | 7/26/16 | Drafting revisions to M&C letter to County of Riverside re its second supplemental response to RPD 2 | 0.87 | 0.87 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| AMP | 7/26/16 | Drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 - 12 based on Steve's comments from review, continue section relating to conclusory statement in responses regarding policy | 0.62 | 0.62 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/26/16 | Continue to draft the global 827, re: Attachment 7, vindication of rights | 0.30 | 0.30 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 7/26/16 | Cootinue drafting new sections of Declaration of Adrian M. Paris in Support of Motion to Compel Further Responses to Interrogatories to.County 9 - 12 based on Steve's comments from second review | 0.27 | 0.27 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 7/27/16 | Review, revise, and edit LOCAL RULE: 37-2 JOINt STIPULATION REGARDING PLAlNTJFF'S MOTlON TO COMPEL FELECIA BUTLER TO PROVIDE FURTHER RESPONSES TO REQUEST FOR ADMISSIONS (SET ONE) . | 0.27 | 0.27 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 7/27/16 | Researching cal Public Records Act | 0.43 | 0.43 | Vague | Vague as to purpose of research and what the research was used for. |
| AMP | 7/27/16 | Continue drafting new sections of Motion to Compel Further Responses to Interrogatories to County 9 - 12 based on Steve's comments from second review, continue large expansion of prior meet and confer section | 0.33 | 0.33 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 7/27/16 | Review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Supplemental Responses to Plaintiffs Request for Admissions (Set One) | 0.40 | 0.40 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 7/27/16 | review, revise, and edit Meet and Confer, re: Defendant Felecia Butler's Response!. to Plaintiff's Request for Admissions (Set Two), | 0.15 | 0.15 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 7/27/16 | Continue drafting new sections of Declaration of Adrian M. Paris in Support of Motion .to Compel Further Responses to lnterrogatories to County 9 - 12 based on Steve's comments from second review | 0.75 | 0.75 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 7/28/16 | Revise and edit Meet and Confer re: Defendant County of Riverside's Supplemental Responses to Request for Admissions (Set One) based on Steve's review | 0.35 | 0.35 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 7/28/16 | Confiue to review, revise, and t:dit LOCAL RULE 37-2 JOINT STIPULATION REGARDlNCi PLAlNTlFF'S MOTION TO COMPEL FELECIA BUTLER TO PROVIDE FURTHER RESPONSES TO REQUEST FOR ADMISSIONS (SET ONE). | 1.03 | 1.03 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 7/28/16 | Continuing to draft :revisions to M&C ltr. to County of Riverside re its 2nd supplemental response to RPD 2 | 0.28 | 0.28 | Duplicative; Excessive | RPDs Set Two sought duplicative and overlapping records as sought in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 7/28/16 | Continue revise and edit Meet and Confer, re: Defendant County of.Ri:verside 's Supplemental '.Responses to Request for Admissions (Set One) based on Steve's review | 0.22 | 0.22 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 7/28/16 | Contiue to review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL FELECIA BUTLER TO PROVJDE FURTHER RESPONSES TO REQUEST FOR ADMISSIONS (SET ONE). | 0.43 | 0.43 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 7/29/16 | Continue revise and edit Joint Stipulation to Compel Responses from Felecia Butler to Request for Admissions (Set One) based on Steve's review | 0.42 | 0.42 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 7/29/16 | Continue revise and edit Joint Stipulation to Compel Responses from Felecia Butler to Request for Admissions (Set One) be.sed on Steve's review, medical opinion, section | 0.07 | 0.07 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| AMP | 7/29/16 | Revise and edit Joint Stipulationi to Compel Responses from Felecia Butler to Request for Admissions (Set One) based on Steve's review | 1.15 | 1.15 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 7/29/16 | Edit, prepare, and ·publish to .pdf joint stipulation to extend deadlines | 0.17 | 0.17 | Clerical; Vague; Unnecessary | Time spent on noncompensable clerical work; Fails to articulate what was edited; Extension of time necessary only to seeking class certification. |
| AMP | 7/29/16 | Edit and revise draft of joint stipulation to extend deadlines, change to 120 days, add new sections re Holland trial and unavailability | 0.30 | 0.30 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| DBA | 8/1/16 | Continuing to draft declarafaons for former Plaintiffs | 0.63 | 0.63 | Vague | Vague as to what filing the declarations are for. Renewed fee motion fails to articulate why obtaining multiple declarations from former plaintiffs was a necessary step to Plaintiff's victory on the individual claims. |
| DBA | 8/1/16 | Drafting sample Public Records Act letter - Danyelle Branning | 0.23 | 0.23 | Vague | Vague as to "sample" and what work was actually completed. Vague as to how Danyelle Branning relates to the task. Fee motion fails to articulate why any information related to Danyelle Branning was a necessary step to Plaintiff's victory. |

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| AMP | 8/1/16 | Continue revisions and editing to Meet and Confer Efforts Section of Motion to Compel Defendant County to Provide Further Responses to Interrogatory Nos. 9-12 (Set Two) based on Steve's comments from review | 0.20 | 0.20 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/1/16 | Review and look through previously filed motions to compel for information relating to practices and procedures for delivered service logs for Joint Stipulation to Compel Responses from Felecia Butler to RFAs (Set One) | 0.37 | 0.37 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 8/1/16 | Review and look through O'Boyle Declaration for information relating to practices and procedures for delivered service logs for Joint Stipulation to Compel Responses from Felecia Butler to RF As (Set One) | 0.12 | 0.12 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| AMP | 8/1/16 | Draft new section of declaration for Joint Stipulation to Compel Responses from Felecia Butler to Request for Admissions (Set One) based on Steve's review of the joint stipulation | 0.37 | 0.37 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 8/1/16 | Continue revise and edit Joint Stipulation to Compel Responses from Felecia Butler to Request for Admissions (Set One) based on Steve's review, draft new section re Request 20 and reasonable inquiry | 0.58 | 0.58 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 8/1/16 | Continue to create excerpts for Exhibits D and L to Declaration of Adrian M. Paris for Motion to Compel Further Responses from Defendant County to Interrogatories 9 • 12 | 0.35 | 0.35 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 8/1/16 | Compile and create excerpts for all exhibits to Declaration of Adrian M Paris for Motion to Compel Further Responses from Defendant County to Interrogatories 9 - 12 | 0.47 | 0.47 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/1/16 | Revisions and editing to Meet and Confer Efforts Section of Motion to Compel Defendant County to Provide Further Responses to Interrogatory Nos. 9-12 (Set Two) based on Steve's comments from review | 0.77 | 0.77 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/1/16 | Prepare and publish to .pdf some of the exhibits to Declaration of Adrian M. Paris for Motion to Compel Further Responses from Defendant County to Interrogatories 9 - 12 | 0.35 | 0.35 | Clerical; Vague | Time spent on noncompensable clerical work; Fails to articulate what constitutes preparing of the exhibits other than clerical work; Fails to articulate what exhibits were prepared. |

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| SDD | 8/1/16 | Continue to review, revise, and edit MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINUFF'S MOTlON TO COMPEL DEFENDANT COUTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORY NOS. 9-12 (SET TWO). | 0.52 | 0.52 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/1/16 | Continue revisions and editing to sections of Meet and Confer letter re County's Supplemental Responses to RFAs·.Set One, addressing the last of Steve's comments from review | 0.27 | 0.27 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/2/16 | Continue to review, revise, and edit Meet and Confer re: Defendant County ofRiverside's Supplemental Responses to Plaintiffs Request for Production of Documents (Set Two). | 0.70 | 0.70 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |

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| AMP | 8/3/16 | Review Joint Stipulation for further issues to be addressed in Plaintiff's Supplemental Briefing re Protective Order | 0.15 | 0.15 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 8/3/16 | review the County's supplemental briefing re: Protective Order for Puentes. | 0.72 | 0.72 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 8/3/16 | Draft email to Doug re joint stipulation to extend deadlines, addressing listed concerns from previous e-mails and discussing changes made to current version | 0.17 | 0.17 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| SDD | 8/3/16 | Continue to draft the Global 827 order | 0.27 | 0.27 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 8/3/16 | Review, proofread, and edit Joint Stipulation to continue discovery and class certification dates. | 0.27 | 0.27 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| AMP | 8/3/16 | Continue draft of Plaintiffs Supplemental Briefing re Protective Order, section re burden | 0.48 | 0.48 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| SDD | 8/3/16 | Draft, revise, and edit Plaintiffs supp. briefing, re: Puentes Joint Stip. | 0.90 | 0.90 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 8/4/16 | Review, revise, and edit JOINT STIPULATION REGARDING PLAINIIEF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE). REQUEST NO. 6. | 1.18 | 1.18 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/4/16 | Continue to draft the global 827 petition. | 1.02 | 1.02 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/4/16 | Continue to draft RPDs (Set 4) to County. | 0.27 | 0.27 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |

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| SDD | 8/4/16 | Draft and review RPD (Set 4) to County. | 0.30 | 0.30 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| SDD | 8/4/16 | Draft and review interrogatory (Set 3) to County. | 0.65 | 0.65 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| DBA | 8/4/16 | Continuing editing of questionnaire for former plaintiffs' declarations. | 0.23 | 0.23 | Vague | Vague as to what filing the declarations were for. Class related task unnecessary to the individual claims. |
| SDD | 8/4/16 | Continue to review, revise, and edit JOINT STIPULATION REGARDING PLAJNTlFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6. | 0.37 | 0.37 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 8/5/16 | review, revise, and edit Meet and Confer, re: Defendant Felecia Butler's Responses to Plaintiff's Requests for Production of Documents (Set One). | 0.33 | 0.33 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. |
| SDD | 8/5/16 | review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Supplemental Responses to Plaintifrs Request for Admissions (Set One) | 0.18 | 0.18 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 8/5/16 | Edit and revise Joint Stipulation to Extend Deadlines based on recent continuance of Duval case cited therein | 0.17 | 0.17 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 8/5/16 | Edit and revise Joint Stipulation to Extend Deadlines based on Defendants' proposed modifications | 0.23 | 0.23 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 8/5/16 | Review Defendants' proposed modifications to Joint Stipulation to Extend, Deadlines | 0.07 | 0.07 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| SDD | 8/5/16 | Review, revise, and edit PLAINTlff A.A.'S REQUEST FOR. ADMISSIONS TO DEFENDANT FELECIA BUTLER, SET THREE. | 0.80 | 0.80 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. |

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| SDD | 8/5/16 | Review, revise, and edit Meet and Confer, re: Defendant Torres' Compelled Supplemental Responses to Requests for Production (Set One). | 0.20 | 0.20 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 8/8/16 | Review Order at Dockt No. 86 Denying Defendants' Motion for Protective Order for Puentes Depo | 0.27 | 0.27 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| SDD | 8/8/16 | Steve - Continue to draft the Global 827. | 0.73 | 0.73 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/8/16 | Continue to draft the Global 827; re: Class Certification requirements. | 0.37 | 0.37 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/8/16 | Review Order Denying Puentes Protective Order. | 0.20 | 0.20 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| DBA | 8/9/16 | Draftihg RFAs to County of Riverside re Removal Policies | 0.85 | 0.85 | Vague | Vague as to what set of RFA's the task relates. |

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| DBA | 8/9/16 | Mtg re written discovery to be sent out. | 0.43 | 0.43 | Vague | Vague as to who attended the meeting, and what was discussed (i.e. type of discovery to whom). |
| AMP | 8/9/16 | Meeting regarding written discovery that still needs to be propounded. | 0.43 | 0.43 | Vague | Vague as to who attended the meeting, and what was discussed (i.e. type of discovery to whom). |
| SDD | 8/9/16 | Meeting regarding written discovery that still needs to be propounded. | 0.43 | 0.43 | Vague | Vague as to who attended the meeting, and what was discussed (i.e. type of discovery to whom). |
| AMP | 8/9/16 | Review written discovery already responded to in order to: determine what further class certification information is needed | 0.27 | 0.27 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| DBA | 8/9/16 | Review written discovery to ascertain what still pending as of 8/9/16. | 0.22 | 0.22 | Vague | Vague as to what discovery was reviewed. |
| SDD | 8/9/16 | Review the discovery already propounded upon Defendants and determine what additional discovery is needed for class certification. | 0.68 | 0.68 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| SDD | 8/9/16 | Continue to draft the Global 827 Petition, re: Class Cert. requirements. | 0.53 | 0.53 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 8/9/16 | Drafting RPD, Set 5, to County of Riverside | 0.27 | 0.27 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, time spent was excessive and unnecessary given the Scheduling Order in place. |

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| AMP | 8/9/16 | Start draft of RPD Set Three to Torres re training materials and courses | 0.43 | 0.43 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 8/9/16 | Start draft of RPD Set Three to Butler re training materials and courses | 0.47 | 0.47 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| SDD | 8/9/16 | Steve - review, revise, and edit NOTICE OF MOTION ANO MOTION TO COM.PEL DEFENDANT COUNTY OFRJVERSlDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES 9-12 (SET TWO). | 0.23 | 0.23 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 8/9/16 | Steve - Review, revise, and edit LPROPOSED] ORDER, RE: MOTlON TO COMPEL DEFENDANT COUNTY OF .RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES 9-12 (SET TWO). | 0.17 | 0.17 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/9/16 | Draft additional RFAs for RFA Set 18 to County, relating to lack of procedures in Atkins depo transcripts | 0.23 | 0.23 | Excessive | RFA-18 sought admissions regarding defendants Butler and Torres acting within scope of duties as an employee. Requests duplicative of RFAs served on Butler and Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking duplicative information was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 8/9/16 | Revise and edit RFA Set 18 to County | 0.28 | 0.28 | Excessive | RFA-18 sought admissions regarding defendants Butler and Torres acting within scope of duties as an employee. Requests duplicative of RFAs served on Butler and Torres in related *Rogers* case. Renewed fee motion fails to articulate why seeking duplicative information was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 8/9/16 | Revise and edit RFA Set 4 to Butler to send for final review | 0.12 | 0.12 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. |

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| DBA | 8/9/16 | Continuing to revise MTC, Joint Stip re RPD 1, No. 6, decl. of DBA | 1.37 | 1.37 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/9/16 | Continue to draft the Global 827 Petition, re: Class Cert. requirements. | 0.58 | 0.58 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 8/9/16 | Continuing to draft RFAs to County of Riverside, re warrant training and warrant protocol. | 0.68 | 0.68 | Vague | Vague as to which set of RFAs the task relates. |
| SDD | 8/9/16 | Draft cover letter for the rescheduled depositions of Puentes and Torres. | 0.30 | 0.30 | Clerical | Entry contains block billing. Includes time spent on noncompensable clerical work. |
| SDD | 8/10/16 | Continue to draft the class certification section of the global 827, fold 1n law from Mark's class cert motion, | 0.23 | 0.23 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/10/16 | Continue to draft the class certification section of the global 827, fold in law from Mark's calss cert motion. | 0.22 | 0.22 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/10/16 | Review Mark's draft class certification motion. | 0.37 | 0.37 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |

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| SDD | 8/10/16 | Steve - Review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL FELECIA BUTLER TO PROVIDE FURTHER RESPONSES TO REQUEST FOR ADMISSIONS (SET ONE). | 0.58 | 0.58 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 8/10/16 | Continuing to draft points and authorities for MTC Joint Stip re RPD l, No. 6 | 1.82 | 1.82 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/10/16 | Reviewing Ankcom Class Cert. Mtn. for needed discovery | 1.22 | 1.22 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |

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| DBA | 8/10/16 | Completing revisions to M&C, RPD 1, No.6 - declarations of AMP and SDD | 0.35 | 0.35 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/10/16 | Continuing to draft revisions to M&C, RPD l, No. 6, as to work product doctrine | 0.30 | 0.30 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/10/16 | Continue to draft the Global 827 peitition, re: County policy. | 0.23 | 0.23 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |

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| DBA | 8/10/16 | Continuing to draft M&C re Joint Stip, RPD I, No. 6 - re attorney client privilege | 0.13 | 0.13 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/10/16 | Steve - Continue to draft the global 827, re, class certification requirements. | 0.58 | 0.58 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 8/10/16 | Continuing to revise M&C re Joint Stip, RPD l numerosity requirement | 0.53 | 0.53 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Entry clearly focused on class certification requirement of numerosity, unnecessary to individual claims. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/11/16 | Steve - Review, revise, and edit PLAINTIFF A.A.'S REQUEST FOR ADMISSIQNS TO DEFENDANT FELECIA BUTLER, SET FOUR | 0.38 | 0.38 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. |
| DBA | 8/11/16 | Drafting RFAs for support of claims made in Class· Cert. Motion | 0.12 | 0.12 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |

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| DBA | 8/11/16 | Continuing to review Ankcorn Class Cert motion for needed discovery | 0.22 | 0.22 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| SDD | 8/11/16 | Steve - Review, revise, and edit PLAINTIFF A.A.'S REQUEST FOR ADMISSJONS TO DEFENDANT COUNTY OF RIVERSIDE (SET SEVENTEEN). | 0.23 | 0.23 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 8/11/16 | Adrian - Continue revisions and edits of Joint Stipulation in support of Motion to Compel Further Responses from Defendant Butler to RFAs (Set One) based on Steve's comments from review | 0.18 | 0.18 | Duplicative ; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 8/11/16 | Revisions and edits of Joint Stipulation in support ofMotion to Compel Further Responses from Defendant Butler to RFAs (Set One) based on Steve's comments from review | 0.82 | 0.82 | Duplicative ; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| SDD | 8/11/16 | Continue to draft the Global 827 peitition, re: County systemwide practice and policy. | 0.52 | 0.52 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 8/11/16 | Continue revisions and edits of Memo of Ps & As "in support of Motion to Compel Further Responses from Defendant County to Interrogatories 9-12 | 0.52 | 0.52 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/11/16 | Revisions and edits of Memo of Ps .& As in support of Motion to Compel Further Responses from Defendant County to Interrogatories 9- 12 based on Steves comments from review | 0.82 | 0.82 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/11/16 | Revisions and edits to RFAs to Butler Set 4 based on Steve's comments from review | 0.85 | 0.85 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. |

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| DBA | 8/11/16 | Researching statements made by Riverside County PMKs re use of the CWS/SMS system for incorporation into RFAs to County in support of Mtn. for Class Cert. | 0.13 | 0.13 | Vague; Excessive | Renewed fee motion fails to articulate why deposing Berkley researchers re CWS/CMS was a necessary step to Plaintiff's limited victory on her underlying claims. |
| AMP | 8/11/16 | Final revisions and edits to RFAs to County Set 17 based on Steve's comments from review | 0.22 | 0.22 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. |
| DBA | 8/11/16 | Continuing to draft RFAs for allegations· found in Ankcorn Mtn. for Class Cert. | 0.42 | 0.42 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| SDD | 8/12/16 | review, revise, .and edit LOCAL RULE 37-2 JOINT STlPULATlON REGARDING PLAINTJPf'S MOTION TO COMPEL COUNTY OF RiVERSJDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6. | 0.15 | 0.15 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 8/12/16 | Continue revisions and edits of Joint Stipulation in support of Motion to Compel Further Responses from .Defendant Butler to RFAs (Set One) based on Steve's comments from review | 0.80 | 0.80 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 8/12/16 | Reviewing old cases against County of Riverside for contact information for declarations in support of class cert motian. | 0.18 | 0.18 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| AMP | 8/12/16 | Revisions and edits to M&C Letter re County's Supplemental Responses to RFAs Set One based on Steve's comments from review | 0.77 | 0.77 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/12/16 | Drafting Revisions to Decl DBA in support of joint Stip re Defendant's responses to RPD I; No. 6 | 0.48 | 0.48 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 8/12/16 | Draft additional paragraphs for declaration in support of Joint Stipulation in support of Motion to Compel Further Responses from Defendant Butler to RF As (Set One) | 0.18 | 0.18 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 8/12/16 | Continuing to draft revisions to Joint Stip re RPD l, No. 6 - Commonality | 0.65 | 0.65 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Task entry clearly focused on class certification requirement of commonality, not necessary to individual claims. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 8/12/16 | Review prior obiained information related to County policy ,and practice of documentation in delivered service logs for Joint Stipulation in support of Motion to Compel Further Responses from Defendant Butler to RF As (Set One) | 0.23 | 0.23 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 8/12/16 | Meet with Dennis to discuss revisions to LOCAL RULE 37-2 JOINT STIPULA TJON RE.GARDING PLAINTIFF'S MOTION TO COMPEL GOUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR. PRODlJCTlON (SET ONE), REQUEST NO. 6. | 0.48 | 0.48 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 8/12/16 | Final revisions and edits to M&C Letter re Butler's Responses to RFAs Set Two | 0.17 | 0.17 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 8/12/16 | Revisions and edits to M&C Letter re Torres' Compelled Responses to RPDs Set One based on Steve's corrunents from review | 0.37 | 0.37 | Duplicative; Excessive | RPDs duplicative and overlapping of RPDs served on Torres in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Attorney identifies task as related primarily to individual claims yet argued in MTC class related. MTC heard on 3/4/2016 resulted in court ordering defendant to respond to just five of the 15 disputed requests. Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| AMP | 8/12/16 | Revisions and edits to M&C Letter re Butler's to RPDs Set One based on Steve's comments from review | 0.18 | 0.18 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set One related to typicality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| DBA | 8/12/16 | Continuing to revise M&C ltr. to Defendant re its.response to RPD 2 | 0.87 | 0.87 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |

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| DBA | 8/12/16 | Continuing to draft questions for former plaintiffs against County of Riverside for use with Class Cert mtn | 0.17 | 0.17 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| AMP | 8/12/16 | Drafting new sections re Requests 97-106 for M&C Letter re County's Supplemental Responses to RFAs Set One based on Steve's comments from review | 0.48 | 0.48 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 8/15/16 | Start draft of Plaintiffs Interrogatories to Defendant Torres Set Two | 0.35 | 0.35 | Vague; Excessive | No ROGS Set Two were served on defendant Torres. Attorney should not bill for discovery never sent. |
| AMP | 8/15/16 | Review prior discovery responses from Defendants Butler and Torres in present case and related case Rogers v. County of Riverside for information needed for Interrogatories | 0.32 | 0.32 | Vague | Vague as to what responses were reviewed and which set of Interrogatories the task relates. |
| AMP | 8/15/16 | Continue draft of Plaintiffs Interrogatories to Defendant Butler Set Three | 0.45 | 0.45 | Excessive | No ROGS Set Three were served on defendant Butler. Attorney should not bill for discovery which was never completed. |
| AMP | 8/15/16 | Start draft of Plaintiffs Interrogatories to Defendant Butler Set Three | 0.38 | 0.38 | Excessive | No ROGS Set Three were served on defendant Butler. Attorney should not bill for discovery which was never completed. |

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| AMP | 8/15/16 | Continue draft of Plaintiff's Request for Production of Documents to Defendant Butler Set Three | 0.20 | 0.20 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 8/15/16 | Continue draft of Plaintiffs Request for Production of Documents to Defendant Torres Set Three | 0.23 | 0.23 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| DBA | 8/15/16 | Phone call from Jason Hunter re upcoming interview | 0.17 | 0.17 | Vague; Duplicative; Excessive | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as related primarily to the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| AMP | 8/15/16 | Continue draft of Plaintiff's Request for Production of Documents to Defendant Torres Set Three | 0.17 | 0.17 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |

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| DBA | 8/16/16 | Drafting further revisions to P's & A's re commonality and numerosity | 0.25 | 0.25 | Vague | Vague as to what Motion the task relates. Task clearly related to class cert issues, not necessary to individual claims. |
| AMP | 8/16/16 | Edit and revise Proposed Order for Joint Stipulation to Compel Responses from Defendant Butler to RFAs (Set One) | 0.20 | 0.20 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 8/16/16 | Continue new section re Requests 4 and 5 for M&C Letter re Torres' Compelled Responses to RPDs Set One based on Steve's comments from review | 0.72 | 0.72 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| DBA | 8/16/16 | Drafting revisions to P&A's to Joint Stip, RPD l, No. 6 | 0.25 | 0.25 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 8/16/16 | Research re incomplete discovery responses and irrelevant material provided in responses for :M.&C Letter re Torres' Compelled Responses to RPDs Set One | 0.42 | 0.42 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| DBA | 8/16/16 | Completing draftng of questionnaire for 8/17/16 telephone interview of former plaintiff Jason Hunter | 0.37 | 0.37 | Vague; Duplicative; Excessive | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| AMP | 8/16/16 | Continue revisions and edits to M&C Letter .re Torres' Compelled Responses to RPDs Set One based on Steve's comments from review, start new section re Requests 4 and 5 | 0.87 | 0.87 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| DBA | 8/16/16 | Review Hunter v. C.O.R complaintr prep for phone call 8/17/16 with Jason Hunter | 0.73 | 0.73 | Vague; Duplicative; Excessive | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| DBA | 8/16/16 | Beginning first draft of declaration of Erik Holmes.in support of our class cert mtn. | 0.82 | 0.82 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |

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| SDD | 8/16/16 | Review, revise, and edit LOCAL RULE,37-2 JOINT STlPULATlON REGARDING PLAINTIFF'S MOTION TO COMPEL COUNTY OF RlVERSlOE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (.SET ONE), REQUEST NO. 6 . | 1.17 | 1.17 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/16/16 | Reviewing call to Erik Holmes and info given in yesterday's phone call | 0.22 | 0.22 | Vague | Vague as to what work the review was for. |
| SDD | 8/17/16 | Review, revise, and edit Meet and Confer. re: Defendant County of Riverside's Supplemental Responses to Plaintiff's Request for Admissions (Set One). | 0.40 | 0.40 | Duplicative ; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 8/17/16 | Final revisions and edits to Dedaration in Support of Motion to Compel Responses from Defendant County to Interrogatories. 9 - 12 | 0.28 | 0.28 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 8/17/16 | Final revisions and edits to Motion to Compel Responses to Interrogatories 9 - 12 | 0.45 | 0.45 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 8/17/16 | Phone interview with Jason Hunter for preparation of his declaration in support of class cert motion. | 0.95 | 0.95 | Excessive; Vague | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| DBA | 8/17/16 | Reviewing and redrafting questionoaire for use in today 's conversation with Jason Hunter | 0.25 | 0.25 | Vague; Duplicative; Excessive | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| SDD | 8/17/16 | Review; revise, and edit DECLARATION OF ADRIAN M. PARIS IN SUPPORT'OF PLAINTlFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSlDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES 9-12 (SET TWO). | 0.23 | 0.23 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 8/17/16 | Meet with DenniS to discuss upocoming. phone call with Hunter: re: decl. for .class cert. | 0.22 | 0.22 | Excessive; Vague | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| SDD | 8/17/16 | Review, revise, and edit MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANTCOUNTY OF .RIVERSIDE TO :PROVlDE FURTHER RESPONSES TO INTERROGATORY NOS. 9-12 (SET TWO). | 0.18 | 0.18 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/17/16 | Continue draft of Plaintiff's lnterrogatories to Defendant Butler Set Three | 0.27 | 0.27 | Excessive | No ROGS Set Three were served on defendant Butler. Attorney should not bill for discovery which was never completed. |
| DBA | 8/17/16 | Continue to draft revisions to P's & A's, Joint Stip re RPD 1. No. 6, as to specific requirements re numerosity | 0.52 | 0.52 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Entry clearly focused on class certification requirement of numerosity, unnecessary to individual claims. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 8/17/16 | Prepare exhibits to declaration in support of motion to compel supplemental responses from Defendant County to Interrogatories 9 - 12 | 0.38 | 0.38 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 8/17/16 | Continue draft of Plaintiff's Interrogatories to Defendant Torres Set Two | 0.32 | 0.32 | Vague; Excessive | No ROGS Set Two were served on defendant Torres. Attorney should not bill for discovery never sent. |
| SDD | 8/17/16 | Continue to draft the Global 827 peitition, re: County sysemwside practice and policy. | 1.03 | 1.03 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 8/17/16 | Continue to draft revisions to MTC, Joint Stip, RPD 1, re work product doctrine | 0.57 | 0.57 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 8/17/16 | Continue to draft P's&A's in support of Joint Stip re RPDl, No. 6, issue of failure to discipline, existence of prior lawsuits | 0.42 | 0.42 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/17/16 | Continue to draft the Global 827 peitition, re: County systemwside practice and policy. | 0.45 | 0.45 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 8/17/16 | Further drafting on P's & A's, re typicality, deliberate indifference | 0.42 | 0.42 | Vague | Vague as to what motion the task pertains. Task clearly related to issues of class cert, unnecessary to individual claims. |
| AMP | 8/17/16 | Revisions and edits to M&C Letter re Torres' Compelled Responses to RPDs Set One before sending back for review | 0.55 | 0.55 | Excessive | Attorney identifies task as work primarily related to individual claims, yet MTC argued requests directly relevant to class certification. Order on MTC found scheduling Orders limited discovery to that which has some bearing on class certification and ordered defendant to respond only to those requests that are relevant to class certification. Renewed fee motion fails to articulate why this discovery was a necessary step for Plaintiff's victory on the underlying claims. |
| SDD | 8/17/16 | Continue to draft the Global 827 peitition, re: County systemwside practice and policy. | 0.45 | 0.45 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |

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| DBA | 8/18/16 | Drafting revisions to joint stip after mtg. with SDD, with reference to numerosity, typicality, and deliberant indifference. | 1.10 | 1.10 | Vague | Vague as to what motion the task pertains. Task clearly related to issues of class cert, unnecessary to individual claims. |
| SDD | 8/18/16 | Meet with Dennis to discuss revisions to the Joint Stip; re: County's RPD (Set 1 ), #6. | 0.60 | 0.60 | Duplicative ; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/18/16 | Review and draft revisfons to JOINT STIPULATION REGARDING PLAJNTlFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6 | 0.47 | 0.47 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/18/16 | Draft, review, revise, and edit JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO, 6 | 1.05 | 1.05 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 8/18/16 | Draft, .review, revise., and edit LOCAL RULE 37-2 JOJNT STIPULATION REGARDING .PLAINTIFF'S MOTION TO COMPEL FELECIA BUTLER TO PROVIDE FURTIIER RESPONSES TO REQUEST FOR ADMJSSJONS (SEtONE). | 0.47 | 0.47 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 8/18/16 | Continue to draft the Global 827 request; re: reasons for the request. | 0.97 | 0.97 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/19/16 | Continue to draft the global 827 petltion, re: blanket orders,. | 1.02 | 1.02 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/19/16 | Review County's meet and confer letters for statements to support the global 827 petition. | 0.48 | 0.48 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 8/19/16 | Prepare all portions o£ attach exhibits to declaration, publish to .pdf, and get Joint Stipulation to Compel Responses from Defendant Butler to RF As (Set One) ready for ·delivery to .opposing counsel | 0.42 | 0.42 | Clerical | Time spent on noncompensable clerical work. |

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| SDD | 8/22/16 | Draft email in response to Doug's mistaken complaint that all joint stipulations are provided Friday after 5 pm. Research emails for all prior Joint Stips. | 0.27 | 0.27 | Vague | Vague as to what motion the task pertains. |
| SDD | 8/22/16 | Continue to draft the Global 827, re: reasons for the order. | 0.70 | 0.70 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 8/22/16 | Continuing to draft P'.s & A's in support of'Joint Stip. RPD 1, No. 6 | 1.05 | 1.05 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/22/16 | Drafting revision to P's & A's, system wide practices for Monell liability | 0.77 | 0.77 | Vague | Vague as to what motion the task pertains. |
| DBA | 8/22/16 | Drafting,revisionsto Ps & A's for Joint Stip, RPD 1, No 6 re typicality | 0.57 | 0.57 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Entry clearly focused on class certification requirement of typicality, unnecessary to individual claims. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 8/22/16 | Drafting revisions to P's & A's in support of Joint. Stip, RPD 1, No. 6, as to Defendant's boilerplate Qbjections | 0.20 | 0.20 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/23/16 | Review, revise, and edit DECLARATION OF DENNIS B. ATCHLEY lN SUPPORT OF JOINT STIPULATION REGARDING PLAJNl'IFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6. | 0.37 | 0.37 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/23/16 | Continue to review, revise, and edit JOINT STIPULATION REGARDING PLAJNTlFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6 | 0.23 | 0.23 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 8/23/16 | Review, revise, and edit JOJNT STIPULA TJON REGARDING PLAINTIFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6 | 0.53 | 0.53 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 8/23/16 | Continue to draft the Global 827, re; Civil Rights Violation.is a. Federal Crime. | 0.55 | 0.55 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 8/23/16 | Completing revisions to p's & a's, forwarding v.15 to SDD | 0.27 | 0.27 | Vague | Vague as to what pleading the task pertains. |
| DBA | 8/24/16 | Drafting Ntc. of Mtn. - Joint Stip, RPD No. 6 | 0.20 | 0.20 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/24/16 | DraRing revisions to decl dba and exhibits | 0.33 | 0.33 | Vague | Vague as to what pleading the declaration pertains. |

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| DBA | 8/24/16 | Drafting information into declarirtion, of Jason Hunter provided by his attorney, Roberta Lack | 0.65 | 0.65 | Vague; Duplicative; Excessive | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as related primarily to the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| DBA | 8/24/16 | Drafting revisions to P's& A's to reflect changes in decl dba | 0.43 | 0.43 | Vague | Vague as to what pleading the Ps and As and declaration pertains. |
| SDD | 8/24/16 | Reviewed file was deleted. Second pass to review, revise, and edit of DECLARATION OF DENNIS B. ATCHLEY IN SUPPORT OF JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6. | 0.32 | 0.32 | Duplicative; Excessive | Attorney should not bill for work already performed due to human and technical errors. |

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| SDD | 8/24/16 | Review, revise, and edit DECLARATION OF DENNIS B. ATCHLEY IN SUPPORT OF JOINT STIPULATION REGARDJNG PLAINTIFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE); REQUEST NO. 6. | 0.25 | 0.25 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/24/16 | Drafting Proposed Order on Joint Stip, RPD 1, No. 6 | 0.37 | 0.37 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 8/25/16 | Researching notarial requirement for decllaration executed outside of California | 0.27 | 0.27 | Vague; Clerical | Vague as to what declaration and document the task pertains. Attorney should not bill for simple research. |
| DBA | 8/25/16 | Revtsing interview outline for Chelle Holmes' input to Erik Holmes' declaration in support of Mtn. to Certify Class. | 0.22 | 0.22 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the father of minor P.H. for class certification motion was a necessary step for her ultimate victory of the underlying claims of A.A. |

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| DBA | 8/25/16 | Completed and emailed draft declaration of Jason Hunter in support of Mm. to certify class | 0.72 | 0.72 | Excessive; Vague | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| DBA | 8/25/16 | Continuing to draft declaration of Jason Hunter in support of class cert mtn. | 0.33 | 0.33 | Excessive; Vague | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| DBA | 8/26/16 | Drafting letters to former Donnie Cox clients who sued and settled with Riverside County, Debbie Boyd and Silvia Cole | 0.60 | 0.60 | Vague | Vague as to purpose of drafting letters to former clients. |
| DBA | 8/29/16 | Drafted revisions to Decl. Erik Holmes in support ofMtn. to cert. class | 0.55 | 0.55 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| AMP | 8/29/16 | Add in Defendant's portion of Joint Stipulation to Compel Responses from Defendant Butler to RFAs Set One | 0.22 | 0.22 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| SDD | 8/30/16 | Make corrections and .edits to Attachment 7, re: Shawn's comments | 0.42 | 0.42 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SAM | 8/30/16 | Continued review, edit, revise, Draft of Attachment 7 to Global 827 petition. | 0.42 | 0.42 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/30/16 | Dtafl declaration in support of the global 827. | 0.48 | 0.48 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/30/16 | Draft Attachment 5 to the Global 827. | 0.12 | 0.12 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/30/16 | Continue to draft the global 827 petition. | 0.32 | 0.32 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| SDD | 8/30/16 | Continue to draft the global 827 petition. | 1.45 | 1.45 | Excessive | Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| DBA | 8/31/16 | Drafting questionnaire for Danyelle Branning's declaration in support of Mtn. to certify Class | 0.43 | 0.43 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |

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| AMP | 8/31/16 | Prepare mandatory chambers copy of all portions of Joint Stipulation to Compel further Responses from Defendant Butler to RFAs Set One | 0.33 | 0.33 | Duplicative; Excessive; Clerical | Time spent on noncompensable clerical work. RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 9/1/16 | Continued drafting outline for P Response to Defendant's Introductory statement - objections, privilege log. | 0.70 | 0.70 | Vague | Vague as to what document/filing the task pertains. |
| DBA | 9/1/16 | Researching issues raised in Defendant's Contentions re Joint Slip, (RPD l) No. 6 | 0.75 | 0.75 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/1/16 | Incorporating Defendant County of Riverside's portion of Joint Stip. RPD 1, No, 6 | 0.53 | 0.53 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 9/2/16 | Continue draft of reply for Motion to Compel Further Responses from County to Interrogatories 9 -12 (Set Two), section re laches and timeliness; | 0.27 | 0.27 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/2/16 | Continue draft of reply for Motion to Compel Further Responses from County to Interrogatories 9 - 12 (Set Two), section re lack of communications | 0.78 | 0.78 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/2/16 | Continue draft of reply for Motion to Compel Further Responses from County to Interrogatories 9 - 12 (Set Two). section re claimed prejudicial delay by Defendant | 0.75 | 0.75 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/2/16 | Research re burden on proving prejudice as a result of delay in filing motion | 0.52 | 0.52 | Vague | Vague as to what motion the task pertains. Vague as to reason research conducted and what it was used for. |

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| AMP | 9/2/16 | Start draft of declaration in support of reply for Motion to Compel Further Responses from County to Interrogatories 9 - 12 (Set Two) | 0.55 | 0.55 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/2/16 | Continue draft of reply for Motion to Compel Further Responses from County to Interrogatories 9 - 12 (Set Two), section re Meet and Confer | 0.57 | 0.57 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/2/16 | Start draft of reply for Motion to Compel Further Responses from County to Interrogatories 9 - 12 (Set Two) | 0.80 | 0.80 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 9/2/16 | Review Defendant's opposition to MTC County Rog 9 -12 (Set Two) and analyze issues for reply brief | 0.43 | 0.43 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/5/16 | Start draft of declaration of Shawn McMillan in support of reply for Motion to Compel Further Responses from County to Interrogatories 9 - 12 (Set Two) | 0.27 | 0.27 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/5/16 | Continue draft of reply for Motion to Compel Further Responses from County to Interrogatories 9 - 12 (Set Two), section re lack of opposition to providing further responses | 0.62 | 0.62 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/6/16 | Prepare exhibits to reply declaration for Adrian M. Paris, compiling all necessary deposition excerpts | 0.17 | 0.17 | Vague | Vague as to which reply declaration the task relates. |

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| SDD | 9/6/16 | Continue to review, revise, and edit PLAlNTIFF'S REPLY IN SUPPORT OF MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES 9-12 (SET TWO). | 1.58 | 1.58 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/6/16 | Continue revising, editing, and drafting new sections for Plaintifl's Reply in Support of Motion to Compel Defendant County of Riverside to Provide Further Responses to Interrogatories 9 - 12 based on Steve's comments from review, section re Defendant's policies and procedures | 0.35 | 0.35 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/6/16 | Continue revising, editing, and drafting new sections for Plaintiff's Reply in Support of Motion to Compel Defendant County of Riverside to Provide Further Responses to Interrogatories 9 - 12 based on Steve's comments from review, section re Defendant's objections | 0.38 | 0.38 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/6/16 | Research r objections to declaration in opposition to motion to compel | 0.48 | 0.48 | Vague | Vague as to what motion to compel the task pertains. Vague as to what objections were researched. Vague as to what declaration the task refers. |

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| AMP | 9/6/16 | Continue revising, editing, and drafung new sections for Plaintiff's Reply in Support of Motion to Compel Defendant County of Riverside to Provide Further Responses to Interrogatories 9 • 12 based on Steve's comments from review | 0.62 | 0.62 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/6/16 | Start revising, editing, and drafting new sections for Plaintiff's Reply in Support of Motion to Compel Defendant County of Riverside to Provide Further Responses to Interrogatories 9 - 12 based on Sfeve's comments from review | 0.68 | 0.68 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 9/6/16 | Continue to review, revise, and edit PLAINTlFF'S REPLY IN SUPPORT OF MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES 9-12 (SET TWO). | 0.48 | 0.48 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 9/6/16 | Draft the Shawn's Decl in support ofReply to MTC, Rog (9~12). | 0.28 | 0.28 | Vague | Vague as to which set of discovery the MTC the task relates. |

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| SDD | 9/6/16 | Review, revise, and edit PLAINTIFF'S REPLY IN SUPPORT OF MOTION TO COMP.EL DEFENDANT COUNTY OF RJVERSlDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES 9-12 (SET TWO). | 0.77 | 0.77 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 9/7/16 | Drafting revisions to Defendants' portion of Joint Stip, RPD l, No. 6 | 0.18 | 0.18 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/7/16 | Reviewed complaint for phone call from Brannings re declaration in support of mtn.to cert.class | 0.25 | 0.25 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| DBA | 9/8/16 | Drafting final revisions to Proposed Order, P's & A's re Joint Stip, RPD l, No.6 | 0.22 | 0.22 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 9/8/16 | Review, revise, and edit the [PROPOSED] ORDER, RE: PLAINTIFF'S MOTION TO COMPEL COUNTY OF RIVERSIDE TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6: | 0.18 | 0.18 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/8/16 | Final review of the Joint Stip. re; RPD (l) no. 6, correct formatting errors. | 0.55 | 0.55 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 9/9/16 | Start drafting Meet and Confer letter for Defendant County's responses to RFA Set 15 | 0.20 | 0.20 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| AMP | 9/9/16 | Review County's responses to RFA Set 15 for issues for Meet and Confer | 0.37 | 0.37 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |

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| SDD | 9/9/16 | Continue to draft, review, revise, and edit Meet and Confur, re: -County's Second Supplemental Responses to Plaintiff's Interrogatories (Set Two), Nos. 7-8 and 13-14. | 0.17 | 0.17 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/12/16 | Continue drafting Supplemental Memorandum of Law for Joint Stipulation to Compel Further Responses from Defendant Butler to RFAs (Set One), section re supervisor's duty to have evidence for approving removal | 0.27 | 0.27 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 9/12/16 | Start drafting Supplemental Memoraildum of Law for Joint Stipulation to Compel Further Responses from Defendant Butler to RFAs (Set One) | 1.28 | 1.28 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| AMP | 9/12/16 | Review Defendant's portion ofJoint Stiplllation for any issues to be addressed in Supplemental Memorandum | 0.23 | 0.23 | Vague | Vague as to which Joint Stipulation and which Supplemental Memorandum the task relates. |
| AMP | 9/12/16 | Continue drafting Meet and Confer letter for Defendant County's responses to RF A Set 15 | 0.18 | 0.18 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 9/12/16 | Draft, review, revise, and edit DECLARATION OF ERlK HOLMES IN SUPPORT OF PLAINTIFF'S MOTION FOR CLASS CERTIFICATION. | 0.47 | 0.47 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| DBA | 9/12/16 | Drafting revisions to M&C re County responses to RPD 2 | 1.13 | 1.13 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |

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| AMP | 9/12/16 | Continue drafting Supplemental Memorandum of Law for Joint Stipulation to Compel Further Responses from Defendant Butler to RFAs (Set One), section re lack of documentation | 0.83 | 0.83 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 9/13/16 | continue drafting M&C letter re County's Responses to RPD 4, including relevanceas to grievances and complaints against social workers. | 1.03 | 1.03 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/13/16 | Continue draft of M&C Letter re County's responses to RFAs Sec 15, section re objection relating to law of the case | 0.32 | 0.32 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| AMP | 9/13/16 | Continue draft of M&C Letter re County's responses to RFAs Set 15 | 0.52 | 0.52 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |

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| AMP | 9/13/16 | Continue editing M&C Letter re County's, supplemental responses to RFAs Set One based on Steve's comments from review | 0.32 | 0.32 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/13/16 | Draft, review, revise, and edit SUPPLEMENTAL MEMORANDUM lN SUPPORT OF JOINT STIPULATION TO COMPEL FELECIA BUTLER TO PROVIDE FURTHER RESPONSES TO REQUEST FOR ADMlSSlONS (SET ONE) | 0.92 | 0.92 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 9/13/16 | Beginning to draft: issue outline for M&C Letter re County's response to RPD 4 | 1.20 | 1.20 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/13/16 | Start editing M&C Letter re County's supplemental responses to RFAs Set One based on Steve's comments from review | 0.23 | 0.23 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 9/13/16 | Meet with Dennis, to discuss the objection and issues with County RPD4. | 0.45 | 0.45 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| DBA | 9/13/16 | Begin reviewing M&C response to County's responses to RPD (Set 4) by reviewing objections made by defendant | 0.68 | 0.68 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/13/16 | Continue drafting Supplemental Memorandum of Law for Joint Stipulation to Compel Further Responses from Defendant Butler to RFAs (Set One) | 0.60 | 0.60 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 9/13/16 | Continuing to edit M&C letter re County's response to RPD, Set 2 | 0.47 | 0.47 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |

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| SDD | 9/13/16 | Continue to draft the global PMK deposition notice; re; request for production of documents. | 1.03 | 1.03 | Vague | Vague as to "global PMK". Vague as to what documents being sought. |
| AMP | 9/13/16 | Continue draft of M&C Letter re County's responses to RFAs Set 15, confidentiality CWS/CMS files objection | 0.83 | 0.83 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| SDD | 9/13/16 | Meet with Dennis to discuss how to proceed with the M&C letter re: County's RPD (Set 4). | 0.43 | 0.43 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/13/16 | Finish editing M&C Letter re County's-supplemental responses to RFAs based on Steve's comments from review | 0.28 | 0.28 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 9/13/16 | Continue draft of M&C Letter re County's responses to RFAs Set 15 | 0.25 | 0.25 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |

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| DBA | 9/13/16 | Drafting M&C letter to County re its responses to RPD, Set 4 addressing relevance of grand jury reports, grievances and complaints. | 1.12 | 1.12 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/13/16 | Prepare mandatory chambers copies of Supplemental Memorandum of Law for Joint stipulation to Compel Further Responses from Defendant Butler to RFAs (Set One) and Declaration | 0.17 | 0.17 | Clerical | Time spent on noncompensable clerical work. |
| AMP | 9/13/16 | Continue editing and revising Supplemental Memorandum of Law for Joint Stipulation to Compel Further Responses from Defendant Butler to RFAs (Set One) based on Steve's comments from review | 0.27 | 0.27 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| AMP | 9/13/16 | Start editing and revising Supplemental Memorandum ofLaw for Joint Stipulation to Compel Further Responses from Defendant Butler to RFAs (Set One) based on Steve's comments from review | 0.17 | 0.17 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 9/13/16 | Start drafting Declaration in support of Supplemental Meinorandum of Law for Joint Stipulation to Compel Further Responses from Defendant Butler to RF As (Set One) | 0.10 | 0.10 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 9/13/16 | Continue to draft, review, revise, and edit SUPPLEMENTAL MEMORANDUM IN SUPPORT OF JOINT STIPULATION TO COMPEL FELECIA BUTLER TO PROVIDE FURTHER RESPONSES TO REQUEST FOR ADMISSIONS (SET ONE) | 0.23 | 0.23 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| AMP | 9/13/16 | Continue draft ofM&C Letter re County's responses to RFAs Set 15, section re reasonable inquiry | 0.18 | 0.18 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| AMP | 9/13/16 | Continue draft of M&C Letter re County's responses to RF As Set 15, vague and ambiguous objections | 0.22 | 0.22 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 9/13/16 | Review County's responses to Interrogatories, Set Three | 0.22 | 0.22 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| DBA | 9/13/16 | Drafting M&C letter re County response to RPD4, boilerplate objections | 1.12 | 1.12 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |

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| AMP | 9/13/16 | Review interagency data-sharing agreement for M&C Letter re County's responses to RF As Set 15 | 0.27 | 0.27 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| DBA | 9/13/16 | Drafting M&C letter re Grievances and Complaints | 0.48 | 0.48 | Vague | Vague as to which M&C and discovery the task relates. |
| DBA | 9/14/16 | drafting revisions to M&C letter after discussions with SDD | 0.52 | 0.52 | Vague | Vague as to which M&C and discovery the task relates. |
| SDD | 9/14/16 | Meet with Dennis to discuss how to proceed in the phone interview with Holmes, re: what specific deatils we still need to obtain. | 0.23 | 0.23 | Vague | Vague as to what the task relates. |
| AMP | 9/14/16 | Continue draft of M&C Letter re County's responses to Interrogatories Set 3, section re class certification objections to all interrogatories | 0.43 | 0.43 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| SDD | 9/14/16 | Meet with Dennis to discuss the M&C Letter, re: County RPD l. Discuss ttie progress and direction. | 0.97 | 0.97 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 9/14/16 | researching authority re County's evasive responses | 0.33 | 0.33 | Vague | Vague as to what discovery the task relates |
| AMP | 9/14/16 | Start draft of M&C Letter re County's responses to Interrogatories Set 3 | 0.95 | 0.95 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 9/14/16 | Continue draft ofM&C Letter re County's responses to RFAs Set 15, section re 827 objection and inapplicability to present requests | 0.72 | 0.72 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |
| DBA | 9/14/16 | Continuing drafting M&C letter re County's response to RPD, Set 4, re overbreath | 0.28 | 0.28 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/14/16 | Continue draft of M&C Letter re County's responses to RFAs Set 15, section re Requests 453 - 479 not being overly broad and remote | 0.37 | 0.37 | Excessive | Renewed fee motion fails to articulate why RFA's seeking admissions on compiled data was a necessary step in Plaintiff's limited victory, especially in light of the MTC hearing on April 6, 2017 regarding RFA Set 15 which resulted in the Court ordering defendant to respond to only three of the 30 requests. |

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| DBA | 9/14/16 | Drafting M&C letter re County Response to RPD, Set 4, re unduly burdensome objection. | 0.28 | 0.28 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/14/16 | Continue draft of M&C Letter re County's responses to RFAs Set 15, section re Request 452 | 0.33 | 0.33 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| DBA | 9/14/16 | drafting Class cert objection portion ofM&C letter re County's responses to RPD, Set Four | 0.93 | 0.93 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| DBA | 9/14/16 | Drafting revisions to declaration of Erik. Holmes after phone call. | 0.48 | 0.48 | Vague | Vague as to what the declaration was for. |
| AMP | 9/14/16 | Continue draft of M&C Letter re County's responses to Interrogatories Set 3, start section re 827 objections | 0.23 | 0.23 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 9/14/16 | Continue draft of M&C Letter re County's responses to Interrogatories Set 3, start section re privacy rights | 0.40 | 0.40 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 9/14/16 | Continue draft of M&C Letter re County's responses to Interrogatories Set 3, start section re overly broad obections | 0.62 | 0.62 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| DBA | 9/14/16 | Phone call to Erik and Chelle Holmes re Erik's declaration in support of Class Cert. Mtn | 1.58 | 1.58 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the father of minor P.H. for class certification motion was a necessary step for her ultimate victory of the underlying claims of A.A. |
| DBA | 9/14/16 | Review revisions to draft declaration of Erik Holmes in preparation for phone call later today. | 0.25 | 0.25 | Vague | Vague as to what the declaration was for. |

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| DBA | 9/15/16 | Steve - review, revise, and edit - Meet and Confer, re: Defendant County of Riverside's Seoond Supplemental Response to Plaintiff's Request for Production of Documents (Set Four). | 0.98 | 0.98 | Vague; Excessive | Vague as to which set of discovery the task relates. No Second Supplemental Responses to RPD Set Four was produced.<br>RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| SDD | 9/15/16 | Dennis - drafting revisions to M&C re County responses to RPD, Set 4 relevance and deliberate indifference sections. | 0.90 | 0.90 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/16/16 | Continue draft of M&C Letter re County's responses to Interrogatories Set 3, start section re overbroad as to content | 0.55 | 0.55 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 9/16/16 | C.ontinue draft of M&C Letter re County's responses to Interrogatories Set 3, continue section re privacy rights | 0.23 | 0.23 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 9/16/16 | Continue draft of M&C Letter re County's responses to Interrogatories Set 3, continue section re 827. objections | 0.43 | 0.43 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| DBA | 9/16/16 | Dennis - Drafting revisions to M&C re County responses to RPD, Set 4. | 0.32 | 0.32 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| DBA | 9/16/16 | reviewing Grand Jury Reports from Evidence file | 0.37 | 0.37 | Vague | Vague as to purpose of review and to what specific work the review was for. Impossible to determine what aspect of the case the task relates. |

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| AMP | 9/16/16 | Continue draft ofM&C Letter re. County's responses to Request for Admissions Set 16, section re vague and ambiguous .as to time | 0.37 | 0.37 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| DBA | 9/16/16 | Drafting declaration of Danyelle Branning in support of Mtn. to Certify Class | 0.25 | 0.25 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| AMP | 9/16/16 | Continue draft of M&C Letter re County's responses to Request for Admissions Set l6, sections re language used in handouts | 0.82 | 0.82 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| DBA | 9/16/16 | Phone call to Danyelle Branning for declaration in support or Mtn. To Certify Class | 0.52 | 0.52 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |

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| AMP | 9/16/16 | Continue draft of M&C Letter re County's responses to Request for Admissions Set 16, section re incompiete hypothetical objection | 0.45 | 0.45 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 9/16/16 | Research re use of incomplete hypothetical as objection to discovery requests for M&C Letter re Countys responses fo Request for Admissions Set 16 | 0.28 | 0.28 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 9/16/16 | Start draft of M&Cletter re County's responses to Request for Admissions Set 16 | 0.68 | 0.68 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 9/16/16 | Review County's responses to RFAs Set Sixteen for adequacy issues for Meet and Confer | 0.32 | 0.32 | Duplicative ; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 9/16/16 | Continue draft of M&C Lettec re County's responses to ln1errogatories Set 3, continue· Section re overbroad as to content | 0.27 | 0.27 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 9/19/16 | Continue draft of M&C Letter re County's responses to Request for Admissions Set 16, commonality requests | 0.98 | 0.98 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 9/19/16 | Continue draft ofM&C Letter re Butler's responses to Request for Admissions Set -3, analysis section re ciass certification objecticm | 0.45 | 0.45 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 9/19/16 | Start draft of M&C Letter re Butler's responses to Request for Admissions Set 3 | 0.90 | 0.90 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |

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| DBA | 9/19/16 | Dennis - Continue draft to M&C letter re County's responses to RPD Set 4, re typicality | 0.67 | 0.67 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/19/16 | Continue draft of M&C Letter re County's responses to Request for Admissions Set 16, section re lacks foundation objection | 0.23 | 0.23 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| DBA | 9/19/16 | Dennis - Continue drafting M&C letter re County's responses to RPD Set 4, as to responses to RFA, Set One. | 1.03 | 1.03 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |

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| AMP | 9/19/16 | Continue draft of M&C Letter re Countys responses to Request for Admissions Set 16, section re overbroad objection and using Defendant's own language | 0.48 | 0.48 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| SDD | 9/19/16 | Steve - Meet with Dennis regarding the M&C letter, re: County RPD 4. Discuss RFA denial documents and Grand Jury Reports | 0.28 | 0.28 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/19/16 | Continue draft ofM&C Letter re County's responses to Request for Admissions Set 16, continue section re vague and ambiguous as to various phrases | 0.25 | 0.25 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 9/19/16 | Continue draft of M&C Letter re County's responses to Request for Admissions Set 16, section re vague and ambiguous as to various phrases | 0.10 | 0.10 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| DBA | 9/19/16 | Dennis - Continue draft of M&C letter re County's Responses to RPD Set 4, Grand Jury Reports | 0.72 | 0.72 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/19/16 | Continue draft of M&C Letter re County's responses to Request for Admissions Set 16, typicality requests | 0.62 | 0.62 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |

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| DBA | 9/19/16 | Dennis - Continue draft of M&C letter in respone to County's responses to RPD Set 4, commonality. | 0.87 | 0.87 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| AMP | 9/19/16 | Continue draft ofM&C Letter re Butler's responses to Request for Admissions Set 3, start analysis section re lack of reasonable inquiry | 0.55 | 0.55 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |
| SDD | 9/20/16 | Review, revise; and edit Meet and Confer, re: Defendant County of Riverside's Second Supplemental Response to Plaintiff's Request for Production of Documents (Set Two). | 0.20 | 0.20 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| AMP | 9/20/16 | Continue draft of M&C Letter re Butler's responses to Request for Admissions Set 3 | 0.75 | 0.75 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |

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| DBA | 9/21/16 | researching online re accessibility of County Board of Supervisor Agendas | 0.32 | 0.32 | Vague | Vague as to purpose of research and what work the research was for. |
| SDD | 9/21/16 | Drfat, review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Second Supplemental Response to Plaintiff's Request for Production of Documents (Set Four). | 1.32 | 1.32 | Vague; Excessive | Vague as to which set of discovery the task relates. No Second Supplemental Responses to RPD Set Four was produced.<br>RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| SDD | 9/21/16 | Draft, review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Supplemental Responses to Plaintiff's Request for Admissions (Set One). | 0.30 | 0.30 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/21/16 | Draft, review, revise, edit PLAINTIFF A.A. 'S REQUEST FOR PRODUCTJON OF DOCUMENTS TO DEFENDANT KARLA TORRES, SET THREE. | 0.12 | 0.12 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |

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| SDD | 9/21/16 | Draft, review, revise, and edit PLA1NTIFF A.A.' S REQUEST FOR ADMISSlONS TO DEFENDANT FELECIA BUTLER (SET FOUR). | 0.10 | 0.10 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. |
| DBA | 9/21/16 | begin drafting Supplemental Memo re MTC response to RPDl, No.6 | 1.50 | 1.50 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 9/21/16 | Review Joint Stipulation and Supplemental Memorandum for Motion to Compel Butler RFA l (Dkt. 90) for possible hearing on Tuesday, September 27 | 0.48 | 0.48 | Duplicative ; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 9/21/16 | Began drafting Outline for Supplemental Response to Joint Stip, RPD 1 No. 6 | 0.82 | 0.82 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/21/16 | drafting Supplemental Declaration of DBA in support of Supplemental Memorandum, RPD 1, No.6 | 0.23 | 0.23 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| SDD | 9/22/16 | Continue to Draft and revise the PMK deposition notice; re: warrants. | 0.77 | 0.77 | Vague; Duplicative; Excessive | Vague as to what work was actually performed: what revisions were made in light of extensive work already performed on PMK notices. Thus excessive and potentially duplicative work performed. |
| AMP | 9/22/16 | Review Joint Stipulation and Supplemental Memorandum for Motion to Compel Butler RF A l (Dkt. 90) for mock argument | 0.53 | 0.53 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 9/22/16 | Continµe draft of M&C: Letter re Butler's responses to Request for Admissions Set 3 | 0.48 | 0.48 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |
| DBA | 9/22/16 | Drafting revisions to decl DBA in support of Supplemental Memo re RPD 1, Request No. 6 | 0.18 | 0.18 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 9/22/16 | discussing revisions to Supplemental Memo re RPD 1, No. 6 with SDD | 1.45 | 1.45 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/22/16 | Meet with Dennis to discuss the Supp. Memo fur County's RPD (Set 1), No. 6. | 0.25 | 0.25 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/22/16 | continuing to draft Supplemental Declaration of DBA in support of Supplemental Memorandum re RPD l, No 6. | 0.53 | 0.53 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/22/16 | Drafting revisions to M&C re RPD 2 to County | 0.17 | 0.17 | Duplicative; Excessive | RPDs Set Two sought duplicative and overlapping records as sought in related *Rogers* case. In total over 20000 documents were produced in *Rogers* . Renewed fee motion fails to articulate why this duplicative discovery was a necessary step to Plaintiff's limited victory of the underlying claims. |
| DBA | 9/22/16 | further drafting of revisions to Supplemental Memo re Joint Stip re RPD 1, No. 6 | 0.28 | 0.28 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 9/22/16 | Adrian - Review Meet and Confer letter re County Rogs Set Two (7-8, 13-14) for phone Meet and Confer conference tomorrow. | 0.15 | 0.15 | Duplicative; Excessive; Vague | Vague to which party propounded the discovery.<br>ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery spanning two decades was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 9/22/16 | Review Meet and Confer letter re Butler RPD Set One for phone Meet and Confer conference tomorrow | 0.10 | 0.10 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. |
| AMP | 9/22/16 | Review Meet and Confer letter re Butler RFA Set Two for phone Meet and Confer conference tomorrow | 0.12 | 0.12 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 9/22/16 | Start draft of second notice of deposition of Angelita Saldana, edit and revise RPDs from prior notice | 0.15 | 0.00 | No Objection | No Objection. |

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| AMP | 9/22/16 | Start draft of second notice of deposition of Felecia Butler, edit and revise RPDs from prior notice | 0.33 | 0.00 | No Objection | No Objection. |
| AMP | 9/22/16 | Start draft of second notice of deposition of Karla Torres, edit and revise RPDs from prior notice | 0.27 | 0.00 | No Objection | No Objection. |
| AMP | 9/23/16 | Continue draft ofM&C Letter re Butler's responses to Request fur Admissions Set 3, individualized typicality analyses for Requests 69 - 85 | 0.58 | 0.58 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |
| SDD | 9/23/16 | Continue to revise the PMK, re: warrants; draft and revise the RPD section. | 1.23 | 1.23 | Vague | Vague as to what document was revised. |
| SDD | 9/23/16 | Review Butler MTC RFA 1 in preparation for practice Oral Argument with Adrian. | 0.45 | 0.45 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| DBA | 9/23/16 | Reviewing Joint Stip re MTC Butler further responses to RFA (Set One) for oral argument 9/27/ 16. | 0.45 | 0.45 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| AMP | 9/23/16 | Prepare for mock oral argument re Butler's responses to RFAs Set One, reviewing applicable law and arguments made, hearing still on calendar for Tuesday, September 27 | 0.45 | 0.45 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 9/23/16 | Review, revise, and edit the Supp. Briefing, re: County RPD Set I, No.6. | 0.82 | 0.82 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 9/23/16 | Continue draft of M&C Letter re Butler's responses to Request for Admissions Set 3, individualized vague and ambiguous analyses for Requests 69-70, 73-74, 77-79, and 82-83 | 0.30 | 0.30 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |
| DBA | 9/23/16 | drafting decl. of AMP in support of Supplemental Memo re Joint Stip, RPD 1, No. 6 | 0.85 | 0.85 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/23/16 | Draft review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Second Supplemental Response to Plaintiff's Request for Production of Documents {Set Four). | 0.83 | 0.83 | Vague; Excessive | Vague as to which set of discovery the task relates. No Second Supplemental Responses to RPD Set Four was produced.<br>RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |

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| AMP | 9/23/16 | Cootinue draft of M&Cletter re Butler's responses to Request for Admissions Set 3, individualsed typicality analyses for Requests 88-91 | 0.30 | 0.30 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 9/23/16 | Continue draft of M&C Letter re Buttler's reponses to Request for Admissions Set 3, continue individualized typicality analyses for Requests 69 - 85 | 0.32 | 0.32 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. |
| DBA | 9/23/16 | Drafting revisions to Supplemental Memo in support of MTC RPD, No. 6 | 1.28 | 1.28 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 9/23/16 | Draft and e-mail summary of phone conference with Paul Burkhart, outlining and detailing results of 28 minute phone conversation and production date for supplemental responses | 0.27 | 0.27 | Vague | Vague as to what discovery the task relates. |

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| AMP | 9/23/16 | Phone Meet and Confer conference with Paul Burkhart re: Butler's Responses to RPDs Set l and RFAs Set Two as well as County's supplemental responses to Interrogatories 7-8 and 13-14 | 0.48 | 0.48 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. RPDs Set One duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related Rogers case. ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria.<br><br>Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| AMP | 9/23/16 | Continue draft ofM&C Letter re Butler's responses to Request for Admissions Set 3, individualized reasonable inquiry analyses for Requests 77 - 80 | 0.13 | 0.13 | Excessive | RFA Set Three to Butler sought admissions regarding the individual claims, including specific actions of Tonita Rogers and defendant Butler. Per the Scheduling Order in place, discovery was limited to that which related to class certification. Thus, time spent seeking discovery Plaintiff not yet entitled to. Further, no such letter was located as having been received. Attorney should not bill for incomplete, unnecessary work. |

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| AMP | 9/23/16 | Review Court's order at Dkt. 95 Denying Plaintiffs Motion to Compel Butler's RF As (Set One) | 0.23 | 0.23 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| DBA | 9/23/16 | drafting revisions to Supplemental Memorandum | 1.72 | 1.72 | Vague | Vague as to what the Supplemental memorandum was regarding and what filing it relates. |
| DBA | 9/23/16 | met with SDD to discuss revisions needed in Supplemental Memorandum. | 1.03 | 1.03 | Vague | Vague as to what the Supplemental memorandum was regarding and what filing it relates. |
| SDD | 9/23/16 | Met with Dennis, discuss the revisions necessary to the Supp. Memo, re: County RPD (Set I) No, 6. | 1.03 | 1.03 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/23/16 | Practice oral argument re Butler, RFA 1 | 0.65 | 0.65 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |

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| AMP | 9/23/16 | Mock oral argument re Butler's responses to RF As Set One, reviewing applicable law and arguments made, hearing still on calendar for Tuesday, September 27 | 0.65 | 0.65 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, Butler had adequately responded and the motion denied; thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 9/23/16 | Practice oral argumnet, re: Butler RfA 1. | 0.65 | 0.65 | Duplicative; Excessive | RFAs Set One to Butler contains duplicative requests of RFAs to Butler in the related *Rogers* case to which she provided responses. Renewed fee motion fails to articulate why seeking duplicative information already received in *Rogers* was a necessary step to Plaintiff's victory in individual claims. Further, at eventual 9/23/16 MTC, court found most requests were not adequately relevant to class, thus excessive time spent on seeking information outside the Scheduling Order to which Plaintiff was not yet entitled to. |
| SDD | 9/26/16 | Meet with Dennis to discuss the Supp. Memo, re: memo organfaation and need for additional argument. | 1.07 | 1.07 | Vague | Vague as to what the Supplemental memorandum was regarding and what filing it relates. |

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| DBA | 9/26/16 | continuing to edit Supplemental Memorandum re MTC defendant's response to RPD, set one, number 6 | 1.78 | 1.78 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/26/16 | revising Supplemental Memo, Joint Stip, RPD 1, No. 6, re Defendant's request for extension to produce documents | 0.27 | 0.27 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/26/16 | meet with Dennis to dicuss the Supp. Memo, re: County's RPD (Set l), No. 6 - 120 days to rpdocue unreasonable. | 0.45 | 0.45 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/26/16 | re-drafting exigency, relevance sections after discussion with SDD | 1.50 | 1.50 | Vague | Vague as to what document was being re-drafted. |
| SDD | 9/26/16 | Meet with Dennis to discuss the Supp. Memo, re: memo organization and argument regarding the call fo the request. | 0.52 | 0.52 | Vague | Vague as to what the Supplemental memorandum was regarding and what filing it relates. |

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| DBA | 9/26/16 | Discussing with SDD content of requests, issue of exigency. | 0.90 | 0.90 | Vague | Vague as to what document the task relates. |
| SDD | 9/27/16 | Review, revise, and edit PLAlNTIFF'S SUPPLEMENTAL BRJEF, RE: MOTION TO COMPEL COUNTY TO PROVIDE RESPONSES TO REQUEST FOR PROOUCTION (SET ONE); REQUEST NO. 6. | 1.25 | 1.25 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/27/16 | final drafting of Supp. Deel. of DBA in support of Supp. Memo re Joint Stip, RPD l | 0.18 | 0.18 | Duplicative; Excessive | RFP Set One sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Renewed fee motion fails to articulate why additional discovery on top of that discovery already sought and obtained in *Rogers* case was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/27/16 | preparing State Attorney Client privilege section to Joint Memo re RPDl, No. 6 | 1.72 | 1.72 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/27/16 | preparing Supp. Decl. of DBA in support of Supp. Memo | 0.50 | 0.50 | Vague | Vague as to what the Supplemental memorandum was regarding and what filing it relates. |

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| SDD | 9/27/16 | Review, revise, and edit PLAINTIFF'S SUPPLEMENT AL BRIEF, RE: MOTION TO COMPEL COUNTY TO PROVIDE RESPONSES TO REQUEST FOR PRODUCTION (SET ONE), REQUEST NO. 6 | 1.53 | 1.53 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 9/27/16 | drafting final revisions to Supplemental Memo, Joint Stip, RPD 1, No. 6 | 0.40 | 0.40 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 9/27/16 | Review, revise, and edit Decl. Dennis in suppor of Supp, Memo. | 0.62 | 0.62 | Vague | Vague as to what the Supplemental memorandum was regarding and what filing it relates. |
| DBA | 9/27/16 | drafting TOC/TOA Supp. Memo, Joint Stip RPD1, No. 6, final revisions to Decl. DBA and exhibits | 1.05 | 1.05 | Clerical; Excessive; Vague | Includes time spent on noncompensable clerical work; Incomprehensible as to what substantive work was completed, appears to be block billing. |
| SDD | 9/28/16 | Steve - Meet with Dennis to discuss the required revisions for the meet and confer letter, re: RPD (Set 4). | 0.7 | 0.7 | Vague | Vague as to which defendant the task relates. |

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| DBA | 9/28/16 | Dennis - conferrign with SDD re revisions to M&C ltr to County re its responses to RPD 4. | 0.6 | 0.6 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| DBA | 9/28/16 | Dennis-researching FOIA requests for A.A. | 0.28 | 0.28 | Vague | Vague as to purpose of research and what work it relates. |
| DBA | 9/28/16 | Dennis - printing and mailing Supp. Memo, dec!. to Court | 0.28 | 0.28 | Clerical | Time spent on noncompensable clerical work. |
| DBA | 9/29/16 | Dennis - drafting revisions to M7C ltr, re County (RPD 4) sections on relevance, evasion, oppression | 1.77 | 1.77 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| SDD | 9/29/16 | Steve - Meet with Dennis to discuss the necessary revisions to the M&C letter, re County (RPD 4) | 0.95 | 0.95 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| DBA | 9/29/16 | Dennis -discussion with SDD re M&C letter | 0.92 | 0.92 | Vague | Vague as to what was discussed and what M&C letter the task relates. |

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| DBA | 9/29/16 | Dennis -contintued to draft M&C ltr. re Defendant's responses to RDP(set 4) commonality, and typicality | 1.47 | 1.47 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. Task clearly related to class cert issues unnecessary to individual claims. |
| DBA | 9/29/16 | Dennis - researching objectionto RPD as vexing, annoying or harrasing in context of M&C ltr to County (RPD 4) | 0.87 | 0.87 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| DBA | 9/29/16 | Dennis - Drafting revisions to M&C ltr. Re County (RPD 4), re documents already produced. | 0.9 | 0.9 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |

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| DBA | 9/30/16 | Dennis - Continued draft of M&C ltr re County response to RPD 4, responses to RFA 1 re policies, discipline | 1.57 | 1.57 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| DBA | 10/6/16 | Dennis - further drafting of declaration of Danyelle Branning in support of class. cert motion. | 0.75 | 0.75 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| DBA | 10/7/16 | Dennis- drafting suggested revisions to decl. ofE rik Holmes in support of Mtn to certify class | 1.43 | 1.43 | Excessive | Task clearly related to solely seeking class certification and completely unnecessary to the individual claims. |
| DBA | 10/7/16 | Dennis - drafting revisions to decl. Jason Hunter in support of Class Cert. Mt. | 0.4 | 0.4 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No such declaration was filed in support of class cert. mtn. or in draft motion for partial summary judgment. |
| DBA | 10/10/16 | Dennis-Outgoing call to Erik. Holmes (951) 230-8663 re details for his declaration in support of Plaintiffs class cert mtn. | 1.52 | 1.52 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims. |

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| SDD | 10/10/16 | Steve - Email to Paul Burkhart, re: Supplemental Interrogatories (Set 2) Nos. 7 and 8. | 0.25 | 0.25 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 10/10/16 | Drafting revisions to decL Erik Holmes in support of MTN. to certify class | 1.25 | 1.25 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims. |
| DBA | 10/10/16 | meet with Steve to discuss the Decl. of Holmes in-support of class cert motion | 0.25 | 0.25 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims. |
| SDD | 10/10/16 | Steve - Meet with Dennis to discuss the Decl. of Holmes in support of the Class Certification Motion. | 0.5 | 0.5 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims. |
| DBA | 10/11/16 | Dennis- editing declaration of Chellie Holmes after discussion with her on the telephone. | 0.83 | 0.83 | Vague; Excessive | Vague as to what filing the declaration relates. Fee motion fails to articulate why obtaining declaration of Chellie Holmes was a necessary step to Plaintiff's victory of individual claims. |
| DBA | 10/11/16 | Dennis - phone call to Chelle Holmes re declaration in support of Mtn. to cert. class | 1.52 | 1.52 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No declaration of Chelle Holmes was filed in support of Plaintiff's class cert motion. |
| DBA | 10/12/16 | Dennis - drafting Deposition Scheduling Worksheet | 0.63 | 0.63 | Clerical | Time spent on noncompensable clerical work. |

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| DBA | 10/12/16 | Dennis - further drafting of Declaration of Chelle Holmes in support of Plaintfffs class cert motion. | 1.33 | 1.33 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No declaration of Chelle Holmes was filed in support of Plaintiff's class cert motion. |
| DBA | 10/12/16 | Dennis - review Joint Stip, RPD 1, No. 6 in preparation for conference call tomorow with Magistrate Pym | 1.35 | 1.35 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 10/13/16 | Dennis- tdephonc conference with Magistrate Pym and defense counsel re MTC RPD 1, No. 6 | 0.58 | 0.58 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| DBA | 10/13/16 | Dennis - drafting chronology of events re RPD 1, No. 6, for todays's conference call with Magistrate Pym | 0.23 | 0.23 | Vague; Duplicative; Excessive | Vague as to which defendant the RFP set relates. RFP Set One to County sought overlapping information sought in related *Rogers* case, and certain documents ranging from 1995-2014. Specifically, request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such extensive, detailed information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| DBA | 10/14/16 | Dennis - drafting final revisions to decl. of Chellie Holmes in support of Mtn. to Certify Class | 0.2 | 0.2 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims. |
| DBA | 10/17/16 | Dennis - reviewing depo transcripts of social workers in Finch v, County of Riverside none usable here, other than lidlren Aikins | 1.18 | 1.18 | Vague | Vague as to purpose of review and to what specific work the review was for. Impossible to determine what aspect of the case the task relates. |
| DBA | 10/18/16 | Dennis - Meet with Steve to discuss the Declaration of Holmes in support of Class Cert. | 0.58 | 0.58 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims. |
| DBA | 10/19/16 | Dennis: drafting revisions to M&C letter re RPD (Set Two) | 0.48 | 0.48 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| SDD | 10/19/16 | Steve - Meet with Dennis to discuss the Meet and Confer ~et, re: County RPD (Set 2). | 1.02 | 1.02 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |

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| DBA | 10/20/16 | Dennis- further drafting of revisions to declaration of Chelle Holmes in support of Plaintiffs Class Cert. Mtn. | 0.52 | 0.52 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No declaration of Chelle Holmes was filed in support of Plaintiff's class cert motion. |
| DBA | 10/21/16 | Dennis - drafting Notices of Rescheduied Depositions of witness Michael Puentes, and defendants Torres, Saldana, and Butler | 0.78 | 0.78 | Vague; Clerical | Entry contains block billing. Includes time spent on noncompensable clerical work. Vague as to "Saldana" as not a defendant in this case. |
| SDD | 10/26/16 | Steve - review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Second Supplemental Response to Plaintiffs Request for Production of Documents (Set Two). | 0.4 | 0.4 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| DBA | 10/27/16 | Dennis - reviewing Defendant Butler's Supp. responses to RPD, Set One | 0.62 | 0.62 | Duplicative; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. Per M&C letter dated 9/13/16, RPD Set One related to typicality requirement of class certification. Renewed fee motion fails to articulate why seeking such discovery was necessary to Plaintiff's victory of the individual claims. |
| SDD | 10/27/16 | Dennis - completing final revisions to M&C ltr. re RPO, set Two | 0.43 | 0.43 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| DBA | 10/27/16 | Steve - Meet with Dennis to discuss the necessary revisions to M&C letter, re: County's RPD No. 2., | 0.6 | 0.6 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |

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| DBA | 10/27/16 | Dennis- revieiwing M & C re RPD 2 with SDD | 0.5 | 0.5 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| DBA | 10/27/16 | Dennis - reviewing SDD suggested revisions to M&C ltr to County re its response to RPD 2 | 0.17 | 0.17 | Excessive; Duplicative | Discovery sought A.A.'s entire juvenile case file. Records protected by WIC 827 to which both parties obtained orders and received records. Thus time spent obtaining duplicative records |
| SDD | 10/27/16 | Steve- Continue to draft the PMK Depo Notice; re: warrants, etc. | 0.63 | 0.63 | Vague; Duplicative; Excessive | Vague as to what work was actually performed: what revisions were made in light of extensive work already performed on PMK notices. Thus excessive and potentially duplicative work performed. Vague as to "etc." |
| SDD | 10/28/16 | Steve - Review, revise, and edit Meet and Confer re Defendant County's Resp to Plaintiffs lnterrogatories (Set three). | 0.92 | 0.92 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| SDD | 10/28/16 | Steve - Review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Responses to Plaintiff's Request for Admissions (Set Sixteen) | 0.22 | 0.22 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |

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| DBA | 10/28/16 | Dennis - drafting revisions to M&C ltr to Defense Counsel re its responses to RPD, Set 4 | 1.32 | 1.32 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |
| DBA | 11/2/16 | Dennis - drafting objeetions to Defendants' Rogs, Set One to Plaintiff | 0.27 | 0.27 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| DBA | 11/2/16 | Dennis - Reviewing Mark Ankcorn's proposed objections to Interrogatorics to Plaintiff, Set 1 from Defendant County of Riverside | 0.5 | 0.5 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. Further time spent seeking expertise from class action attorney, unnecessary to individual claims. |
| AMP | 11/2/16 | Dennis - drafting revisions to M&C ltr re County's response to RPD 4 | 0.38 | 0.38 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |

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| AMP | 11/7/16 | Adrian - Review Defendant Torres' Responses to RPDs Set 3, analyzing for early possible Meet and Confer issues | 0.12 | 0.12 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, no such M&C letter was located as having been received. Attorney should not bill for incomplete work. |
| AMP | 11/7/16 | Adrlan - Review Defendant Butler's Responses to RPDs Set 3, analyzing for any possible Meet and Confer issues | 0.22 | 0.22 | Duplicative ; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 11/7/16 | Adrian - Final revision and edits of Meet and Confer letter re County's responses to lnterrogatories Set 3 | 0.07 | 0.07 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 11/7/16 | Adrian - Finish drafting, edits and revisions to M&C Letter re County's Responses to RFAs' Set 16 based on Steve's comments from review | 0.18 | 0.18 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 11/7/16 | Adrian - Drafting, edits and revisions to M&C Letter re County's Responses to RFAs Set 16 based on Steve's comments from review | 0.13 | 0.13 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. |

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| SDD | 11/9/16 | Steve-Review, revise, and edit Meet and Confer re: Defendant Felecia Butler's Supplemental Responses to Plaintiff's Request for Admissions (Set Two). | 0.55 | 0.55 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 11/9/16 | Adrian - Start draft of M&C Letter re Defendant Butler's Responses to RPDs Set 3 | 0.15 | 0.15 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 11/9/16 | Adrian- Finish first draft ofM&C Letter re Defendant Butler's Supplemental Responses to RFAs Set 2 | 0.67 | 0.67 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |

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| AMP | 11/9/16 | Adrian - Continue draft of M&C Leiter re Defendant Butler's Supplemental Responses to RFA Set 2 | 0.43 | 0.43 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| AMP | 11/9/16 | Adrian - Research propriety of adding additional grounds for relevancy objection in supplemental response | 0.2 | 0.2 | Vague | Vague as to what discovery the task relates. |
| AMP | 11/9/16 | Adrian - Start draft ofM&C Letter re Defendant Butler's Supplemental Responses to RFAs Set 2 | 0.72 | 0.72 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| DBA | 11/9/16 | Adrian - Review Defendant Butler's Supplemental Responses to RFAs Set 2, analyzing for any possible Meet and Confer issue.s | 0.13 | 0.13 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| DBA | 11/9/16 | Dennis - Researching class action type objections to lnterrogatories County of Riverside, Set One. | 1.43 | 1.43 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |

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| DBA | 11/9/16 | Dennis - drafting supplemental objections to Rogs, Set One, propounded by County of Riverside | 0.13 | 0.13 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 11/9/16 | Adrian - Review, edit, and finalize M&C Letter re County's Supp Responsees to RFAs Set One | 0.17 | 0.17 | Duplicative; Excessive | RFA's Set One sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 11/9/16 | Adrian - Continue draft of M&C Letter re Defendant Butler's Responses to RPDs Set 3 | 0.25 | 0.25 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 11/9/16 | Adrian - Draft new sections, revise, and edit Meet and Confer letter re: Defendant Felecia Butler's Supplemental Responses to Plaintiff's Request for Admissions (Set Two) per Steve's comments from review. | 0.67 | 0.67 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 11/10/16 | Adrian - Research re documents previously produced objection to request for production | 0.55 | 0.55 | Vague | Vague as to what set of discovery the task relates. |
| AMP | 11/10/16 | Adrian - Continue draft of.M&C Letter re Defendant Butler's Responses to RPDs Set 3 | 0.52 | 0.52 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 11/10/16 | Adrian - Continue drafting new sections, revising and editing Meet and Confer let1er re: Defendant Felecia Butler's Supplemental Responses to Plaintiff's Request for Admissions (Set Two) per Steve's comments from review; section re response containing improper objection | 0.28 | 0.28 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 11/10/16 | Adrian - Continue drafting new sections, revising and editing Meet and Confer let1er re: Defendant Felecia Butler's Supplemental Responses to Plaintifrs Request for Admissions (Set Two) per Steve's comments from review. | 0.75 | 0.75 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 11/10/16 | Adrian - Research official information privilege, applicability to personnel files, and balancing test to overrule privilege | 0.72 | 0.72 | Vague | Vague as to purpose of research and what work the research was for. |

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| AMP | 11/10/16 | Adrian-Continue draft of M&C Letter re Defendant Butler's Responses to RPDs Set 3, continue section re RPD 30, privacy objection | 0.28 | 0.28 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| SDD | 11/10/16 | Steve - Review, revise, and edit Meet and Confer, re: Defendant County of Riverside's Second Supplemental Response to Plaintiff's Request for Production of Documents (Set Two). | 0.3 | 0.3 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| AMP | 11/10/16 | Adrian - Continue draft ofM&C Letter re Defendant Butler's Responses to RPDs Set 3, start section re RPO 30 | 0.75 | 0.75 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 11/10/16 | Adrian - Research applicability and impact of case law cited in Defendant's objection to Request No. 30 | 0.38 | 0.38 | Vague | Vague as to what set of discovery the task relates and what defendant the discovery relates. |

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| AMP | 11/10/16 | Adrian- Continue dratl ofM&C Letter re Defendant Butler's Responses to RPDs Set 3, section re overly broad and unduly burdensome objection | 0.4 | 0.4 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 11/10/16 | Adrian - Continue draft of M&C Letter re Defendant Butler's Responses to RPDs Set 3, section re documents already produced objection | 0.5 | 0.5 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 11/11/16 | Adrian - Start draft ofM&C Letter re Defendant Torres Responses to RPDs Set 3 | 0.18 | 0.18 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |

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| AMP | 11/11/16 | 11/11/2016 AMP Adrian - Research re applicability of WIC 827 to request for social worker personnel files | 0.35 | 0.35 | Excessive; Vague | Vague as to what social workers personnel files were being sought. Personnel files never produced nor needed for draft partial msj. Seeking global section 827 records not necessary to underlying claims, necessary only to seeking class certification. Further, 827 petition was denied, thus time spent not necessary to victory on individual claims. |
| AMP | 11/11/16 | Adrian - Continue dtaft of M&C Letter re Defendant Butler's Responses to RPDs Set 3, section re vague and ambiguous objection | 0.53 | 0.53 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 11/11/16 | Adrian- Research re privacy objections; specific cases relating to privacy and personnel files | 0.27 | 0.27 | Vague | Vague as purpose of research and what work the research was for. |

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| AMP | 11/11/16 | Adrian - Continue draft ofM&C Letter .re Oerendail~ Butler's Responses to RPDs Set 3 | 1.03 | 1.03 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 11/14/16 | Dennis - Researching issue of waiver in successive responses to County's Third Supplemental Response to Rogs, Set 2, from Plaintiff | 0.65 | 0.65 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 11/14/16 | Adrian - Finish first draft ofM&C Letter re Defendant Torres' Responses 10 RPDs Set3 | 0.53 | 0.53 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |

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| AMP | 11/14/16 | Adrian Continue draft of M.&C Letter re Defendant Torres' Response to RPDs Set 3, section re individualized official information privilege objection analysis for Request 35 | 0.72 | 0.72 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 11/14/16 | Adrian - Continue draft ofM&C Letter re Defendant Torres' Responses to RPDs Set 3, section re individualized vague and ambiguous objection analysis for Request 35 | 0.52 | 0.52 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| DBA | 11/14/16 | Dennis - Reviewing County's Third Supplemental Response to Rogs, Set 2, from Plaintiff | 0.38 | 0.38 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| DBA | 11/14/16 | 11/14/2016 OBA Dennis - Reviewing Butler's responses to Plaintiffs RFA, Set Two | 0.05 | 0.05 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| AMP | 11/14/16 | Adrian - Continue draft ofM&C Letter re Defendant Torres' Responses to RPDs Set 3, section re individualized burden analysis for Request 35 | 0.72 | 0.72 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 11/14/16 | Adrian - Continue draft ofM&C Letter re Defendant Torres' Responses to RPDs Set 3, section re possession, custody, control and expanded scope for responding | 0.63 | 0.63 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |

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| DBA | 11/15/16 | Dennis - reviewing third supplemental objections to Interrogatories, set two, propounded to County | 0.1 | 0.1 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 11/15/16 | Adrian - Finish first draft of M&C Letter ref Defendant Butler's Responses to RPDs Set 3 | 0.35 | 0.35 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| DBA | 11/15/16 | Dennis- researching additional objections to Defendants' Rogs, Set One to Plaintiff | 0.3 | 0.3 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| DBA | 11/15/16 | Dennnis- drafting objections to County Rogs, set one to Plaintiff | 1.02 | 1.02 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| DBA | 11/15/16 | Dennis - researching objection to County of Riverside's Rogs, set One I | 0.57 | 0.57 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| DBA | 11/15/16 | Dennis- reviewing supplemental response to RPD. set one, propounded to Butler | 0.05 | 0.05 | Duplicative ; Excessive | Duplicative of requests served on Torres and information sought and obtained through other written discovery in this case and related *Rogers* case. |
| DBA | 11/15/16 | Dennis - reviewing Defendant Countys Request for Production of Document, Set One | 1.02 | 1.02 | Excessive | County RPDs to Plaintiff sought documents supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 11/16/16 | Adrian - Continue review, editing, revising, and cheeking to see if more objections needed for Plaintiff's responses to interrogatories, set one, propounded by Defendant County of Riverside | 0.48 | 0.48 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 11/16/16 | Adrian - Review, edit, revise, and check to see if more objections needed fur Plaintiffs responses to interrogatories, set one, propounded by Defendant County of Riverside | 0.28 | 0.28 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| SDD | 11/16/16 | Steve - Review, revise, and edit Meet and Confer, re: Defendant Felecia Torres Responses to Plaintiff's Request for Production of Documents (Set Three) | 0.4 | 0.4 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| SDD | 11/16/16 | Steve - Review; revise, and edit Meet and Confer, re: Defendant Felecia Butler's Supplemental Responses to Plaintiff's Request for Admissions (Set Two). | 0.15 | 0.15 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory of individual claims. Further, time spent seeking further responses to Set Two excessive given M&C letter sought admission on only one request Plaintiff argued was related to class certification. Response not necessary to individual claims as a response was never provided due to legitimate objections. |
| SDD | 11/16/16 | Steve - Draft, review, revise and edit Meet and Confer, re: Defendant County ofRiverside's Response to Plaintiff's Request for Production of Documents (Set Four). | 0.15 | 0.15 | Excessive | RPD Set Four sought County of Riverside documents related to Grand Jury Reports from 1990 to 2016, documents related to complaints and grievances from 1995-2016. Renewed fee motion fails to articulate why seeking and obtaining documents spanning three decades was a necessary step to Plaintiff's victory on the individual claims. Further, counsel argues the requests were relevant to class certification in their 11/16/2016 M&C letter. |

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| DBA | 11/16/16 | Dennis- drafting Plaintiff's responses to interrogatories, set one, propounded by Defendant County of Riverside | 1.5 | 1.5 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| DBA | 11/16/16 | Dennis - drafting objections to request for Production, Set One, propounded by County of Riverside. | 0.7 | 0.7 | Excessive | County RPDs to Plaintiff sought documents supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| DBA | 11/17/16 | Dennis - drafting objections to Request for Production, Set One, from county based on companion objections to County's lnterrogatories, Set One. | 0.18 | 0.18 | Excessive | County RPDs to Plaintiff sought documents supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| DBA | 11/17/16 | Dennis - drafting revisions to Plaintiffs response to Request for Production, Set One, propounded by County of Riverside | 0.42 | 0.42 | Excessive | County RPDs to Plaintiff sought documents supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| DBA | 11/17/16 | Dennis - researching objections to Defendant County's Request for Production, Set One | 0.25 | 0.25 | Excessive | County RPDs to Plaintiff sought documents supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 11/17/16 | Adrian - Continue review, editing, and revising of Plaintiffs responses to interrogatories, set one, propounded by Defendant Coμnty of Riverside | 1.25 | 1.25 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| DBA | 11/18/16 | Dennis - drafting meet and confer letter re County's Third Supplemental Responses to lnterrogatories, (Set Two) Nos. 7, 8, 13 | 0.58 | 0.58 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 11/18/16 | Dennis- researching law on waiver of objections in initial response for meet and confer letter to County re Third Supplemental response to interrogatories, set two. | 0.28 | 0.28 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 11/18/16 | Adrian - Continue reviewing, editing, and revising Meet and Confer Letter re Torres's responses to RPD Set Three based on Steve's comments from review, privilege objections | 0.8 | 0.8 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, no such M&C letter was located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 11/18/16 | Adrian- Continue reviewing, editing, and revising Meet and Confer Letter re Torres' responses to RPDs Set Three based on Steve's comments from review (includes 17 minute discussion with 'Steve on review comments) | 0.82 | 0.82 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, no such M&C letter was located as having been received. Attorney should not bill for incomplete work. |
| AMP | 11/18/16 | Adrian - Review, edit, and revise Meet and Confer Letter re Torres' responses to RPOs Set Three based on Steve's comments from review | 0.53 | 0.53 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 11/21/16 | Adrian - Draft summary of partial Meet and Confer phone conference and e-mail to Burkhart | 0.23 | 0.23 | Vague | Vague as to what set of discovery the task relates. |
| DBA | 11/21/16 | Dennis - meet and confer telephone call to Attorney Burkhart the further supplemental response to Request for Production, Set Two. | 0.17 | 0.17 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |

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| AMP | 11/21/16 | Adrian - Meet and Confer phone conference re County's responses to RFAs Sets 15 and 16, Rogs Set 3, and County's supplemental responses to RfAs Set 1 | 0.37 | 0.37 | Vague; Duplicative; Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. M&C letter dated 11/9/2016 alleges RFA 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Thus, time spent on seeking class related discovery and information Plaintiff was not yet entitled to. |
| AMP | 11/21/16 | AMP Adrian - Start outline of issues not yet resolved by written discovery to explore during depositions | 0.15 | 0.15 | Vague | Vague as to which category of issues and depositions the task relates given the number of depositions sought in this case. |
| DBA | 11/21/16 | DBA Dennis - reviewing objections to County's Request for Production Set One for additional objections based on objections to interrogatories (Set One) from County | 0.28 | 0.28 | Excessive | County RFPS to Plaintiff sought information supporting Plaintiff's class allegations. Discovery would not have been propounded if no class allegation made, thus time spent not necessary to individuals claims. |

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| AMP | 11/21/16 | AMP Adrian - Continue reviewing, editing, and revising Meet and Confer Letter re Torres' responses to RPDs Set Three based on Steve's comments from review | 0.23 | 0.23 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 11/21/16 | DBA Dennis - review meet and confer letter re County's responses to Request for Production, Set Two, prepare for meet and confer call with counsel for County today | 0.2 | 0.2 | Excessive | Time spent seeking records already obtained pursuant to WIC 827 and previously produced by defendant. |
| AMP | 11/21/16 | AMP Adrian - Review M&C Letters for conference at 11 a,m, to discuss discovery disputes (County RFA 15, County RFA16, County Rog), County Supp RFA) | 0.52 | 0.52 | Duplicative ; Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. M&C letter dated 11/9/2016 alleges RFA 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Thus, time spent on seeking class related discovery and information Plaintiff was not yet entitled to. |

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| DBA | 11/21/16 | DBA Dennis- reviewing Plaintiffs Supplememal memo submitted in response to Motion to Compel responses to rogs, set two, propounded by plaintiff | 1.03 | 1.03 | Vague | Vague as to which defendant the task relates. |
| DBA | 11/21/16 | DBA Dennis - reviewing Plaintiffs supplemental memo regarding her motion to compel responses to interrogatory nos. 7-& | 0.25 | 0.25 | Vague | Vague as to which set of discovery and which defendant the task relates. |
| DBA | 11/21/16 | DBA Dennis - continuing to draft meet and confer to County regarding its third supplemental response to interrogatories, Set Two. | 1.68 | 1.68 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 11/21/16 | AMP Adrian - Continue outline of issues not yet resolved by written discovery to explore during depositions, policies, proc«lure, practices, training. discipline for commonality | 0.7 | 0.7 | Excessive | Task clearly related to class related issue of commonality for the purpose of seeking class certification and unnecessary to the individual claims. |
| AMP | 11/21/16 | AMP Adrian- Continue outline of issues not yet resolved by written discovery to explore during depositions, topics based on County's responses to written discovery | 0.27 | 0.27 | Vague | Vague as to which category of issues and depositions the task relates given the number of depositions sought in this case. |

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| AMP | 11/22/16 | 11/22/2016 AMP Adrian - Continue draft of outline for depositions based on gaps wriitten discovery responses, draft sections related to individual Defendants | 0.72 | 0.72 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| SDD | 11/22/16 | 11/22/2016 SDD Steve- Review, revise, and edit fyieet and Confer, re: County's Third Supplemental Responses to Plaintiff's Interrogatories (Set Two), Nos. 7-8 and D. | 1.38 | 1.38 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| DBA | 11/22/16 | 11/22/2016 DBA Dennis - further drafting of waiver section of meet and confer letter to defendant re its supplemental responses to interrogatories 7 and 8 | 0.6 | 0.6 | Vague | Vague as to which set of discovery and which defendant the task relates. |
| AMP | 11/22/16 | 11/22/2016 AMP Adrian - Review prior written discovery responses of individual Defendants for deposition outlines | 0.25 | 0.25 | Vague | Vague as to what work was actually performed and what deposition(s) the task relates. |
| AMP | 11/22/16 | 11/22/2016 AMP Adrian - Continue draft of outline for depositions to cover holes in written discovery responses | 0.88 | 0.88 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |

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| DBA | 11/22/16 | 11/22/2016 DBA Dennis - continuing drafting meet and conter letter to Defendant County re its supplemental responses to Interrogs, Set Two, Nos. 7-8, l3 | 0.92 | 0.92 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 11/22/16 | 11/22/2016 AMP Adrian - Finish draft of Plaintiff's objections and responses to Interrogatories, Set 1, from Defendant County | 0.55 | 0.55 | Excessive | County's ROGs to Plaintiff sought information supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| DBA | 11/22/16 | 11/22/2016 DBA Dennis - drafting responses to County of Riverside's Request for Production, Set One | 0.12 | 0.12 | Excessive | County's RFP's to Plaintiff sought documents supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| DBA | 11/22/16 | 11/22/2016 DBA Dennis - researching cases involving requests for production of documents that support contentions in complaint | 0.47 | 0.47 | Vague | Vague as to what work the research relates to. |
| AMP | 11/22/16 | Continue drafting Plaintiff's objections and responses to Interrogatories. Set 1, from Defendant County | 0.63 | 0.63 | Excessive | County's ROGs to Plaintiff sought information supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |

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| SDD | 11/22/16 | Steve - Meet with Dennis to discuss the M&C Jetter to County re: Rogs 9 Set 2). | 0.43 | 0.43 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 11/22/16 | AMP Adrian -Continue drafting Plaintiffs responses to Interrogatories, Set 1, from Defendant County | 0.52 | 0.52 | Excessive | County's ROGs to Plaintiff sought information supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| DBA | 11/22/16 | Dennis - continuing to draft Plaintiff's re Request for Production, set one, from County | 0.58 | 0.58 | Excessive | County's RFP's to Plaintiff sought documents supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| DBA | 11/22/16 | Dennis - continuing to draft meet &. confer letter to Defendant County re its third supplemental responses to rogs, set 2 | 0.38 | 0.38 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 11/22/16 | Adrian-Continue draft of outline for depositions on gaps in written discovery responses, continue draft of sections related to individual Defendants | 0.2 | 0.2 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| SDD | 11/22/16 | Steve - Review,revise, and edit Plaintiff A.A. RESPONSES TO COUNTY Of RlVERSlDE'S lNTERROGATORlES (SET ONE). | 0.88 | 0.88 | Excessive | County's ROGs to Plaintiff sought information supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| AMP | 11/22/16 | Adrian - Preparing and compiling all 827 and future trial exhibits to be used for depositions | 0.4 | 0.4 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| AMP | 11/23/16 | Adrian - Preparing and analyzing exhibits to be used for Puentes deposition from recently compiled exhibits | 0.78 | 0.78 | Vague; Clerical | Vague as to "preparing." Vague as to "recently compiled exhibits." Includes time spent on noncompensable clerical work. |
| AMP | 11/23/16 | Adrian - Continue preparing; and compiling all documents produced by Defendants as future trial exhibits to be used for depositions | 0.83 | 0.83 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| AMP | 11/23/16 | Adrian- Continue draft of deposition outline fur Michael Puentes | 0.52 | 0.52 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |

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| AMP | 11/23/16 | Adrian - Continue preparing and compiling all 827 and future trial exhibits to be used for depositions, pulling exhibits: identified in previous depositions against County of Riverside | 0.52 | 0.52 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| AMP | 11/23/16 | Adrian - Start draft of deposition outline for Michael Puentes | 0.85 | 0.85 | Excessive; Vague | Renewed fee motion fails to articulate why taking the deposition of Michael Puentes at this time was a necessary step to Plaintiff's victory on the individual claims and not just relevant to class certification issues. If relevant to individual claims only, deposition could have been sought after merits discovery began. |
| AMP | 11/23/16 | Adrian - Continue preparing and compiling all 827 and future trial exhibits to be used for depositions | 0.43 | 0.43 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| DBA | 11/23/16 | Dennis - researching issue of "contention" requests for production in defendants request for Production, Set One, to Plaintiff | 0.82 | 0.82 | Excessive | County's RFP's to Plaintiff sought documents supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| AMP | 11/23/16 | Adrian - Start draft of Exhibit Index identifying each exhibit for exhibit binders for deposition | 0.77 | 0.77 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| SAM | 11/27/16 | Review Atkins deposition and relevant exhibit-9 to prepare for the deposition of Michael Puentes. | 3.12 | 3.12 | Vague | Vague as to "relevant exhibit-9" |

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| DBA | 11/28/16 | Dennis-drafting list of missing cases from Boord· Minutes sent us by County in response to Request for Production, Set One, No. 6. | 0.03 | 0.03 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SAM | 11/28/16 | 112016 SAM Attended and take the deposition of Michael Puentes, Billing entry includes 1.6 hours round trip travel. | 6.1 | 0.00 | No objection | No Objection. |
| AMP | 11/28/16 | Adrian - Continue preparing and compiling exhibits to be used for later depositions and trial, looking specifically for training and policy exhibits | 0.82 | 0.82 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| DBA | 11/28/16 | Dennis- reviewing production of documents by County of Riverside in response to Court Order re Request for Production. (Set one) No. 6 | 0.33 | 0.33 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 11/28/16 | Steve-Continue to draft, review, revise, and edit PLAINTIFF A.A.'S RESPONSES TO COUNTY OF RIVERSIDE'S INTERROGATOR1ES (SET ONE). | 0.95 | 0.95 | Excessive | County's ROGs to Plaintiff sought information supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| DBA | 11/281/6 | Dennis- drafting further revisions to responses to Request for Production, Set One, propounded by County of Riverside. | 0.25 | 0.25 | Excessive | County's RFP's to Plaintiff sought documents supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |

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| SDD | 11/28/16 | Steve - Continue to review, revise, and edit PLAJNTlFF A.A. 'S RESPONSES TO COUNTY OF RIVERSIDE'S INTERROGATORIES (SET ONE). | 0.53 | 0.53 | Excessive | County's ROGs to Plaintiff sought information supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| AMP | 11/28/16 | Adrian - Final edits to Meet and Confer letter re Butler's Supp. Response lo RFA Set 2 (No. 35) | 0.18 | 0.18 | Duplicative; Excessive | RFAs Set Two to Butler, received on the same day as Set One, contains duplicative requests of RFAs to Butler in the related Rogers case to which she provided responses. Parties limited to discovery related to class certification. Renewed fee motion fails to articulate why seeking information already received in Rogers and additional information related to class issues was a necessary step to Plaintiff's victory in individual claims. |
| AMP | 11/28/16 | Adrian - Review produced documents in related case Rogers for further expansion of trial exhibits | 0.15 | 0.15 | Duplicative; Excessive | Time spent reviewing documents already produced in Rogers case |
| AMP | 11/28/16 | Adrian - Update exhlbit index based on changes made during today's deposition | 0.32 | 0.32 | Vague | Vague as to which deposition(s) the task relates. Potentially contains block billing. |
| AMP | 11/28/16 | Adrian - Continue preparing and compiling exhibits to be used for later depositions and trial, using results from Puentes' deposition to determine necessary exhibits | 0.82 | 0.82 | Vague; Clerical | Vague as to "later depositions". Vague as to "preparing". Time includes noncompensable clerical work. Vague as to "necessary exhibits" to what. |
| AMP | 11/29/16 | Adrian - County - Continue draft of Meet and Confer Letter re improper attorney client privilege objection at Puentes deposition | 0.55 | 0.55 | Excessive; Vague | No such meet and confer letter located as having been received. Attorney should not bill for letter never sent. |

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| DBA | 11/29/16 | Dennis - County - review file, prep for M&C phone calI to counsel for County of Riverside on 11/29/16 at 1:00. | 0.2 | 0.2 | Vague | Vague as to what discovery the M&C relates. |
| AMP | 11/29/16 | Adrian - County - Research regarding lack of responses and documents at Puentes deposition and consequences of fallure to respond | 0.45 | 0.45 | Excessive; Vague | Vague as to purpose of research and what work the research was used for. |
| SDD | 11/29/16 | Steve - County- Continue to draft, review, revise, and edit PLAINTIFF A.A.' S RESPONSES TO COUNTY Of RIVERSIDE'S REQUEST FOR PRODUCTION OF DOCUMENTS (SET ONE). | 1.38 | 1.38 | Excessive | County's RFP's to Plaintiff sought documents supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| AMP | 11/29/16 | Adrian - Research re attorney client privilege and applicability to training cited during Puentes deposition | 0.6 | 0.6 | Vague | Vague as to purpose of research and what work the research was used for. |
| SDD | 11/29/16 | Steve - Draft, review, revise, and edit PLAINTIFF' A.A. 'S RESPONSES TO COUNTY OF RIVERSIDE'S REQUEST FOR PRODUCTION OF DOCUMENTS (SET ONE). | 0.23 | 0.23 | Excessive | County's RFP's to Plaintiff sought documents supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |

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| AMP | 11/29/16 | Adrian -Start draft of Meet and Confer Letterr re improper attorney client privilege objections at Puentes deposition | 1.22 | 1.22 | Excessive; Vague | No such meet and confer letter located as having been received. Attorney should not bill for letter never sent. |
| AMP | 11/29/16 | Adrian - County- Continue draft of Meet and Confer Letter re improper attorney client privilege objections at Puentes deposition, section re waiver of objections | 0.52 | 0.52 | Excessive; Vague | No such meet and confer letter located as having been received. Attorney should not bill for letter never sent. |
| DBA | 11/29/16 | Dennis - County - Meet & Confer phone call from Counsel for County re its supplemental response to Request for Production, (Set One) No. 6. | 0.38 | 0.38 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |

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| AMP | 11/29/16 | Adrian - County - Draft e-mail summary of 67-minute Meet and Confer phone conference re re County's responses to RFAs Sets 15 and 16, Rogs Set 3, an.d County's supplemental responses to RFAs Set 1 and send to Burkhart | 0.55 | 0.55 | Duplicative; Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. M&C letter dated 11/9/2016 alleges RFA 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Thus, time spent on seeking class related discovery and information Plaintiff was not yet entitled to. |

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| AMP | 11/29/16 | Adrian- County- Meet and Confer follow up phone conference re County's responses to RF As Sets 15 and 16, Rogs Set 3, arid County's supplemental responses to RF As Set 1 | 1.12 | 1.12 | Duplicative; Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. M&C letter dated 11/9/2016 alleges RFA 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Thus, time spent on seeking class related discovery and information Plaintiff was not yet entitled to. |
| AMP | 11/29/16 | Adrian - County - Research regarding lack of privilege log and documents at Puentes deposition and consequences of failure to respond to attached RPDs | 0.35 | 0.35 | Vague | Vague as to purpose of research and what work the research was used for. |

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| AMP | 11/29/16 | Adrian- Meet and Confer follow up phone conference re County's responses to RFAs Sets 15 and 16, Rogs Set 3, and County's supplemental responses to RFAs Set 1, Burkhart stated he would call back in an hour | 0.07 | 0.07 | Duplicative; Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. M&C letter dated 11/9/2016 alleges RFA 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Thus, time spent on seeking class related discovery and information Plaintiff was not yet entitled to. |
| AMP | 11/29/16 | Adrian - County - Continue draft of Meet and Confer Letter re improper attorney client privilege objections at Puentes deposition, section re work product | 0.43 | 0.43 | Excessive; Vague | No such meet and confer letter located as having been received. Attorney should not bill for letter never sent. |
| AMP | 11/30/16 | Adrian -County - Start review, revise, and edit Meet and Confer, re: County's Second Supplemental Responses to Plaintiff's Interrogatories (Set Two), No. 9 through 12 based on Steve's comments from review | 0.35 | 0.35 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 11/30/16 | 1 J/30/2016 AMP Adrian• County• Conlinue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintifl.'s Request for Admissions (Set 16), section re Meet and Confer efforts | 0.27 | 0.27 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| SDD | 11/30/16 | 11/30/2016 SDD Steve - County • Draft, review, revise, and edit Meet and Confer, re: County's Second Supplemental Responses to Plaintiff's Interrogatories (Set Two), No. 9 through 12. | ]1.12 | 1.12 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 11/30/16 | Adrian - Coority - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 16) | 0.88 | 0.88 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 11/30/16 | Adrian - County - Start draft of declaration in support of Joint Stipulation 1o Compel Further Responses from Deendant County to Plaintiff's Request for Admisslons (Set 16) | 0.23 | 0.23 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 11/30/16 | Adrian - County - Start draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 16) | 1.13 | 1.13 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| DBA | 11/30/16 | Dennis - County - researching Gov't Code 54956.9 | 0.43 | 0.43 | Vague | Vague as to purpose of research and what it was used for. |
| AMP | 11/30/16 | Adrian County -Research re incomplete search for responsive information reported to County's second supplemental responses to Interrogatories 9 - 12 | 0.3 | 0.3 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 11/30/16 | Adrian - County- Continue draft of Meet and Confer Letter re County's Second Supplemental Responses to Interrogatories No. 9 - 12, section re failure to identify training and policies by year | 0.55 | 0.55 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 11/30/16 | Adrian - County - Continue draft -of Meet and Confer utter re County's Second Supplemental Re Responses to Interrogatories No. 9 - 12 | 0.23 | 0.23 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 11/30/16 | Adrian - County - Review prior Motion to Compel, attached Declaration, and Order for information for Meet and Confer Letter re County's Serond Supplemental Responses to Interrogatories No. 9 - 12 | 0.22 | 0.22 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| SDD | 11/30/16 | Steve- Contune to draft, review, revise, and edit PLAINTIFF A.A.' S RESPONSES TO COUNTY OF RJV.ERSIDE'S REQUEST FOR PRODUCTlON OF DOCUMENTS (SET ONE). | 0.45 | 0.45 | Excessive | County's RFP's to Plaintiff sought documents supporting class related allegations. Time spent responding to class related discovery, which would not have been propounded had class certification not been sought. Thus, time spent unnecessary to individual claims. |
| DBA | 11/30/16 | Dennis - County - drafting meet and confer letter re County's supplemental response to Request for Production, (Set One) No. 6 | 0.47 | 0.47 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| SDD | 11/30/16 | Steve - Meet with Dennis to discuss how to proceed with the M&C effort regarding RPD (Set 1 ), No. 6. | 0.3 | 0.3 | Excessive | Request 6 sought Board of Supervisors' Agenda's and Minutes from 1995-2014 regarding removals without judicial authorization. Renewed fee motion fails to articulate why seeking such records spanning two decades was a necessary step to Plaintiff's limited victory on the underlying claims. |
| AMP | 11/30/16 | Adrian - County - Start draft of Meet and Confer Letter re County Second Supplemental Responses to Interrogatories No. 9 - 12 | 0.77 | 0.77 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 11/30/16 | Steve - County - Draft course and scope RFAs to the County. | 0.25 | 0.25 | Vague | Vague as to which set of RFA's the task relates. |

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| AMP | 11/30/16 | Adrian - County-Finish first draft of Meet and Confer Letter re improper attorney client privilege objections at Puentes deposition, section re work product | 0.43 | 0.43 | Excessive; Vague | No such meet and confer letter located as having been received. Attorney should not bill for letter never sent. |
| SDD | 12/1/16 | Steve - Review, revise, and edit LOCAL RULE 3 7-2 JOINT STIPULATlON REGARDING PLAINTlFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) | 0.3 | 0.3 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 12/1/16 | Adrian - Start draft of Joint StipulAtion to Extend all Discovery and ClAss Certification Deadlines 90 Days | 0.42 | 0.42 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| SDD | 12/1/16 | Steve - Review, revise, and edit Meet and Confer, re: County's Second Supplemental Responses to Plaintiff's Intenogatories (Set Two), Nos. 9 through 12. | 0.45 | 0.45 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |

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| AMP | 12/1/16 | Adrian - County - Continue draft of Joint StipulatioN to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3) | 0.43 | 0.43 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/1/16 | Adrian- County - Draft Notice of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's lnterrogatories (Set 3) | 0.1 | 0.1 | Clerical; Excessive | Includes time spent on noncompensable clerical work or basic/routine tasks. |
| AMP | 12/1/16 | Adrian- County - Continue dtafting proposed order for Joint Stipulation to Compel Further Responses from Defendant Counly to Plaintiffs Interrogatories (Set 3) | 0.15 | 0.15 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/1/16 | Adrian -County - Draft proposed order for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Interrogatorics (Set 3) | 0.07 | 0.07 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/1/16 | Adrian- County - Start draft of Joint Stipulation to Compel Further Responses from. Defendant County toPlaintiffs lnterrogatories (Set 3) | 1.02 | 1.02 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 12/1/16 | Adrian - Research re Request for Admissions relating to contents of documents | 0.27 | 0.27 | Vague | Vague as to which set of RFA's the task relates. |
| AMP | 12/1/16 | Adrian- County - Prepare and compile exhibits to declaration in support of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 16) | 0.15 | 0.15 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| DBA | 12/1/16 | Adrian - County- Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 16), section re ¥ague and ambiguous objections | 0.58 | 0.58 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| DBA | 12/1/16 | Dennis- County continuing edits to declaration of Jason Hunter in support of Motion to Certify Class | 0.9 | 0.9 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No such declaration was filed in support of class cert. mtn. or in draft motion for partial summary judgment. |
| AMP | 12/1/16 | Adrian - County Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 16), introduction | 0.27 | 0.27 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 12/1/16 | Adrian - County - Draft Notice of Joini Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 16) | 0.15 | 0.15 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 12/1/16 | Adrian - County - Draft Proposed Order for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 16) | 0.2 | 0.2 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| DBA | 12/1/16 | Dennis - County - reviewing declaration of Jason Hunter re additional details needed for his declaration in support of Mtn. to Certify Class | 0.83 | 0.83 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No such declaration was filed in support of class cert. mtn. or in draft motion for partial summary judgment. |
| AMP | 12/1/16 | Adrian- County-Continue Draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 16) | 0.73 | 0.73 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| SAM | 12/1/16 | Review; and annotate draft of class certification motion sent by Mark Ankcorn. Return with comments. | 0.5 | 0.5 | Excessive | Renewed fee motion fails to articulate how time spent working on a class certification motion was a necessary step for her ultimate victory of the underlying claims. |

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| AMP | 12/1/16 | Adrian - County- Continue review, revise, and edit Meet and Confer, re: County's Second Supplemental Responses to Plaintiff's Interrogatories (Set Two), No. 9 through 12 based on Steve's comments from review, drafting new section based on requiring responses to fullest extent possible | 0.43 | 0.43 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 12/1/16 | Adrian -County - Continue review, revise, and edit Meet and Confer re: County's Second Supplemental Responses to Plaintiffs Interrogatories(Set Two), No. 9 through 12 based on Steve's comments from review | 0.53 | 0.53 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 12/2/16 | Adrian - Continue draft of Joint Stipulation to Extend all Discovery and Class Certification Deadlines 90 Days, section re updated docket since last stipulation to extend | 0.32 | 0.32 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |

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| AMP | 12/2/16 | Adrian. Review Meet and Confer letter re County's second supplemental Response to lnterrogatories 7, 8, and 13 as well as previous responses to Interrogatories 7, 8, and 13 | 0.32 | 0.32 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 12/2/16 | Steve - Phone call with Jason Hunter; re: details for his declaration. | 0.98 | 0.98 | Vague; Duplicative; Excessive | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |
| SAM | 12/2/16 | Phone with Rebeca Lack re: settlement in Hunter. I just spoke with Rebecca Lack, the atty in Hunter. She says she did not sue or settle on behalf of the kids. They are wide open at this point. We may consider getting a hold of the mom, or whoever has custody, and filing on their behalf | 0.32 | 0.32 | Vague; Duplicative; Excessive | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as related primarily to class claims. |
| SDD | 12/2/16 | Steve - Review the Hunter's Declaration in preparation for the upcoming phone call. Draft question outline. | 0.63 | 0.63 | Vague; Duplicative; Excessive | Renewed fee motion fails to articulate why information from a former plaintiff was a necessary step for her ultimate victory of the underlying claims. Attorney identifies task as enmeshed with the individual claims, yet no reference to Jason Hunter made in the draft motion for partial summary judgment. |

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| AMP | 12/2/16 | Adrian - Continue draft of Joint Stipulation to Extend all Discovery and Class Certification Deadlines 90 Days, sections relating to Duval case | 0.08 | 0.08 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| AMP | 12/2/16 | Adrian - Continue draft of Joint Stipulation to Extend all Discowry and Class Certification Deadlines 90 Days | 0.77 | 0.77 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 12/2/16 | Adrian - County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3), expand section re privacy rights | 0.17 | 0.17 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/2/16 | 12/02/2016 AMP Adrian - County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3) | 0.28 | 0.28 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/2/16 | Adrian - Continue draft of Joint Stipulation to Extend all Discovery and Class Certification Deadlines 90 Days | 0.53 | 0.53 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| SDD | 12/2/16 | Steve - All - Draft Hunter's Decl; re: Class Cert.; fold in facts from the phone conversation. | 0.83 | 0.83 | Excessive | Renewed fee motion fails to articulate how time spent working on a declaration for the class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No such declaration was filed in support of class cert. mtn. or referenced in draft motion for partial summary judgment. |

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| AMP | 12/5/16 | Adrian - County- Research re waiver of objections not interposed in initial response but interposed in supplementa1 response | 0.62 | 0.62 | Vague | Vague as to which set of discovery the task relates |
| AMP | 12/5/16 | Adrian - County - Draft notice of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 1) | 0.18 | 0.18 | Duplicative ; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/5/16 | Adrian- County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 1), Meet and Confer section | 0.63 | 0.63 | Duplicative ; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/5/16 | Adrian - County - Start draft of declaration in support of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 1) | 0.73 | 0.73 | Duplicative ; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |

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| AMP | 12/5/16 | Adrian - County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 1) | 1.13 | 1.13 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/5/16 | Adrian - County- Start draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set l) | 0.77 | 0.77 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/5/16 | Adrian - County - Start draft of declaration in support of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Interrogatories (Set 3) | 0.27 | 0.27 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/5/16 | Adrian - County- Continue draft of Joint Stipulation to Compel Fur1her Responses from Defendant County to Plaintiff's Interrogatories (Set 3), expand section re interrogatories not seeking juvenile case information | 0.38 | 0.38 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 12/5/16 | Adrian - County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Interrogatories (Set 3) | 0.6 | 0.6 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/5/16 | Adrian - County - Continue draft of declaration in support of Joint Stipulation to Compel Fur1her Responses from Defendant County to Plaintiffs Request for Admissions (Set I) | 0.23 | 0.23 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/5/16 | Adrian - County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant Cowity to Plaintiff's Request for Admissions (Set l ), expand section re waiver of objedions | 0.22 | 0.22 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/6/16 | Adrian -Continue review, edit, and revise draft of Joint Stipulation to Extend all Discovery and Class Certification Deadlines | 0.18 | 0.18 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |

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| AMP | 12/6/16 | Adrian - County - Finish review, edit, and revision ofMeet and Confer letter re County's second supplemental responses to Interrogatories 9 - 12 | 0.28 | 0.28 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| SDD | 12/6/16 | Steve - All - Review, revise, and edit JOINT STIPULATION AND MOTION TO EXTEND DEADLINES. | 0.28 | 0.28 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 12/6/16 | Adrian - County - Continue draft of proposed order for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 1) | 0.18 | 0.18 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/6/16 | Adrian - County - Research re relevance of discipline to system-wide policies and practices and commonality | 0.33 | 0.33 | Vague | Vague as to purpose of research. Task clearly related to class issues not necessary to individual claims. |

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| AMP | 12/6/16 | Adrian - County- Continue draft of declaration in support of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set I) | 0.27 | 0.27 | Duplicative ; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| SDD | 12/6/16 | Steve - All -Continue to draft Hunter's declaration in support of class certification | 0.88 | 0.88 | Excessive | Attorney identifies work as "enmeshed", inconsistent with 12/7/16 entry regarding the same task. Renewed fee motion fails to articulate how time spent working on a declaration for a class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No such declaration was filed in support of class cert. mtn. or referenced in draft motion for partial summary judgment. |
| AMP | 12/6/16 | Adrian - Continue review, edit, and revise draft of Joint Stipulation to Extend all Discovery and Class Certification Deadlines 90 Days based on Steve"s comments from review | 0.78 | 0.78 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| AMP | 12/6/16 | Adrian - Review, edit, and revise draft) of Joint Stipulation to Extend all Discovery and Class Certification Deadlines 90 Days based on Steve's comments from review | 0.4 | 0.4 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |

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| AMP | 12/6/16 | Adrian - County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 1); expand section re burden objection and lack of support | 0.57 | 0.57 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/6/16 | Adrian - County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set l) | 0.45 | 0.45 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/6/16 | Adrian - County - Start draft of proposed order for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 1) | 0.28 | 0.28 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/7/17 | Adrian - All - Prepare, publish to .pdf and send proposed stipulation to extend disoovery deadlines to opposing counsel | 0.22 | 0.22 | Clerical; Vague; Unnecessary | Includes time spent on noncompensable clerical work or basic/routine tasks. Extending discovery deadlines unnecessary to underlying claims, necessary only to seeking class certification. Vague as to what is meant by "prepare" other than the clerical work listed. |

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| AMP | 12/7/16 | AMP Adrian - County - Continue review, edit, and revisions of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3), expwision of section re commonality and relation to interrogatories | 0.15 | 0.15 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| SDD | 12/7/16 | SDD Steve - All - Continue to draft Hunter's declaration in support of class certification. | 0.22 | 0.22 | Excessive | Atty claims work primarily relates to the individual claims. Renewed fee motion fails to articulate how time spent working on a declaration for a class certification motion was a necessary step for her ultimate victory of the underlying claims.<br><br>No such declaration was filed in support of class cert. mtn. or referenced in draft motion for partial summary judgment. |
| AMP | 12/7/16 | SDD Steve - County - Review the Meet and Confer letter, re; County's Supp. Response to Interrogatory (Set 2), in preparation for Friday's meet and Confer phone call with Defendants. | 0.22 | 0.22 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 12/7/16 | AMP Adrian - County - Continue review, edit, and revisions of Joint Stipulation to Compel _Further Responses from Defendant County to Plaintiff's lnterrogatories (Set 3) based on Steve's comments from review | 0.62 | 0.62 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 12/7/16 | AMP Adrian - County - Research for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3) based on prior complaints/ grievances and relevance to Monell and commonality | 0.28 | 0.28 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/7/16 | AMP Adrian - County - Start review, edit, and revisions of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3) based on Steve's comments from review | 0.73 | 0.73 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| SDD | 12/7/16 | SDD Steve - meet with Adrain to dicuss LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RlVERSIDE TO PROVIDE FUR1HER RESPONSES TO INTERROGATORIES (SET THREE). | 0.27 | 0.27 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 12/7/16 | Adrian - County- Start draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set l5) | 0.2 | 0.2 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 12/7/16 | Steve - County - Continue to draft, review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATJON REGARDING: PLAINTIFF'S MOTION T0 COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE). | 1 | 1 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| SDD | 12/7/16 | Steve - County- Draft, review; revise, and edit LOCAL RULE 3 7-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE). | 0.17 | 0.17 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/7/16 | Adrian - Finish first draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request fur Admissions (Set 1) | 0.37 | 0.37 | Duplicative; Excessive | RFAs Set One served on the County sought overlapping if not identical admissions as sought in March 2015 in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why duplicative information was a necessary step to Plaintiff's limited victory on the underlying claims. No Motion to Compel was filed regarding Further Responses to RFAs Set One. Attorney should not bill for premature, unnecessary, incomplete work. |
| AMP | 12/8/16 | Adrian -Review exhibits .and determine what additional exhibits need to be included for deposition of Angelita Saldana on December 12 | 0.77 | 0.77 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of multiple County employees, PMKs, witnesses was a necessary step for Plaintiffs victory of the individual claims, especially in light of the extensive written discovery received in this case and the related *Rogers* case. |
| AMP | 12/8/16 | Adrian - Start deposition outline for December 12 depositian ofAngelita Saldana | 0.6 | 0.6 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of multiple County employees, PMKs, witnesses was a necessary step for Plaintiffs victory of the individual claims, especially in light of the extensive written discovery received in this case and the related *Rogers* case. |

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| AMP | 12/8/16 | Adrian - County - Continue draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.32 | 0.32 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 12/8/16 | Adrian- County - Finish second draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3) | 0.48 | 0.48 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/8/16 | Adrian- County - Research re time periods for class, discovery allowed, and injunctive relief for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3) | 0.23 | 0.23 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| AMP | 12/8/16 | Adrian - County - Continue review, edit, and revisions of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3), expand section re overbreadth objections | 0.35 | 0.35 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 12/8/16 | Adrian- County - Continue tevieW, edit, and revisions of Joint Stipulation to Compd Further Responses from Defendant County to Plaintiff's Intertogatories(Set 3), expand section re privacy objections-and complaints | 0.72 | 0.72 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/8/16 | Adrian - County - Continue review, edit, and revisions of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Interrogatories (Set 3), expand section re training and specific interrogatories | 0.97 | 0.97 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/8/16 | Adrian - County - Continue review, edit, and revisions of Joint Stipulation to Compel Further Responses from Defendant County fo Plaintiffs lnterrogatories (Set 3) | 0.78 | 0.78 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 12/8/16 | Adrian - Review 827 records produced and detennine what additional exhibits need to be included for deposition of Angelita Saldana on December 12 | 0.32 | 0.32 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of multiple County employees, PMKs, witnesses was a necessary step for Plaintiffs victory of the individual claims, especially in light of the extensive written discovery received in this case and the related *Rogers* case. |

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| AMP | 12/9/16 | Adrian - Continue deposition outline for December 12 deposition of Angelita Saldana | 0.85 | 0.85 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of multiple County employees, PMKs, witnesses was a necessary step for Plaintiffs victory of the individual claims, especially in light of the extensive written discovery received in this case and the related *Rogers* case. |
| AMP | 12/9/16 | Adrian - Continue compiling and preparing exhibits to be used in December 12 deposition of Angelita Saldana | 0.7 | 0.7 | Vague; Clerical | vague as to "compiling and preparing". Includes time spent on noncompensable clerical work. |
| AMP | 12/9/16 | Adrian - Continue compiling and preparing exhibits to be used in December 12 deposition of Angelita Saldana | 0.17 | 0.17 | Vague; Clerical | vague as to "compiling and preparing". Includes time spent on noncompensable clerical work. |
| SDD | 12/9/16 | Steve - County - M&C phone call, re: County's responses to Rogs (Set 2), Nos. 7-8 and 13. | 0.77 | 0.77 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 12/9/16 | Adrian - Review training and poljcy documents and. deterrnine that additional exhibits need to be included for deposition of Angelita Saldana on December 12 | 0.78 | 0.78 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of multiple County employees, PMKs, witnesses was a necessary step for Plaintiffs victory of the individual claims, especially in light of the extensive written discovery received in this case and the related *Rogers* case. |

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| AMP | 12/9/16 | Adrian - Continue deposition outline for December 12 deposition of Angelita Saldana . | 0.92 | 0.92 | Excessive | Renewed fee motion fails to articulate why seeking and taking the deposition of multiple County employees, PMKs, witnesses was a necessary step for Plaintiffs victory of the individual claims, especially in light of the extensive written discovery received in this case and the related *Rogers* case. |
| SDD | 12/9/16 | Steve - County- Draft RFAs to County re: following interrogatory response language | 0.03 | 0.03 | Vague | Vague as to what set of RFA's the task relates. Vague as to "re: following interrogatory response language." |
| SDD | 12/9/16 | Steve - County - Review County's Supp. Response to Interrogatory (Set 2) and Plaintiff's M&C letter in preparation for the meet and Confer phone call with Defendant | 0.58 | 0.58 | Duplicative ; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 12/9/16 | Adrian - Compiling and preparing exhibits to be used in December 12 deposition of Angelica Saldana | 0.85 | 0.85 | Clerical; Excessive; Vague | Includes time spent on noncompensable clerical work or basic tasks.Vague as to what is meant by "prepare" other than the clerical/basic work listed. |
| SAM | 12/11/16 | Prep for Deposition of Saldana. | 2.58 | 0.00 | No Objection | No Objection. |
| SAM | 12/12/16 | Take deposition of Angelita Saldana | 6.03 | 0.00 | No Objection | No Objection. |
| AMP | 12/12/16 | Adrian - Review Joint Stipulation, Supplemental Briefing, and Order re Puentes Protective Order for arguments and rulings previously given relating to attorney-client privilege and work product for trainings | 0.2 | 0.2 | Vague | Vague as to purpose of review and to what specific work the review relates. |

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| AMP | 12/12/16 | Adrian - Continue review, edit, and revise draft of Meet and Confer letter re: improper privilege objections asserted during deposition of Angelita Saldana, expand section re privilege and training materials | 0.67 | 0.00 | No Objection | No Objection. |
| AMP | 12/12/16 | Adrian - Continue review, edit, and revise draft of Meet and Confer letter re: improper privilege objections asserted during deposition of Angelita Saldana, expand section re privilege and training materials | 0.67 | 0.00 | No Objection | No Objection. |
| AMP | 12/12/16 | Adrian - Continue review, edit, and revise draft of Meet and Conrer letter re: improper privilege objections asserted during deposition of Angelita Saldana, draft section re previous admissions made by Defendants | 0.58 | 0.00 | No Objection | No Objection. |
| AMP | 12/12/16 | Adrian - Continue review, edit, and revise draft of Meet and Coofer letter re: improper privilege objections asserted during deposition of Angelita Saldana based on Steve's comments fiom review | 0.28 | 0.00 | No Objection | No Objection. |

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| AMP | 12/12/16 | Adrian - Review, edit, and revise draft of Meet and Con fur letter re: improper privilege oqections asserted during deposition of Angelita Saldana based on Steve's comments from review | 0.73 | 0.00 | No Objection | No Objection. |
| AMP | 12/12/16 | Adrian - Continue deposition outline for Dea:mber 14 deposition of Felecia Butler | 0.45 | 0.00 | No Objection | No Objection. |
| SDD | 12/12/16 | Steve~ Review, revise, and edit Meet and Confer, re: lmproper Objections During the Deposition of Michael Puentes and Angetita Saldana; Anticipated Objections During the Depositions of Felecia Butler and Karla Torres; Overall Lack of Production of Documents | 0.77 | 0.00 | No Objection | No Objection. |
| AMP | 12/12/16 | Adrian - Start draft of Meet and Confer letter re: improper prlivilege objections asserted during deposition of Angelita Saldana | 0.32 | 0.00 | No Objection | No Objection. |
| AMP | 12/12/16 | Adrian - Continue deposition outline fur December 14 deposition of Felecia Butler, sections re RFA responses concerning removal and Monell aspects | 0.13 | 0.00 | No Objection | No Objection. |

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| AMP | 12/12/16 | Adrian- Review prior discovery responses and determine what additional exhibits need to be included for deposition of Felecia Butler on December 14 | 0.68 | 0.00 | No Objection | No Objection. |
| AMP | 12/12/16 | Adrian - Start deposition outline for December 14 deposition of Felecia Butler | 1.05 | 0.00 | No Objection | No Objection. |
| AMP | 12/13/16 | Adrian - Butler - Compiling and adding new exhibits for deposition of Felecia Butler, materials from records produced by agency and juvenile court | 1.12 | 0.00 | No Objection | No Objection. |
| AMP | 12/13/16 | Adrian - Continue review, edit, and revise draft of Meet and Confer letter re: improper privilege objections asserted during deposition of Angelita Saldana, expand section re probable judicial estoppel on privilege objection | 0.35 | 0.35 | Vague | No such meet and confer letter located as having been received. Attorney should not bill for letter that was never sent. |
| AMP | 12/13/16 | Adrian - Butler - Continue compiling and adding new exhibits for deposition of Felecia Butler, compile exhibits in anticipated order to be used at deposition, update exhibit indices | 0.77 | 0.00 | No Objection | No Objection. |

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| AMP | 12/13/16 | Adrian - Butler - Continue deposition outline for December 14 deposition of Felecia Butler, sections re safety and risk assessment | 0.63 | 0.00 | No Objection | No Objection. |
| AMP | 12/13/16 | Adrian - Butler - Continue deposition outlineJor December 14 deposition of Felecia Butler:, sections re information gathered from Puentes and Saldana depositions | 0.18 | 0.00 | No Objection | No Objection. |
| AMP | 12/13/16 | Adrian - Continue draft of Plaintiff's Proposed Joint Stipulation to Resume Deposition of Michael Puentes and Production of Documents, sections re training production and testimony | 0.43 | 0.00 | No Objection | No Objection. |
| AMP | 12/13/16 | Adrian - Continue draft of Plaintiff's Proposed Joint Stipulation to Resume Deposition of Michael Puentes and Production of Documents | 0.3 | 0.00 | No Objection | No Objection. |
| AMP | 12/13/16 | Adrian - Start draft of Plaintiffs Proposed Joint Stipulation to Resume Deposition of Michael Puentes·and Production of Documents | 0.42 | 0.00 | No Objection | No Objection. |
| AMP | 12/13/16 | Adrian - Butler - continue compiling and adding new exhibits for deposition of Felecia Butler, Butler's discovery responses, update exhibit indices | 0.28 | 0.00 | No Objection | No Objection. |

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| AMP | 12/13/16 | Adrian - Butler - Continue compiling and adding new exhibits for deposition of Felecia Butler, materials from Rogers discovery and training materials | 0.48 | 0.00 | No Objection | No Objection. |
| SAM | 12/14/16 | Attend and take deposition of DPSS Supervisor Felicia Butler Billing entry includes 1.5 hours round trip travel. | 6.75 | 0.00 | No Objection | No Objection. |
| AMP | 12/14/16 | Adrian - County - Draft notice of rescheduling of deposition of County PMK re warrant policies, practices, and training | 0.18 | 0.00 | No Objection | No Objection. |
| AMP | 12/14/16 | Adrian - County - Continue compiling and adding new exhibits for deposition of County PMK., compile exhibits in anticipated order to be used at deposition, update exhibit indices | 0.28 | 0.00 | No Objection | No Objection. |
| AMP | 12/14/16 | Adrian - County - Continue deposition outline for deposition of Riverside County PMK re Warrants | 0.6 | 0.00 | No Objection | No Objection. |
| AMP | 12/14/16 | Adrian - County - Review information from UC Berkeley CCWIP and analyze for questions to ask. County PMK re Warrants at deposition | 0.22 | 0.00 | No Objection | No Objection. |

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| AMP | 12/14/16 | Adrian - County - Continue deposition outline fur deposition of Riverside County PMK re Warrants, start sections re training and discipline | 0.75 | 0.00 | No Objection | No Objection. |
| AMP | 12/14/16 | Adrian - County - Continue compiling and adding new exhibits for deposition of County PMK re Warrants, relevant training handouts and slides | 0.27 | 0.00 | No Objection | No Objection. |
| AMP | 12/14/16 | Adrian - County - Start compiling and adding new exhibits for deposition of County PMK re Warrants | 0.13 | 0.00 | No Objection | No Objection. |
| AMP | 12/14/16 | Adrian - County - Continue deposition outline for deposition of Riverside County PMK. re Warrants, start sections re policies and practices | 0.87 | 0.00 | No Objection | No Objection. |
| AMP | 12/14/16 | Adrian - County - Review PMK Deposition noti<r and attached exhibits for information that needs to be covered in deposition and prioritize needs based on class certification requirements | 0.27 | 0.27 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| AMP | 12/14/16 | Adrian - County - Start deposition outline for deposition of Riverside County PMK re Warrants | 0.45 | 0.00 | No Objection | No Objection. |

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| AMP | 12/15/16 | Adrian - Continue review, edit and revise stipulation to continue dates based on comments from Shawn | 0.22 | 0.22 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 12/15/16 | Adrian - Review, edit and revise stipulation to continue dates based on comments from Shawn | 0.4 | 0.4 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |
| AMP | 12/15/16 | Adrian - County - Review student transcript of Felecia Butler to determine if there are any other courses where we will need documents produced | 0.18 | 0.00 | No Objection | No Objection. |
| AMP | 12/15/16 | Adrian - County - Start draft of RPDs to County asking for training presentations, handouts, e-mails based on information obtained during Butler's deposition | 0.73 | 0.73 | Vague | Vague as to what set of discovery the task relates. Renewed fee motion fails to articulate why obtaining additional County documents on top of the documents already obtained in the present and related case was a necessary step to Plaintiff's victory on the individual claims. |
| AMP | 12/19/16 | Adrian - Draft proposed order for joint stipulation to extend discovery and class certification deadlines | 0.08 | 0.08 | Excessive | Task clearly relates to class certification issues. Renewed fee motion fails to articulate how this work was a necessary step for Plaintiff's victory of the individual claims. |
| AMP | 12/19/16 | Adrian - Draft new section of joint stipulation to extend deadlines based on discovery responses recently received from Defendants | 0.27 | 0.27 | Excessive | Task related to seeking class discovery extensions, clearly related to class certification issues, not necessary to the individual claims. |
| AMP | 12/19/16 | Adrian - Draft new section of joint stipulation to extend deadlines based on e-mail from Defendants | 0.1 | 0.1 | Excessive | Time spent seeking extension of deadlines excessive and disproportionate to plaintiff's limited success and recovery an necessary only to seeking class certification and unnecessary to the underlying claims. |

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| AMP | 12/20/16 | Adrian - Review of deposition transcript of Michael Puentes for information for future depooitions | 0.22 | 0.22 | vague | Vague as to outcome of review, determinations made and what "future depositions" are being referred. |
| AMP | 12/20/16 | Adrian - Torres - Continue draft of deposition outline for Karla Torres | 0.22 | 0.00 | No Objection | No Objection. |
| AMP | 12/20/16 | Adrian - Torres - Continue preparing and compiling exhibits for December 22 deposition of Karla Torres | 0.28 | 0.00 | No Objection | No Objection. |
| AMP | 12/20/16 | Adrian - Torres - Continue draft of deposition outline fur Karla Torres | 0.55 | 0.00 | No Objection | No Objection. |
| AMP | 12/20/16 | Adrian - Torres - Start preparing and compiling exhibits for December 22 deposition of Karla Torres | 0.53 | 0.00 | No Objection | No Objection. |
| AMP | 12/20/16 | Adrian - Torres - Start draft of deposition outline far Karla Torres | 0.33 | 0.00 | No Objection | No Objection. |
| AMP | 12/21/16 | Adrian - Torres - Continue preparing and compiling exhibits for December 22 deposition of Karla Torres | 0.22 | 0.00 | No Objection | No Objection. |
| AMP | 12/21/16 | Adrian - Torres - Review Defendant's responses to Requests for Production of Documents for December 22 Deposition | 0.12 | 0.00 | No Objection | No Objection. |
| AMP | 12/21/16 | Adrian - Torres - Finish draft of deposition outline for Karla Torres | 0.38 | 0.00 | No Objection | No Objection. |

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| AMP | 12/21/16 | Adrian - Torres - Continue draft of deposition outline for Karla Torres | 0.77 | 0.00 | No Objection | No Objection. |
| AMP | 12/21/16 | Adrian - Torres - Continue preparing and compiling exhibits for December 22 deposition of Karla Torres | 1.1 | 0.00 | No Objection | No Objection. |
| AMP | 12/21/16 | Adrian - Torres - Finish preparing and compiling exhibits for December 22 deposition of Karla Torres | 0.47 | 0.00 | No Objection | No Objection. |
| AMP | 12/22/16 | Deposition of Karla Torres Billing entry includes 1.5 hour round trip travel to Tememcula. | 7.53 | 0.00 | No Objection | No Objection. |
| AMP | 12/22/16 | Adrian - Butler - Continue draft of Meet and Confer letter re Butler's objections and lack of responses to RFAs Set 4, sections re overly broad and unduly burdensome and specific requests | 0.27 | 0.27 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/22/16 | Adrian - Butler - Continue draft of Meet and Confer letter re Butler's objections and lack of responses to RFAs Set 4, sections re reasonable inquiry and specific requests | 0.65 | 0.65 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 12/22/16 | Adrian - Butler - Review Butler's prior discovery responses in Rogers for Meet and Confer letter re Butler's objections and lack of responses to RFAs Set 4 | 0.57 | 0.57 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/22/16 | Adrian - Butler - Continue draft of Meet and Confer letter re Butler's objections and Jack of responses to RFAs Set 4 | 0.75 | 0.75 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/22/16 | Adrian - Butler - Start draft of Meet and Confer letter re Butler's objecticns :and lack of responses to RFAs Set 4 | 0.2 | 0.2 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/22/16 | Adrian - Review recently obtained discovery responses frontButler (RFA Set 4) for issues that heed to be met and conferred on | 0.42 | 0.42 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/23/16 | Adrian - Revise and edit stipulation to resume depositions and discover training materials based on Shawn's -comments from review | 0.33 | 0.33 | Vague | Vague as to what depositions the task relates. Vague as to what Shawn reviewed. |

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| AMP | 12/23/16 | Adrian - County -Dratf deposition notice and request for production of documents for Guy Pittman | 0.23 | 0.00 | No Objection | No Objection. |
| AMP | 12/23/16 | Adrian - Butler - Continue draft of Meet and Confer letter re Butler's objections and lack of responses to RFAs Set 4 | 0.17 | 0.17 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/23/16 | Adrian - Revise and edit stipulation to resume depositions and discover training materials | 0.35 | 0.35 | Vague | Vague as to what depositions the task relates. |
| AMP | 12/23/16 | Adrian - Butler - Continue draft of Meet and Confer letter re Butler's objections and lack of responses to RFAs Set 4 | 0.48 | 0.48 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/27/16 | Adrian - Butler - Continue draft.of Meet and Confer Letter re Butler's Responses and Objections to RFAs Set 4 | 0.4 | 0.4 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 12/27/16 | Adrian - Butler - Review Defendant Butler's prior discovery responses in present case and related case Rogers for- Meet and Confer letter te Butler's objections and lack of responses to RFAs Set 4 | 0.2 | 0.2 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/27/16 | Adrian - Butler - Continue draft of Meet and confer letter re Butler's objections and lack of responses to RFAs Set 4, expanding section re class rertification objection and individual requests | 0.32 | 0.32 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/27/16 | Adrian - County - Draft notice of relocation of deposition for Guy Pittman | 0.18 | 0.18 | Clerical; Excessive | Time spent on noncompensable clerical work or basic tasks. |
| AMP | 12/27/16 | Adrian - Butler - Continue draft of Meet and Confer letter re Butler's objections and Jack of responses to RFAs Set 4 | 0.28 | 0.28 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/28/16 | Adrian - Butler - Continue draft of Meet and Qonfer letter re Butler's Responses and Objections to RFAs Set 4 | 0.68 | 0.68 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 12/28/16 | Adrian - Butler - Continue draft of Meet and Confer Letter re Butler's Responses and Objections to RFAs Set 4, expand section re 827 objection | 0.37 | 0.37 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/28/16 | Adrian - Butler - Coniinue draft of Meet and Confer Letter re Butler's Responses and Objections to RFAs Set 4, expand section re undue burden and requests re own experiences | 0.52 | 0.52 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/28/16 | Adrian - Butler - Continue draft of Meet and Confer Letter re Butler's Responses md Objetions to RFAs Set 4, expand section re four old children and numerosity | 0.47 | 0.47 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/28/16 | Adrian - Butler - Research re numerosity and four older children, litigation of daims | 0.4 | 0.4 | Vague | Vague as to purpose of research and what work the research relates. Task clearly related to class issues, not necessary to individual claims. |
| AMP | 12/28/16 | Adrian - Butler - Continue draft of Meet and Confer Letter re Butler's Responses and Objections to RFAs Set 4, expand section re purpose of RFAs and objections re improper purpose | 0.62 | 0.62 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 12/28/16 | Adrian - Butler - Research re purpose of requests for admission and narrowing issues for trial, starting with Asea | 0.2 | 0.2 | Vague | Vague as to purpose of research and what work the research relates. Vague as to "Asea". |
| AMP | 12/28/16 | Adrian - Butler - Continue draft of Meet and Confer Letter re Butler's Responses and Objections to RFAs Set 4 | 0.42 | 0.42 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/28/16 | Adrian - Butler - Continue draft cf Meet and Confer Letter re Butler's Responses and Objections to RFAs Set 4, expand section re California Court of Appeal requests | 0.28 | 0.28 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/29/16 | Adrian - Start review of deposition transcript of Felecia Butler for discrepancies between transcript and responses to discovery requests | 0.1 | 0.1 | Vague | Vague as to purpose of review and to what specific work the review was for. Impossible to determine what aspect of the case the task relates. |
| AMP | 12/29/16 | Adrian - Butler - Review, edit, and proofread first draft of Meet and Confer letter re Butler's Responses to RFAs Set 4 | 0.4 | 0.4 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 12/29/16 | Adrian - Butler - Continue draft of Meet and Confer Letter re Butler's Responses and Objections to RFAs Set 4 | 0.72 | 0.72 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 12/30/16 | Adrian - Continue review of deposition transcript of Felecia Butler for discrepancies between transcript and responses to discovery requests | 0.07 | 0.00 | No Objection | No Objection. |
| AMP | 12/30/16 | Adrian - Continue review of deposition transcript of Angelita Saldana for discrepancies between transcript and responses to discovery requests | 0.33 | 0.00 | No Objection | No Objection. |
| AMP | 12/30/16 | Adrian - Start review of deposition transcript of Angelita Saldana for discrepancies between transcript and responses to discovery requests | 0.42 | 0.00 | No Objection | No Objection. |
| AMP | 12/30/16 | Adrian - Butler - Draft sections re admissions made in deposition for Meet and Confer Letter re Butler's Responses and Objections to RFAs Set 4 | 0.35 | 0.35 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 12/30/16 | Adrian - Continue review of deposition transcript of Felecia Butler for discrepancies between transcript and responses to discovery requests | 0.38 | 0.38 | Vague | Vague as to purpose of review and to what specific work the review was for. Impossible to determine what aspect of the case the task relates. |
| AMP | 1/3/17 | Adrian - County - Review, edit, revise Joint Stipulation to Compel County's responses to Rogs Set 3 based on comments and discussion on review | 0.68 | 0.68 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/3/17 | Adrian - County - Continue review, edit, revise Joint Stipulation to Compel County's responses to RFAs Set 16 based on comments and discussion on review | 0.55 | 0.55 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 1/3/17 | Adrian - County - Continue review, edit, revise Joint Stipulation to Compel County's responses to RFAs Set 16 based on comments and discussion on review | 0.32 | 0.32 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 1/3/17 | Adrian - County - Review deposition transcript of Michael Puentes for information relating to commonality and training for Joint Stipulation to Compel County's responses to RFAs Set 16 | 0.28 | 0.28 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 1/3/17 | Adrian - County - Continue review, edit, revise Joint Stipulation to Compel County's responses to RFAs Set 16 based on comments and discussion on review | 0.82 | 0.82 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 1/3/17 | Steve - Review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE). | 0.88 | 0.88 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data spanning two decades was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 1/3/17 | Adrian - County- Continue review, edit, revise Joint Stipulation to Compel County's responses to RFAs Set 16 based on commmts and dIscussion on review | 0.63 | 0.63 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 1/3/17 | Adrian - County - Review, edit, revise, Joint Stipulation to CompeL County's responses to RFAs Set 16 based on comments and discussion on review | 0.38 | 0.38 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| SDD | 1/3/17 | Steve - Meet with Adrian to disccuss the necessary revisions and edits to Joint Stip, re: RFA 16. | 0.4 | 0.4 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 1/3/17 | Adrian - County - Discuss with Steve comments and sections to be edited for Joint Stipulation to Compel | 0.4 | 0.4 | Vague | Vague as to which Joint Stipulation to Compel the task relates. |
| AMP | 1/3/17 | Adrian - Butler - Continue drafting sections re admissions made in deposition for Meet and Conrer Letter re Butler's Responses and Objrctions to RFAs Set 4 | 0.35 | 0.35 | Excessive | Requests sought admission regarding specific acts by Butler, not related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Further, a M&C letter regarding this set of discovery was not located as having been received. Attorney should not bill for incomplete work. |

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| SDD | 1/3/17 | Steve - Review, revise, and edit LOCAL RULE 37-2 JOJNT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY Of RIVERSIDE TO PROVIDE FURTIJER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) | 0.68 | 0.68 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 1/3/17 | Adrian - County - Review, edit, revise Declaration in Support of Joint Stipulation to Compel County's responses to Rogs Set 3 based on comments and discussion on review | 0.13 | 0.13 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/3/17 | Adrian - County - Review deposition transcript of Michael Puentes for information responsive to interrogatories provided without objedions for Joint Stipulation to Compel County's responses to Rogs Set 3 | 0.27 | 0.27 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| SDD | 1/4/17 | Steve - draft, review, revise, and edit PLAINTIFF A.A.'S REQUEST FOR ADMISSIONS TO DEFENDANT COUNTY OF RIVERSIDE (SET NlNETEEN). | 0.23 | 0.23 | Excessive | RFA Set 19 sought admissions regarding County policies spanning from 1995 to 2015. Renewed fee motion fails to articulate why seeking such admissions was a necessary step to Plaintiff's victory of the individual claims, especially in light of the extensive documents already produced in this and the related Rogers case. |
| AMP | 1/4/17 | Adrian - County - Continue review, edit, revise Joint Stipulation to Compel County's responses to RFAs Set 16 based on comments and discussion on review | 0.2 | 0.2 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 1/4/17 | Adrian - County - Prepare, compile, publish to .pdf; and finalize Joint Stipulation to Compel Further Responses from County to Interrogatories (Set 3) for service to opposing counsel | 0.23 | 0.23 | Vague; Clerical | Vague as to "prepare" and "finalize". Time spent on noncompensable clerical work. |

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| AMP | 1/4/17 | Adrian - County - Compile and prepare all exhibits to be attached to declaration in support of Joint Stipulalion to Compel County to Provide Further Responses to Interrogatories (Set 3) | 0.47 | 0.47 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data spanning two decades was a necessary step to Plaintiff's victory in the individual claims. |
| SDD | 1/4/17 | Steve - draft, review, revise, and edit PLAINTIFF A.A.'S REQUEST FOR ADMISSIONS TO DEFENDANT COUNTY OF RIVERSIDE (SET TWENTY). | 0.53 | 0.53 | Excessive | No such set of discovery was propounded to County of Riverside. Attorney should not bill for incomplete and unnecessary work. |
| AMP | 1/4/17 | Adrian - County - Continue first draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.27 | 0.27 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/4/17 | Adrian - County - Continue draft of declaration for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.28 | 0.28 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/4/17 | Adrian - County - Continue draft of proposed order for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.2 | 0.2 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| SAM | 1/5/16 | Create spreadsheet of potential claimants and witnesses | 0.23 | 0.23 | Excessive | Task clearly related to class certification and unnecessary to the individual claims. |

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| AMP | 1/5/16 | Adrian - County - Research re "law of this case" objection and inapplicability to specific discovery requests for Joint Stipulation to Compel Responses from Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.18 | 0.18 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/5/16 | Adrian - County - Continue first draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15), expand sections re "law of the case" objection | 0.33 | 0.33 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| SAM | 1/5/16 | Review case "file for Allison Lockwood. Son is possible class memeber. Assess whether he should be made a member of the class, or whether he should file his own case. | 1.7 | 1.7 | Excessive | Task clearly related to class certification and unnecessary to the individual claims. |

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| AMP | 1/5/16 | Adrian - County - Continue first draft of Joint Stipulation to Compel Further "Responses from Defendant County to Plaintiffs Request for Admissions (Set 15), draft introduction | 0.27 | 0.27 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| SAM | 1/5/16 | Review case file for Tiffany Knight. Son is possible class memeber. Assess whether he should be made a member of the class, or whether he should file his own case. | 0.92 | 0.92 | Excessive | Task clearly related to class certification and unnecessary to the individual claims. |
| AMP | 1/5/16 | Adrian - County - Continue first draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.3 | 0.3 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/5/16 | Adrian - County - Continue first draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.77 | 0.77 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/5/16 | Adrian - Revise and edit stipulation to resume depositions and discover training materials based on phone conversation with opposing counsel | 0.1 | 0.1 | Vague | Vague as to what depositions and what discovery the task relates. |
| AMP | 1/5/16 | Adrian - County - Continue draft of Declaration for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.32 | 0.32 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/5/16 | Adrian - Review presentation given in October 2012 in Riverside County DPSS building re removal data for for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.23 | 0.23 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/5/16 | Adrian - County - Continue draft of declaration for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.22 | 0.22 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/5/16 | Adrian - County - Research re numbers publically reported on UC Berkeley's website to use as exhibits for Joint Stipulation to Compel Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.68 | 0.68 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/5/16 | Adrian - County - Continue first draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.47 | 0.47 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/5/16 | Adrian - County - Research re possible waiver of objections for Joint Stipulation to Compel Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.18 | 0.18 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/5/16 | Adrian - County - Continue first draft of Joint Stipulation to Compel Further Responses from Defendanl County to Plaintiffs Request for Admissions (Set 15), expand section re vague and ambiguous objection | 0.53 | 0.53 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/5/16 | Adrian - County - Continue first draft of Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 15), expand section re overly broad objection | 0.4 | 0.4 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/6/17 | Adrian - Prepare and compile exhibits for stipulation to resume depositions and discover training materials | 0.23 | 0.23 | Vague | Vague as to what depositions and what discovery the task relates. |
| AMP | 1/6/17 | Adrian - County - Continue draft of declaration for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 15), draft section re materials obtained from CCWIP website | 0.57 | 0.57 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/6/17 | Adrian - County - Continue draft of declaration for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.38 | 0.38 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/6/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RFAs Set 17 | 0.18 | 0.18 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/6/17 | Adrian - County - Research further into numerosity requirement and evidence to be used for Meet and Confer letter re Countys responses to RFAs Set 17 | 0.3 | 0.3 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |

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| AMP | 1/6/17 | Adrian - County - Start draft of Meet and Confer letter re County's responses to RFAs Set 17 | 0.73 | 0.73 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/6/17 | Adrian - County - Continue draft of declaration for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15), continue drafting section re materials obtained from CCWIP website | 0.28 | 0.28 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/6/17 | Adrian - County- Review inter-agency data-sharing agreement for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.28 | 0.28 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/6/17 | Adrian - County - Continue draft of declaration fur Joint Stipulation to Compel Further Responses from Defendant County to Plaintifrs Requestfor Admissions (Set 15), continue drafting section re materials obtained from CCWIP website | 0.38 | 0.38 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/9/17 | Adrian - E-file and send proposed orders, to chambers for JOINT STIPULATION FOR RESUMING DEPOSITIONS AND THE DISCOVERY OF TRAINING CONTENTS AND DOCUMENTS | 0.2 | 0.2 | Clerical | Time spent on noncompensable clerical work. |
| AMP | 1/9/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RFAs Set 17 | 0.32 | 0.32 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/9/17 | Adrian - Draft proposed order for JOINT STIPULATION FOR RESUMING DEPOSITIONS AND THE DISCOVERY OF TRAINING CONTENTS AND DOCUMENTS | 0.22 | 0.22 | Vague | Vague as to what depositions and what discovery the task relates. |

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| AMP | 1/9/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RFAs Set 17 | 0.15 | 0.15 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/9/17 | Adrian - County - Review, edit, and revise first draft of declaration for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.48 | 0.48 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/9/17 | Adrian - County - Continue draft of declaration fur Joint Stipulation to Compel Further Responses from Defendant County to Plaintiffs Request for Admissions (Set 15) | 0.73 | 0.73 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 1/9/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RFAs Set 17 | 0.28 | 0.28 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/9/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RFAs Set 17 | 0.77 | 0.77 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/9/17 | Adrian - County - Research re CCWIP and child maltreatment allegations availability to the County for Meet and Confer letter re County's responses to RFAs Set 17 | 0.37 | 0.37 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/9/17 | Adrian - County - Research re equally available objection and publically available information for Meet and Confer letter re County's responses to RFAs Set 17 | 0.33 | 0.33 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |

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| AMP | 1/9/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses lo RFA Set 17, start draft of sections re vague and ambiguous objection | 0.7 | 0.7 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/9/17 | Adrian - County - Continue draft of Meet and Confer re County's responses to RFAs Set 17 | 0.38 | 0.38 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/10/17 | Adrian - County - Research re commonality and predominance requirements related to specific requests for Meet and Confer letter re County's responses to RFAs Set 17 | 0.18 | 0.18 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/10/17 | Adrian - County- Continue draft of Meet and Confer letter re County's responses to RFAs Set 17, sections re commonality | 0.27 | 0.27 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |

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| AMP | 1/10/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RFAs Set 17 | 0.2 | 0.2 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |
| AMP | 1/10/17 | Adrian - County - Continue to edit and make revisions to LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLA1NfIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) based on Stew's comments from review, continue section re, Requests Nos. 462-487 and commonality | 0.62 | 0.62 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 1/10/17 | Adrian - County- Edit and make revisions to LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL OEFENDANT COUNTY OF RIVERSIDE to PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) based on Steve's comments from review | 0.8 | 0.8 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 1/10/17 | Adrian - County - Continue review, edit, and revisions to first draft of declararion for Joint Stipulation to Compel Further Responses tom Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.18 | 0.18 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 1/10/17 | Steve - Review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDINIG PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMlSSION (SET SIXTEEN). | 0.7 | 0.7 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| SDD | 1/10/17 | Steve - Review, revise, and edit Meet and Confer, re; Defendant Felecia Torres' Responses to Plaintiff's Request for Production of Documents (Set Three). | 0.55 | 0.55 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 1/10/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RFAs Set 17 | 0.43 | 0.43 | Excessive | RFAs sought irrelevant County data between the years 1998-2015 which was objected to on several legitimate grounds. No substantive responses provided, thus the information sought was clearly not a necessary step to Plaintiff's victory of the underlying claims. Further, no such M&C letter re: RFAs-Set 17 was located as having been received. Attorney should not charge for incomplete work. |

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| AMP | 1/11/17 | Adrian - County - Continue review, edit, and revisions to first draft of declaration for Joint Stipulation to Compel Further Responses from Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.57 | 0.57 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/11/17 | Adrian - County - Continue to edit and make revisions to LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMlSS!ON (SET SIXTEEN) based on Steve's comments from review, continue seciion re Requests Nos. 482-487 and commonality | 0.35 | 0.35 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 1/11/17 | Adrian - County - Finish review, edit, and revisions to first draft of declaration for Joint Stipulation to Compel Further Responses from - Defendant County to Plaintiff's Request for Admissions (Set 15) | 0.18 | 0.18 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 1/13/17 | Adrian - Prepare, finalize, publish to .pdf Joint Stipulation to Compel County's responses to Rogs Set 3 | 0.28 | 0.28 | Vague; Clerical | Vague as to "prepare" and "finalize". Time spent on noncompensable clerical work. |
| AMP | 1/13/17 | Adrian - Draft Table of Contents and Table of Authorities for Joint Stipulation to Compel County's responses to Rogs Set 3 | 0.53 | 0.53 | Clerical; Excessive | Time spent on noncompensable clerical work or basic tasks. |
| AMP | 1/13/17 | Adrian - County - Add Defendant's portion and ensure proper formatting for Joint Stipulation to Compel County's responses to Rogs Set 3 | 0.38 | 0.38 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 1/17/17 | Adrian - Torres - Review, edit, and revise Meet and Confer, re: Defendant Torres' Responses to Plaintiffs Request for Production of Documents (Set Three) based on Steve's comments from review | 0.18 | 0.18 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 1/17/17 | Adrian - County - Prepare mandatory chambers copies of Joint Stipulation to Compel County's responses to Rogs Set 3, declaration, notice, and proposed order for delivery | 0.33 | 0.33 | Clerical; Vague | Time spent on noncompensable clerical work. Vague as to "prepare". |
| AMP | 1/17/17 | Adrian - County - Prepare Joint Stipulation to Compel County's responses to Rogs Set 3, declaration, notice, and proposed order for e-filing and service | 0.32 | 0.32 | Clerical; Excessive; Vague | Includes time spent on noncompensable clerical work and basic tasks. Vague as to what is meant by "prepare" other than clerical work. |

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| SDD | 1/17/17 | Steve - Draft, review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE lO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN). Computer kept crashed, lost some edits and work. | 1.85 | 1.85 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| SDD | 1/17/17 | Steve - Continue to review, revise, and edit Meet and Confer, re: Defendant Torres' Responses to PlaintiEs Request for Production of Documents (Set Three). | 0.9 | 0.9 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |

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| AMP | 1/19/17 | Adrian - County - Start draft of SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE) | 0.32 | 0.32 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/19/17 | Adrian • County - Review Defendant's Portion of Joint Stipulation to Compel Further Responses to Interrogatories Set 3 to determine if issues oeed to be addressed in supplemental memorandum of law | 0.27 | 0.27 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/20/17 | Adrian - County - Continue draft of SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE) | 0.2 | 0.2 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 1/20/17 | Adrian - County - Review grievance and complaint procedures for SUPPLEMENTAL MEMORANDUM lN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE) | 0.22 | 0.22 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/20/17 | Adrian - County - Continue draft of SUPPLEMENT AL MEMORANDUM iN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE) | 0.73 | 0.73 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 1/23/17 | Adrian - County - Continue review, edit, and revise first draft of SUPPLEMENTAL MEMORANDUM lN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY Of RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE) | 0.17 | 0.17 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/23/17 | Adrian - County - Review, edit, and revise first draft of SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 .JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE) | 0.4 | 0.4 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 1/23/17 | Adrian - County - Continue draft of SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE), section re relevancy and Defendant's improper attempts to limit that scope | 0.53 | 0.53 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/23/17 | Adrian-County-Continue draft of SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STJPULAT!ON TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE), section re unsupported objections | 0.42 | 0.42 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 1/23/17 | Adrian -County • Continue draft of SUPPLEMENT AL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOJNT STIPULATJON TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO lNTERROGATOR!ES (SET THREE), section re overly broad as to time | 0.55 | 0.55 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/23/17 | Adrian• County- Continue draft of SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY Of RIVERSIDE TO PROVIDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE) | 0.42 | 0.42 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| AMP | 1/23/17 | Adrian - County - Continue draft of SUPPLEMENT AL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOJNT. STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO) INTERROGATORIES (SET THREE) | 0.27 | 0.27 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/24/17 | Adrian - Torres - Revise and edit portions of M&C letter re Torres' Responses to RPDs Set 3 for final review | 0.18 | 0.18 | Excessive | RPD Set Three sought Torres's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative/excessive discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. |
| AMP | 1/24/17 | Adrian - County - Review County's responses to Plaintiff's RPDs Set 5 | 0.18 | 0.18 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. |

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| AMP | 1/24/17 | Adrian - County- Draft TOC and TOA for SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STJPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVlDE FURTHER RESPONSES TO INTERROGATORIES (SET THREE) | 0.33 | 0.33 | Excessive; Clerical | Time includes noncompensable clerical work.<br>ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 1/26/17 | Adrian • Butler - Draft new sections for M&C letter re Butler's Responses to RPDs Set 3 re possession, custody, control | 0.35 | 0.35 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |

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| AMP | 1/26/17 | Adrian - Butler - Revise and edit portions of M&C letter re Butler's Responses to RPDs Set 3 | 0.28 | 0.28 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 1/27/17 | Adrian - Butler - Research re discovery of social worker files and personnel files | 0.27 | 0.27 | Vague | Vague as to purpose of research. Vague as to "social worker files". |
| AMP | 1/27/17 | Adrian - Buder - Continue to revise and edit portions of M&C letter re Butler's Responses to RPDs Set 3 | 0.57 | 0.57 | Duplicative; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 1/30/17 | Adrian - Butler - Draft notice of resumption of deposition of Felecia Butler | 0.07 | 0.00 | No Objection | No Objection. |
| AMP | 1/30/17 | Adrian • Torres - Draft notice of resumption of deposition of Karla Torres | 0.12 | 0.00 | No Objection | No Objection. |

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| AMP | 1/30/17 | Adrian • Research re class certification objection and specific training materials for Meet and Confer letter re County's responses to RPDs (Set 5) | 0.18 | 0.18 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 1/30/17 | Adrian - County - Continue review of deposition transcript of Felecia Butler fo, Meet and Confer letter re County's responses to RPDs ( Set 5 ), sections re reasonable inquiry and mentions of specific trainings | 0.18 | 0.18 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 1/30/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RPDs (Set 5) | 0.53 | 0.53 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |

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| AMP | 1/30/17 | Adrian - Research re reasonable inquiry and duties of public entity for Meet and Confer letter re County's responses to RPDs (Set 5) | 0.38 | 0.38 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 1/30/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RPDs (Set 5) | 0.22 | 0.22 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 1/30/17 | Adrian - County - Continue draft of Meet and Confer letter re County's responses to RPDs (Set 5), section re relevance and Butler's deposition | 0.25 | 0.25 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |

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| AMP | 1/30/17 | Adrian • County • Review deposition transcript of Felecia Butler for Meet and Confer letter re County's responses to RPDs (Set 5), sections re reasonable inquiry and mentions of specific trainings | 0.42 | 0.42 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 1/30/17 | Adrian County• Continue drn:ft of Meet and Confer letter re County's responses to RPDs (Set 5) | 0.28 | 0.28 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 1/30/17 | Adrian - County - Continue draft cf Meet and Confer letter re County's responses to RPDs (Set 5) | 0.13 | 0.13 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |

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| AMP | 1/30/17 | Adrian - County - Start draft of Meet and Confer letter re County's responses to RPDs (Set 5) | 0.33 | 0.33 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |
| AMP | 1/30/17 | AdriWI - Butler - Continue to revise and edit portions of M&C letter re Butler's Responses to RPDs Set 3 | 0.35 | 0.35 | Duplicative ; Excessive | RPD Set Three sought Butler's transcript and personnel file, both of which are categories of records not sufficiently related to class certification required by the standing Scheduling Order. Additionally the requests sought County training materials which had already been produced through other discovery. Thus time spent propounding duplicative discovery and information the Plaintiff was not yet entitled to given the Scheduling Order in place at the time. Further, a M&C letter regarding RPD Set Three was not located as having been received. Attorney should not bill for incomplete work. |
| AMP | 1/30/17 | Adrian • Draft notice of resumption of depositlon of Michael Puentes | 0.1 | 0.1 | Clerical | Includes time spent on noncompensable clerical work or basic tasks. |
| AMP | 1/31/17 | Adrian - County - Continue draft of Meet and Coofer letter re County's responses to RPDs (Set 5), start drafting section re Butler's statements in deposition and training materials | 0.27 | 0.27 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |

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| AMP | 1/31/17 | Adrian • County - Continue draft of Meet and Confer letter re County's responses to RPDs (Set 5) | 0.68 | 0.68 | Excessive | Time spent seeking records outside Scheduling Order which required discovery to be related to class certification. RPD Set Five to County sought specific training documents pertaining to the individual defendants. Thus, the County properly did not produce records as the request was not sufficiently related to issues of class certification. Further, no M&C letter was located as being received regarding this set of discovery. Attorney should not bill for incomplete, unnecessary work. |
| SDD | 2/1/17 | Steve - Continue to review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN). | 0.72 | 0.72 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 2/1/17 | Steve - review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN). | 0.87 | 0.87 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 2/1/17 | Steve - Review, revise. and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN). | 0.72 | 0.72 | Duplicative ; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 2/3/17 | Adrian - Continue review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVJDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) based on Steve's comments from review | 0.8 | 0.8 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/3/17 | Adrian - Start review; revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARD1NG PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) based on Steve's comments from review | 0.13 | 0.13 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/3/17 | Adrian - Review, edit, revise second notice of rescheduling of deposition of County PMK re Warrants | 0.2 | 0.2 | Vague; Clerical | Vague as to what revisions actually made other than noncompensable clerical work. |

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| AMP | 2/3/17 | Start review. revise, and editLOCAL RULE 37-2 JOINTSTIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) based on Steve's comments from review | 0.45 | 0.45 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/3/17 | Adrian - Finish review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) based on Steve's comments from review | 0.22 | 0.22 | Duplicative ; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 2/3/17 | Adrian - Review Defendants' responses and statements of inquiry for LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) | 0.27 | 0.27 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/6/17 | Adrian- Review letter from Sarah Overton with attached objections to document reqµests for February 16 deposition of PMK of Riverside County Juvenile Court | 0.2 | 0.2 | Vague | Vague as to determinations made from review or action taken. |
| AMP | 2/6/17 | Adrian - Practice oral argument for the Motion to Compel hearing in Riverside | 0.68 | 0.68 | Excessive | Vague as to which MTC hearing the task relates.<br>ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |

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| SDD | 2/6/17 | Steve - Adrian's practice oral argument for the Motion to Compel hearing in Riverside | 0.68 | 0.68 | Excessive | Vague as to which MTC hearing the task relates.<br>ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 2/6/17 | Review Joint Stipulation regarding Motion to Compel further Responses from County to Interrogatories (Set 3) for tomorrow's hearing still on calendar | 0.55 | 0.55 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| AMP | 2/6/17 | Continue review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) based on Steve's comments from review | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/6/17 | Continue review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) based on Steve's comments from review | 0.58 | 0.58 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/7/17 | Continue review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) based on Steve's comments from review | 0.63 | 0.63 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/7/17 | Attend and argue Motion to Compel hearing in Riverside; re: County (Rog 3). | 5.42 | 5.42 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims. |
| SDD | 2/7/17 | Attend and argue Motion to Compel hearing in Riverside; re: County (Rog 3). | 5.42 | 5.42 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Of the six disputed requests, the Court found 3 overly burdensome, and 2 possibly implicated by WIC 827. Renewed fee motion fails to articulate why seeking such extensive data was a necessary step to Plaintiff's victory in the individual claims.<br>Duplicative of AMP billing of the same day - Two attorneys should not bill for attending the same hearing. |
| AMP | 2/7/17 | Add material relating to County Counsel's sworn testimoney for LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COlNIY OF RIVERSIDE TO PROVJDE FURTHER RESPONSES TO REQUESTS FOR ADMISSlON (SET SIXTEEN) | 0.13 | 0.13 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 2/7/17 | Review deposition transcript of Michael Puentes for material to cover in deposition of Riverside County Juvenile Court PMK | 0.38 | 0.38 | Vague | Vague as to determinations made form review or actions taken. |
| AMP | 2/8/17 | Research re providiog responses on information and belief to RFAs for LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMlSSION (SET SIXTEEN) | 0.18 | 0.18 | Duplicative ; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/8/17 | Start revisions to LOCAL RULE 37-2 JOlNT STIPULATlON REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT'S COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQCESTS FOR ADMJSSION (SET SJXTEEN) based on Steve's comments from review and meeting | 0.68 | 0.68 | Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| SDD | 2/8/17 | Meet with Adrian to discuss comments for LOCAL RULE 37-2 JOINT STIPULATION REGARDlSG PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PR0VIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN). | 0.33 | 0.33 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/8/17 | Meeting to discuss comments for LOCAL RULE 37-2 JOINT STJPOLATJON REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMlSSION (SET SIXTEEN) with Steve | 0.33 | 0.33 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| SDD | 2/8/17 | Continue to review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMlSSION (SET SIXTEEN). | 0.60 | 0.60 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/8/17 | Continue review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMJSSION (SET FIFTEEN) based on Steve's comments from review | 0.23 | 0.23 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 2/8/17 | Review, Revise,and edit LOCAl, RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPELDEFENDANT COUNIY OF RJVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN). | 0.70 | 0.70 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/9/17 | Continue revisions to LOCAL RULE 37-2 JOINT STIPlJLA TION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNlY OF RIVERSIDE TO PROVJOE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) based on Steve's comments from review and meeting | 0.20 | 0.20 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 2/9/17 | Research re reasonable inquiry for public entity and qualified responses to RFAs for LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) | 0.27 | 0.27 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/9/17 | Continue revisions to LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) based on Steve's comments from review and meeting | 0.68 | 0.68 | Duplicative; Excessive | M&C letter dated 11/9/2016 alleges requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres and some requests sought admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent on seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/9/17 | Continue draft of outline for deposition of Riverside County Juvenile Court PMK | 0.57 | 0.57 | Excessive | Renewed fee motion fails to articulate why deposing Riverside Juvenile Court PMK was a necessary step to Plaintiff's limited victory on underlying claims. |

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| AMP | 2/9/17 | Review deposition transcripts of County PMKs re CWS/CMS for LOCAL RULE 37-2 JOINT STJPULA TtON REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMJSSION (SET FIFTEEN) | 0.18 | 0.18 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/9/17 | Continue review, revise, and edit LOCAL RULE 37.z JOJNT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RJVERSIDE TO PROVIDE FURTHERRESPDNSES TO REQUESTS FOR ADMJSS!ON (SET FIFTEEN) based on Steve's comments from review | 0.58 | 0.58 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/10/17 | Continue redrafting and revising sections of LOCAL RU.LE 37-2 JOINT STJPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RJVERSIDE TO PROVIDE FUIJTHER RESPDNSES TO REQUESTS FOR ADMISSION (SET FIFTEEN), start redrafting sections re lack of confidentiality | 0.45 | 0.45 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/10/17 | Continue redrafting and revising sections of LOCAL RULE 37-2 JOINT STIPULATION REGARDISG PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) | 0.53 | 0.53 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/10/17 | Continue redrafting and revising sections of LOCAL RULE 37-2 JOJNT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) | 0.18 | 0.18 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/10/17 | Continue redrafting and revising sections of LOCAL RULE 37-2 JOINT STJPULA TION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFlEEN) based on Steve's comments from meeting and prior review | 0.23 | 0.23 | Excessive | RFA-Set 15 included 30 class related requests for admissions. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/10/17 | Redrafting and revising sections of LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTJON TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) based on Steve's comments from meeting and prior review | 0.17 | 0.17 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/10/17 | Meet with Steve to discuss revisions, edits, and comments on LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVBRSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN). | 0.45 | 0.45 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 2/10/17 | Meet with Adrian to discuss revisions, edits, and comments on LOCAL RULE 37-2 JOINT STJPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN), | 0.45 | 0.45 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/10/17 | Continue review, revise, and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) based on Steve's comments from review | 0.27 | 0.27 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

| OBJECTIONS TO BILLING ENTRIES IN "EXHIBIT 2" OF MCMILLAN DECLARATION | | | | | | |
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| **ATTY** | **DATE** | **DESCRIPTION** | **TIME CHALLENGED** | **REDUCE BY** | **OBJECTION** | **REASON FOR OBJECTION** |
| SAM | 9/23/18 | Continue review/critique of Abacus billing entries. | 2.70 | 2.70 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SAM | 9/23/18 | Review Abacus billing data and exercise billing judgment to ensure hours billed are correct. Create spread sheet to tabulate billing entry reductions. May add in other reduction categories as I go through the Abacus billings. Will address Amicus billings separately. | 1.20 | 1.20 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SAM | 9/20/18 | Continue research on fee motion. restructure memorandum to incorporate same | 0.40 | 0.40 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SAM | 9/20/18 | Continue work on motion for attorney's fees | 2.70 | 2.70 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SAM | 9/20/18 | Review Abacus fee billing. Begin process of assessing and cutting fees based on Hensley. | 0.50 | 0.50 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SAM | 9/19/18 | Continue work on motion for attorney's fees. Condud further research on question of whether Plaintiffs counsel may recover for work on motions as to which Plaintlff did not prevail. | 1.10 | 1.10 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SDD | 9/18/18 | Continue to draft the Ps&As in support of the attorney fee motion. | 0.50 | 0.50 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |

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| SAM | 9/18/18 | Continue work on motion for attorney's fees. Conduct further research on question of whether Plaintiffs counsel may recover for work on motions as to which Plaintiff did not prevail | 0.60 | 0.60 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SAM | 9/18/18 | Continue work on motion for attorney's fees. Conduct further research on question of whether Plaintiffs counsel may recover for work on motions as to which Plaintiff did not prevail. | 1.10 | 1.10 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SAM | 9/17/18 | Begin outline for Motion for Prevailing Party Attorneys fees and costs. | 0.80 | 0.80 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SDD | 9/17/18 | Continue to draft the request for attorney's fees. | 1.00 | 1.00 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SDD | 9/17/18 | Research class fees for attorney fee motion. | 0.30 | 0.30 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SDD | 9/17/18 | Review the County's training timeline in relation to Plaintiff's lawsuit; for use in the fee motion, i.e., outstanding result | 0.30 | 0.30 | Duplicative | Billing entry appears in McMillan Exhibit 10. Atty cannot bill twice for the same entry. |
| SDD | 9/14/18 | Begin to draft A.A's fee motion | 0.60 | 0.60 | Excessive | Excessive in light of the Court’s Order Denying Plaintiff’s Motion for Attorneys’ Fees. Attorney should not bill for a failed Motion for Attorneys’ Fees. |
| SAM | 9/14/18 | Draft proposed joint stipulation to enter judgment on Rule 68 Offer. Forward to Doug for review and approval. | 0.90 | 0.00 | No objection | No Objection. |

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| SAM | 9/12/18 | Draft proposed form of judgment. Send to Doug for review. | 0.20 | 0.00 | No objection | No Objection. |
| SAM | 9/12/18 | Research procedure for accepting and filling rule 68 offers | 0.80 | 0.00 | No objection | No Objection. |
| SAM | 9/12/18 | Review judgment. Redline same. Return to Doug with a request that he conform the judgment to the specific of the Rule 68 offer. | 0.40 | 0.00 | No objection | No Objection. |
| SDD | 8/15/18 | Review the proposed Rule 68 Offer | 0.30 | 0.00 | No objection | No Objection. |
| SAM | 8/10/18 | Review Rule 68 offer. Return position to Dough Smith | 0.20 | 0.00 | No objection | No Objection. |
| SAM | 7/26/18 | Phone with Doug Smith regarding details of Rule 68 Offer. | 0.40 | 0.00 | No objection | No Objection. |
| SAM | 7/24/18 | Phone with Tonita regarding settlement. Sounds like she will be doing it. | 0.90 | 0.00 | No objection | No Objection. |
| SDD | 7/16/18 | Continue to draft and revise the Separate Statement in support of the MSJ. | 1.00 | 0.00 | No objection | No Objection. |
| SDD | 6/29/18 | Continue to draft the Ps&As in support of the MSJ; provide a copy of the draft to Doug Smith. | 0.40 | 0.00 | No objection | No Objection. |
| SDD | 6/28/18 | Draft email to Defense Counsel, re: Meet and Confer on the MSJ. | 0.30 | 0.00 | No objection | No Objection. |
| SDD | 6/28/18 | Modify the MSJ to allow defense counsel to review the issues, consider whether any issues can be resolved, and consider any settlement offer | 0.70 | 0.00 | No objection | No Objection. |

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| SAM | 6/28/18 | Phone with Doug Smith regarding meet and confer on Summary Judgment Motion and potential for settlement. Doug indicated that it would be helpful for him in discussing the potential settlement with his client, if he had our motion in hand. I agreed to get the nearly completed draft to him within 24 hours, if not by the end of the day today. | 0.40 | 0.00 | No objection | No Objection. |
| SAM | 6/28/18 | Review, edit, revise MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT. | 1.20 | 0.00 | No objection | No Objection. |
| SDD | 6/27/18 | Continue to draft the Ps&As in support of the Motion for Partial Summary Judgment | 0.20 | 0.00 | No objection | No Objection. |
| SDD | 6/27/18 | Continue to draft the Ps&As in support of the MSJ. | 2.20 | 0.00 | No objection | No Objection. |
| SDD | 6/27/18 | Continue to draft the Ps&As in support of the MSJ. | 2.40 | 0.00 | No objection | No Objection. |
| SDD | 6/27/18 | Email defense counsel, re: Meet and Confer regarding the partial MSJ | 0.30 | 0.00 | No objection | No Objection. |
| SDD | 6/26/18 | Continue to draft and revise the separate statement in support of the partial MSJ. | 1.60 | 0.00 | No objection | No Objection. |

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| SDD | 6/26/18 | Continue to draft and revise the separate statement in support of the partial MSJ. | 2.00 | 0.00 | No objection | No Objection. |
| SDD | 6/26/18 | Continue to draft the Ps&As in support of the MSJ. | 1.00 | 0.00 | No objection | No Objection. |
| SDD | 6/26/18 | Review the separate statement and ensure all necessary facts are included. | 0.90 | 0.00 | No objection | No Objection. |
| SDD | 6/25/18 | Continue to draft and revise the Separate Statement in support of the MSJ. | 1.90 | 0.00 | No objection | No Objection. |
| SDD | 6/25/18 | Continue to draft and revise the Separate Statement in support of the MSJ. | 2.20 | 0.00 | No objection | No Objection. |
| SDD | 6/21/18 | Continue to draft and revise the Ps&As in support of the MSJ. | 1.10 | 0.00 | No objection | No Objection. |
| SDD | 6/21/18 | Continue to draft and revise the Separate Statement in support of the MSJ. | 1.40 | 0.00 | No objection | No Objection. |
| SDD | 6/21/18 | Continue to draft and revise the Separate Statement in support of the MSJ. | 1.50 | 0.00 | No objection | No Objection. |
| SDD | 6/20/18 | Continue to draft and revise the separate statement in support of the Motion for Summary Judgment. | 0.30 | 0.00 | No objection | No Objection. |
| SDD | 6/20/18 | Continue to draft the Ps&As in support of the Motion for Summary Judgment. | 1.70 | 0.00 | No objection | No Objection. |
| SDD | 6/20/18 | Continue to draft the Ps&As in support of the Motion for Summary Judgment. | 1.60 | 0.00 | No objection | No Objection. |

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| SDD | 2/16/17 | Research public records request for Superior Court policies, procedures, and related documents. | 0.30 | 0.30 | Vague; Excessive | Vague as to what aspect of the case the task relates. Juvenile Court polices etc unnecessary to the underlying claims and renewed fee motion fails to articulate why the work was necessary step to Plaintiff's victory. |
| SDD | 6/19/18 | Continue to revise and draft the Ps&As in support of the partial summary judgment motion. | 2.50 | 0.00 | No objection | No Objection. |
| SDD | 6/19/18 | Continue to revise and draft the Ps&As in support of the partial summary judgment motion. | 0.30 | 0.00 | No objection | No Objection. |
| SDD | 6/18/18 | Continue to draft the Ps&As in support of the Partial Summary Judgment Motion | 1.40 | 0.00 | No objection | No Objection. |
| SDD | 6/18/18 | Research issue preclusion issue; re: new case Pike v. Hester. | 0.60 | 0.60 | Vague | Vague as to purpose of research and for what work it relates. |
| SDD | 6/12/18 | Continue to draft the Ps&As in support of the MSJ. | 1.30 | 0.00 | No objection | No Objection. |
| SDD | 6/4/18 | Continue to draft the Ps&As in support of the MSJ | 0.90 | 0.00 | No objection | No Objection. |
| SDD | 6/2/18 | Continue to draft the Ps&As in support of the motion for summary judgment. | 0.90 | 0.00 | No objection | No Objection. |
| SDD | 5/29/18 | Draft Ps&As in support of Motion for Partial Summary Judgment. Convert the Class Cert motion. | 1.30 | 0.00 | No objection | No Objection. |
| SDD | 3/19/18 | Review and comment on the Reply Petition, 23(f) | 0.50 | 0.50 | Excessive; Vague | Attorney identifies work as primarily class related. Time spent preparing a Rule 23(f) unnecessary to individual claims. |
| SAM | 3/16/18 | Review the Reply in support of the 23(f) Petition. | 0.70 | 0.70 | Excessive; Vague | Attorney identifies work as primarily class related. Time spent preparing a Rule 23(f) unnecessary to individual claims. |

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| SAM | 3/13/18 | Review documents to answer the question regarding 23(c)(4). | 0.30 | 0.30 | Excessive; Vague | Vague as to "documents". Attorney identifies work as primarily class related.<br><br>Attorney identifies work as primarily class related. Time spent preparing a Rule 23(f) unnecessary to individual claims. |
| SAM | 3/2/18 | File the Rule 23(f) petition with the Ninth Circuit Court of Appeals. | 0.40 | 0.40 | Clerical; Excessive | Time spent on noncompensable clerical work.<br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 3/1/18 | Review and edit the Petition for Appeal, re: class certification | 1.00 | 1.00 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 3/1/18 | Review, edit, revise, annotate new draft of Petition for leave to file interlocutory appeal | 1.30 | 1.30 | Excessive; Clerical | Time spent on noncompensable clerical work.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 3/1/18 | Reviewing Documents-Reviewing prior docket entries and exhibits for appeal, checking for statements relating to 4-child removal | 0.60 | 0.60 | Vague; Excessive | Fails to articulate what prior docket entries and exhibits are being reviewed;<br>Entry contains block billing.<br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 2/28/18 | Review the frcp rule 23(f) draft brief. Make comments or suggestions. | 0.70 | 0.70 | Excessive; Vague | Vague as to for what purpose the review. Fails to articulate the relevancy of the comments or suggestions. Entry contains block billing. Attorney identifies work as primarily class related. Time spent preparing a Rule 23(f) unnecessary to individual claims. |
| SAM | 2/27/18 | Review and comment on proposed Petition for Review of Court's order denying Rule 23 motion | 2.10 | 2.10 | Excessive; Vague | Attorney identifies work as primarily class related. Time spent preparing a Rule 23(f) unnecessary to individual claims. |
| AMP | 2/26/18 | Reviewing Documents - Continue reviewing prior docket entries and exhibits for appeal | 0.30 | 0.30 | Vague; Excessive; Duplicative | Fails to articulate what prior docket entries and exhibits are being reviewed. Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 2/22/18 | Continue to review the class certification documents to respond to Noah and Phil's questions. | 0.50 | 0.50 | Vague; Excessive | Vague as to "class certification documents". Vague as to "Noah and Phil's questions". Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 2/22/18 | Phone call with Phil regarding the Rule 23(f) petition | 0.50 | 0.50 | Excessive; Vague | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 2/20/18 | Review documents to respond to Phil's questions, re: policy end practice to only seize under exigent circumstances. | 0.50 | 0.50 | Vague; Excessive | Vague as to what documents were reviewed. Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 2/19/18 | Continue to cut out documents for the rule 23(f) petition. | 0.80 | 0.80 | Vague; Excessive | Vague as to failing to articulate what documents are being "cut out".<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 2/19/18 | Continue to cut out documents to respond to Noah questions | 0.40 | 0.40 | Vague; Excessive | Vague as to "cut out".Fails to articulate relevancy of "Noah questions". Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 2/19/18 | Phone call with Noah, re: conference for Rule 23(f) petition. | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 2/19/18 | Review the questions/document requests from Noah and Phil. Locate responsive information and documents. | 0.90 | 0.90 | Vague | Vague as to failing to identify questions and document requests being reviewed. Vague as to failing to articulate what "responsive information" and "documents" are being located.<br>Entry contains block billing. |
| AMP | 2/19/18 | Reviewing Documents - Start reviewing docket entries and written discovery for documents needed in preparation for appeal | 0.90 | 0.90 | Vague; Excessive | Vague as to docket entries and written discovery being reviewed.<br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 2/19/18 | Reviewing Documents - Continue reviewing deposition transcripts for documents needed in preparation for appeal | 0.30 | 0.30 | Vague; Excessive | Vague as to failing to identify what deposition transcripts reviewed.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 2/19/18 | Reviewing Documents - Continue reviewing deposition transcripts for documents needed in preparation for appeal | 0.40 | 0.40 | Vague; Excessive | Fails to articulate which deposition transcripts are being reviewed.<br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 2/19/18 | Reviewing Documents - Continue reviewing deposition transcripts for documents needed in preparation for appeal | 0.30 | 0.30 | Vague; Excessive | Vague as to failing to identify what deposition transcripts reviewed.<br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 2/19/18 | Reviewing Documents - Continue reviewing docket entries and written discovery for documents needed in preparation for appeal | 0.80 | 0.80 | Vague; Excessive | Fails to articulate what docket entries and written discovery reviewed.<br><br>Fails to articulate what written discovery reviewed.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 2/19/18 | Reviewing Documents - Start reviewing deposition transcripts for documents needed in preparation for appeal | 0.60 | 0.60 | Vague; Excessive | Vague as to deposition transcripts and documents being reviewed.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 1/2/18 | Research regarding attorneys fees recovery where class certification is denied | 1.40 | 1.40 | Excessive; Vague; Clerical | Task related to preparing initial motion for attorneys' fees, which was denied. Attorney should not charge for failed motion. |
| SDD | 12/26/17 | Continue to draft the Reply to the Reconsideration Motion. | 1.80 | 1.80 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 12/26/17 | Review, edit, revise and file Reply in Support of Motion for Reconsideration | 1.90 | 1.90 | Excessive; Vague; Clerical | Time includes noncompensable clerical work. Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 12/25/17 | Continue to draft the Reply to the Reconsideration Motion. | 2.50 | 2.50 | Excessive; Vague | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 12/24/17 | Continue to draft the Reply to the Reconsideration Motion. | 2.30 | 2.30 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 12/22/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections to declaration of Jaime Shaw for motion for reconsideration | 0.30 | 0.30 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Continue drafting section for reply for motion for reconsideration re general neglect and non-exigency | 0.50 | 0.50 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Continue drafting section for reply for motion for reconsideration re general neglect and non-exigency | 0.40 | 0.40 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Continue drafting section for reply for motion for reconsideration re general neglect and non-exigency | 0.60 | 0.60 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Continue drafting section for reply for motion for reconsideration re injunctive relief not being moot | 0.60 | 0.60 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Continue drafting section for reply for motion for reconsideration re injunctive relief ot being moot | 0.40 | 0.40 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 12/22/17 | Drafting Documents - Continue drafting section re motion for reconsideration, tocal rules, and standards for material in reconsideration motions | 0.20 | 0.20 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Draft section for reply for motion for reconsideration re failure to disclose Sullivan | 0.50 | 0.50 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Draft section for reply for motion for reconsideration re injunctive relief not being moot | 0.30 | 0.30 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Start drafting section for reply for motion for reconsideration re general neglect and non-exigency | 0.40 | 0.40 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Drafting Documents - Start drafting section re motion for reconsideration, tocal rules, and standards for material in reconsideration motions | 0.30 | 0.30 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Research - Continue research re motion for reconsideration, local rules, and standards for material in reconsideration motions | 0.20 | 0.20 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Research - Continue research re section for reply for motion for reconsideration re injunctive relief not being moot | 0.30 | 0.30 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 12/22/17 | Research - Research re motion for reconsideration, local rules, and standards for material in reconsideration motions | 0.40 | 0.40 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Research - Research re section for reply for motion for recondiseration re injuctive releif not being moot | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/22/17 | Research - Research re section for reply for motion for reconsideration re general neglect and non-exigency | 0.40 | 0.40 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/21/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections ID declaration of Jaime Shaw for motion for reconsideration | 0.60 | 0.60 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/21/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections ID declaration of Jaime Shaw for motion for reconsideration | 0.50 | 0.50 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/21/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections ID declaration of Jaime Shaw for motion for reconsideration | 0.30 | 0.30 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 12/20/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections ID declaration of Jaime Shaw for motion for reconsideration | 0.40 | 0.40 | Excessive; Vague | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/20/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections ID declaration of Jaime Shaw for motion for reconsideration | 0.60 | 0.60 | Excessive; Vague | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/20/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections ID declaration of Jaime Shaw for motion for reconsideration | 0.30 | 0.30 | Excessive; Vague | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/20/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections ID declaration of Jaime Shaw for motion for reconsideration | 0.60 | 0.60 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/20/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections ID declaration of Jaime Shaw for motion for reconsideration | 0.50 | 0.50 | Excessive; Vague; Clerical | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 12/19/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendants' objections to declaration of Jaime Shaw for motion for reconsideration | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 12/19/17 | Drafting Documents - Start drafting Plaintiff's responses to Defendants' objections to declaration of Jaime Shaw for motion for reconsideration | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/20/17 | Continue to draft the Ps&As in support of reconsideration | 1.30 | 1.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/20/17 | Continue to draft the Ps&As in support of the Reconsideration Motion. | 2.70 | 2.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/20/17 | Continue to review and edit the declaration of Shaw. | 1.70 | 1.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/20/17 | Drafing Documents - Continue drafting declaration in support of motion for reconsideration of class certification | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/20/17 | Drafing Documents - Start drafting declaration of Shawn McMillan in support of motion for reconsideration of class certification | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/20/17 | Drafting Documents - Draft notice of motion for reconsideration of class certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 11/20/17 | Drafting Documents: Continue drawing declaration in support of motion for consideration of class certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/20/17 | Meet with expert Jaime Shaw, re: declaration for motion | 0.90 | 0.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 11/20/17 | Review, Edit, Revise Draft Declaration of Shawn A. McMIllan re: Mail procedures in support of reconsideration motion | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 11/20/17 | Review, edit, revise Shaw Declaration. | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 11/20/17 | Review. edit, revise Ps & As for motion reconsideration. | 0.90 | 0.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/20/17 | Revise and edit the Dec of Paris | 0.70 | 0.70 | Excessive; Vague | Vague as to "Dec of Paris". Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/19/17 | Continue to draft the Ps&As in support of reconsideration | 2.90 | 2.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 11/19/17 | Continue to draft the Ps&As in support of reconsideratlon. | 2.40 | 2.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/19/17 | Draft and revise Declaration of Jaime Shaw in support of the reconsideration motion. | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/18/17 | Continue to draft Ps&As in support of reconsideration. | 2.30 | 2.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/17/17 | Assemble documents for Jaime Shaw to review in preparation for her declaration. | 1.20 | 1.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/17/17 | Continue to draft the Ps&As for reconsideratlon. | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/17/17 | Continue to draft the Ps&As in for reconsideratlon. | 1.00 | 1.00 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/17/17 | Continue to draft the Ps&As in support of reconsideratlon. | 1.80 | 1.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 11/17/17 | Meet with Expert Witness Jaime Shaw to go over her declaration and calculations. | 1.00 | 1.00 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/17/17 | Research for information regarding the SDM tools. | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 11/17/17 | Review, edit, revise, draft declaration of Shaw (statistician). Return to Steve with comments and revision. | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/16/17 | Continue to draft the Declaration of Jaime Shaw | 1.80 | 1.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/16/17 | Continue to draft the declaration of Jaime Shaw in support of Class Certification | 2.20 | 2.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/16/17 | Continue to draft the Ps&As in support of Reconsideration | 0.90 | 0.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/16/17 | Continue to draft the Ps&As in support of Reconsideration | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 11/16/17 | Continue to draft the Ps&As in support of Reconsideration | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/16/17 | Drafting Documents - Continue drafting section for motion for reconsideration of class certification re failure to disclose Sullivan, custom re PMK designation | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/16/17 | Drafting Documents - Continue drafting section for motion for reconsideration of class certification re failure to disclose Sullivan, substantial justification and harmlessness analysis | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/16/17 | Research issue regarding calculations for numerosity. | 0.90 | 0.90 | Vague; Excessive | Fails to articulate the purpose of the research.<br><br>Vague as to "calculations for numerosity".<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/15/17 | Begin to assemble the data for the declaration of Jaime Shaw in support of the Reconsideration Motion. | 2.10 | 2.10 | Excessive; Vague | Vague as to "assemble".<br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 11/15/17 | Begin to draft Jaime Shaw's declaration. | 0.30 | 0.30 | Vague; Excessive | Vague as to what the declaration relates.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/15/17 | Continue to draft the Ps&As for reconsideration. | 1.20 | 1.20 | Excessive; Duplicative | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/15/17 | Phone call to Jaime Shaw, re: statistical analysis of removal data. | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/15/17 | Research regarding general neglect reporting requirements to caci | 0.60 | 0.60 | Vague; Excessive | Fails to specify the purpose for the research.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/14/17 | Continue to draft Ps&As in support of motion for reconsideration. | 2.00 | 2.00 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/14/17 | Continue to draft the Ps&As in support of the Reconsideration motion | 1.90 | 1.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 11/14/17 | Drafting Documents - Continue drafting declaration in support of motion for reconsideration of class certification | 0.30 | 0.30 | Vague; Excessive | Fails to identify the Declarant.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/14/17 | Drafting Documents - Continue drafting declaration in support of motion for reconsideration of class certification | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/14/17 | Drafting Documents - Continue drafting section for motion for reconsideration of class certification re failure to disclose Sullivan | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/14/17 | Drafting Documents - Continue drafting section for motion for reconsideration of class certification re failure to disclose Sullivan | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/14/17 | Drafting Documents - Continue drafting section for motion for reconsideration of class certification re failure to disclose Sullivan | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/14/17 | Drafting Documents - Continue drafting section for motion for reconsideratoin of class certification re failure to disclose Sullivan | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/14/17 | Drafting Documents - Start drafting section for motion for reconsideration of class certification re faijure to disclose Sullivan | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 11/14/17 | Research case law regarding class definition overbreadth | 1.50 | 1.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/14/17 | Research for CWS/CMS documents and definitions. | 1.60 | 1.60 | Vague; Excessive | Fails to specify the purpose for the research.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/14/17 | Research re Defendants' obligations for FRCP disclosure requirements and burdens for objections to the declaration of Sean Sullivan for reconsideration of motion for class certification | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/14/17 | Research re FRCP disclosure requirements, burdens, and oppositions to motions for objections to the declaration of Sean Sullivan for reconsideration of motion for class certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/13/17 | Continue to draft Ps&As in support of the Motion for Reconsideration. | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 11/13/17 | Continue to research class case regarding false arrest and child seizure. | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/13/17 | Drafting Documents - Continue drafting declaration in su pport of motion for reconsideration of class certification | 0.30 | 0.30 | Vague; Excessive | Fails to identify the declarant.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/13/17 | Drafting Documents - Continue drafting declaration in support of motion for reconsideration of class certification | 0.30 | 0.30 | Vague; Excessive | Fails to identify the declarant.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/13/17 | Drafting Documents - Continue drafting declaration in support of motion for reconsideration of class certification | 0.20 | 0.20 | Vague; Excessive | Fails to identify the declarant.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/13/17 | Drafting Documents - Start drafting declaration in support of motion for reconsideration of class certification | 0.60 | 0.60 | Vague; Excessive | Fails to identify the declarant.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 11/13/17 | Reviewing Documents - Reviewing Defendant's Objections to Plaintiff deposition notices for declaration in support of motion for reconsideration of class certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/10/17 | Begin to draft the Ps&As in support of the Motion for Reconsideration; re: class cert | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/10/17 | Continue to draft Ps&As for motion for reconsideration, re: class certification. | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/10/17 | Continue to draft Ps&As for motion for reconsideration, re: class certification. | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/10/17 | Continue to draft the Ps&As in support of reconsideration, re: class certification | 1.20 | 1.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/10/17 | Phone call to Mark to discuss the how to proceed with the Class Certification motion for reconsideration and leave to file new class cert. | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 11/10/17 | Research class definition issue, re: ability to modify as necessary. | 1.30 | 1.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/10/17 | Research for governing law, re: reconsideration motion in federal court. | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/10/17 | Review documents and evidence for reference to "general neglect." | 0.70 | 0.70 | Vague; Excessive | Vague as to what documents and evidence were reviewed.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/9/17 | Research cases cited in Judge Phillips Class Certification Order. | 1.60 | 1.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/9/17 | Research class issue, re: case with civil rights violation and commonality | 1.20 | 1.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/9/17 | Reviewing Documents - Continue PMK designations and PMK transcripts for categories already designated and compare to categories in Sean Sullivan's declaration for motion for reconsideration | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 11/9/17 | Reviewing Documents - Continue reviewing PMK transcripts for categories already designated and compare to categories in Sean Sullivan's declaration for motion for recondsideration | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/9/17 | Reviewing Documents - Continue reviewing PMK transcripts for categories already designated and compare to categories in Sean Sullivan's declaration for motion for recondsideration | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/9/17 | Reviewing Documents - Continue reviewing PMK transcripts for categories already designated and compare to categories in Sean Sullivan's declaration for motion for recondsideration | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/9/17 | Reviewing Documents - Continue reviewing prior docket entries for instances where discovery into specific cases blocked for motion for reconsideration | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/9/17 | Reviewing Documents - Review PMK designations and PMK transcripts for categories already designated and compare to categories in Sean Sullivan's declaration for motion for reconsideration | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 11/8/17 | Review of Court's class certification order, mark law and evidence to address on reconsideration and recertification. | 1.60 | 1.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/8/17 | Reviewing Documents - Review prior docket entries for instances where discovery into specific cases blocked for motion for reconsideration | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/8/17 | Reviewing Documents - Reviewing Order at Docket No. 162 Denying Motion for Class Certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/3/17 | Prepare records in preparation for Monday's class certification hearing | 0.30 | 0.30 | Vague; Excessive | Vague as to "prepare records".<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/3/17 | Review documents in preparation for class certification hearing. | 1.70 | 1.70 | Vague; Excessive | Fails to articulate what documents were reviewed.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/2/17 | Drafting Documents - Continue drafting declaration for reply to Defendants' response for objections to declaration of Sean Sullivan | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 11/2/17 | Drafting Documents - Continue drafting reply to Defendants' response for objections to declaration of Sean Sullivan | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/2/17 | Drafting Documents - Continue drafting reply to Defendants' response for objections to declaration of Sean Sullivan | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/2/17 | Drafting Documents - Start drafting declaration for reply to Defendants' response for objections to declaration of Sean Sullivan | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 11/2/17 | Drafting Documents - Start drafting reply to Defendants' response for objections to declaration of Sean Sullivan | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 11/2/17 | Review PMK depositions and discovery, re: Burkhart's opposition to Plaintiffs objection | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/18/17 | Drafting Documents - Continue reviewing and editing Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/18/17 | Drafting Documents - Continue reviewing and editing Plaintiffs objections to the declaration of Sean Sullivan submitted by Defendants based on Mark's comments and provided caselaw | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/18/17 | Drafting Documents - Drafting section for reply brief re standing and prospective injunctive relief | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/18/17 | Reviewing Documents - Reviewing prior docket entries and briefs for citations to supply for reply brief | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/18/17 | Reviewing Documents - Reviewing separate statement and supporting exhibits for citations to supply for reply brief | 0.60 | 0.60 | Excessive; Vague | Vague as to what filing the documents relate. Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/14/17 | Drafting Documents - Continue reviewing and editing Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants based on Shawn's comments from review | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/14/17 | Drafting Documents - Preparing and compiling exhibits for Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/14/17 | Drafting Documents - Review and edit Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/14/17 | Drafting Documents - Review and edit Plaintiffs objections to the declaration of Sean Sullivan submitted by Defendants based on Shawn's comments from review | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/14/17 | Drafting Documents - Review and edit proposed order for Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/14/17 | Drafting Documents - Continue reviewing and editing Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants based on Shawn's comments from review | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 9/14/17 | Review, edit, revise draft of objections to Sullivan declaration filed in opposition to motion for Class Certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/14/17 | Reviewing Documents - Reviewing exhibits to the declaration of Sullivan for any possible furtner objections to the declaration | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/13/17 | Drafting Documents - Continue drafting declaration in support of Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/13/17 | Drafting Documents - Continue drafting Plaintiffs objections to the declaration of Sean Sullivan submitted by Defendants, sections re lack of foundation | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/13/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/13/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/13/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/13/17 | Drafting Documents - Drafting table of contents and table of authorities for Plaintiff's responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Certification | 0.30 | 0.30 | Clerical; Excessive | Time includes noncompensable clerical work.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/13/17 | Drafting Documents - Review, proofread, and edit Plaintiffs responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Certification based on Shawn's comments from review | 0.60 | 0.60 | Clerical; Excessive | Time includes noncompensable clerical work.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Drafting Documents - Continue drafting declaration in support of Plaintiff's objections to the declaration of Sean Sullivan Submitted by Defendants | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/12/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Drafting Documents - Start drafting declaration in support of Plaintiff's objections to the declaration of Sean Sullivan Submitted by Defendants | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Drafting Documents • Continue drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Drafting Documents Draft proposed order for Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Research - Research re failure to designate expert for Plaintiff's objections to the declaration of Sean Sullivan | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/12/17 | Research re improper opinion testimony for Plaintiff's objections to the declaration of Sean Sullivan | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/11/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Certification | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/11/17 | Drafting Documents - Review and edit Plaintiff's responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Cerification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/11/17 | Drafting Documents - Continue drafting Plaintiff's objections to the declaration of Seen Sullivan submitted by Defendants | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/11/17 | Drafting Documents - Start drafting Plaintiff's objections to the declaration of Sean Sullivan submitted by Defendants | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/11/17 | Reviewing Documents - Reviewing declaration of Sean Sullivan submitted by Defendants for further objections | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/8/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Certification | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/8/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Certification | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/8/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Certification | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/8/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiffs Exhibits in Support of Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/8/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiffs Exhibits in Support of Motion for Class Certification, continue sections re paragraphs 95 and 97-101 | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/8/17 | Drafting Documents - Continue drafting Plaintiffs responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Certification, sections re paragraphs 95 and 97-101 | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/8/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiffs Exhibits in Support or Motion for Class Certification | 0.90 | 0.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/8/17 | Research -Research re expert opinions and common knowledge for Plaintiff's responses to Defendant's Objections to Plaintiff's Exhibits in Support of Motion for Class Certification | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/7/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiffs Exhibits in Support of Motion for Class Certification | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/7/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiffs Exhibits in Support of Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/6/17 | Drafting Documents - Continue drafting Plaintiff's responses to Defendant's Objections to Plaintiffs Exhibits in Support of Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 9/6/17 | Drafting Documents - Start drafting Plaintiffs responses to Defendant's Objections to Plaintiffs Exhibits In Support of Motion for Class Certification | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 9/6/17 | Reviewing Documents - Start reviewing Defendants' Opposition and attachments to Plaintiffs Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/15/17 | Begin to draft the opposition to Defendant's Ex Parte to Strike. | 3.60 | 3.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/15/17 | Research for local rules to oppose Defendant's ex parte application. | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 8/15/17 | Review Riverside's Ex-Parte App to strike separate statement. Draft declaration in opposition. | 0.90 | 0.90 | Vague; Excessive | Vague as to the Declarant. Entry contains block billing.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/14/17 | Review Defendant's Ex Parte Application to Strike the Class Certification Statement of Facts. | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/11/17 | Continue to draft responses to County's Sprog (set 1). [sic] | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 8/11/17 | Draft Meet & Confer Response letter, re: separate statement. | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 8/10/17 | Research issue of separate statement in support of Class certification motion | 1.10 | 1.10 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 8/10/17 | Draft meet and confer letter, re: separate statement | 1.20 | 1.20 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/7/17 | Drafting Documents - Continue reviewing and editing separate statement, drafting table of contents, final edits | 0.60 | 0.60 | Clerical; Excessive | Time includes noncompensable clerical work.<br>Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/7/17 | Drafting Documents - Reviewing and editing points and authorities for motion for class certification, final edits | 0.40 | 0.40 | Clerical; Excessive | Time includes noncompensable clerical work.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/7/17 | Drafting Documents - Drafting of declaration of Mark Ankcorn, getting into final form for e-filing | 0.50 | 0.50 | Clerical; Excessive | Time includes noncompensable clerical work.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 8/7/17 | Drafting Documents - Final edits, draft Table of Contents, Table of Authorities, and final formatting edits to Points and Authorities in support of motion for class certification | 0.55 | 0.55 | Clerical; Excessive | Time includes noncompensable clerical work.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/7/17 | Drafting Documents - Draft ex parte application for relief from 4:00 p.m. filing deadline | 1.00 | 1.00 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/7/17 | Drafting Documents - Continue drafting Plaintiffs Request to File Index Volume V under seal | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/7/17 | Motions - Continue preparing, publishing to PDF and compiling motion for class certification | 0.50 | 0.50 | Clerical; Excessive | Time includes noncompensable clerical work.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/7/17 | Continue to draft the P&As in support of the Class certification Motion. | 2.70 | 2.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 8/6/17 | Review, edit, revise, final draft of memorandum in support of class certification | 1.20 | 1.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 8/6/17 | Continue to draft the Ps&As in support of the Class Certification Motion. | 1.70 | 1.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/6/17 | Continue to draft the Ps&As in support of the Class Certification Motion. | 2.90 | 2.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/6/17 | Continue to draft the Ps&As in support of Class Certification. | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/6/17 | Continue to revise and edit the Ps&As in support ot the class cert motion. | 2.00 | 2.00 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/6/17 | Continue to draft and revise the Ps&As in support of class | 3.50 | 3.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/6/17 | Drafting Documents - Continue reviewing and editing separate statement, adding in sections per Steve's comments from review | 1.10 | 1.10 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/6/17 | Motions - Continue preparing and compiling exhibits, editing in exhibits per Steve's comments from review | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 8/5/17 | Drafting Documents - Continue reviewing and editing declaration of Adrian Paris in support of motion for class certification. | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/5/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification, separating into appropriate volumes. | 1.20 | 1.20 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/5/17 | Drafting Documents - Continue reviewing and editing declaration of Adrian Paris in support of motion for class certification, drafting references to indices. | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/5/17 | Drafting Documents - Continue reviewing and editing declaration of Adrian Paris in support of motion for class certification. references to quality work in docket by Judge Pym | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/5/17 | Drafting Documents - Continue reviewing and editing separate statement, continue sections re adequacy | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/5/17 | Drafting Documents - Continue reviewing and editing declaration of Adrian Paris in support of motion for class certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 8/5/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/5/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification, preparing indices for electronic submission, bookmarking exhibits, fixing pages [sic] | 1.20 | 1.20 | Clerical; Excessive | Time includes noncompensable clerical work.<br>Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 8/5/17 | Revise and edit the Ps&As in support of the Class Certification Motion. | 0.90 | 0.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/5/17 | Continue to revise and edit the Ps&As in support of Class Certification | 2.60 | 2.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/5/17 | Continue to draft the Ps&As in support of the class cert motion | 3.10 | 3.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/5/17 | Continue to draft the Ps&As in support of the Class Cert Motion | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SAM | 8/5/17 | Continue work on editing and augmenting declaration of Shawn A. McMIiian in support of Class Cert. | 1.30 | 1.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/4/17 | Review evidence and exhibits for more evidence to support the Class certification motion | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/4/17 | Revise and edit the Decl. of Holmes in support of the class action. | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/4/17 | Revise and edit the Decl. of Tonita in support of the class action | 0.90 | 0.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/4/17 | Revise and edit the Decl. of Tashaurie Rogers, in support of the class certification motion | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/4/17 | Phone call with mark, re: necessary revisions and edits to the Ps&As in support of class certificat'lon. | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing separate statement, continue sections re Tonita's declaration | 0.40 | 0.40 | Vague; Excessive | Entry contains block billing. Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 8/4/17 | Motions -Continue preparing and compiling exhibits for separate statement for motion for class certification, LA County removals | 0.50 | 0.50 | Excessive | Time includes noncompensable clerical work.<br>Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing declaration of Adrian Paris in support of motion for class certification, sections re L.A. removals | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing declaration of Adrian Paris in support of motion for class certification, sections re statistical analysis and Riverside removals | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing separate statement, continue sections re commonality | 0.70 | 0.70 | Excessive | Time includes noncompensable clerical work.<br>Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/4/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification. declarations | 0.50 | 0.50 | Excessive | Time includes noncompensable clerical work.<br>Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 8/4/17 | Drafting Documents - Continue drafting French declaration in support of Motion for Class Certification | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing separate statement, continue typicality section | 0.50 | 0.50 | Excessive | Time includes noncompensable clerical work.<br>Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing declaration of Adrian Paris in support of motion for class certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Reviewing and editing Tashaurie Rogers' declaration in support of Motion for Class Cerification based on Steve's comments | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Motions - Continue preparing and compHing exhibits for separate statement for motion for class certification | 0.60 | 0.60 | Excessive | Time includes noncompensable clerical work.<br>Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing separate statement | 0.40 | 0.40 | Excessive | Time includes noncompensable clerical work.<br>Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 8/4/17 | Telephone Conference with Ms. Tonita Rogers re declaration, other cases, other parents | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Start reviewing and editing Declaration of Tonita Rogers based on results of phone call | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Reviewing and editing Branning declaration in support of Motion for Class Certification based on short phone call with Danyelle Branning | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing separate statement. continue sections re adequacy | 0.30 | 0.30 | Vague; Excessive | Entry contains block billing. Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/4/17 | Drafting Documents - Reviewing ard editing Branning declaration in support of Motion for Class Certification based on Steve's comments | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/4/17 | Drafting Documents - Continue reviewing and editing separate statement. continue sections re lawsuits | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 8/3/17 | Drafting Documents - Draft section for Motion for Class Certification relating to evidentiery standard | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Drafting Documents - Finish first draft of Hunter declaration in support of Motion for Class Certification | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/3/17 | Drafting Documents - Continue reviewing and editing separate statement, sections re prior complaints | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/3/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/3/17 | Drafting Documents - Continue reviewing and editing declaration of Adrian Paris in support of motion for class certification | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Drafting Documents - Continue drafting Branning declaration in support of Motion for Class Certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 8/3/17 | Telephone Conference with Erik Holmes re draft declaration, edits and revisions | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Drafting Documents • Start reviewing and editing Declaration of Erik Holmes based on results of phone call | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Motions• Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/3/17 | Drafting Documents - Start drafting Hunter declaration in support of Motion for Class Certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Drafting Documents - Continue reviewing and editing separate statement, sections re depositions from other cases | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/3/17 | Reviewing Documents - Reviewing deposition transcripts from county PMKs regarding CWS/CMS from present case and other cases | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification, new deposition exhibits | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 8/3/17 | Telephone Conference with Ms. Tonita Rogers re draft declaration, edits and revisions | 0.30 | 0.30 | Vague; Excessive | Vague as to the purpose of the declaration.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Drafting Documents - Continue reviewing and editing Declaration of Tonita Rogers based on results of phone call | 0.30 | 0.30 | Vague; Excessive | Vague as to the purpose of the declaration.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Drafting Documents - Continue reviewing and editing separate statement, sections re ascertainability | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/3/17 | Drafting Documents - Start drafting French declaration in support of Motion for Class Certification | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Drafting Documents - Continue drafting French declaration in support of Motion for Class Certification | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/3/17 | Drafting Documents - Continue reviewing and editing separate statement, sections re adequacy | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| SDD | 8/3/17 | Continue to draft the Ps&As is support of the Class certification Motion | 2.30 | 2.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/3/17 | Continue to draft the Points & Authorities to support the Class Certification Motion | 1.00 | 1.00 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/3/17 | Phone call with Mark re: Class Definition and B(1) argument. | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/3/17 | Continue to draft the Points & Authorities to support the Class Certification Motion | 1.30 | 1.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/3/17 | Continue to draft the Points & Authorities to support the Class Certification Motion | 1.90 | 1.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/3/17 | Continue to draft the Ps&As is support of the Class certification Motion | 2.20 | 2.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/2/17 | Continue to draft the Points and Authorities in Support of the Class Certification Motion. | 2.20 | 2.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 8/2/17 | Continue to draft the Points and Authorities in Support of the Class Certification Motion. | 1.80 | 1.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/2/17 | Phone call to Mark re: Class Definition | 0.50 | 0.50 | Vague; Excessive | Fails to articulate the purpose of the phone call.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/2/17 | Continue to draft the Points end Authorities in Support of the Class Certification Motion | 2.30 | 2.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/2/17 | Continue to draft the Points and Authorities in Support of the Class Certification Motion | 1.30 | 1.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 8/2/17 | Review, edit, revise draft of PLAINTIFF'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF CLASS CERTIFICATION | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 8/2/17 | Review, revise, edit McMillan Decl. in support of moiton for class certification | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 8/2/17 | Drafting Documents - Continue reviewing end editing separate statement based on written comments and discussions with Steve, policies, practices section | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/2/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/2/17 | Drafting Documents - Continue reviewing and editing separate statement based on written comments and discussion with Steve, inadequacy sections | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/2/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification, new CCWIP exhibits | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/2/17 | Drafting Documents - Start drafting Branning declaration in support of Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/2/17 | Drafting Documents - Reviewing and editing declaration of Adrian Paris in support of motion for class certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 8/2/17 | Drafting Documents• Continue reviewing and editing separate statement based on comments and discussion with Steve | 1.40 | 1.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/2/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/2/17 | Drafting Documents - Continue reviewing and editing separate statement based on comments and discussion with steve | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/2/17 | Drafting Documents - Continue reviewing and editing separate statement based on comments and discussion with Steve, training section | 1.10 | 1.10 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/2/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Motions - Continue preparing and compiling exhibits for index for separate statement for motion for class certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 8/1/17 | Motions - Continue preparing and compiling discovery responses for separate statement for motion for class certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Motions - Creating and compiling new deposition excerpts for separate statement for motion for class certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification, former complaints | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Discussion with Steve re Separate Statement and factual and evidentiary additions to be made | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Motions - Continue preparing and compiling deposition excerpts for separate statement for motion for class certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Motions - Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Drafting Documents - Continue adding additional citations for separate statement for motion for class certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 8/1/17 | Motions -Continue preparing and compiling exhibits for separate statement for motion for class certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Motions -Finish preparing and compiling deposition excerpts for separate statement for motion for class certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Telephone Conference with Ms. Tonita Rogers re factual allegations, complaint, second removal, secondary details, obtaining full history | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 8/1/17 | Drafting Documents - Start reviewing and editing separate statement based on comments and discussion with Steve | 1.30 | 1.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Motions -Continue preparing and compiling deposition excerpts for separate statement for motion for class certification | 1.10 | 1.10 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 8/1/17 | Drafting Documents - Adding additional citations for separate statement for motion for dass certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 8/1/17 | Continue to draft the Points and Authorities in support of Class Certification | 2.20 | 2.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 8/1/17 | Continue to draft the Points and Authorities in support of Class Certification | 1.70 | 1.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/1/17 | Continue to revise and edit the Separate Statement. | 1.60 | 1.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 8/1/17 | Continue to revise and edit the Separate Statement. | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 8/1/17 | Continue to draft the Points and Authorities in support of Class Certification. | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/1/17 | Continue to draft the Points and Authorities in support of Class Certification. | 1.70 | 1.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 8/1/17 | Continue to draft the Points and Authorities in support of Class Certification. | 1.80 | 1.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 7/31/17 | Revise and edit the separate statement in support of the Class cert Motion. | 2.40 | 2.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| SDD | 7/31/17 | Draft the section, re: class action appropriate against CPS | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 7/31/17 | Continue to revise and edit the separate statement. | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 7/31/17 | Continue to draft the Class Certification Motion sections | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/31/17 | Drafting Documents - Continue drafting declaration of Adrian M. Paris in support of Motion for Class Certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/31/17 | Telephone Conference with Ms. Tonita Rogers re factual allegations, complaint, first removal, secondary details, obtaining full history | 1.20 | 1.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/31/17 | Drafting Documents - Start reviewing and editing Declaration of Tonita Rogers based on result of phone call | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/31/17 | Drafting Documents - Continue reviewing and editing Declaration of Tonita Rogers based on results of phone call | 0.90 | 0.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 7/31/17 | Motions - Continue preparing and compiling exhibits for Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/31/17 | Drafting Documents - Continue redrafting and Motion for Class Certification, sections re duties and Appellate Court's opinion | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/31/17 | Drafting Documents - Continue reviewing and editing Motion for Class Certification, sections re policy, practice, training | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/28/17 | Drafting Documents - Continue drafting index of exhibits for Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/28/17 | Drafting Documents - Start reviewing and editing Motion for Class Certification, providing citations to facts and additional citations where needed | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/28/17 | Drafting Documents - Continue reviewing and editing Motion for Class Certification, providing citations to facts and additional citations where needed | 0.90 | 0.90 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 7/28/17 | Drafting Documents - Continue reviewing, editing, and adding juvenile court sections to Separate Statement of Facts for Motion for Class Certification based on Steve's comments from review | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/28/17 | Drafting Documents - Continue reviewing and editing Motion for Class Certification, providing citations to facts and additional citations where needed | 0.80 | 0.80 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/28/17 | Drafting Documents - Continue reviewing and editing Motion for Class Certification, sections re removal | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/28/17 | Drafting Documents - Continue reviewing and editing Motion for Class Certification, sections re policy, practice, training | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/28/17 | Reviewing Documents - Reviewing juvenile court documents for A.A. and Ms. Rogers' four other children for Separate Statement | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/27/17 | Discussion with steve re Juvenile Court documents, Kisselburg deposition, use and need for Separate Statement | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/27/17 | Drafting Documents - Reviewing and editing declaration of Tonita Rogers in support of Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/27/17 | Drafting Documents - Continue drafting and editing declaration of P.H. in support of Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/27/17 | Drafting Documents - Start reviewing, editing. and adding juvenile court sections to Separate Statement of Facts for Motion for Class Certification based on Steve's comments from review | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/27/17 | Drafting Documents - Continue reviewing, editing, and adding juvenile court sections to Separate Statement of Facts for Motion for Class Certification based on Steve's comments from review | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/27/17 | Drafting Documents - Continue reviewing, editing, and adding Juvenile court sections to Separate Statement of Facts for Motion for Class Certification based on Steve's comments from review | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/27/17 | Reviewing Documents - Continue reviewing juvenile court documents for A.A. and Ms. Rogers' four other children for Separate Statement | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/27/17 | Drafting Documents - Continue reviewing, editing, and adding juvenile court sections to Separate Statement of Facts for Motion for Class Certification based on Steve's comments from review | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/27/17 | Drafting Documents - Continue reviewing, editing, and adding juvenile court sections to Separate Statement of Facts for Motion for Class Certification based on Steve's comments from review | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 7/27/17 | Continue to research class actions lawsuits against DCFS. | 0.70 | 0.70 | Excessive | Attorney identifies work on an unnecessary Separate Statement as "enmeshed". Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how all work was a necessary step for Plaintiff's victory on underlying claims. |
| AMP | 7/26/17 | Motions - Continue preparing and compiling exhibits for index of exhibits for Plaintiffs Motion for Class Certification | 0.80 | 0.80 | Excessive | Attorney identifies work on an unnecessary Separate Statement as "enmeshed". Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how all work was a necessary step for Plaintiff's victory on underlying claims. |

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| AMP | 7/26/17 | Drafting Documents - Continue drafting declaration of P.H. in support of Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/26/17 | Drafting Documents - continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/26/17 | Drafting Documents - Continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/26/17 | Reviewing Documents- Continue reviewing P.H. v. County of Riverside Juvenile Court Documents for Separate Statement of Facts . | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/26/17 | Drafting Documents - Continue drafting and editing declaration of P.H. in support of Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/26/17 | Reviewing Documents - Reviewing deposition transcripts of Shackleford and Kisselburg for Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/26/17 | Drafting Documents - Continue drafting and editing declaration of P.H. in support of Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/26/17 | Motions -Continue preparing and compiling exhibits for index of exhibits for Plaintiffs Motion for Class Certification | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/26/17 | Reviewing Documents - Reviewing P.H. v. County of Riverside Juvenile Court Documents | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/26/17 | Drafting Documents - Continue drafting declaration of P.H. in support of Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/26/17 | Drafting Document - Continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/25/17 | Discussion with Steve re class certification motion, separate statement, and progress | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/25/17 | Motions -Continue preparing and compiling exhibits for index of exhibits for Plaintiffs Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 7/25/17 | Motions -Continue preparing and compiling exhibits for index of exhibits for Plaintiffs Motion for Class Certification | 1.20 | 1.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/25/17 | Drafting Documents - Continue drafting Index of Evidence for Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/25/17 | Drafting Documents - Continue review and editing Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/25/17 | Drafting Documents - Continue reviewing and editing Separate Statement of Facts for Motion for Class certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/25/17 | Drafting Documents - Continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/25/17 | Drafting Documents - Continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/25/17 | Reviewing Documents - Reviewing P.H. v. County of Riverside Complaint for Separate Statement of Facts | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/25/17 | Drafting Documents - Start drafting declaration of P.H. In support of Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/25/17 | Correspondence with Mark Ankcorn by e-mail re Separate Statement of Facts for Motion for Class Certification, Motion for Consolidation hearing, progress on Memorandum of Points and Authorities, and future steps | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/25/17 | Correspondence with Mark Ankcom by e-mail re Separate Statement of Facts for Motion for Class Certification and progress on Memorandum of Points and Authorities | 0.20 | 0.20 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 7/25/17 | Research class Action cases against CPS | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/24/17 | Drafting Documents - Continue drafting request for judicial notice for Plaintiff's Motion for Class Certification | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/24/17 | Drafting Documents - Continue drafting Index of Evidence for Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/24/17 | Motions - Start preparing and compiling exhibits for request for judicial notice for Plaintiff's Motion for Class Certification | 0.40 | 0.40 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/24/17 | Drafting Documents - Continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/24/17 | Drafting Documents - Continue Reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/24/17 | Drafting Documents - Continue reviewing and editing Separate. Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/24/17 | Drafting Documents - Continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/24/17 | Drafting Documents - Cotinue drafting declaration of Adrian M. Paris in support of Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/24/17 | Drafting Documents - Continue drafting Index of Evidence for Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/24/17 | Motions - Start preparing and compiling exhibits for index of exhibits for Plaintiffs Motion for Class Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/24/17 | Reviewing Documents - Reviewing docket for citations to be made in Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/24/17 | Drafting Documents - Continue drafting Index of Evidence tor Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/24/17 | Drafting Documents - Start drafting request for judicial notice for Plaintiff's Motion for Class Certification | 0.60 | 0.60 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/24/17 | Drafting Documents - start drafting Index of Evidence for Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/21/17 | Drafting Documents - Continue drafting declaration of Tonita Rogers In support of Separate Statement of Facts for Mooon for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/21/17 | Drafting Documents - Conlinue drafting dedaration of Adrian M. Paris in support of Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/21/17 | Drafting Documents - Continue drafting declaration of Tonita Rogers in support of Separate Statement of Facts for Motion for Class Certification, sections re February 13, 2013 | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/21/17 | Drafting Documents - Continue drafting declaration of Tonita Rogers in support of Separate Statement of Facts for Motion for Class Certification, sections re December 4, 2012 | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/21/17 | Drafting Documents - Continue drafting declaration of Tonita Rogers in support of Separate Statement of Facts for Motion for Class Certification | 1.10 | 1.10 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/21/17 | Reviewing Documents - Reviewing prior deposition transcripts for information for declaration of Tonita Rogers In support of Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/21/17 | Drafting Documents - Continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/21/17 | Drafting Documents - Continue reviewing end editing Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Drafting Documents • Continue reviewing and editing Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.20 | 0.20 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Motions - Continue preparing exhibits to be attached to declaration in support of Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Drafting Documents - Continue drafting declaration of Adrian M. Paris in support of Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/20/17 | Drafting Documents. Continue drafting declaration of Adrian M. Paris in support of Separate Statement of Facts for Motion for Class Certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Drafting Documents • Continue drafting dedaration of Adrian M. Paris in support of Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Drafting Documents - Start drafting dedaration of Adrian M. Paris in support of Separate Statement of Facts for Motion for Class Certification | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Motions - Continue preparing exhibits to be attached to declaration in support of Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/20/17 | Drafting Documents - Continue drafting declaration of Adrian M. Paris in support of Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/19/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/19/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 1.10 | 1.10 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/19/17 | Drafting Documents - Continue redrafting and editing Separate Statement of Facts for Motion for Class Certification, drafting sections re training | 1.20 | 1.20 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/19/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/19/17 | Reviewing Documents - Continue reviewing Defendants' written discovery responses for Separate Statement of Facts for Motion for Class Certification, both from AA and related Rogers Case | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/19/17 | Reviwing Documents - Continue reviewing depostion transcript of Mark Kisselburg for Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/19/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/19/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/19/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, finding citations to additional evidence | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/18/17 | Reviewing Documents - Continue reviewing and editing draft of Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/18/17 | Reviewing Documents - Reviewing deposition transcript of Mark Kisselburg for Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/18/17 | Discussion with Steve re Separate Statement for Class Certification, citations to additional evidence, statements to be edited, statements to be added | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/18/17 | Drafting Documents - Start drafting and editing Separate Statement of Facts for Motion for Class Certificatioo based on Steve's comments from review, adding evidentiary citations and statements of fect [sic] | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/18/17 | Drafting Documents - Continue drafting end editing Separate Statement of Facts for Motion for Class Certification based on Steve's comments from review | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/18/17 | Motions - Start preparing and compiling deposition excerpts for Separate Statement for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/18/17 | Motions - Continue preparing and compiling exhibits for Separate Statement for Class Certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/18/17 | Motions - Start preparing and compiling new exhibits for Separate Statement for Class Certification numbers of removals | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/18/17 | Motions - Analyzing and compiling exhibits for Separate Statement for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 7/18/17 | Revise and edit the Separate Statement in support of the Class Cert motion. | 1.30 | 1.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/18/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification based on Steve's comments from review | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/14/17 | Reviewing Documents - Continue reviewing and editing dreft of Separate Statement of Facts for Motion for Class Certification, class certification requirement sections | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/13/17 | Drafting Documents - Continue drafting Declaration of Shawn A. McMillan for Separate Statement of Facts for Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/13/17 | Reviewing Documents - Reviewing deposition transcripts for Separate Statement of Facts for Motion for Class Certification, training and timeline of new material | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/13/17 | Drafting Documents - Start drafting Declaration of Shawn A. McMillan for Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/13/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/13/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/13/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/13/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/13/17 | Reviewing Documents- Continue reviewing and editing draft of Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/13/17 | Drafting Documents - Continue drafting Declaration of Tonita Rogers for Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Drafting Documents - Continue drafting and editing Separate statement of Facts for Motion for Class Certification, inputting citations to trial exhibits | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| SDD | 7/12/17 | Meet with Adrian to discuss the Separate Statement | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, reorganization of Monell section | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, inputting citations to written discovery responses | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/12/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, Monell section based on discussion with Steve | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Discussion with Steve re Monell section of Plaintiff's Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Drafting Documents - Start drafting Declaration of Tonita Rogers for Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Motions - Continue preparing and compiling exhibits for Plaintiff's Separate Statement of Facts in Support of Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/12/17 | Trial preparations - Preparing and compiling exhibits for Plaintiff's Separate Statement of facts in Support of Motion for Class Certification | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification based on discussion and comments from Steve | 1.10 | 1.10 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, section re numerosity | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, typicality section | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, commonality section | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, defendant class numerosity section | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Reviewing Documents - Continue reviewing current exhibits for Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Reviewing Documents- Reviewing prior complaints for Separate Statement of Facts for Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Reviewing Documents - Reviewing Defendants' written discovery responses for Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/11/17 | Reviewing Documents - Reviewing current exhibits for Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, sections re Monell issues | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/10/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, sections re typicality | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification, sections re numerosity; adequacy | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Drafting Documents - Start drafting and editing Separate Statement of Facts for Motion for Class Certification based on discussion and comments from Steve | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Reviewing Documents - Reviewing draft of Separate Statement of Facts for Motion for Class Certification to edit out non-essential facts | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/10/17 | Research - Research re materiality of facts for Separate Statement of Facts for Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Discussion with Steve and Shawn re edits and revisions to Separate Statement of Facts for Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Drafting Documents - Start drafting end editing Separate Statement Of Facts for Motion for Class Certification based on discussion end comments from Steve and Shawn | 1.00 | 1.00 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/10/17 | Drafting Documents - Continue drafting and editing Separate Statement of Facts for Motion for Class Certification based on discussion and comments from Steve | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 7/10/17 | Continue to revise and edit the separate statement in support of the class certification motion. | 1.00 | 1.00 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| SDD | 7/9/17 | Revise and edit the Separate Statement in support of the Class Certification Motion. | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/6/17 | Drafting Documents - Continue second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification based on Steve's comments from meeting | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/6/17 | Drafting Documents - Continue second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Action Certification based on Steven's comments from meeting | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/6/17 | Drafting Documents - Continue second redrafting and editing Separate Statement of Facts in Support of Plaint'lff's Motion for Class Certification based on Steve's comments from meeting | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/6/17 | Drafting Documents - Continue second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification based on Steve's comments from meeting, sections re findings in appellate case | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/6/17 | Drafting Documents - Continue second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/6/17 | Drafting Documents - Finish second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/6/17 | Drafting Documents - Start third redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification, adding in sections re Fendon and four children removal | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/6/17 | Drafting Documents - Continue second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification based on Steve's comments from meeting | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/6/17 | Drafting Documents - Continue second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification based on Steve's comments from meeting | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/6/17 | Drafting Documents - Continue second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification based on Steve's comments from meeting | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/6/17 | Reviewing Documents - Reviewing deposition transcripts for refined citations to evidence for Separate Statement | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Drafting Documents - Continue drafting Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 0.30 | 0.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Drafting Documents - Continue drafting Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification, start drafting correction sections | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Reviewing Documents - Continue reviewing depostion transcripts for corrections to be made for separate statement of facts | 0.40 | 0.40 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Drafting Documents - Continue drafting Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification, continue drafting correction sections | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/5/17 | Drafting Documents - Redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification based on Steve's comments from review | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Drafting Documents - Continue redrafting and editing Separate Statement of Facts for Motion for Class Certification on Steve's comments from review | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Drafting Documents - Continue drafting Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 0.80 | 0.80 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Drafting Documents - Continue drafting Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 1.30 | 1.30 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Reviwing Documents - Reviewing deposition transcripts for information to add to separate statement of facts | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/5/17 | Meeting with Steve re edits and comments for Separate Statement of Facts in Support of Plaintff's Motion for Class Certificaton | 0.70 | 0.70 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| AMP | 7/5/17 | Drafting Documents - Start second redrafting and editing Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification based on Steve's Comments from meeting | 0.20 | 0.20 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/3/17 | Drafting Plaintiff's Motion Documents for - Class Continue Certification | 0.50 | 0.50 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 7/3/17 | Reviewing Documents - Review tatest version of class certification motion for facts to set out in Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 0.60 | 0.60 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/3/17 | Drafting Documents - Continue dratting Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 1.10 | 1.10 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/3/17 | Discussion with Steve re Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 0.50 | 0.50 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |
| AMP | 7/3/17 | Drafting Documents - Start drafting Separate Statement of Facts in Support of Plaintiff's Motion for Class Certification | 0.90 | 0.90 | Excessive | Separate Statement was an unnecessary step for the class certification motion. Renewed fee motion fails to articulate how work on a Separate Statement drafted for a class certification motion was necessary for a Separate Statement in a partial msj. |

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| SDD | 2/17/17 | Continue to research public records request for Superior Court policies, procedures, and related documents | 0.50 | 0.50 | Vague; Excessive | Vague as to what aspect of the case the task relates. Juvenile Court polices etc unnecessary to the underlying claims and renewed fee motion fails to articulate why the work was necessary step to Plaintiff's victory. |
| SAM | 6/30/17 | Travel to and attend Deposition of Mark Kisselberg. Includes 1.3 hours air travel time. | 6.00 | 0.00 | No Objection | No Objection. |
| SDD | 2/17/17 | Begin to draft public records request, re: Juvenile Court policies, procedures, etc., re: warrants | 0.70 | 0.70 | Vague | Vague as to "etc." Vague as to what information about warrants is being sought. |
| AMP | 6/28/17 | Drafting Documents - Updating deposition outline for June 30 deposition of Mark Kisselburg | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/28/17 | Discovery preparations - Finish preparing and compiling exhibits to be used for June 30 deposition of Mark Kisselburg | 0.40 | 0.40 | Clerical; Vague | Vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 6/28/17 | Discovery preparations - Reviewing and analyzing documents produced on March 22, 2017 for documents identified in Shackleford deposition | 0.60 | 0.60 | Excessive; Vague | Renewed fee motion fails to articulate how documents gleaned from Shackleford deposition was a necessary step to victory on individual claims. Vague as to what documents/type of documents were looked for. Vague as to purpose of review. |
| AMP | 3/6/17 | Discovery preparations - Compiling new exhibits from documents provided by Riverside County Juvenile Court PMK | 0.50 | 0.50 | Vague; Clerical | Vague as to purpose of compiling exhibits. Time includes noncompensable clerical work. |
| AMP | 3/8/17 | Reviewing Documents - Review Juvenile Court PMK depo transcript and depo subpoena for possible Meet and Confer | 0.70 | 0.70 | Vague | Vague as to what documents were looked for and for what purpose. Vague as to results of review. |

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| AMP | 6/27/17 | Discovery preparations - Analyzing, preparing, and compiling exhibits to be used for June 30 deposition of Mark Kisselburg | 1.10 | 1.10 | Clerical; Vague | vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 6/27/17 | Discovery preparations - Continue preparing and compiling exhibits to be used for June 30 deposition of Mark Kisselburg | 0.70 | 0.70 | Clerical; Vague | vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 6/27/17 | Discovery preparations - Continue preparing and compiling exhibits to be used for June 30 deposition of Mark Kisselburg | 0.50 | 0.50 | Clerical; Vague | vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 3/9/17 | Drafting Documents - Continue draft of public records request to Riverside County Juvenile Court | 0.40 | 0.40 | Vague | Vague as to what type/topic of documents sought through request and relevancy to case. |
| AMP | 3/9/17 | Drafting Documents - Continue draft of public records request to Riverside County Juvenile Court | 0.50 | 0.50 | Vague | Vague as to what type/topic of documents sought through request and relevancy to case. |
| SDD | 6/26/17 | Deposition of PMK for Berkeley CCWIP. Roundtrip travel to Berkeley, California 7.5 hours | 10.50 | 10.50 | Excessive | Renewed fee motion fails to articulate why seeking testimony re Berkeley CCWIP was a necessary step to plaintiff's victory on the underlying claims.No reference to deposition testimony in Sep. Statement in draft msj. |
| SDD | 6/26/17 | Draft outline for Berkeley PMK deposition. | 0.20 | 0.20 | Excessive | Renewed fee motion fails to articulate why seeking testimony re Berkeley CCWIP was a necessary step to plaintiff's victory on the underlying claims.No reference to deposition testimony in Sep. Statement in draft msj. |

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| SDD | 6/22/17 | Prepare and assemble documents for the Berkeley Pmk Deposition. | 0.60 | 0.60 | Excessive; Clerical; Vague | Vague as to "prepare". Includes time spent on noncompensable clerical work. Renewed fee motion fails to articulate why seeking testimony re Berkeley CCWIP was a necessary step to plaintiff's victory on the underlying claims.No reference to deposition testimony in Sep. Statement in draft msj. |
| AMP | 3/13/17 | Research re applicability of deliberative process privilege to identity of persons engaged in communications | 0.40 | 0.40 | Vague | Vague as to purpose of research and to what aspect of the case it relates. |
| SAM | 6/20/17 | Research issues for meet and confer email re: consolidation of class actions for purposes of class certification motion | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 6/19/17 | Review/Researeh issues re: Common Defenses, and Consolidation of related class cases | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 3/13/17 | Drafting Documents - Draft RFAs relating to statements made in warrant protocol training presentation produced by Defendants | 0.50 | 0.50 | Vague; Excessive | Vague as to which set of RFAs the task relates. Attorney should not bill for incomplete work that was never sent, clearly unnecessary to Plaintiff's victory. |
| AMP | 6/16/17 | Reviewing Documents - Reviewing deposition transcript of Crystal Shackleford for information for Kisselburg deposition outline. | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/16/17 | Drafting Documents - Continue drafting deposition subpoena for Mark Kisselburg | 0.60 | 0.00 | No Objection | No Objection. |

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| AMP | 6/16/17 | Reviewing Documents - Reviewing deposition transcript of Patricia O'Boyle for Information for Kisselburg deposition outline | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/16/17 | Drafting Documents - Continue drafting deposition subpoena for Mark Kisselburg | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 6/16/17 | Drafting Documents - Continue drafting deposition subpoena for Mark Kisselburg | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/16/17 | Reviewing Documents - Continue reviewing deposition transcript of Sophia Williams for information for Kisselburg deposition outline | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 6/16/17 | Telephone Conference with Paul Burkhart re Kisselburg deposition, Detention logs, Shackelford documents | 0.20 | 0.20 | Vague | Vague as to purpose of discussion of each topic. Vague as to "Shackelford documents." Vague as to "detention logs." |
| AMP | 6/16/17 | Correspondence with Paul Burkhart by email summarizing telephone conference re Kisselburg deposition, Detention logs, Shackleford documents | 0.20 | 0.20 | Vague | Vague as to purpose of discussion of each topic. Vague as to "Shackelford documents. |
| SAM | 6/15/17 | Review draft of Certification motion sent up by Mark for review. Edit/Comment on same. Return. | 2.20 | 2.20 | Vague; Excessive | Entry contains block billing.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 6/14/17 | Drafting Documents - Start drafting deposition subpoena for Mark Kisselburg | 0.30 | 0.30 | Clerical | Includes time spent on noncompensable clerical work. |
| AMP | 6/14/17 | Reviewing Documents - Reviewing deposition transcript of Crystal Shackleford for documents identified for Meet and Confer | 0.90 | 0.00 | No Objection | No Objection. |
| AMP | 6/14/17 | Drafting Documents - Start drafting Meet and Confer letter re documents identified at deposition of Cyrstal Shackleford | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/14/17 | Drafting Documents - Continue drafting Meet and Confer letter re documents identified at deposition of Cyrstal shackleford | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 6/14/17 | Drafting Documents - Continue drafting Meet and Confer letter re documents identified at deposition of Cyrstal Shackleford | 0.40 | 0.00 | No Objection | No Objection. |
| SAM | 6/13/17 | Travel to and attend deposition of Crystal Shackleford. Billing entry includes 1.3 hours of round trip travel. | 5.80 | 0.00 | No Objection | No Objection. |
| AMP | 6/12/17 | Reviewing Documents - Reviewing Deposition transcript of Sophia Williams PMK for County of Riverside for tomorrow's deposition of Crystal Shackleford | 0.50 | 0.00 | No Objection | No Objection. |

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| AMP | 6/12/17 | Discovery preparations - Start preparing exhibits and deposition excerpts for tomorrow's deposition of Crystal Shackleford | 0.80 | 0.00 | No Objection | No Objection. |
| AMP | 6/12/17 | Discovery preparations - Continue preparing exhibits and deposition excerpts for tomorrow's deposition of Crystal Shackleford | 0.60 | 0.00 | No Objection | No Objection. |
| AMP | 6/12/17 | Drafting Documents - Finish draft of deposition outline of Crystal Shackleford | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/12/17 | Discovery preparations - Finish preparing exhibits and deposition excerpts for tomorrow's deposition of Crystal Shackleford | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/9/17 | Reviewing Documents - Continue reviewing exhibits and PMK deposition transcripts for deposition outline of Crystal Shackleford | 0.80 | 0.00 | No Objection | No Objection. |
| AMP | 6/9/17 | Drafting Documents - Continue draft of deposition outline of Crystal Shackleford | 0.40 | 0.00 | No Objection | No Objection. |
| SDD | 6/9/17 | Draft Notice of Deposition, re: Berkeley PMK. | 0.30 | 0.00 | No Objection | No Objection. |
| SDD | 6/7/17 | Review the draft Class Certification · Motion | 0.30 | 0.30 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| SDD | 6/7/17 | Phone call with Mark, Re: Berkeley Depo and Class Certification | 0.80 | 0.80 | Excessive; Vague | Vague as to who Mark is. Renewed fee motion fails to articulate why seeking testimony re Berkeley CCWIP was a necessary step to plaintiff's victory on the underlying claims.No reference to deposition testimony in Sep. Statement in draft msj. |
| AMP | 6/7/17 | Drafting Documents - Continue draft of deposition outline of Mark Kisselburg | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/7/17 | Reviewing Documents - Reviewing prior deposition transcripts for deposition outlines of Mark Kissleburg and Crystal Shackleford | 0.70 | 0.00 | No Objection | No Objection. |
| AMP | 6/7/17 | Drafting Documents - Continue draft of deposition outline of Mark Kisselburg | 0.60 | 0.00 | No Objection | No Objection. |
| AMP | 6/7/17 | Telephone Conference with co-counsel and Steve re class certification motion, deposition at UC Berkeley, elements to still be met, and other strategic considerations | 0.70 | 0.70 | Excessive | Renewed fee motion fails to articulate why seeking testimony re Berkeley CCWIP was a necessary step to plaintiff's victory on the underlying claims.No reference to deposition testimony in Sep. Statement in draft msj. Discussion regarding class certification motion not necessary to individual claims. |
| AMP | 3/13/17 | Drafting Documents - Continue draft of public records request to Riverside County Juvenile Court | 0.40 | 0.40 | Vague | Vague as to what type/topic of documents sought through request and relevancy to case. |
| AMP | 6/7/17 | Drafting Documents - Continue draft of deposition outline of Crystal Shackleford, sections and information to be discussed re O'Boyle deposition | 0.60 | 0.00 | No Objection | No Objection. |

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| AMP | 6/6/17 | Drafting Documents - Continue draft of deposition outline of Crystal Shackleford | 0.70 | 0.00 | No Objection | No Objection. |
| AMP | 6/6/17 | Drafting Documents - Start draft of deposition outline of Mark Kisselburg | 0.40 | 0.00 | No Objection | No Objection. |
| SDD | 6/6/17 | Phone call to Mark Anckom; re: Depo of CCWIP and draft of Class cert motion. Left Message. | 0.10 | 0.10 | Excessive | Renewed fee motion fails to articulate why seeking testimony re Berkeley CCWIP was a necessary step to plaintiff's victory on the underlying claims.No reference to deposition testimony in Sep. Statement in draft msj. Time spent seeking expertise from class action expert Mark Ankcorn, not necessary to individual claims. |
| SDD | 6/2/17 | Continue to draft the PMK categories for Berkeley CCWIP | 0.20 | 0.00 | No Objection | No Objection. |
| AMP | 6/2/17 | Reviewing Documents - Review training presentation to find statements to be discussed during deposition of Crystal Shackleford | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 6/2/17 | Drafting Documents - Start draft of deposition outline of Crystal Shackleford | 0.70 | 0.00 | No Objection | No Objection. |
| AMP | 6/2/17 | Reviewing Documents - Review current exhibits to find exhibits to be used for deposition of Crystal Shackleford | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 6/2/17 | Drafting Documents - Continue draft of deposition outline of Crystal Shackleford | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 5/31/17 | Drafting Documents - Draft notice of deposition of Crystal Shackleford | 0.30 | 0.00 | No Objection | No Objection. |

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| AMP | 5/31/17 | Drafting Documents - Draft notice of deposition of Mark Kisselburg | 0.20 | 0.00 | No Objection | No Objection. |
| AMP | 5/31/17 | Drafting Documents - Draft cover letter accompanying notices of deposition of Crystal Shackleford and Mark Kisselburg | 0.20 | 0.00 | No Objection | No Objection. |
| AMP | 5/30/17 | Attend discovery-Deposition of County PMK re Warrants, includes approximately 2 hours travel time to and from deposition | 7.30 | 0.00 | No Objection | No Objection. |
| SAM | 5/30/17 | Prepare for deposition of PMK. Review and highlight exhibits to talk about at Deposition | 1.70 | 0.00 | No Objection | No Objection. |
| SAM | 5/30/17 | Travel to and take the deposition of Riverside County PMK on Warrant policy, practice and training. Billing entry includes 1.7 hours of round trip travel to and from deposition in Temecula | 7.30 | 0.00 | No Objection | No Objection. |
| AMP | 5/25/17 | Drafting Documents - Draft Meet and Confer letter re failure to supplement responses and provide documents identified in May 24, 2017 deposition of County PMK | 0.70 | 0.00 | No Objection | No Objection. |
| AMP | 3/13/17 | Reviewing Documents-Review and proofread public records request to Riverside County Juvenile Court | 0.20 | 0.20 | Vague | Vague as to what type/topic of documents sought through request and relevancy to case. |
| SDD | 3/13/17 | Review prior RPDs for training requests. | 0.40 | 0.40 | Vague | Vague as to which set of discovery the task relates. |

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| SDD | 3/14/17 | Draft RPD to County of Riverside (set 6), re: induction training. | 0.50 | 0.50 | Excessive; Duplicative | RFP-Set 6 included 39 requests for documents certain social workers used for training. Requests duplicative of each other and of prior RFP requests in this and related *Rogers* case. Time spent excessive and unnecessary to individual claims in light of documents plaintiff's counsel already had in its possession. |
| SDD | 5/25/17 | Revise and edit MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION TO EXTEND DEADLINES. | 1.50 | 1.50 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| SAM | 5/24/17 | Deposition of Person Most Qualified to testify regarding warrant Policy, Practice, Procedures, and Customs | 6.10 | 0.00 | No Objection | No Objection. |
| AMP | 5/24/17 | Drafting Documents - Start redrafting and editing motion to extend all deadlines based on Steve's comments from third review | 0.90 | 0.90 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/24/17 | Drafting Documents - Continue redrafting and editing motion to extend all deadlines based on Steve's comments from second review | 0.70 | 0.70 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/24/17 | Drafting Documents - Continue redrafting and editing declaration in support of motion to extend all deadlines based on Steve's comments from second review | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| AMP | 5/24/17 | Drafting Documents - Continue redrafting and editing motion to extend all deadlines based on Steve's comments from second review | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Drafing Documents - Continue redrafting and editing motion to extend all deadlines based on Steve's comments from review and meeting | 1.00 | 1.00 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Telephone Conference with Doug Smith re ex parte application for extension of deadlines | 0.20 | 0.20 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Drafting Documents - Continue draft of declaration in support of motion to extend all deadlines | 0.80 | 0.80 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Drafting Documents - Continue redrafting and editing motion to extend all deadlines based on Steve's comments from review and meeting | 0.50 | 0.50 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Motions - Start preparing and compiling exhibits to declaration in support of motion to extend all deadlines | 0.90 | 0.90 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Motions - Continue preparing and compiling exhibits to declaration in support of motion to extend all deadlines, creating deposition excerpts | 0.80 | 0.80 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Research - Research case law re ex parte applications and propriety for requesting continuances | 0.20 | 0.20 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| AMP | 5/23/17 | Drafting Documents - Start redrafting and editing motion to extend all deadlines based on Steve's comments from second review | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Drafting Documents - Start redrafting and editing motion to extend all deadlines based on Steve's comments from review and meeting | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/23/17 | Drafting Documents - Continue redrafting and editing motion to extend all deadlines based on Steve's comments from review and meeting | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| SDD | 5/23/17 | Revise and edit the MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S EX PARTE MOTION TO EXTEND DEADLINES. | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| SDD | 5/23/17 | Meet with Adrian to discuss MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S EX PARTE MOTION TO EXTEND DEADLINES | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| SDD | 5/23/17 | Revise and edit the MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S EX PARTE MOTION TO EXTEND | 0.90 | 0.90 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/22/17 | Drafting Documents - Continue draft of motion to extend all deadlines expanding section re diligence of Plaintiff | 0.50 | 0.50 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/22/17 | Drafting Documents - Continue draft of declaration in support of motion to extend all deadlines | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/22/17 | Drafting Documents - Continue draft of declaration in support of motion to extend all deadlines | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/22/17 | Drafting Documents - Start draft of Plaintiff's supplemental responses to County's Interrogatories Set One | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 5/22/17 | Drafting Documents - Continue draft of motion to extend all deadlines, proofreading and editing | 0.50 | 0.50 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/22/17 | Drafting Documents - Start draft of declaration of Shawn A. McMillan in support of motion to extend all deadlines | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/22/17 | Drafting Documents - Continue draft of declaration in support of motion to extend all deadlines | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| AMP | 5/22/17 | Drafting Documents - Continue draft of motion to extend all deadlines, expanding section re County PMK deposition | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/22/17 | Drafting Documents - Start draft of declaration of Adrian Paris in support of motion to extend all deadlines | 0.70 | 0.70 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/22/17 | Drafting Documents - Continue draft of Plaintiff's supplemental responses to County's Interrogatories Set One | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 5/22/17 | Reviewing Documents - Reviewing Defendant County's supplemental responses to interrogatories for possibly responsive information for Plaintiff's supplemental responses to County's Interrogatories Set One | 0.30 | 0.30 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 5/22/17 | Drafting Documents - Continue draft of Plaintiffs supplemental responses to County's Interrogatories Set One | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 5/19/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/19/17 | Drafting Documents - Continue draft of motion to extend all deadlines expanding section re failure to produce County PMK | 0.70 | 0.70 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| AMP | 5/19/17 | Drafting Documents - Continue to draft of motion to extend all deadlines, continue sections re Plaintiff's diligence | 0.80 | 0.80 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/19/17 | Reviewing Documents - Review declaration and exhibits at Docket No. 00-2 [sic] for motion to extend all deadlines | 1.10 | 1.10 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/19/17 | Drafting Documents - Continue draft of motion to extend all deadlines, section re lack of prejudice | 0.50 | 0.50 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/19/17 | Research - Start research re complicated nature of case for motion to extend all deadlines | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/19/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 1.30 | 1.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| SAM | 5/19/17 | Take PMK Deposition of County. Billing entry includes 1.2 hours round trip travel. | 3.20 | 3.20 | Vague | Vague as to which deposition the task relates. |
| SDD | 5/18/17 | Revise and edit the PMK categories for the Berkeley CCWIP PMK. | 0.40 | 0.40 | Duplicative ; Excessive | Duplicative of work completed in 2015 and 2016 wherein the same were drafted. Task unclear how work completed different and not duplicative. Further, renewed fee motion fails to articulate why seeking testimony from CCWIP PMKwas a necessary step to plaintiff's victory on the underlying claims. |
| AMP | 5/18/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| AMP | 5/18/17 | Research - Research re FRCP 16 good cause standard for motion to extend all deadlines | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/18/17 | Drafting Documents - Continue to draft of motion to extend all deadlines, section re good cause standard | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/18/17 | Research - Research re FRCP 16 and effect of lack of prejudice to opposing party for motion to extend all deadlines | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/18/17 | Drafting Documents - Continue draft of motion to extend all deadlines, sections re Defendants' conduct | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/18/17 | Reviewing Documents - Reviewing prior correspondences re PMK and Pittman depositions for motion to extend all deadlines | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/18/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/18/17 | Drafting Documents - Continue draft of motion to extend all deadlines, continue sections re Defendants' conduct | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/17/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/17/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| AMP | 5/17/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/17/17 | Drafting Documents - Start drafting PMK notice and subpoena for Berkeley and CCWIP | 0.30 | 0.30 | Duplicative; Excessive | Duplicative of work completed in 2015 and 2016 wherein the same were drafted. Task unclear how work completed different and not duplicative. Further, renewed fee motion fails to articulate why seeking testimony from Berkeley and CCWIP was a necessary step to plaintiff's victory on the underlying claims. |
| AMP | 5/17/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.20 | 0.20 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/16/17 | Drafting Documents - Start draft of motion to extend all deadlines | 0.40 | 0.40 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/16/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.10 | 0.10 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/16/17 | Drafting Documents - Continue draft of motion to extend all deadlines | 0.70 | 0.70 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/12/17 | Drafting Documents • Review and update deposition outline for rescheduled deposition of County PMK | 0.20 | 0.20 | Vague | Vague as to which PMK deposition task relates. |
| AMP | 5/12/17 | Discovery preparations - Start preparing and compiling exhibits for resCheduled deposition of County PMK | 0.60 | 0.60 | Vague; Clerical | Vague as to which PMK deposition task relates. Vague as to "preparing and compiling." Time includes noncompensable clerical work. |
| AMP | 5/12/17 | Discovery preparations - continue preparing and compiling exhibits for rescheduled deposition of County PMK | 0.50 | 0.50 | Vague; Clerical | Vague as to which PMK deposition task relates. Vague as to "preparing and compiling." Time includes noncompensable clerical work. |

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| AMP | 5/12/17 | Reviewing Documents - Review Defendant County responses to RPD Sets 6 and 7 for issues for Meet and Confer | 0.60 | 0.60 | Excessive; Duplicative | RFP-Set 6 included 39 requests for documents certain social workers used for training. Requests duplicative of each other and of prior RFP requests in this and related *Rogers* case. Time spent excessive and unnecessary to individual claims in light of documents plaintiff's counsel already had in its possession.<br><br>RFP-Set 7, served same day as Set 6, included an additional 59 requests mostly of personnel files for certain individuals. Renewed fee motion fails to articulate why seeking such extensive privileged information was a necessary step to Plaintiff's victory on the underlying claims. Records never produced, thus unnecessary to Plaintiff's victory. |
| AMP | 5/12/17 | Discovery Preparations - Continue preparing and compiling exhibits for rescheduled deposition of County PMK reviewing trainings received and compiling new exhibits | 0.20 | 0.00 | No Objection | No Objection. |
| SAM | 5/9/17 | Continued deposition of Guy Pitman. Includes 2.2 hours of round trip travel. | 6.20 | 0.00 | No Objection | No Objection. |
| SAM | 5/8/17 | Begin review of documents in preparation for Volume 2 of Pitman Deposition | 0.50 | 0.00 | No Objection | No Objection. |
| SAM | 5/8/17 | Review deposition of Guy Pitman in preparation for volume two of Pitman Depo | 0.20 | 0.00 | No Objection | No Objection. |

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| AMP | 5/8/17 | Drafting Documents - Redraft, edit, and proofread joint stipulation to continue all dates based on requested additions from Defense Counsel | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 5/8/17 | Reviewing Documents- Review County's compelled supplemental responses to Plaintiffs RFAs Set 15 | 0.10 | 0.10 | Excessive | RFA-Set 15 included 30 class related RFAs regarding data from 1998-2015. At 4/6/2017 MTC hearing, Court found County provided adequate responses to most of the requests and ordered additional responses to just three, which had to do with how CCWIP obtains data from CWS. Renewed fee motion fails to articulate why these requests for admissions were a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 5/5/17 | Discovery preparations - Start preparing and compiling e.xhibits for May 9, 2017 deposition of Guy Pittman | 0.60 | 0.00 | No Objection | No Objection. |
| AMP | 5/5/17 | Discovery preparations - Continue preparing and compiling exhibits for May 9, 2017 deposition of Guy Pittman | 0.60 | 0.00 | No Objection | No Objection. |
| AMP | 5/5/17 | Reviewing Documents - Reviewing produced training presentations for May 9, 2017 deposition of Guy Pittman | 0.50 | 0.00 | No Objection | No Objection. |
| SAM | 3/22/17 | Meeting at Doug Smith's office to review documents produced by the County of Riverside | 5.50 | 5.50 | Vague | Vague as to "documents". Vague as to which set of discovery the task relates. Vague as to who participated in the meeting and what was discussed. |
| SDD | 4/28/17 | Phone call to Attorney Patti, re: Daniel Webster's deposition. | 0.30 | 0.30 | Vague; Excessive | Vague as to what the conversation entailed. No reference to Daniel Webster in Separate Statement. Deposition never took place. Renewed fee motion fails to articulate why seeking deposition of Webster was a necessary step to victory on individual claims. |

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| AMP | 4/28/17 | Reviewing Documents - Finish reviewing materials and responses for Meet and Confer phone conference with Sarah Overton re Deposition of Juvenile Court PMK | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 4/28/17 | Telephone Conference with Sarah Overton re Deposition of Juvenile Court PMK and document production | 1.40 | 0.00 | No Objection | No Objection. |
| AMP | 4/28/17 | Drafting Documents - Draft summary of 84 minute Telephone Conference with Sarah Overton re Deposition of Juvenile Court PMK and document production | 0.60 | 0.00 | No Objection | No Objection. |
| SDD | 3/22/17 | Defendants' document production at Defense Counsel's office. Reviewed documents for relevancy; scanned documents (33,000 pages). Travel time 3.5 hours round. trip (San Diego to Riverside). | 11.80 | 11.80 | Clerical; Excessive; Vague | Entry contains block billing. Time includes noncompensable clerical work. Vague as to relevancy. Renewed fee motion fails to articulate what information gleaned was a necessary step to Plaintiff's victory on individual claims. |
| AMP | 4/27/17 | Telephone Conference with Paul Burkhart re Plaintiffs Responses to Defendant County's Interrogatories Set One | 1.20 | 1.20 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/27/17 | Drafting Documents - Draft Summary re Telephone Conference with Paul Burkhard re Plaintiff's Responses to Defendant County's Interrogatories Set One | 0.30 | 0.30 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| AMP | 3/22/17 | Attend discovery. Attend Document Production from Defendants at Defense Counsel's office (Time indudes travel of 4 hours round trip), compile, analyze, and scan approximately 35,000 pages | 11.80 | 11.80 | Clerical; Excessive; Vague | Entry contains block billing. Time includes noncompensable clerical work. Vague as to relevancy. Renewed fee motion fails to articulate what information gleaned was a necessary step to Plaintiff's victory on individual claims. |
| AMP | 3/23/17 | Reviewing Documents - Start reviewing training presentations provided by Defendants relating to Puentes and Pittman | 0.04 | 0.00 | No Objection | No Objection. |
| SAM | 3/23/17 | Travel to Riverside and complete scan of produced documents. | 6.50 | 6.50 | Clerical; Vague | Vague as to "documents" and to which discovery set the task pertains. Vague as to where scan occurred. Time includes noncompensable clerical work. |
| AMP | 3/24/17 | Discovery preparations - Start compiling and creating new exhibits from documents produced by Defendants on March 22, 2017 | 1.10 | 1.10 | Clerical; Vague | Vague as to purpose of compiling exhibits. Time includes noncompensable clerical work. |
| AMP | 3/24/17 | Discovery preparations - Continue compiling and creating new exhibits from documents produced by Defendants on March 22, 2017, analyze 2017 material | 0.60 | 0.60 | Clerical; Vague | Vague as to purpose of compiling exhibits. Time includes noncompensable clerical work. Vague as to what documents were analyzed for |
| AMP | 3/24/17 | Discovery preparations - Continue compiling and creating new exhibits from documents produced by Defendants on March 22, 2017, analyze 2015 material | 0.80 | 0.80 | Clerical; Excessive; Vague | Vague as to purpose of compiling exhibits. Time includes noncompensable clerical work. Vague as to what documents were analyzed for |

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| AMP | 4/25/17 | Telephone Conference with Paul Burkhart re PMK deposition dates, setting date for Meet and Confer re County's Interrogatories Set One, and County's production of compelled responses to RFAs Set 15 | 0.20 | 0.20 | Vague; Excessive | Vague as to propounding party for Rogs- Set One. RFAs Set 15 included 30 class related RFAs regarding data from 1998-2015. At 4/6/2017 MTC hearing, Court ordered additional responses to just three, which had to do with how CCWIP obtains data from CWS. Renewed fee motion fails to articulate why these requests for admissions were a necessary step to Plaintiff's victory on the underlying claims.Vague as to which PMK deposition the task relates. |
| AMP | 4/25/17 | Correspondence - Email summary of conference re PMK deposition dates. setting date for Meet and Confer re County's Interrogatories Set One, and County's production of compelled responses to RFAs Set 15 | 0.20 | 0.20 | Vague; Excessive | Vague as to propounding party for Rogs- Set One. RFAs Set 15 included 30 class related RFAs regarding data from 1998-2015. At 4/6/2017 MTC hearing, Court ordered additional responses to just three, which had to do with how CCWIP obtains data from CWS. Renewed fee motion fails to articulate why these requests for admissions were a necessary step to Plaintiff's victory on the underlying claims.Vague as to which PMK deposition the task relates. |
| AMP | 4/25/17 | Discovery preparations - Prepare notice of rescheduling as well as location for resumption of deposition of Guy Pittman | 0.20 | 0.20 | Clerical | Time spent on noncompensable clerical work. |
| AMP | 4/25/17 | Drafting Documents - Continue redrafting and editing of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One. based on Steve's comments from review | 0.70 | 0.70 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| SDD | 4/25/17 | Revise and edit Meet and Confer Response. re: Plaintiffs' Responses to Defendant County's Interrogatories (Set One). | 0.30 | 0.30 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| SDD | 3/28/17 | Review prior discovery to use in drafting additional discovery to serve on the County | 0.80 | 0.80 | Vague | Vague as to "prior discovery". Fails to articulate what "additional discovery" is being drafted. |
| SAM | 4/24/17 | Review, edit. revise proposed stip to continue all cut-off dates again. | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 4/24/17 | Drafting Documents - Continue redrafting and editing of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One based on Steve's comments from review | 0.80 | 0.80 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/24/17 | Drafting Documents - Continue redrafting and editing of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One based on Steve's comments from review, expand section re disclosure from juvenile case files | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/24/17 | Drafting Documents - Continue draft of stipulation to extend discovery cutoff and class certification motion dates | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| AMP | 4/24/17 | Drafting Documents - Redrafting and editing of stipulation to extend discovery cutoff and class certification motion dates based on Shawn's comments from review | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 4/24/17 | Meeting with Steve to discuss Meet and Confer letter re Plaintiffs Responses to County's Interrogatories Set One | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/24/17 | Drafting Documents - Redrafting and editing of Meet and Confer letter re Plaintiffs Responses to County's Interrogatories Set One based on Steve's comments from review | 0.90 | 0.90 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/21/17 | Drafting Documents - Start draft of stipulation to extend discovery cutoff and class certification motion dates | 0.80 | 0.80 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 4/21/17 | Drafting Documents - Continue draft of stipulation to extend discovery cutoff and class certification motion dates | 0.60 | 0.60 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 4/21/17 | Drafting Documents - Continue draft of stipulation to extend discovery cutoff and class certification motion dates | 0.30 | 0.30 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |

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| AMP | 4/21/17 | Drafting Documents - Continue draft of stipulation to extend discovery cutoff and class certification motion dates | 0.50 | 0.50 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 4/20/17 | Drafting Documents - Continue draft of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One, expand section re attorney client privilege | 0.70 | 0.70 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/20/17 | Drafting Documents - Continue draft of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One, expand section re attorney work product | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/20/17 | Drafting Documents - Continue draft of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One | 0.80 | 0.80 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/20/17 | Drafting Documents - Continue draft of Meet and Confer letter re Plaintiffs Responses to County's Interrogatories Set One | 0.50 | 0.50 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/20/17 | Drafting Documents - Continue draft of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One | 0.80 | 0.80 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| AMP | 4/19/17 | Drafting Documents - Continue draft of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One | 0.80 | 0.80 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/17/17 | Drafting Documents - Continue draft of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One | 1.10 | 1.10 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/17/17 | Research - Research re reasonable inquiry end objections for Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One | 0.30 | 0.30 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/17/17 | Meeting with Steve to discuss Meet and Confer letter re Plaintiffs Responses to County's Interrogatories Set One | 0.50 | 0.50 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/17/17 | Drafting Documents - Continue draft of Meet and Confer letter re Plaintiffs Responses to County's Interrogatories Set One | 0.90 | 0.90 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/17/17 | correspondence with Defense Counsel re failure to appear for deposition of County PMK re Warrants | 0.20 | 0.20 | Vague | Vague as to what type of correspondence and vague as to outcome of correspondence. |
| AMP | 4/17/17 | Drafting Documents - Redrafting and editing of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One based on Steve's comments from review | 1.40 | 1.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| AMP | 4/17/17 | Drafting Documents - Continue redrafting and editing of Meet and Confer letter re Plaintiff's Responses to County's Interrogatories Set One based on Steve's comments from revie.v, adding analysis sections to various objections | 1.10 | 1.10 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/17/17 | Drafting Documents - Continue redrafting and editing of Meet and Confer letter re Plaintiffs Responses to County's Interrogatories Set One based on Steve's comments from review, expanding section re compound interrogatories | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 3/28/17 | Drafting Documents - Continue draft of exhibit index, adding new exhibits compiled from document production | 0.30 | 0.30 | Clerical; Excessive; Vague | Vague as to purpose of compiling exhibits. Time includes noncompensable clerical work. |
| SDD | 4/17/17 | Revise and edit Meet and Confer Response, re: Plaintiffs' Responses to Defendant County's Interrogatories (Set One) | 0.20 | 0.20 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| SAM | 4/14/17 | Review powerpoints created by Pittman to determine whether or not we need them to be addressed at upcoming PMK depositions. | 0.50 | 0.50 | Vague | Vague as to which PMK depositions the task relates. |

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| AMP | 4/14/17 | Discovery preparation Continue preparing and compiling exhibits for April 17 deposition of County PMK re Warrants | 1.20 | 1.20 | Vague; Clerical | Vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 4/14/17 | Discovery preparation Continue preparing and compiling exhibits for April 17 deposition of County PMK re Warrants | 1.10 | 1.10 | Vague; Clerical | Vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 4/14/17 | Drafting Documents - Continue drafting deposition outline for April 17 deposition of County PMK re Warrants | 0.20 | 0.20 | Excessive; Duplicative | Renewed fee motion fails to articulate why seeking and taking the deposition of multiple PMKs was a necessary step for Plaintiffs victory of the individual claims, especially in light of the extensive written discovery received in this case and the related Rogers case. |
| AMP | 4/14/17 | Drafting Documents - Continue drafting depositon outline for April 17 deposition of county PMK re Warrants | 0.70 | 0.70 | Vague; Clerical | Vague as to what sections/topics of Juvenile Court PMK deposition are being drafted and how related to warrants. |
| AMP | 4/14/17 | Discovery preparations - Continue preparing end comptling exhibits for April 17 deposition of County PMK re Warrants | 0.80 | 0.80 | Vague; Clerical | Vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 4/14/17 | Discovery preparations - Review and compile exhibits from training presentations of Pittman and Puentes for April 17 deposition of County PMK re Warrants | 0.40 | 0.40 | Vague | Vague as to "review and compile." Includes time spent on noncompensable clerical work. Vague as to "training presentations of Pittman and Puentes" and what the training presentations were for, who drafted or used the presentations. |

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| AMP | 4/14/17 | Drafting Documents - Continue draft of Meet and Confer response letter re Plaintiff's Responses to Defendant County's Interrogatories Set One | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/14/17 | Discovery preparations - Finish preparing and compiling deposition exhibits for April 17 Deposition of County PMK re Warrants | 0.70 | 0.70 | Vague; Clerical | Vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 4/14/17 | Drafting Documents - Finish drafting deposition outfine for April 17 deposition of County PMK re Warrants | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 4/14/17 | Reseach reasonable inquiry for Meet and Confer response letter re Plaintiffs Responses to Defendant County's Interrogatories Set One | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/13/17 | Discovery preparations - Preparing and compiling ell exhibits to be used during April 17, 2017 deposition of PMK re Warrants | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 4/13/17 | Meeting with Steve to discuss Meet and Confer response letter re Plaintiffs Responses to Defendant County's Interrogatories Set One | 0.70 | 0.70 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/13/17 | Drafting Documents - Start draft of Meet and Confer response letter re Plaintiffs Responses to Defendant County's Interrogatories Set One | 1.00 | 1.00 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| AMP | 4/13/17 | Drafting Documents• Continue draft of Meet and Confer response letter re Plaintiffs Responses to Defendant County's Interrogatories Set One, expand section re class certification | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/13/17 | Drafting Documents - Corrt;inue draft of Meet and Confer response letter re Plaintiffs Responses to Defendant County's Interrogatories Set One, expand section re overly broad | 0.70 | 0.70 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/13/17 | Research re attorney client privilege and attorney work product doctrine for Meet and Confer response letter re Plaintiffs Responses to Defendant County's Interrogatories Set One | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 3/28/17 | Drafting Documents - Draft Requests for Production of Documents relating to training provided by trainers identifed b County in Interrogatory response | 0.70 | 0.70 | Vague | Vague as to which set of discovery the task relates as to production. Vague as to which set of interrogatories the task relates. |
| AMP | 4/13/17 | Research re forcing adversary to work for you objection for Meet and Confer response letter re Plaintiff's Responses to Defendant County's Interrogatories Set One | 0.60 | 0.60 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| AMP | 3/28/17 | Drafting Documents - Start drafting Requests for Production of Documents relating to relevant sections of personnel files of social workers who have received grievances or complaints | 1.00 | 1.00 | Vague | Vague as to which set of discovery the task relates. Renewed fee motion fails to articulate why seeking personnel files was a necessary step, especially in light of the files not having been received before victory on the underlying claims. |
| AMP | 4/13/17 | Research re harassment objection for Meet and Confer response letter re Plaintiffs Responses to Defendant County's Interrogatories Set One | 0.30 | 0.30 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| SDD | 4/13/17 | Revise and edit the outline for Plaintiff's response to M&C letter; re: Interrogatories ( set 1). | 0.30 | 0.30 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 3/28/17 | Drafting Documents - Continue drafting Requests for Production of Documents relating to relevant sections of personnel files of social workers who have received grievances or complaints | 0.40 | 0.40 | Vague | Vague as to which set of discovery the task relates. Renewed fee motion fails to articulate why seeking personnel files was a necessary step, especially in light of the files not having been received before victory on the underlying claims. |
| AMP | 3/29/17 | Drafting Documents - Final proofreading and edits of Requests for Production of Documents relating to training provided by trainers identified by County in interrogatory response | 0.30 | 0.30 | Vague | Vague as to which set of discovery the task relates as to production. Vague as to which set of interrogatories the task relates. |

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| AMP | 3/29/17 | Drafting Documents - Continue drafting Requests for Production of Documents relating to relevant sections of personnel files of social workers who have received grievances or oomp1aints | 0.30 | 0.30 | Vague | Vague as to which set of discovery the task relates. Renewed fee motion fails to articulate why seeking personnel files was a necessary step, especially in light of the files not having been received before victory on the underlying claims. |
| AMP | 4/11/17 | Drafting Documents. Redraft, edit, and add to outline of issues to address in response letter to Defendant's Meet and Confer letter regarding Plaintiffs Responses to Defendant County's Interrogatories Set One based on Steve's comments from meeting | 0.80 | 0.80 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/11/17 | Drafting Documents - Continue redraft, edit, and add to outline of issues to address in response letter to Defendant's Meet and Confer letter regarding Plaintiffs Responses to Defendant County's Interrogatories Set One based on Steve's comments from meeting | 0.60 | 0.60 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/11/17 | Drafting Documents - Draft outline of issues to address in response letter to Defendant's Meet and Confer letter regarding Plaintiffs Responses to Defendant County's Interrogatories Set One | 0.60 | 0.60 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| AMP | 3/29/17 | Drafting Documents - Draft RFAs relating to the number of potential social worker Defendants over the class period | 0.70 | 0.70 | Vague | Vague as to which set of RFAs the task relates and unclear whether discovery ever sent. Attorney should not bill for incomplete work that was never sent, clearly unnecessary to Plaintiff's victory. |
| AMP | 3/29/17 | Reviewing Documents - Reviewing and analyzing Defendant County's supplemental responses to discovery to determine what further written discovery is needed | 0.40 | 0.40 | Vague | Vague as to what set of discovery the task relates. |
| AMP | 4/10/17 | Drafting Documents - Draft Meet and Confer letter re production date for County's compelled supplemental.responses to RFAs Set 15 | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related RFAs regarding data from 1998-2015. At 4/6/2017 MTC hearing, Court found County provided adequate responses to most of the requests and ordered additional responses to just three, which had to do with how CCWIP obtains data from CWS. Renewed fee motion fails to articulate why these requests for admissions were a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 4/10/17 | Reviewing Documents - Start review of Defendant's Meet and Confer letter regarding Plaintiff's Responses to Defendant County's Interrogatories Set One | 0.50 | 0.50 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| SDD | 4/10/17 | Review the Court's Order, re: Motion to Compel RFA (set 15). | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related RFAs regarding data from 1998-2015. At 4/6/2017 MTC hearing, Court found County provided adequate responses to most of the requests and ordered additional responses to just three, which had to do with how CCWIP obtains data from CWS. Renewed fee motion fails to articulate why these requests for admissions were a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/29/17 | Drafting Documents - Continue drafting Requests for Production relating to relevant sections of personnel files of social workers who have received grievances or complaints | 0.50 | 0.50 | Vague | Vague as to which set of discovery the task relates. Renewed fee motion fails to articulate why seeking personnel files was a necessary step, especially in light of the files not having been received before victory on the underlying claims. |
| AMP | 3/30/17 | Drafting Documents Drafting Documents - Continue drafting Requests for Production relating to information from first volume of deposition of Guy Pittman; Drafting Documents | 0.30 | 0.30 | Vague | Vague as to which set of discovery is being drafted to and to which defendant. |
| AMP | 3/30/17 | Reviewing Documents Reviewing Documents - Reviewing Combined Search Warrant Training PowerPoint presentation for material to cover in second volume of deposition of Guy Pittman. | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 4/7/17 | Reviewing Documents - Review order granting in part and denying in part Plaintiff's motion to compel County RFA 15 | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SAM | 4/6/17 | Continue to Review cases provided by Steve. Specifically, M.D. V. Perry, and Neal v. Casey. Draft short memo regarding same. | 0.80 | 0.80 | Vague; Excessive | Entry contains block billing.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SAM | 4/5/17 | Review cases provided by Steve. Specifically, M.D. V. Perry, and Neal v. Casey. Draft short memo regarding same. | 1.40 | 1.40 | Vague; Excessive | Entry contains block billing.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 3/31/17 | Discovery Preparations - Prepare, print, sign, scan, draft POS, and serve Plaintiff's Request for Productions to County Sets 6 and 7 | 0.30 | 0.30 | Clerical | Time includes noncompensable work. |
| SDD | 4/4/17 | Attend Motion to Compel hearing (RFA 15) in Riverside, CA before Judge Pym. Hearing was scheduled to begin at 10:00 am, but did not start until 10:40 am. 3.3 hours of round trip travel time. | 5.20 | 5.20 | Excessive | Event also billed by atty AMP - Renewed fee motion fails to articulate why sending two attorneys to a MTC hrg was necessary. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 4/4/17 | Motions - Attend and argue Motion to Compel hearings in Riverside; re: County (RFA 15) (round trip included) | 5.10 | 5.10 | Excessive | Event also billed by atty SDD - Renewed fee motion fails to articulate why sending two attorneys to a MTC hrg was necessary. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 4/3/17 | Drafting Documents - Continue drafting deposition outline for County PMK re Warrants | 0.80 | 0.00 | No Objection | No Objection. |
| AMP | 4/3/17 | Reviewing Documents - Continue reviewing motion, supporting declaration, and supplemental responses filed for Motion to Compel Further Responses to County RFA Set 15 based on comments from second mock argument in preparation for April 4 hearing | 0.60 | 0.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 4/3/17 | Drafting Documents - Draft outline of possible arguments for tomorrow's hearing on Motion to Compel County RFA Set 15 based on mock arguments and review of supporting documents | 0.50 | 0.50 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 4/3/17 | Discovery preparations - Prepare and print all possible documents to reference during tomorrow's argument of Motion to Compel County RFA Set 15 | 0.20 | 0.20 | Clerical | Time includes noncompensable work. |
| AMP | 3/31/17 | Research re improperly withdrawing admissions through supplemental responses and how to address such withdrawals for County's Second Supplemental Responses to RFAs Set 15 | 0.70 | 0.70 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/31/17 | Reviewing Documents - Continue reviewing motion. supporting declaration, and suppemental responses filed for Motion to Compel Further Responses to County RFA Set 15 based on comments from mock - argument in preparation for April 4 hearing | 0.80 | 0.80 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/31/17 | Drafting Documents - Continue drafting outline for second part of deposition of Guy Pittman | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 3/31/17 | Reviewing Documents - Continue reviewing Combined Search Warrant Training PowerPoint presentation for material to cover in second volume of deposition of Guy Pittman | 0.80 | 0.00 | No Objection | No Objection. |
| SDD | 4/5/17 | Email to Daniel Webster from the Califomia Child Welfare Indicators Project, re: getting a declaration as to the data obtained from the CWS/CMS system. | 0.20 | 0.20 | Vague | Vague as to what filing the declaration is for. Renewed fee motion fails to articulate why seeking the declaration was a necessary step. Unclear whether declaration ever obtained. |
| AMP | 3/31/17 | Drafting Documents - Continue drafting deposition outline for County PMK re Warrants, adding material from Pittman training presentations to be discussed | 0.30 | 0.00 | No Objection | No Objection. |

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| AMP | 3/31/17 | Meeting with Steve re mock argument in preparation for April 4 hearing on Motion to Compel Further Responses to Requests for Admission Set 15 | 0.80 | 0.80 | Excessive; Vague; Duplicative | Vague as to what was actually discussed during meeting. Attorney SDD also billed for event. Preparation for MTC hearing by two attorneys is duplicative and excessive billing.<br><br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/31/17 | Drafting Documents - Continue drafting deposition outline for County PMK re Warrants, adding material from Defendants' March 22 production to be discussed | 0.50 | 0.50 | Vague | Vague as to "material" and how it relates to deposition. Vague as to what subject matter added to outline. |
| AMP | 3/31/17 | Reviewing documents - Review Defendant's second set supplemental responses to Requests for Admission Set 15 | 0.60 | 0.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 3/31/17 | Revise and edit PLAINTIFF A.A.'S REQUEST FOR ADMISSIONS TO DEFENDANT COUNTY OF RIVERSIDE (SET NINETEEN). | 0.20 | 0.20 | Excessive | RFA Set 19 sought admissions regarding County policies spanning from 1995 to 2015. Renewed fee motion fails to articulate why seeking such admissions was a necessary step to Plaintiff's victory of the individual claims, especially in light of the extensive documents already produced in this and the related Rogers case. |
| SDD | 3/31/17 | Revise and edit PLAINTIFF A.A.'S REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT - COUNTY OF RIVERSIDE (SET SIX) | 0.20 | 0.20 | Excessive; Duplicative | RFP-Set 6 included 39 requests for documents certain social workers used for training. Requests duplicative of each other and of prior RFP requests in this and related *Rogers* case. Time spent excessive and unnecessary to individual claims in light of documents plaintiff's counsel already had in its possession. |
| SDD | 3/31/17 | Revise and edit PLAINTIFF A.A.'S REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT COUNTY OF RIVERSIDE (SET SEVEN). | 0.40 | 0.40 | Excessive | RFP-Set 7, served same day as Set 6, included an additional 59 requests mostly of personnel files for certain individuals. Renewed fee motion fails to articulate why seeking such extensive privileged information was a necessary step to Plaintiff's victory on the underlying claims. Records never produced, thus unnecessary to Plaintiff's victory. |
| SDD | 3/31/17 | Practice argument with Adrian, re: RFA (set 15). in preparation for argument on Tuesday (4/4/17). | 0.80 | 0.80 | Excessive; Vague; Duplicative | Vague as to what was actually discussed during meeting. Attorney AMP also billed for event. Preparation for MTC hearing by two attorneys is duplicative and excessive billing.<br><br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 3/30/17 | Practice oral argument with Adrian in preparation for the Motion to Compel (RFA 15) Hearing | 0.30 | 0.30 | Excessive; Vague; Duplicative | Vague as to what was actually discussed during meeting. Attorney AMP also billed for event. Preparation for MTC hearing by two attorneys is duplicative and excessive billing.<br><br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/30/17 | Drafting Documents - Draft Requests for Admission relating to information from second volume of deposition of Michael Puentes | 0.30 | 0.30 | Vague | Vague as to which set of RFAs the task relates. |
| AMP | 3/30/17 | Drafting Documents - Draft Request& for Production relating to information from first volume of deposition of Guy Pittman; Drafting Documents | 0.10 | 0.10 | Vague | Vague as to which set of RFPs the task relates. |

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| AMP | 3/30/17 | Meeting with Meeting with Steve re mock argument in preparation for April 4 healing on Motion to Compel Further Responses to Request for Admision Set 15 | 0.30 | 0.30 | Excessive; Vague; Duplicative | Vague as to what was actually discussed during meeting. Attorney SDD also billed for event. Preparation for MTC hearing by two attorneys is duplicative and excessive billing.<br><br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 4/10/17 | Draft outline for phone call with Daniel Webster; re: Berkley Data. | 0.70 | 0.70 | Vague | Vague as to "Berkley Data". Renewed fee motion fails to articulate why obtaining Berkeley data was a necessary step to victory on underlying claims. |
| AMP | 3/30/17 | Reviewing Documents - Continue reviewing motion and supporting declaration filed for Motion to Compel Further Responses to County RFA Set 15 based on comments from mock argument in preparation for April 4 hearing | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/30/17 | Discovery preparations - Continue review of documents and training presentations received from Defendants on March 22 and create exhibits for later depositions and trial | 0.50 | 0.50 | Vague; Clerical | Vague as to "create exhibits". Vague as to what depositions the task relates. Includes time spent on noncompensable clerical work. |

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| AMP | 3/30/17 | Reviewing Documents - Review deposition transcript of second volume of Michael Puentes for possible follow-up written discovery | 0.60 | 0.00 | No Objection | No Objection. |
| AMP | 3/30/17 | Reviewing Documents - Review deposition transcript of Guy Pittman for possible follow-up written discovery | 0.70 | 0.00 | No Objection | No Objection. |
| AMP | 3/30/17 | Drafting Documents - Start drafting outline of topics to cover for second part of deposition of Guy Pittman | 0.70 | 0.00 | No Objection | No Objection. |
| AMP | 3/30/17 | Drafting Documents - Continue drafting outline for second part of deposition of Guy Pittman | 0.80 | 0.00 | No Objection | No Objection. |
| AMP | 3/30/17 | Reviewing Documents - Reviewing CPS Warrant Training Guide PowerPoint presentation for m·aterial to cover in second volume of deposition of Guy Pittman | 0.60 | 0.00 | No Objection | No Objection. |
| SDD | 4/10/17 | Phone call with Daniel Webster, re: Berkeley CWS/CMS Data. | 0.60 | 0.60 | Vague | Vague as to who Daniel Webster is and as to what the conversation entailed. |
| SAM | 4/10/17 | Review meet and confer letter to Juvenille Court regarding defective PMK designation | 1.00 | 1.00 | Vague | Vague as to "review". Renewed fee motion fails to articulate why PMK for Juvenile Court was a necessary step. |

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| AMP | 3/29/17 | Reviewing Documents - Continue reviewing motion and supporting declaration filed for Motion to Compel Further Responses to County RFA Set 15 in preparation for April 4 hearing | 1.10 | 1.10 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 4/11/17 | Review Defendant's Meet and Confer Letter, re: Interrogatory (set 1) | 0.60 | 0.60 | Vague; Excessive | Vague as to propounding party.<br>County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 3/29/17 | Research - Research re need for proper representatives for possible subclasses | 0.30 | 0.30 | Vague; Excessive | Entry contains block billing.<br><br>Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |

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| AMP | 3/29/17 | Meeting with Steve re mock argument in preparation for April 4 hearing on Motion to Compel Further Responses to Requests for Admission Set 15 | 0.80 | 0.80 | Excessive; Vague; Duplicative | Vague as to what was actually discussed during meeting. Attorney AMP also billed for event. Preparation for MTC hearing by two attorneys is duplicative and excessive billing.<br><br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 4/11/17 | Meet with Adrian to discuss Defendant's Meet & Confer letter; re: Plaintiffs Special Interrogatory (set 2). | 0.50 | 0.50 | Vague | Vague as to whether letter is a response to M&C letter. As written implies initial M&C letter by Defendant, yet no SROGs-Set Two served by Defendant. ROGs - Set Two served by plaintiff were served in October 2015. |
| AMP | 3/29/17 | Reviewing Documents - Reviewing deposition transcript of Karin Atkins for information relating to numbers of investigative specialists | 0.20 | 0.20 | Vague | Vague as to purpose of review and what was done with the information. Vague as to what aspect of the case the task relates. |
| AMP | 3/29/17 | Reviewing Documents - Continue reviewing declaration filed for Motion to Compel Further Responses to County RFA Set 15 based on comments from mock argument in preparation of April 4 hearing | 0.50 | 0.50 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 4/11/17 | Reviewing Documents - Review Plaintiffs responses to County for any further issues to be addressed in Meet and Confer Response Letter | 0.50 | 0.50 | Vague | Vague as to which discovery set and responses the task relates. |
| AMP | 4/11/17 | Meeting with Steve to discuss Plaintiff's Response to Defendant's Meet and Confer Letter | 0.70 | 0.70 | Vague | Vague as to which set of discovery the task relates. All discovery propounded by Defendant class related which would not have been sent had it not been for class allegations. |
| SDD | 3/29/17 | Continue to research the Texas CPS Class Action; i.e. M.D. v. Perry | 1.00 | 1.00 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 3/29/17 | Continue - to research CPS Class class certification | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 3/29/17 | Continue to research for CPS Class Actions and case law for class certification | 1.10 | 1.10 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 3/29/17 | Review the Motion to Compel RFA (set 15) to prepare for practice oral argument with Adrian | 0.20 | 0.20 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 3/29/17 | Practice argument with Adrian for the Motion to Compel RFA (set 15) | 0.80 | 0.80 | Excessive; Vague; Duplicative | Vague as to what was actually discussed during meeting. Attorney AMP also billed for event. Preparation for MTC hearing by two attorneys is duplicative and excessive billing.<br><br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 3/28/17 | Research infonnation regarding the Texas CPS class action | 0.60 | 0.60 | Excessive; Vague | Vague as to purpose of researching TX CPS class action, clearly unnecessary to individual claims.Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| SDD | 3/28/17 | Draft and revise RFA (set 19) to the County | 0.60 | 0.60 | Excessive | RFA Set 19 sought admissions regarding County policies spanning from 1995 to 2015. Renewed fee motion fails to articulate why seeking such admissions was a necessary step to Plaintiff's victory of the individual claims, especially in light of the extensive documents already produced in this and the related Rogers case. |
| AMP | 4/13/17 | Drafting Documents - Continue draft of Meet and Confer response letter re Plaintiffs Responses to Defendant County's lntenogatorles Set One | 0.70 | 0.70 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| AMP | 3/28/17 | Discovery preparations - Review and analyze documents and trainign presentations received from Guy Pittman and create exhibits for later depositions and trial | 0.50 | 0.50 | Vague; Clerical | Time includes noncompensable clerical work. Vague as to "later depositions". |
| AMP | 3/28/17 | Reviewing Documents - Review County's compelled supplemental responses to interrogatories Set 3, Nos. 17, 18, and 19. | 0.20 | 0.20 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |
| AMP | 3/28/17 | Discovery preparations - Continue review of documents and training presentations received from Defendants on March 22 and create exhibits for later depositions and trial | 0.70 | 0.70 | Vague; Clerical | Vague as to "create exhibits". Vague as to what depositions the task relates. Includes time spent on noncompensable clerical work. |
| AMP | 4/13/17 | Drafting Documents - Continue draft of Meet and Confer response letter re Plaintiffs Responses to Defendant County's lntenogatories Set One | 0.40 | 0.40 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| AMP | 3/28/17 | Reviewing Documents - Review supplemental memorandums filed for Motion to Compel Further Responses to County RFA Set 15 in preparation for April 4 hearing | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/28/17 | Reviewing Documents - Review motion and supporting declaration filed for Motion to Compel Further responses to County RFA Set 15 in preparation for April 4 hearing | 0.20 | 0.20 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 4/13/17 | Meet with Adrian to discuss the meet and confer response, re: Interrogatories (set 1) | 0.70 | 0.70 | Vague; Excessive | Vague as to propounding party and responding party.<br>County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| SDD | 4/17/17 | Meet with Adrian to discuss the meet and confer letter, re: Plaintiff's responses to Rog (set 1) | 0.50 | 0.50 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |

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| SDD | 4/24/17 | Meet with Adrian; re: meet and confer letter for Interrogatory (set 1) | 0.50 | 0.50 | Vague; Excessive | Vague as to propounding party and responding party.<br>County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 4/25/17 | Drafting Documents - Draft index of disputes for Meet and Confer for Riverside County Juvenile Court PMK | 0.40 | 0.40 | Vague | Vague as to "index of disputes." Renewed fee motion fails to articulate why taking deposition of Juvenile Court PMK was a necessary step to victory on individual claims only. |
| AMP | 4/26/17 | Discovery preparations - Prepare documents produced on March 22, 2017 in electronic form for transmittal to Defendants | 0.60 | 0.60 | Vague; Clerical | Vague as to "prepare." Time includes noncompensable clerical work. |
| AMP | 4/26/17 | Review Documents - Review materials and responses for tomorrow's Meet and Confer phone conference with Paul Burkhart | 0.40 | 0.40 | Vague | Vague as to "materials." Vague as to which responses were reviewed. Vague as to which set of discovery the meet and confer conference relates. |
| AMP | 3/24/17 | Drafting Documents - Continue drafting Meet and Confer Letter re Juvenile Court PMK Deposition | 0.70 | 0.70 | Vague | Vague as to intended recipient of letter. Vague as to subject matter of letter. |
| AMP | 3/24/17 | Drafting Documents - Draft notice of rescheduling of deposition of County PMK re Warrants | 0.30 | 0.30 | Clerical | Includes time spent on noncompensable clerical work. |
| AMP | 4/26/17 | Reviewing Documents - Continue reviewing materials and responses for tomorrow's Meet and Confer phone conference with Paul Burkhart | 0.50 | 0.50 | Vague | Vague as to "materials." Vague as to which responses were reviewed. Vague as to which set of discovery the meet and confer conference relates. |

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| AMP | 4/26/17 | Reviewing Documents - Review Plaintiff's responses to finalize list of which objections Will be withdrawn for tomorrow's Meet and Confer phone conference with Paul Burkhart | 0.80 | 0.80 | Vague | Vague as to which set of discovery the meet and confer conference relates. |
| AMP | 4/26/17 | Discovery preparations - Final edits and preparation of joint stipulation to extend all deadlines to be sent to opposing counsel | 0.20 | 0.20 | Excessive | Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 4/27/17 | Reviewing Documents - Finish reviewing materials and responses for tomorrow's Meet and Confer phone conference with Paul Burkhart | 0.40 | 0.40 | Vague | Vague as to "materials." Vague as to which responses were reviewed. Vague as to which set of discovery the meet and confer conference relates. |
| SDD | 5/4/17 | Continue to draft letter to Counsel for the Berkeley Welfare Indicators Project | 0.90 | 0.90 | Vague | Vague as to recipient of letter and purpose of correspondence. |
| AMP | 3/21/17 | Drafting Documents - Continue redrafting and editing of supplemental memorandum for motion to compel County to provide further responses to RF As Set 15 based on Steve's comments from second review, redraft section re numerosity | 0.70 | 0.70 | Excessive | Task clearly related to class issue of "numerosity", not necessary to individual claims.<br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/21/17 | Drafting Documents - Continue drafting Meet and Confer Letter re Juvenile Court PMK Deposition | 0.50 | 0.50 | Vague | Vague as to intended recipient of letter. Vague as to subject matter of letter. |
| AMP | 3/21/17 | Drafting Documents - Redrafting and editing of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 based on Steve's comments from third review | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/21/17 | Drafting Documents - Continue drafting ·Meet and Confer Letter re Juvenile Court PMK Deposition | 0.30 | 0.30 | Vague | Vague as to intended recipient of letter. Vague as to subject matter of letter. |
| AMP | 3/21/17 | Discovery preparations - Finalize supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15, publish to .pdf and e-file | 0.10 | 0.10 | Excessive; Vague; Clerical | Vague as to "finalize". Time includes noncompensable clerical work. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/21/17 | Drafting Documents - Continue redrafting and editing of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 based on Steve's comments from second review | 0.80 | 0.80 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/21/17 | Reviewing Documents - Review Defendants' Supplemental Briefing re Motion to Compel County of Riverside to Provide Further Responses to Requests for Admission (Set 15) | 0.10 | 0.10 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/21/17 | Reviewing Documents - Review Defendants' Supplemental Responses provided with Supplemental Briefing re Motion to Compel County of Riverside to Provide Further Responses to Requests for Admission (Set 15) | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 3/21/17 | Revise and review SUPPLE.MENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) | 1.30 | 1.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 3/20/17 | Revise and review SUPPLE.MENTAL MEMORANDUM IN SUPPORT OF OCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) | 0.60 | 0.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 3/20/17 | Meet with Adrian to discuss edits and revisions to the SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) | 1.60 | 1.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/20/17 | Drafting Documents-Continue redrafting and editing of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 based on Steve's comments from review, finishing section re confidentiality objection | 0.60 | 0.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/20/17 | Correspondence with Doug Smith re status of compelled supplemental responses from County to Interrogatories 17, 18, and 19 | 0.10 | 0.10 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |

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| AMP | 3/20/17 | Drafting Documents - Continue drafting Meet and Confer Letter re Juvenile Court PMK Deposition, expand section re faulty privilege log | 0.30 | 0.30 | Vague | Vague as to intended recipient of letter. Vague as to "faulty privilege log." |
| AMP | 3/20/17 | Meeting with Steve to discuss supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 | 1.20 | 1.20 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/20/17 | Drafting Documents - Redrafting and editing of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 based on Steve's comments from second review | 0.80 | 0.80 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/17/17 | Drafting Documents - Continue draft of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15, expand section re confidentiality objection | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/17/17 | Drafting Documents - Review, proofread, and edit first draft of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15. Meeting with Steve to discuss supplemental memorandum for motion to compel further responses from County to RFAs Set 15 | 0.60 | 0.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/17/17 | Drafting Documents - Start redrafting and editing of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 based on Steve's comments from review | 1.20 | 1.20 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/17/17 | Drafting Documents - Continue redrafting and editing of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 based on Steve's comments from review | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/17/17 | Drafting Documents - Continue redrafting and editing of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 based on Steve's comments from review | 0.70 | 0.70 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/17/17 | Drafting Documents - Continue draft of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 | 0.90 | 0.90 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/17/17 | Drafting Documents - Continue draft of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15, expand section re class certification | 0.70 | 0.70 | Excessive | Task clearly relates to class issues, not necessary for individual claims.<br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 3/17/17 | Revise and edit the SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN). | 0.60 | 0.60 | Excessive | Task clearly relates to class issues, not necessary for individual claims. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 3/17/17 | Meet with Adrian to discuss the necessary revisions and edits to SUPPLEMENTAL MEMORANDUM IN SUPPORT OF LOCAL RULE 37-2 JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) | 0.80 | 0.80 | Excessive | Task clearly relates to class issues, not necessary for individual claims. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 3/16/17 | Review County's portion of the Joint Stipulation (RFA 15) to determine what issues should be addressed in the Supp. Memo | 0.20 | 0.20 | Excessive | Task clearly relates to class issues, not necessary for individual claims. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 3/16/17 | Draft issue spotting outline to discuss with Adrian regarding the Supp. Memo for the Joint Stip (RFA 15). | 0.30 | 0.30 | Excessive; Duplicative | Task clearly relates to class issues, not necessary for individual claims. Task duplicative of work completed by AMP on same day. Two attorneys should not bill for completing the same work. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 3/16/17 | Meet with Adrian to discuss his outline for issue to discuss/address in the supp memo; re: Joint Stipulation (RFA 15) | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/16/17 | Drafting Documents - Continue draft of deposition outline for County PMK re Warrants, sections re deposition of Juvenile Court PMK | 0.70 | 0.70 | Vague | Vague as to what sections/topics of Juvenile Court PMK deposition are being drafted and how related to warrants. |
| AMP | 3/16/17 | Discovery preparations - Start preparing and compiling exhibits to be used for deposition for County PMK re Warrants | 0.30 | 0.30 | Vague; Clerical | Vague as to "preparing and compiling". Time includes noncompensable clerical work. |
| AMP | 3/16/17 | Drafting Documents - Start draft of issue outline for supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 | 0.80 | 0.80 | Excessive; Duplicative | Task clearly relates to class issues, not necessary for individual claims. Task duplicative of work completed by SDD on same day. Two attorneys should not bill for completing the same work.<br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/16/17 | Drafting Documents - Continue draft of issue outline for supplemental memorandum for motion to compel County to provide further responses to RF As Set 15, expand section re numerosity | 0.20 | 0.20 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims |
| AMP | 3/16/17 | Drafting Documents - Continue draft of Meet and Confer letter to attorney for Riverside County Juvenile Court re objections at PMK deposition | 0.30 | 0.30 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. Vague as to what objections letter is regarding. |
| AMP | 3/16/17 | Drafting Documents - Start draft of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 | 1.30 | 1.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/16/17 | Drafting Documents - Start draft of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15 | 0.90 | 0.90 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/16/17 | Drafting Documents - Continue draft of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15, section re unsupported objections | 0.70 | 0.70 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/16/17 | Drafting Documents - Continue draft of supplemental memorandum for motion to compel County to provide further responses to RFAs Set 15, expand section re numerosity | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. Thus, time spent seeking additional responses excessive in light of the County's adequate responses. Moreover, all 30 requests related to class related issues and the renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims |
| SAM | 3/14/17 | Deposition of Guy Pittman . | 6.50 | 0.00 | No Objection | No Objection. |

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| AMP | 5/25/17 | Drafting Documents - Redrafting and editing Plaintiffs supplemental responses to County's Interrogatories Set One | 0.80 | 0.80 | Excessive | County ROGs to Plaintiff sought information supporting Plaintiff's class allegations which would not have been propounded if no class allegations were made. Thus, time spent on responding not necessary to the individual claims. |
| AMP | 3/14/17 | Drafting Documents - Continue draft of deposition outline for County PMK re Warrants, sections re deposition of Juvenile Court PMK | 0.50 | 0.50 | Vague | Vague as to what sections/topics of Juvenile Court PMK deposition are being drafted and how related to warrants. |
| AMP | 3/14/17 | Drafting Documents - Continue draft of Meet and Confer letter to attorney for Riverside County Juvenile Court re objections at PMK deposition | 0.40 | 0.40 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. Vague as to what objections letter is regarding. |
| AMP | 3/14/17 | Discovery preparations - Prepare notice, declaration, proposed order, and draft POS for Joint Stipulation to Compel Further Responses from County to RFAs (Set 15) | 0.30 | 0.30 | Excessive; Clerical | Time includes noncompensable clerical work.<br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/13/17 | Drafting Documents - Continue draft of Meet and Confer letter to attorney for Riverside County Juvenile Court re objections at PMK deposition | 1.30 | 1.30 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. Vague as to what objections letter is regarding. |
| SDD | 5/25/17 | Revise and edit Plaintiff's Supplemental Responses | 0.30 | 0.30 | Vague | Vague as to which set of discovery the task relates. |

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| AMP | 3/13/17 | Drafting Documents - Continue draft of Meet and Confer letter to attorney for Riverside County Juvenile Court re objections at PMK deposition | 0.60 | 0.60 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. Vague as to what objections letter is regarding. |
| AMP | 3/13/17 | Drafting Documents - Add in final material to deposition outline of Guy Pittman based on results of earlier second part of the deposition of Puentes | 0.20 | 0.20 | Vague | Vague as to "earlier second part". Vague as to "final material." |
| AMP | 3/13/17 | Drafting Documents - Continue draft of Meet and Confer letter to attorney for Riverside County Juvenile Court re objections at PMK deposition, start section re judicial privilege | 0.40 | 0.40 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. |
| AMP | 3/13/17 | Discovery preparations - Prepare and compile all exhibits to be used for tomorrow's deposition of Guy Pittman | 0.40 | 0.40 | Vague Clerical | Time includes noncompensable clerical work. Vague as to "prepare and compile." |
| AMP | 3/13/17 | Review·1ng Documents - Review training PowerPoint presentation produced by Defendants for use in deposition of Guy Pittman tomorrow | 0.20 | 0.00 | No Objection | No Objection. |
| SDD | 5/25/17 | Revise and edit Meet and Confer, re: Defendant County's Failure to Supplement and Provide Documents. | 0.50 | 0.50 | Vague | Vague as to which set of discovery the task relates. |

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| AMP | 6/7/17 | Correspondence with Burkhart by e-mail re production of Detention Logs, failure to communicate re status | 0.20 | 0.20 | Excessive | Renewed fee motion fails to articulate why obtaining and work related to detention logs was a necessary step to plaintiff's victory in underlying claims. No reference to such logs in draft msj. |
| AMP | 6/19/17 | Trial preparations - Preparing and compiling new trial exhibits out of documents from March 22, 2017 production. | 0.40 | 0.40 | Clerical; Vague | Time includes noncompensable clerical work. Vague as to "preparing and compiling". Vague as to which party produced documents. |
| AMP | 3/13/17 | Discovery preparations- Prepare and compile new exhibits from documents produced by Defendants to be used in later depositions and trial | 0.20 | 0.20 | Vague; Clerical | Vague as to "preparing and compiling". Vague as to "new exhibits"Vague as to what depositions the task relates. Includes time spent on noncompensable clerical work. |
| AMP | 3/13/17 | Drafting Documents - Continue draft of Meet and Confer letter to attorney for Riverside County Juvenile Court re objections at PMK deposition | 0.40 | 0.40 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. Vague as to what objections letter is regarding. |
| SAM | 3/13/17 | Attend deposition of Micahel Puentes. Billing includes 1.5 hours round trip travel | 5.00 | 0.00 | No Objection | No Objection. |
| SDD | 6/21/17 | Research issue for stipulating to conduct discovery after the cut-off. | 0.40 | 0.40 | Excessive | Time spent seeking extension to conduct further discovery on class related discovery unnecessary to individual claims. |
| AMP | 3/9/17 | Drafting Documents - Continue draft of Meet and Confer letter to attomey for Riverside County Juvenile Court re objections at PMK deposition | 0.90 | 0.90 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. Vague as to what objections letter is regarding. |

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| AMP | 3/9/17 | Reviewing Documents - Reviewing deposition transcript of Juvenile Court PMK for documents to be obtained through public records request | 0.50 | 0.50 | Vague | Vague as to what documents are being referred. Vague as to who is completing public records request. |
| AMP | 6/26/17 | Reviewing Documents - Start reviewing warrant logs sent by Defendants | 0.70 | 0.70 | Excessive | Renewed fee motion fails to articulate why obtaining and work related to warrant logs was a necessary step to plaintiff's victory in underlying claims. No reference to such logs in draft msj. |
| AMP | 6/26/17 | Reviewing Documents - Continue reviewing warrant logs sent by Defendants | 0.60 | 0.60 | Excessive | Renewed fee motion fails to articulate why obtaining and work related to warrant logs was a necessary step to plaintiff's victory in underlying claims. No reference to such logs in draft msj. |
| AMP | 3/8/17 | Drafting Documents - Continue draft of Meet and Confer letter to attomey for Riverside County Juvenile Court re objections at PMK deposition | 0.60 | 0.60 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. Vague as to what objections letter is regarding. |
| AMP | 3/8/17 | Discovery preparations - Continue preparing and compiling exhibits to be used for depositions and trial | 0.60 | 0.60 | Vague; Clerical | Vague as to "preparing and compiling". Vague as to what depositions the task relates. Includes time spent on noncompensable clerical work. |
| AMP | 3/8/17 | Discovery preparations - Continue preparing and compiling exhibits to be used for depositions and trial | 0.60 | 0.60 | Vague; Clerical | Vague as to "preparing and compiling". Vague as to what depositions the task relates. Includes time spent on noncompensable clerical work. |

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| AMP | 3/8/17 | Drafting Documents - Continue proofreading and editing of Joint Stipulation to Compel Further Responses from County to RFAs Set 16 | 0.30 | 0.30 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 6/27/17 | Trial preparations - Preparing and compiling new exhibits from documents received from PMKs and Defendants | 0.50 | 0.50 | Vague; Clerical | Vague as to "preparing and compiling." Time includes noncompensable clerical work. |
| AMP | 3/8/17 | Research re deliberative process privilege asserted during deposition of Riverside County Juvenile Court PMK | 0.80 | 0.80 | Vague | Vague as to purpose of research and what work the research was for. |
| AMP | 3/8/17 | Correspondence with Doug Smith by phone re Court-ordered supplemental responses to Interrogatories 17, 18, and 19, expecting to get responsive information tomorrow | 0.10 | 0.10 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |

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| AMP | 3/8/17 | Correspondence with Doug Smith by phone re Court-ordered supplemental responses to Interrogatories 17, 18, and 19, expecting to get responsive information tomorrow | 0.10 | 0.10 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |
| AMP | 3/8/17 | Correspondence with Doug Smith by phone re Court-ordered supplemental responses to Interrogatories 17, 18, and 19, expecting to get responsive information tomorrow | 0.10 | 0.10 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |
| AMP | 3/8/17 | Drafting Documents - Start draft of Meet and Confer letter to attorney for Riverside County Juvenile Court re objections at PMK deposition | 0.60 | 0.60 | Vague | Vague as to what PMK deposition the task relates. Vague as to intended recipient of letter. Vague as to what objections letter is regarding. |

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| AMP | 3/8/17 | Drafting Documents - Continue drafting new paragraphs for declaration in support of Joint Stipulation to Compel Further Responses from County to RFAs Set 16 | 0.40 | 0.40 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 3/8/17 | Drafting Documents - Continue updating and redrafting portions of deposition outline for second part of Puentes deposition, sections re interactions with juvenile court | 1.10 | 1.10 | Vague | Vague as to whose interactions with juvenile court the task relates. Vague as to "second part". |
| SAM | 3/8/17 | Review exhibits in preparation for deposition of Michael Puentes | 0.10 | 0.10 | Vague | Vague as to what exhibits are being reviewed. Vague as to date of scheduled deposition. |

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| SDD | 3/7/17 | Revise 'and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET SIXTEEN) | 0.30 | 0.30 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| SDD | 3/7/17 | Meet with Adrian to discuss edits and revisions to Joint Stipulation RFA (set 16). | 0.30 | 0.30 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 3/7/17 | Drafting Documents - Redrafting and editing Joint Stipulation to Compel Further Responses from County to RFAs (Set 16) | 1.10 | 1.10 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 3/7/17 | Reviewing Documents Reviewing deposition transcript of Karla Torres re lack of specific reasonable inquiry for Joint Stipulation to Compel Further Responses from County to RFAs (Set 16) | 0.40 | 0.40 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 3/7/17 | Drafting Documents - Continue redrafting and editing Joint Stipulation to Compel Further Responses from County to RFAs (Set 16) | 0.30 | 0.30 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 3/7/17 | Drafting Documents - Continue redrafting and editing Joint Stipulation to Compel Further Responses from County to RFAs (Set 16), expand section re specific efforts | 0.70 | 0.70 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 3/7/17 | Research re corporation's duty of reasonable inquiry for Joint Stipulation to Compel Further Responses from County to RFAs (Set 16) | 0.50 | 0.50 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 3/7/17 | Drafting Documents Continue redrafting and editing Joint Stipulation to Compel Further Responses from County to RFAs (Set 16), expand section re specific response duties of corporation/public entity | 0.80 | 0.80 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 3/7/17 | Discovery preparations - Preparing and compiling new exhibits to declaration in support of Joint Stipulation to Compel Further Responses from County to RFAs Set 16 | 0.60 | 0.60 | Excessive; Vague; Clerical | Vague as to "preparing and compiling." Time includes noncompensable clerical work. M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 3/7/17 | Drafting Documents - Draft new paragraphs for declaration in support of Joint Stipulation to Compel Further Responses from County to RFAs Set 16 | 0.30 | 0.30 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 3/6/17 | Discovery preparations - Continue compiling and preparing exhibits for deposition of Guy Pittman | 0.90 | 0.00 | No Objection | No Objection. |
| AMP | 3/6/17 | Drafting Documents - Continue updating and redrafting portions of deposition outline for second part of Puentes deposition | 0.70 | 0.00 | No Objection | No Objection. |
| AMP | 3/6/17 | Reviewing Documents - Reviewing deposition transcript of PMK for Riverside County Juvenile Court for Information to use for deposition of Michael Puentes | 0.80 | 0.00 | No Objection | No Objection. |
| AMP | 6/27/17 | Trial preparations - Continue preparing and compiling new exhibits from documents received from PMKs and Defendants | 0.30 | 0.30 | Vague; Clerical | Vague as to "preparing and compiling." Time includes noncompensable clerical work. |
| AMP | 3/6/17 | Discovery preparations - Continue preparing and compiling exhibits to be used for depositions and trial | 0.40 | 0.40 | Vague; Clerical | Vague as to "preparing and compiling". Vague as to what depositions the task relates. Includes time spent on noncompensable clerical work. |
| AMP | 3/6/17 | Drafting Documents - Continue updating and redrafting portions of deposition outline for second part of Puentes deposition, sections re material from Juvenile Court PMK deposition transcript | 0.70 | 0.70 | Vague | Vague as to "second part of Puentes deposition." |

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| AMP | 3/6/17 | Drafting Documents - Continue drafting deposition outline for Guy Pittman, sections re Juvenile Court PMK deposition transcript | 0.60 | 0.00 | No Objection | No Objection. |
| AMP | 3/6/17 | Discovery preparations - Prepare and compile excerpts of deposition of Riverside County Juvenile Court PMK for use in depositions of Puentes and Pittman | 1.10 | 1.10 | Clerical; Vague | Vague as to "prepare and compile". Time includes noncompensable clerical work. |
| AMP | 3/3/17 | Discovery preparations - Prepare joint stipulation to compel further responses from County to RFAs (set 15) for delivery to defendants per Local Rule 37-2 | 0.40 | 0.40 | Excessive; Clerical; Vague | Vague as to "prepare....for delivery". Time includes noncompensable clerical work. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/3/17 | Correspondence with Doug Smith by phone for Meet and Confer re provision of compelled responses to Interrogatories 17, 18, and 19 | 0.20 | 0.20 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |

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| AMP | 3/3/17 | Drafting Documents - Continue updating and redrafting portions of deposition outline for second part of Puentes deposition | 0.60 | 0.60 | Vague | Vague as to "second part of Puentes deposition." Vague as to what sections updated and redrafted. |
| AMP | 3/3/17 | Reviewing Documents - Review deposition transcript of Karla Torres for information to cover during Puentes and Pittman depositions | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 3/2/17 | Discovery preparations. Prepare and compile exhibits to declaration in support of joint stipulation to compel further responses from Defendant County to RFAs (set 15) | 0.90 | 0.90 | Excessive; Clerical; Vague | Vague as to "prepare and compile". Time includes noncompensable clerical work. RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/2/17 | Drafting Documents - Continue drafting deposition outline for Guy Pittman | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 3/2/17 | Reviewing Documents - Review deposition transcript of Felecia Butler for information relating to training for upcoming depositions of Pittman and Puentes | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 3/2/17 | Drafting Documents - Start updating and redrafting portions of deposition outline for second part of Puentes depositions | 0.80 | 0.80 | Vague | Vague as to "second part of Puentes depositions." Vague as to what sections updated and redrafted. |

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| AMP | 3/2/17 | Reviewing Documents - Review first volume of deposition transcript of Puentes for deposition outline of second part of deposition | 0.30 | 0.30 | Vague | Vague as to what work was actually performed and outcome of review. |
| AMP | 3/2/17 | Drafting Documents - Continue updating and redrafting portions of deposition outline for second part of Puentes depositions | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 3/2/17 | Discovery preparations - Prepare, print, sign, scan, and serve third notice of rescheduling of deposition of Guy Pittman | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 3/2/17 | Drafting Documents - Continue updating and redrafting portions of deposiijon outline for second part of Puentes depositions | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 3/1/17 | Drafting Documents Proofread and edit of declaration in support of Joint Stipulation to Compel Defendant County to provide Further Responses to RFAs (Set 15) | 0.60 | 0.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 3/1/17 | Drafting Documents - Proofread and edit Joint Stipulation to Compel Defendant County to provide Further Responses to RFAs (Set 15) | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 3/1/17 | Drafting Documents - Continue editing declaration in support of Joint Stipulation to Compel Defendant County to provide Further' Responses to RFAs (Set 15) | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/28/17 | Drafting Documents - Continue editing declaration in support of Joint Stipulation to Compel Defendant County to provide Further' Responses to RFAs (Set 15) | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/28/17 | Correspondence with Doug Smith, multiple e-mails re scheduling of depositions and inability to schedule multiple depositions on same day due to lack of production of documents | 0.20 | 0.20 | Vague | Vague as to what deposition(s) the task relates. |
| SDD | 2/28/17 | Steve- Edit and revise LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN). | 0.50 | 0.50 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/27/17 | Correspondence with Paul Burkhart re deadline for compelled supplemental responses from County to Interrogatories Set Three, left voicemail | 0.10 | 0.10 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |
| AMP | 2/27/17 | Drafting Documents - Continue drafting and editing deposition outline of County PMK re Warrants | 0.60 | 0.00 | No Objection | No Objection. |

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| AMP | 2/24/17 | Drafting Documents - Adrian - Continue redrafting and editing of joint stipulaUon to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from review, overall edits and proofreading | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/24/17 | Adrian - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from review | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/23/17 | Drafting Documents - Adrian - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from review | 1.10 | 1.10 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/23/17 | Adrian - Redrafting and editing of dedaration in support of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from review adding new paragraphs and exhibits re specific social workers not obtaining warrants prior to removal | 0.20 | 0.20 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/23/17 | Drafting Documents - Adrian - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest omments from review, expanding section re commonality and system-wide practices | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/23/17 | Adrian - Continue redrafting and editing of declaration in support of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from review | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/23/17 | Drafting Documents - Adrian - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from review | 0.50 | 0.50 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/23/17 | Drafting Documents - Adrian · Redrafting and editing of declaration in support of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from Steve's 02/23/17 review | 0.70 | 0.70 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 2/23/17 | Revise and edit DECLARATION OF ADRIAN M. PARIS IN SUPPORT OF JOINT STIPULATION TO COMPEL DEFENDANT COUNTY OF IVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN) . | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| SDD | 2/22/17 | Edit and revise LOCAL RULE 37--2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN). | 0.50 | 0.50 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/22/17 | Adrian - Redrafting and editing of declaration in support of joint stipulation to compel further responses from Defendant County to RF As (Set 15) based on latest comments from review adding new. paragraph and exhibit re federal reporting requirements | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/22/17 | Adrian - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from review | 0.70 | 0.70 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/22/17 | Reviewing Documents - Reviewing deposition transcripts from prior County of Riverside cases for joint stipulation to compel further responses from Defendant County to RFAs (Set .15) based on latest comments from review | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related RFAs regarding data from 1998-2015. At 4/6/2017 MTC hearing, Court found County provided adequate responses to most of the requests and ordered additional responses to just three, which had to do with how CCWIP obtains data from CWS. Renewed fee motion fails to articulate why these requests for admissions were a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/22/17 | Adrian - Redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on latest comments from review | 0.90 | 0.90 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/21/17 | Adrian - Redrafting and editing of declaration in support of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review and meeting | 0.80 | 0.80 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/21/17 | Discovery Preparations - Prepare and compile exhibits to declaration in support of joint stipulation to compel further responses from Defendant County to RF As (Set 15) | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/21/17 | Adrian• Continue redrafting and editing of declaration in support of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/21/17 | Drafting Documents - Continue draft of deposition outline for Guy Pittman | 0.50 | 0.00 | No Objection | No Objection. |
| AMP | 2/21/17 | Drafting Documents - Continue draft of deposition outline for Guy Pittman | 0.70 | 0.00 | No Objection | No Objection. |

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| AMP | 2/21/17 | Discovery Preparations - Prepare and compile exhibits to declaration in support of joint stipulation to compel further responses from Defendant County to RFAs (Set 16) | 0.30 | 0.30 | Excessive; Vague; Clerical | Vague as to "preparing and compiling." Time includes noncompensable clerical work. M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/21/17 | Adrian - Redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 16) | 0.70 | 0.70 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 2/20/17 | Research re publical1y available information for joint stipulation to compel further responses from Defendant County to RFAs (Set 15) | 0.60 | 0.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/20/17 | Drafting Documents - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review and meeting, expanding sections re County's abflity to acquire data from CCWIP | 0.90 | 0.90 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/20/17 | Drafting Documents - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review and meeting, sections re warrant protoool not established until 2011-2012 | 1.10 | 1.10 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/17/17 | Drafting Documents - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RF As (Set 15) based on Steve's comments from review and meeting | 0.60 | 0.60 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/17/17 | Research re numerosity for joint stipulation to compel further responses from Defendant County RFAs (Set 15), reasonable estimate and inferences | 0.60 | 0.60 | Excessive | Task clearly solely related to class issue of numerosity, not necessary to individual claims.<br>RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/17/17 | Drafting - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review and meeting | 0.90 | 0.90 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/17/17 | Reviewing Documents-Review deposition transcripts of individual Defendants for information relating to warrant protocols, policies, and training | 0.30 | 0.00 | No Objection | No Objection. |
| AMP | 2/17/17 | Drafting Documents - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review and meeting | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/17/17 | Drafting Documents - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review | 0.80 | 0.80 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/17/17 | Research re confidentiality objections for joint stipulation to compel further responses from Defendant County to RFAs (Set 15) | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/17/17 | Reviewing Documents - Review written discovery responses from Defendant Torres to RPDs Set 3 and RPDs from deposition to determine what documents are still missing. | 0.20 | 0.20 | Vague | Vague as to outcome of review. |
| AMP | 2/17/17 | Meeting with Steve re motion to compel further responses from County to RFAs Set 15 | 0.50 | 0.50 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/17/17 | Drafting Documents - Continue redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review and meeting | 0.40 | 0.40 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 6/28/17 | Trial preparations - Continue preparing and compiling new exhibits from documents received from PMKs and Defendants | 0.30 | 0.30 | Vague; Clerical | Vague as to "preparing and compiling." Vague as to which PMKs and which Defendants the task relates and from what discovery set(s) the documents taken. Time includes noncompensable clerical work. |
| AMP | 6/30/17 | Drafting Documents - Draft Meet and Confer letter re improper redactions in detention logs. | 0.40 | 0.40 | Excessive | Renewed fee motion fails to articulate why obtaining and work related to detention logs was a necessary step to plaintiff's victory in underlying claims. No reference to such logs in draft msj. |

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| SAM | 2/16/17 | Attend and take deposition of person most knowledgeable for the Superior Court of California, County of Riverside. | 5.60 | 0.00 | No Objection | No Objection. |
| SDD | 2/16/17 | Revise and edit LOCAL RULE 37-2 JOINT STIPULATION REGARDING PLAINTIFF'S MOTION TO COMPEL DEFENDANT COUNTY OF RIVERSIDE TO PROVIDE FURTHER RESPONSES TO REQUESTS FOR ADMISSION (SET FIFTEEN). | 1.50 | 1.50 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| SDD | 2/16/17 | Revise and edit PLAINTIFF A.A.'S INTERROGATORIES TO DEFENDANT COUNTY OF RIVERSIDE (SET FOUR) | 0.30 | 0.30 | Excessive | No ROGs-Set Four was served on the County. Attorney should not bill for incomplete work, work clearly unnecessary to Plaintiff's victory on underlying claims as requests never served nor responded to. |
| SDD | 6/20/18 | Review Torres and Butler deposition transcripts for additional supporting evidence | 1.20 | 1.20 | Vague | Vague as to what supporting evidence is for. |

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| AMP | 2/16/17 | Drafting Documents - Redrafting and editing Meet and Confer letter re County's Second Supplemental Responses to Interrogatories 9-12 based on Judge Pym's order at Dkt. No. 108 | 0.30 | 0.30 | Duplicative; Excessive | ROGs Set Two to the County seeks policies and identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was necessary in addition to the similar discovery sought and obtained in related *Rogers* case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour provided input on this discovery as indicated in Mark Ankcorn's billing records. |
| AMP | 2/16/17 | Discovery Preparations - Compiling and preparing attachment to County Interrogatories (Set 4) | 0.20 | 0.20 | Excessive | No ROGs-Set Four was served on the County. Attorney should not bill for incomplete work, work clearly unnecessary to Plaintiff's victory on underlying claims as requests never served nor responded to. |
| AMP | 2/16/17 | Drafting Documents - Start draft of deposition outline for Guy Pittman | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 2/16/17 | Reviewing Documents - Review deposition transcript of Michael Puentes for topics to cover in deposition outline for Guy Pittman | 0.40 | 0.00 | No Objection | No Objection. |
| AMP | 2/16/17 | Drafting Documents - Continue draft of deposition outline for Guy Pittman | 0.80 | 0.00 | No Objection | No Objection. |
| AMP | 2/16/17 | Drafting Documents - Redrafting and editing of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review | 0.30 | 0.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/16/17 | Drafting Documents - Start draft of Interrogatories to County-Set 4 | 0.60 | 0.60 | Excessive | No ROGs-Set Four was served on the County. Attorney should not bill for incomplete work, work clearly unnecessary to Plaintiff's victory on underlying claims as requests never served nor responded to. |
| AMP | 2/16/17 | Reviewing Documents - Review Judge Pym's order at Dkt. No. 108 for guidelines and structure of interrogatories for County interrogatories Set 4 | 0.40 | 0.40 | Excessive | No ROGs-Set Four was served on the County. Attorney should not bill for incomplete work, work clearly unnecessary to Plaintiff's victory on underlying claims as requests never served nor responded to. |
| AMP | 2/16/17 | Drafting Documents - Continue redrafting and editing of joint stlpulatlon to compel further responses from Defendant County to RFAs (Set 15) based on Steve's comments from review | 1.30 | 1.30 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/15/17 | Drafting Documents - Continue draft of joint stipulation to compel further responses from Defendant County to RFAs (Set 16), expand sections utilizing rulings and holdings in Order at Docket No. 108 | 0.30 | 0.30 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 2/15/17 | Drafting Documents - Continue draft or joint stipulation to compel further responses from Defendant County to RFAs (Set 16), expand sections utilizing rulings and holdings in Order at Docket No. 108 | 0.60 | 0.60 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |
| AMP | 2/15/17 | Drafting Documents - Continue draft of joint stipulation to compel further responses from Defendant County to RFAs (Set 16) | 0.60 | 0.60 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 2/15/17 | Drafting Documents - Draft M&C Letter re production of supplemental responses from Defendant County pursuant to Dkt. No. 108 | 0.70 | 0.70 | Vague | Vague as to which set of discovery the task relates.<br><br>ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |
| AMP | 2/15/17 | Drafting Documents - Continue draft of joint stipulation to compel further responses from Defendant County to RFAs (Set 16), expand section re overbroad objection based on Dkt. 108 | 0.20 | 0.20 | Excessive | M&C letter dated 11/9/2016 alleges RFA Set 16 requests were all class related. Requests duplicative and overlapping of RFAs served on defendants Butler and Torres with a number of requests seeking admissions regarding specific acts by Butler and Torres, not sufficiently related to class certification issues as required by the standing Scheduling Order. Thus, time spent includes seeking information Plaintiff was not yet entitled to. Renewed fee motion fails to articulate why spending time seeking duplicative information from multiple sources was a necessary step to Plaintiff's victory in the individual claims. Further, no MTC re RFA-16 was filed, thus time spent preparing documents never utilized excessive to the needs of the individual claims. |

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| AMP | 2/15/17 | Drafting Documents - Re-drafting, editing, and revising M&C Letter re production of supplemental responses from Defendant County pursuant to Dkt. No. 108, addressing Steve's comments from review | 0.10 | 0.10 | Vague | Vague as to which set of discovery the task relates.<br><br>ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |
| AMP | 2/15/17 | Meeting with Shawn and Steve to discuss deposition tomorrow, class certification requirements, possibility of stipulation, and future discovery and depositions | 0.70 | 0.70 | Excessive; Vague | Vague as to what deposition is being discussed. Topics clearly related to issues of class cert. unnecessary to individual claims. Time spent seeking deadlines for class related discovery, multiple extensions regarding class discovery unnecessary to individual claims. |
| AMP | 2/15/17 | Drafting Documents - Continue drafting outline for deposition of Riverside County Juvenile Court PMK | 0.60 | 0.00 | No Objection | No Objection. |
| AMP | 2/15/17 | Reviewing Documents Continue analyzing and compiling exhibits for deposition of Riverside County Juvenile Court PMK | 0.80 | 0.80 | Vague Clerical | Includes time spent on noncompensable clerical work.Vague as to what is be analyzed. |
| AMP | 2/15/17 | Revise and edit the Meet and Confer, re: Defendant County's Response Deadline Pursuant to Hon. Judge Sheri Pym's Order (Dkt. No. 108). | 0.30 | 0.30 | Vague | Vague as to which set of discovery the task relates. |

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| AMP | 2/15/17 | Discuss with Shawn and Adrian the Class Certification requirements that County can stipulate to. | 0.70 | 0.70 | Excessive | Attorney identifies work as primarily class related. Renewed fee motion fails to articulate how work primarily related to seeking class certification was a necessary step for Plaintiff's ultimate victory on underlying claims. |
| AMP | 2/15/17 | Prepare for deposition of Person Most Knowledgeable for the Superior Court, Juvenile Division. | 2.10 | 2.10 | Vague | Vague as to "prepare" as attorney did not take the deposition. |
| AMP | 2/14/17 | Drafting Documents - Continue draft of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) | 1.20 | 1.20 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. At the 4/6/2017 MTC hearing, the court found defendant County provided adequate responses to most of the requests and ordered additional responses to just three of the 30 requests. All 30 were class related issues and the renewed fee motion fails to articulate why any of the requests or information gleaned from them was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/14/17 | Drafting Documents - Continue drafting outline for deposition of Riverside County Juvenile CourtPMK | 0.80 | 0.00 | No Objection | No Objection. |
| AMP | 2/14/17 | Reviewing Documents - Analyzing and compiling exhibits for deposition d Riverside County Juvenile Court PMK | 0.90 | 0.00 | No Objection | No Objection. |
| AMP | 2/14/17 | Drafting Documents - Continue draft of joint stipulation to compel further responses from Defendant County to RFAs (Set 15), expand section re confidential information utilizing rulings and holdings in Order at Docket No. 108 | 0.80 | 0.80 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. Renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |

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| AMP | 2/13/17 | Reviewing Documents - Review order re Plaintiff's Motion to Compel Further Responses to County Interrogatories Set 3 | 0.30 | 0.15 | Excessive | ROGS-Set 3 sought class related discovery requesting identifying information and data of social workers between the years 1995-2016. Specifically re 17-19, renewed fee motion fails to articulate why seeking all County employees who taught training, all social workers with grievances or complaints filed against them from 1995-2016 was a necessary step to Plaintiff's victory in the individual claims. Such extensive data unnecessary for individual claims. |
| AMP | 2/13/17 | Drafting Documents - Continue draft of joint stipulation to compel further responses from Defendant County to RFAs (Set 15) based on ruling at Dkt. 108 | 0.80 | 0.80 | Excessive | RFA-Set 15 included 30 class related requests for admissions regarding data from 1998-2015. Renewed fee motion fails to articulate why any of the information obtained was a necessary step to Plaintiff's victory on the underlying claims. |
| AMP | 2/13/17 | Drafting Documents - Continue drafting outline for deposition of Riverside County Juvenile Court PMK | 0.80 | 0.00 | No Objection | No Objection. |
| AMP | 2/13/17 | Reviewing Documents - Review deposition transcript of Judge Michael Nash in Whitman v. County of Los Angeles, et al. for information for outline for deposition of Riverside County Juvenile Court PMK | 0.70 | 0.70 | Vague | Vague as to what type/category of information sought for use in outline. Vague as to relevancy of testimony of individual from other county. |

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| AMP | 2/13/17 | Reviewing Documents - Review deposition transcript of Cynthia Hernandez-Suter, PMK for LA County Juvenile Court from Duval v. County of Los Angeles, et al. for information to use in outline for deposition of Riverside County Juvenile Court PMK | 0.30 | 0.30 | Vague | Vague as to what type/category of information sought for use in outline. Vague as to relevancy of testimony of individual from other county. |
| AMP | 2/13/17 | Drafting Documents - Continue drafting outline for deposition of Riverside County Juvenile CourtPMK | 0.40 | 0.00 | No Objection | No Objection. |
| **OBJECTIONS TO BILLING ENTRIES IN "EXHIBIT 10" OF MCMILLAN DECLARATION- Time Spent** | | | | | | |
| **ATTY** | **DATE** | **DESCRIPTION** | **TIME CHALLENGED** | **REDUCE BY** | **OBJECTION** | **REASON FOR OBJECTION** |
| SAM | 10/12/19 | Finish work on Points and-Authorities, fold in costs section and fees incurred in making the instant motion. | 1.90 | 1.9 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 10/12/19 | Continue to draft the declaration in support of the renewed fee motion. | 2.60 | 2.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| SDD | 10/12/19 | Continue to draft the the hour table setting forth the original and update classifications. | 1.70 | 1.70 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 10/12/19 | Continue to draft the declaration in support of the renewed motion for attorney fees. | 0.60 | 0.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 10/12/19 | Continue to draft my declaration in support of the renewed fee motion. | 4.00 | 4.00 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 10/11/19 | Drafting Documents - Finish drafting and finalize declaration in support of motion for attorney's fees | 0.60 | 0.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 10/11/19 | Draft Notice of Motion and Motion. | 0.60 | 0.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 10/9/19 | Continue research on Renewed fee motion paying particular attention to the Farrar standards even though this is not a "nominal" damages case. | 2.80 | 2.80 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| SAM | 10/9/19 | Continue drafting points and authorities. | 0.60 | 0.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 10/4/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 0.20 | 0.20 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 10/3/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 0.70 | 0.70 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 10/3/19 | Continue to draft the declaration in support of the renewed motion for attorney's fees. | 3.50 | 3.50 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 10/3/19 | Complete declarations and final edits/review of same. Additional research on evidence to support anticipated issues on appeal. | 4.20 | 4.20 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 10/2/19 | Continue work on Declaration in support of Renewed Fee motion. Fold in data and exhibits regarding categorization of costs. | 1.50 | 1.50 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| SAM | 10/2/19 | Research issue regarding success and catalyst for change in policy. | 1.40 | 1.40 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 10/2/19 | Continue drafting Renewed Motion for Fees and Costs. | 3.80 | 3.80 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 10/2/19 | Continue to draft the Declaration in Support of the renewed motion for attorney's fees. | 2.30 | 2.30 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 10/2/19 | Continue to draft the declaration in support of the renewed fee motion. | 1.70 | 1.70 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 10/2/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 1.20 | 1.20 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 10/2/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 0.60 | 0.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 10/1/19 | Reviewing Documents - Reviewing billing records for fee table for declaration regarding enmeshed and primarily merits fee entries | 0.50 | 0.50 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 10/1/19 | Continue to draft the classification fee table. | 2.50 | 2.50 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 10/1/19 | Draft the Renewed Declaration of Stephen Daner. | 0.50 | 0.50 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 9/30/19 | Continue to draft the time table, re: renewed motion for attorney fees. | 1.00 | 1.00 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/27/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 1.60 | 1.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/27/19 | Drafting Documents - Continue drafting fee table for declaration regarding enmeshed and separate statement fee entries | 0.40 | 0.40 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 9/26/19 | Drafting Documents - Continue drafting fee table for declaration regarding enmeshed and separate statement fee entries | 1.50 | 1.50 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/26/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 0.40 | 0.40 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/25/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees, inputting information from spreadsheet and argument re enmeshment of hours | 1.30 | 1.30 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/25/19 | Drafting Documents - Continue drafting fee table for declaration regarding enmeshed and separate statement fee entries | 1.30 | 1.30 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/25/19 | Drafting Documents - Start drafting fee table for declaration regarding enmeshed and separate statement fee entries | 1.60 | 1.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 9/25/19 | Reviewing Documents - Reviewing billing records for fee table for declaration regarding enmeshed and separate statement fee entries | 0.80 | 0.80 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/25/19 | Drafting Documents - Continue drafting fee table for declaration regarding enmeshed and separate statement fee entries | 0.90 | 0.90 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SDD | 9/24/19 | Review and organize my time entries for my declaration in support of the renewed fee motion. | 1.90 | 1.90 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/24/19 | Compare cost bill with Case file/events. Evaluate primary purpose, categorize same. Create spreadsheet depicting same. | 0.90 | 0.90 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/23/19 | Draft and circulate stipulation to continue due date for renewed motion for atty fees. | 0.30 | 0.30 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/23/19 | Continue work on Declaration in support of renewed fee motion. | 0.80 | 0.80 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| SAM | 9/23/19 | Detailed review and analysis of Cost bills. Compare cost item with underlying event to determine primary purpose and categorize. | 0.50 | 0.50 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/19/19 | Continue work on drafting McMillan Deci. In Support of Renewed Motion. | 3.20 | 3.20 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/19/19 | Research cases cited in Court's order regarding fees. Pay particular attention to supreme court cases | 0.60 | 0.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/17/19 | Continue work on drafting McMillan DecI. In Support of Renewed Motion. | 1.10 | 1.10 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/17/19 | Drafting Documents - Finish drafting and finalize declaration in support of Plaintiff's Renewed Motion for Attorney's Fees | 0.60 | 0.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/16/19 | Drafting Documents - Continue drafting declaration in support of Plaintiff's Renewed Motion for Attorney's Fees | 0.90 | 0.90 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| SAM | 9/16/19 | Review, edit, revise and annotate DECLARATION OF ADRIAN M. PARIS IN SUPPORT OF PLAINTIFF'S RENEWED MOTION FOR ATTORNEY'S FEES AND COSTS PURSUANT TO 42 U.S.C. §1988. Return to Adrian for amendment according to comments. | 1.40 | 1.40 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/16/19 | Work on drafting DECLARATION OF SHAWN A. MCMILLAN IN SUPPORT OF RENEWED MOTION FOR ATTORNEY'S FEES AND COSTS PURSUANT TO 42 U.S.C. §1988. | 2.70 | 2.70 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/16/19 | Review final draft of Adrian's decl in support of Renewed Motion for Attorney's fees. | 0.30 | 0.30 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| SAM | 9/15/19 | Continue work on analytical grid depicting three categories of billing entries subject to potential reduction. Those where there is a dual purpose between merits and class issues, those that are pure class issues, and those that are merits issues with a secondary use for class cert | 3.30 | 3.30 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/14/19 | Continue work on analytical grid depicting three categories of billing entries subject to potential reduction. Those where there is a dual purpose between merits and class issues, those that are pure class issues, and those that are merits issues with a secondary use for class cert | 4.30 | 4.30 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/13/19 | Continue detailed review and analysis of Exhibits L and M, as instructed by the Court. | 2.60 | 2.60 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/13/19 | Review and annotate billing entries as to which objections were made in relation to the prior fee motion where Plaintiff agrees to the objection/deduction and fold those reductions into the current fee claim to arrive a new adjusted totals. | 2.70 | 2.70 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| SAM | 9/13/19 | Create analytical grid depicting three categories of billing entries subject to potential reduction. Those where there is a dual purpose between merits and class issues, those that are pure class issues, and those that are merits issues with a secondary use for class cert. | 3.20 | 3.20 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/13/19 | Drafting Documents - Continue drafting declaration in support of Plaintiff's Renewed Motion for Attorneys Fees | 1.00 | 1.00 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/13/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 1.40 | 1.40 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/13/19 | Drafting Documents - Continue drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 1.10 | 1.10 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| AMP | 9/13/19 | Reviewing Documents - Reviewing extensive 4-year Meet and Confer history for declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 1.10 | 1.10 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |

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| AMP | 9/12/19 | Drafting Documents - Start drafting declaration in support of Plaintiffs Renewed Motion for Attorney's Fees | 1.00 | 1.00 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/12/19 | Continue working on draft of renewed motion for attorney's fees. | 2.10 | 2.10 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/12/19 | Begin detailed review and analysis of Exhibits L and M, as instructed by the Court. | 4.50 | 4.50 | Excessive | Renewed fee motion includes excessive time for preparation and should be reduced in proportion to the reductions of plaintiff's attorneys' fees. Attorneys have failed to articulate why spending thousands of hours was a necessary step to Plaintiff's victory in the underlying claims. |
| SAM | 9/7/19 | Begin drafting Renewed Motion for Attorney's fees. Pay particular attention to structure of motion to specifically address each of the Court's concerns as expressed in her order denying the original motion without prejudice. | 3.50 | 3.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/7/19 | Review court order denying motion for attorney's fees. | 0.20 | 0.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 5/2/19 | Draft short brief explaining the structure of Plaintiffs response to Defendants' blunderbus objections. | 2.20 | 2.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 5/1/19 | Continue to work on responding to Defendants' massive objections to fee declarations. Continue analysis of objections and respond to same. | 4.60 | 4.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 5/1/19 | Draft Response to Defendants' objections to Plaintiffs billing entries and agreement to the deduction of certain hours. | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 4/30/19 | Continue to work on responding to Defendants' massive objections to fee declarations. | 5.50 | 5.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 4/30/19 | Continue to work on responding to Defendants' massive objections to fee declarations. | 1.50 | 1.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 4/30/19 | Research - Research re attorneys' fees, training of junior associates, supervision of junior attorneys | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 4/29/19 | Begin responding to Defendants' massive objections to fee declarations. | 4.60 | 4.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 4/23/19 | Email to Doug, re: extension to respond to the fee table. | 0.20 | 0.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 4/23/19 | Draft stipulation to extend Plaintiffs response deadline, re: Defendant's Court Ordered Objections. | 0.90 | 0.90 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SDD | 4/22/19 | Email to Defense Counsel, re: extension to respond to Fee Objections | 0.20 | 0.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 4/4/19 | Review materials in preparation for oral argument on fee motion. | 3.50 | 3.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 4/3/19 | Assemble and review motion note books for oral argument on motion for prevailing party attorneys' fees. | 2.00 | 2.00 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 3/11/19 | Research issue of admissibility of settlement discussions. | 1.60 | 1.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 3/11/19 | Continue drafting reply in support of Fees. | 2.10 | 2.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 3/11/19 | Draft McMillan DecI. In support of Reply on fee motion. | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 3/11/19 | Research legal issues in support of the Reply brief, re: attorney fees. | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 3/11/19 | Continue to draft the declaration in support of the Attorney Fee Reply Brief. | 1.60 | 1.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 3/11/19 | Drafting Documents - Final revisions and finalize declaration submitted in support of reply<br>to fee motion | 0.60 | 0.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| AMP | 3/11/19 | Drafting Documents - Continue reviewing and editing objections to Smith Declaration based on Shawn's comments from review | 1.10 | 1.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 3/11/19 | Research - Research re settlement discussions used in declaration for proof of merit of Plaintiffs claim for objections to Smith Declaration | 0.80 | 0.80 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 3/10/19 | Review local rules regarding length of reply papers (12 page limitation). Continue work on Reply memorandum. Try to finish up draft. | 2.10 | 2.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 3/9/19 | Continue work on fee Reply. Fold in Adrian's and Steve's facts from their declarations. | 4.60 | 4.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 3/8/19 | Continue work on Reply in support of motion for prevailing party attorney's fees. | 1.10 | 1.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 3/8/19 | Continue to draft the Reply Declaration in support of the fee motion. | 1.70 | 1.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 3/8/19 | Assemble and prepare the final exhibits for the Reply Declaration in support of the fee motion. | 0.20 | 0.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 3/8/19 | Drafting Documents - Reviewing and editing objections to Smith Declaration based on Shawn's comments from review | 1.00 | 1.00 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SDD | 3/4/19 | Continue to draft the Reply DecI. In support of the Fee Motion Reply. | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 2/21/19 | Continue to draft the Reply Declaration in support of the fees motion. | 0.90 | 0.90 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/15/19 | Drafting Documents - Add in section to reply declaration in support of fee motion regarding McManus fee order | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/11/19 | Drafting Documents - Continue drafting objections to declaration of Douglas C. Smith re fee motion | 0.50 | 0.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/11/19 | Drafting Documents - Continue drafting objections to declaration of Douglas C. Smith re fee<br>motion based on Shawn's comments from review | 0.60 | 0.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/11/19 | Drafting Documents - Finish drafting reply declaration in support of fee motion | 0.20 | 0.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/11/19 | Reviewing Documents - Finish preparing and compiling exhibits for reply declaration filed in support of fee motion | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 2/11/19 | Draft declaration in support of the A.A. Fee Motion Reply. | 1.10 | 1.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 2/11/19 | Continue work on drafting reply in support of motion for fees and costs. | 1.80 | 1.80 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 2/11/19 | Review, edit, revise, and return Draft Objections to the Declaration of Doug Smith. | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/8/19 | Drafting Documents - Continue drafting objections to declaration of Douglas C. Smith re fee motion | 0.50 | 0.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/8/19 | Reviewing Documents - Continue preparing and compiling exhibits for reply declaration filed in support of fee motion | 0.80 | 0.80 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/6/19 | Drafting Documents - Draft joint stipulation to extend reply deadline and hearing date for attorneys' fees motion | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/6/19 | Drafting Documents - Draft proposed order for joint stipulation to extend reply deadline and hearing date for attorneys' fees motion | 0.10 | 0.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/6/19 | Drafting Documents - Start drafting objections to declaration of Douglas C. Smith re fee motion | 1.30 | 1.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/6/19 | Research - Research re use of settlement discussions for objections to declaration of Douglas C. Smith re fee motion | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/6/19 | Drafting Documents - Continue drafting reply declaration in support of fee motion | 0.90 | 0.90 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| AMP | 2/6/19 | Drafting Documents - Continue drafting objections to declaration of Douglas C. Smith re fee motion | 0.60 | 0.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/6/19 | Drafting Documents - Finish drafting and finalize joint stipulation and proposed order to extend reply deadline for attorneys fees motion | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/5/19 | Reviewing Documents - Continue preparing and compiling exhibits for reply declaration in support of fee motion | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 2/5/19 | Drafting Documents - Continue drafting reply declaration in support of fee motion | 0.60 | 0.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 1/29/19 | Reviewing Documents - Continue reviewing, preparing, and compiling exhibits for reply declaration in support of fee motion | 0.20 | 0.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 1/24/19 | Drafting Documents - Continue drafting reply declaration in support of fee motion | 1.40 | 1.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 1/24/19 | Reviewing Documents - Reviewing, preparing, and compiling exhibits for reply declaration in support of fee motion | 0.70 | 0.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 1/23/19 | Drafting Documents - Continue drafting reply declaration in support of fee motion | 1.10 | 1.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 1/23/19 | Continue work on drafting Reply in support of Motion for Attorneys Fees and Costs. | 1.50 | 1.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 1/22/19 | Begin to draft Reply in support of Motion for Attorneys Fees and Costs | 3.20 | 3.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 1/22/19 | Review the Case File for evidence to support the Reply in Support of the Fee Motion | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 1/22/19 | Drafting Documents - Continue drafting reply declaration in support of fee motion | 1.50 | 1.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 1/21/19 | Research Motion filings and court orders, re: enmeshed discovery is allowed. | 0.60 | 0.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 1/21/19 | Reviewing Documents - Reviewing personal participation in A.A. Discovery issues and Meet and Confer conferences for reply declaration in support of fee motion | 1.40 | 1.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 1/21/19 | Drafting Documents - Start drafting reply declaration in support of fee motion | 1.90 | 1.90 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 1/21/19 | Review opposing papers. Begin to outline objections to the Declaration of Doug Smith. | 2.10 | 2.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 1/21/19 | Research key cases cited by Defendants in opposition to fee motion. Look first for accuracy of interpretation, then for distinguishing features or later cases, but only if applicable. | 2.90 | 2.90 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 1/21/19 | Continue to research key cases cited by Defendants in opposition to fee motion. Look first for accuracy of interpretation, then for distinguishing features or later cases, but only if. applicable. | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 11/2/18 | Draft supplemental declaration of Shawn A. McMillan in support of motion for attorney's fees (time in drafting motion). | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 11/2/18 | Review, edit, revise, i.e., fold supp deci information into fee motion. | 0.70 | 0.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 11/2/18 | Draft Notice of Motion. Check local rule and chamber rules for obtaining hearing date. | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 10/30/18 | Drafting Documents - Finish drafting and finalize declaration in support of fee motion | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/29/18 | Draft Notice of Motion and Motion for Attorneys fees and costs, including proof of service and assembly of Chamber's copies, etc. | 1.30 | 1.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/29/18 | Continue putting together moving papers in support of Motion for Attorney's fees and costs. | 2.20 | 2.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 10/26/18 | Finish and finalize declaration in support of the fee motion. | 0.10 | 0.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SDD | 10/25/18 | Continue to draft the Declaration in support of the fee motion. | 0.60 | 0.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 10/24/18 | Continue to draft the declaration in support of Plaintiffs fee motion. | 2.40 | 2.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 10/23/18 | Continue to draft the Declaration in support of the Fee Motion | 0.70 | 0.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 10/16/18 | Continue to draft the Declaration in support of Attorney's fees. | 0.60 | 0.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 10/15/18 | Drafting Documents - Continue drafting declaration in support of fee motion | 0.80 | 0.80 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 10/15/18 | Continue to draft my declaration in support of the fee motion. | 0.50 | 0.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/15/18 | Review, edit, revise Declaration of Adnan Paris in support of fee motion. | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/15/18 | Continue working on points and authorities in support of fee motion. Incorporate figures and evidence from supporting declarations. | 1.40 | 1.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 10/13/19 | Continue work on drafting McMillan DecI. Review costs data accumulated by staff. Draft memorandum of costs. Incorporate data and exhibits into Declaration of Shawn A. McMillan in support of motion for fees and costs. | 3.30 | 3.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 10/12/18 | Begin to draft declaration in support of motion for attorney fees. | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 10/8/18 | Drafting Documents - Continue drafting declaration in support of fee motion | 0.90 | 0.90 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/8/18 | Continue working on declaration of Shawn A. McMillan for the portion where we are requesting recovery for costs | 1.30 | 1.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/8/18 | Continue working on Points and Authorities in Support of Fee Motion. | 1.30 | 1.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/8/18 | Review deposition evidence to find testimony to support the proposition that Riverside began to do a better job of training its social workers regarding warrants as a result of this litigation | 0.70 | 0.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/6/18 | Continue work on attorney fee motion. | 1.80 | 1.80 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 10/6/18 | Research proper method of presenting claim for costs in Central district. Also ascertain whether it is proper to include the request for costs within the fee motion itself. | 0.50 | 0.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| AMP | 10/5/18 | Drafting Documents - Start drafting declaration in support of fee motion | 0.50 | 0.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 10/4/18 | Continue work on points and authorities in support of fees and costs. Assimilate data from declarations into Ps&As. | 3.00 | 3.00 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/27/18 | Begin drafting template for supporting declaration of Robert Powell re: Reasonable value of fees in this case, in the Riverside venue. | 1.00 | 1.00 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/27/18 | Begin drafting template for supporting declaration of Donnie Cox re: Reasonable value of fees in this case, in the Riverside venue. | 0.70 | 0.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/27/18 | Draft template for Declaration of Stephen King in support of Motion for Attorneys fees and costs. | 1.20 | 1.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/26/18 | Continue work on drafting declaration in support of fee motion. | 2.70 | 2.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 9/25/18 | Begin work on drafting declaration in support of fee motion. | 2.60 | 2.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/25/18 | Continue to completion review and exercise of billing judgment on Amicus billing data. | 1.80 | 1.80 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/24/18 | Continue review of Abacus billing data and exercise billing judgment to ensure hours billed are correct. Create spreadsheet to tabulate billing entry reductions. May add in other reduction categories as I go through the Abacus billings. Will address Amicus billings separately. | 2.50 | 2.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/24/18 | Complete review of Abacus billing data and exercise billing judgment to ensure hours billed are correct. Create spreadsheet to tabulate billing entry reductions. May add in other reduction categories as I go through the Abacus billings. Will address Amicus billings separately | 1.10 | 1.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/24/18 | Begin review and exercise of billing judgment on Amicus billing data. | 1.00 | 1.00 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/23/18 | Continue review/critique of Abacus billing entries. | 2.70 | 2.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 9/23/18 | Review Abacus billing data and exercise billing judgment to ensure hours billed are correct. Create spreadsheet to tabulate billing entry reductions. May add in other reduction categories as I go through the Abacus billings. Will address Amicus billings separately. | 1.20 | 1.20 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/20/18 | Review Abacus fee bills. Begin process of assessing and cutting fees based on Hensley. | 0.50 | 0.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/20/18 | Continue work on motion for attorney's fees. | 2.70 | 2.70 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/20/18 | Continue research on fee motion. Restructure memorandum to incorporate same. | 0.40 | 0.40 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/19/18 | Continue work on motion for attorney's fees. Conduct further research on question of whether Plaintiffs counsel may recover for work on motions as to which Plaintiff did not prevail. | 1.10 | 1.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/18/18 | Continue work on motion for attorney's fees. Conduct further research on question of whether Plaintiffs counsel may recover for work on motions as to which Plaintiff did not prevail. | 1.10 | 1.10 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

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| SAM | 9/18/18 | Continue work on motion for attorney's fees. Conduct further research on question of whether Plaintiffs counsel may recover for work on motions as to which Plaintiff did not prevail | 0.60 | 0.60 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 9/18/18 | Continue to draft the Ps&As in support of the attorney fee motion. | 0.50 | 0.50 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 9/17/18 | Review the County's training timeline in relation to Plaintiffs lawsuit; for use in the fee motion, i.e., outstanding result. | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 9/17/18 | Continue to draft the request for attorney's fees. | 1.00 | 1.00 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SDD | 9/17/18 | Research class fees for attorney fee motion. | 0.30 | 0.30 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |
| SAM | 9/17/18 | Begin outline for Motion for Prevailing Party Attorneys fees and costs. | 0.80 | 0.80 | Excessive | Excessive in light of the Court's Order Denying Plaintiff's Motion for Attorneys' Fees. Attorney should not bill for a failed Motion for Attorneys' Fees. |

| OBJECTIONS TO BILLING ENTRIES IN "EXHIBIT A" TO ANKCORN DECLARATION | | | | | | |
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| **ATTY** | **DATE** | **DESCRIPTION** | **TIME CHALLENGED** | **REDUCE BY** | **OBJECTION** | **REASON FOR OBJECTION** |
| Mark Ankcorn | 10/13/14 | communication with co-counsel re: potential new matter | 0.80 | 0.80 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the communication specifically concerned. |
| Mark Ankcorn | 10/16/14 | review complaint in Rogers v. County of Riverside | 2.50 | 2.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br>Vague as to purpose of reviewing complaint in a related case relevant to this case. |
| Mark Ankcorn | 10/17/14 | drafting complaint, researching facts and law | 4.20 | 4.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 10/30/17 | meeting with Shawn McMillan | 1.30 | 1.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate what the meeting concerned. |
| Mark Ankcorn | 10/30/17 | Travel to French Valley for client meeting | 0.80 | 0.80 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |

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| Mark Ankcorn | 10/30/17 | meeting with client | 1.80 | 1.80 | Duplicative; Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate what the meeting concerned; Potentially duplicative as it is unclear whether this is a different meeting than of the meeting above with Shawn McMillan. |
| Mark Ankcorn | 10/30/17 | return travel from French Valley to office | 1.90 | 1.90 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 12/12/14 | finalize complaint and file via ECF | 4.60 | 4.60 | Clerical Excessive; Vague | Includes time spent on noncompensable clerical work;<br>Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory;<br>Fails to articulate what is meant by "finalize". |
| Mark Ankcorn | 12/12/14 | communication with co-counsel | 0.20 | 0.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory;<br>Fails to articulate what the communication entailed. |
| Mark Ankcorn | 12/15/14 | communication with co-counsel re: Press inquiries | 0.40 | 0.40 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory; Fails to articulate why press inquiries necessary for underlying claims. |

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| Mark Ankcorn | 12/15/14 | draft and file Certificate of Interested parties | 0.50 | 0.50 | Clerical; Excessive | Time includes noncompensable clerical work;<br>Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 12/16/14 | communication with co-counsel re: Case management and media strategy | 0.50 | 0.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 2/20/15 | communication with co-counsel re: Case management | 0.80 | 0.80 | Excessive Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what is meant by "case management" |
| Mark Ankcorn | 2/20/15 | review emails from opposing counsel re: Settlement discussions | 0.40 | 0.40 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 2/24/15 | prepare for meeting with opposing counsel | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what is meant by "prepare". |

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| Mark Ankcorn | 2/25/15 | meeting with Doug Smith and Jeb Brown, with Shawn McMillan re: Case Management | 3.00 | 3.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what is meant by "case management". |
| Mark Ankcorn | 2/25/15 | meeting with Shawn McMillan | 2.20 | 2.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory;<br><br>Fails to articulate what the meeting concerned. |
| Mark Ankcorn | 2/26/15 | review authorities re: Rule 23(b)(2) injunctive relief | 1.30 | 1.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory; Work only necessary for class claims. |
| Mark Ankcorn | 2/27/15 | review authorities, including *In re Online DVD Rental* (9th Cir., issued today) re class action settlement certification | 2.40 | 2.40 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory; Work only necessary for class claims. |
| Mark Ankcorn | 3/26/15 | email to counsel re: Rule 26 conference scheduling | 0.20 | 0.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. Vague as to whom the email sent and what specifically it was about. |

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| Mark Ankcorn | 4/3/15 | Rule 26 conference | 1.00 | 1.00 | Excessive; Duplicative | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Same event billed by Shawn McMillan. Attendance by both attorneys unnecessary to the underlying claims. |
| Mark Ankcorn | 4/6/15 | prepare Joint Discovery Report | 2.50 | 2.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 4/7/15 | further edits; communication with co-counsel re: Case management | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory;<br><br>Vague as to what was edited and what is meant by "case management." Appears to be block billing. |
| Mark Ankcorn | 4/7/15 | final edits to draft of Joint Discovery Report | 0.40 | 0.40 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 4/10/15 | finalize Joint Report, communications with opposing counsel and co-counsel; file via ECF with exhibit | 1.50 | 1.50 | Excessive; Vague; Clerical | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the communications entailed.<br><br>Includes noncompensable clerical work.<br><br>Includes block billing. |

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| Mark Ankcorn | 4/27/15 | travel to USDC for initial status conference | 1.80 | 1.80 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Same event billed by Shawn McMillan. Attendance by both attorneys unnecessary to the underlying claims. |
| Mark Ankcorn | 4/27/15 | confer with opposing counsel | 0.20 | 0.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory;<br><br>Vague as to failing to articulate what conversation was about. |
| Mark Ankcorn | 4/27/15 | appear at initial status conference | 1.80 | 1.80 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory;<br><br>Same event billed by Shawn McMillan. Attendance by both attorneys unnecessary to the underlying claims. |
| Mark Ankcorn | 4/27/15 | return travel to San Diego from USDC in Riverside | 1.60 | 1.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory;<br><br>Hearing also attended by Shawn McMillan. Attendance by both attorneys unnecessary to the underlying claims. |

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| Mark Ankcorn | 4/29/15 | communication with co-counsel re: Discovery | 0.60 | 0.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specifically discussed regarding discovery. |
| Mark Ankcorn | 5/1/15 | finalized and propound Interrogatories 1-4 re: DPSS records | 2.00 | 2.00 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Specifically, Interrogatories 1-4 requests to "identify all potential class members" and specific questions regarding those individuals. Renewed fee motion fails to articulate why this work was a necessary step for her ultimate victory. |
| Mark Ankcorn | 5/2/15 | email to opposing counsel re: Discovery of DPSS records | 0.60 | 0.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to the purpose of the email. |
| Mark Ankcorn | 5/6/15 | review and edit initial disclosures | 1.50 | 1.50 | Excessive; Duplicative | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Duplicative as attorney DBA billed for the same event. |

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| Mark Ankcorn | 5/20/15 | emails with opposing counsel re: Discovery | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specifically discussed regarding discovery. |
| Mark Ankcorn | 5/22/15 | call with Shawn McMillan re: Discovery and 827 issues | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 5/25/15 | email to opposing counsel re: Discovery of class list | 0.60 | 0.60 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. Work specific to class action. |
| Mark Ankcorn | 5/27/15 | review County of Riverside's discovery responses in Rogers | 2.50 | 2.50 | Duplicative; Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate how this work was necessary to underlying claim, and if solely necessary to individual claim why a class action attorney billing at $650 per hour needed to complete it. |

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| Mark Ankcorn | 6/12/15 | Letter to opposing counsel re: Objections to interrogatories | 3.30 | 3.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery attorney is referring. Assuming work related to Interrogatories 1-4, requests were to "identify all potential class members" and specific questions regarding those individuals. Renewed fee motion fails to articulate why this work was a necessary step for her ultimate victory in her underlying claims. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 6/16/15 | revise and update discovery dispute letter | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery attorney is referring. Assuming work related to Interrogatories 1-4, requests were to "identify all potential class members" and specific questions regarding those individuals. Renewed fee motion fails to articulate why this work was a necessary step for her ultimate victory in her underlying claims. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 6/16/15 | communication with co-counsel re: Discovery dispute letter | 0.30 | 0.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery attorney is referring. Assuming work related to Interrogatories 1-4, requests were to "identify all potential class members" and specific questions regarding those individuals. Renewed fee motion fails to articulate why this work was a necessary step for her ultimate victory in her underlying claims. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 6/16/15 | finalize and send Discovery Dispute Letter | 0.80 | 0.80 | Clerical; Excessive; Vague | Time includes noncompensable clerical work.Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery attorney is referring. Assuming work related to Interrogatories 1-4, requests were to "identify all potential class members" and specific questions regarding those individuals. Renewed fee motion fails to articulate why this work was a necessary step for her ultimate victory in her underlying claims. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 6/23/15 | prepare and file Notice of Related Case (AA) | 0.80 | 0.80 | Clerical; Excessive | Time includes noncompensable clerical work.Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. Notice of Related Case is a simple task, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 6/23/15 | call with co-counsel re: Discovery | 0.60 | 0.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery attorney is referring. If this work solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/10/15 | review Kirkpatrick v. Washoe Co., (9th Cir) released today | 1.30 | 1.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the purpose of this task was. If this work solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 7/10/15 | email to opposing counsel | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the purpose of this task was and what the email concerned. If this work solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/14/15 | prepare Plaintiffs portion of joint stipulation re discovery dispute | 3.50 | 3.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery attorney is referring. Assuming work related to Interrogatories 1-4, requests were to "identify all potential class members" and specific questions regarding those individuals. Renewed fee motion fails to articulate why this work was a necessary step for her ultimate victory in her underlying claims. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 7/14/15 | communication with co-counsel re: Joint Stip | 0.20 | 0.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery attorney is referring. Assuming work related to Interrogatories 1-4, requests were to "identify all potential class members" and specific questions regarding those individuals. Renewed fee motion fails to articulate why this work was a necessary step for her ultimate victory in her underlying claims. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/15/15 | prepare draft of consent letter | 2.80 | 2.80 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of consent letter. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/16/15 | revise Consent Letter | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of consent letter. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 7/16/15 | emails with opposing counsel re: Consent letter | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of consent letter. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/20/15 | meeting with Shawn McMillan and Steve Daner re: Discovery | 4.00 | 4.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of meeting and why class action attorney presence necessary to the underlying claims. |
| Mark Ankcorn | 7/20/15 | emails with opposing counsel re: Scheduling telephone conference | 0.20 | 0.20 | Excessive; Clerical | Time spent on noncompensable clerical work.<br><br>Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |
| Mark Ankcorn | 7/22/15 | review authorities re: Scope of Discovery and privacy | 3.30 | 3.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |

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| Mark Ankcorn | 7/22/15 | email to co-counsel and opposing counsel re: Consent letter | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of consent letter. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/22/15 | conference call re: Discovery | 0.30 | 0.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate who the call was with and what the conversation was about. |
| Mark Ankcorn | 7/22/15 | review authorities re: Federal preemption | 2.50 | 2.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what was actually researched and for what purpose. If solely related to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 7/26/15 | review subpoenas directed at Plaintiffs siblings' medical records | 1.30 | 1.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what was actually researched and for what purpose. If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/26/15 | communication with co-counsel re: Subpoenas by Riverside County | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case the task relates. If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/26/15 | review authorities re: Rule 45 | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case the task relates. If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 7/28/15 | draft objection letter; send to hospital | 1.50 | 1.50 | Clerical; Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case the task relates. If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/28/15 | review authorities re: Motion to quash | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case the task relates. If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/28/15 | communication with co-counsel re: Case management | 0.30 | 0.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what is meant by "case management." If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 7/28/15 | email to opposing counsel re: Subpoenas for medical records | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case the task relates. If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/28/15 | review email from Doug Smith; communication with co-counsel | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Entry contains block billing.<br><br>Vague as to what the email was about and what the communication was about. If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/29/15 | finalized Motion, notice of motion, declaration | 3.50 | 3.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what Motion was finalized. |

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| Mark Ankcorn | 7/30/15 | opposition to Ex Parte | 6.10 | 6.10 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what work was completed on the opposition. If related to Opposition filed on 7/30/15, the document related to a discovery dispute over plaintiff obtaining the "contact information for potential class members." Renewed fee motion fails to articulate why this task was necessary to the underlying claims. If related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 7/30/15 | review Ex Parte application by County of Riverside | 1.50 | 1.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case this task relates. Ex Parte application filed on 7/29/19 relates to discovery dispute of Interrogatories 1-4 seeking contact information for potential class members. Renewed fee motion fails to articulate why this discovery was necessary to the underlying claims. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 7/30/15 | errata notice for Motion to Compel | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what work was actually performed. Notice of Errata filed on this day was filed by Defendant making a simple correction of the assigned Judge. Renewed fee motion fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 8/4/15 | review draft Requests for Production to Karla Torres | 0.60 | 0.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 8/4/15 | review draft Requests for Admission to Karla Torres | 0.80 | 0.80 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 8/4/15 | review draft Interrogatories to Karla Torres | 0.60 | 0.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 8/18/15 | meeting with Shawn McMillan re: Case management | 2.30 | 2.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what is meant by "case management." |
| Mark Ankcorn | 8/19/15 | call with Shawn McMillan re: Reply brief for discovery motion | 0.60 | 0.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 8/20/15 | email to Doug Smith re: Medical records discovery | 0.30 | 0.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate what aspect of case this task pertains and why it would be necessary for the underlying claims. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 8/23/15 | draft reply brief for motion to compel | 2.80 | 2.80 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory. |
| Mark Ankcorn | 8/24/15 | emails with co-counsel re: Reply Brief | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory. |

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| Mark Ankcorn | 8/25/15 | Reply Brief for Motion to Compel; finalize and file | 5.00 | 5.00 | Clerical; Excessive; Vague | Time includes noncompensable clerical work. Vague as to what constitutes "finalize."<br><br>Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory. |
| Mark Ankcorn | 8/25/15 | emails with co-counsel re: Reply Brief | 0.50 | 0.50 | Clerical; Excessive; Vague | Vague as to what Reply Brief this task relates.<br><br>Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory. |

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| Mark Ankcorn | 9/7/15 | prepare for hearing on Motion to Compel | 3.00 | 3.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory. |
| Mark Ankcorn | 9/8/15 | travel to USDC in Riverside | 2.00 | 2.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory.<br><br>Vague also as to what the travel was for. |

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| Mark Ankcorn | 9/8/15 | hearing on Motion to Compel | 1.00 | 1.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory. |
| Mark Ankcorn | 9/8/15 | return travel to San Diego | 2.00 | 2.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery motion task relates. If pertaining to Motion to Compel filed on 7/29/15, motion seeking responses to Interrogatories 1-4 which requests contact information for potential class members. Renewed fee motion failed to articulate why this discovery motion was a necessary step for her ultimate victory.<br><br>Vague also as to what the travel was for. |

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| Mark Ankcorn | 9/20/15 | review draft Interrogatories 5 -17 to County | 0.60 | 0.60 | Duplicative; Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate to whom the discovery is directed. ROGs 5-17 seeks identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was a necessary step for her ultimate victory and how it is not duplicative of discovery already obtained in related case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 9/21/15 | review draft of Interrogatories 5-17 | 1.50 | 1.50 | Duplicative; Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate to whom the discovery is directed. ROGs 5-17 to the County seeks the identities of all social workers from January 1, 1995 to December 31, 2014 that meet certain enumerated criteria. Renewed fee motion fails to articulate why this discovery was a necessary step for her ultimate victory and how it is not duplicative of discovery already obtained in related case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 9/21/15 | review Requests for Admission 1-120 | 1.30 | 1.30 | Duplicative; Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate to whom the discovery is directed. RFA's to County 1-132 primarily sought admissions regarding the County's training and policies, which is duplicative of discovery already sought and obtained in the related *Rogers* case, RFA's Set One received on March 16, 2015. Renewed fee motion fails to articulate why this set of discovery was a necessary step for her ultimate victory and how it is not duplicative of discovery already obtained in related case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 9/21/15 | prepare Joint Motion and Stipulation for Stay of Discovery | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate what aspect of the case this task pertains. It appears no such document was filed with the court. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 9/21/15 | review authorities re: Objection to Magistrate Order on non-dispositive matters | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what Order attorney is referring. Presuming Order issued 9/11/15, Order pertains to discovery interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 9/22/15 | review Requests for Production to County; email to co-counsel with revisions | 2.50 | 2.50 | Excessive; Vague; Duplicative | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what set of RFPs attorney is referring. Renewed fee motion fails to articulate why this set of discovery was a necessary step for her ultimate victory and how it is not duplicative of discovery already obtained in related case. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |

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| Mark Ankcorn | 9/24/15 | revise and update Joint Motion and Stipulation; emails with opposing counsel | 1.20 | 1.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Fails to articulate what aspect of the case this task pertain; does not specify what Motion and Stipulation this work relates. If this task related primarily to individual claims as alleged, fails to articulate why a class action attorney billing at $650 per hour needed to complete this task. |
| Mark Ankcorn | 10/2/15 | review draft of opposition to County's Objection to Order Compelling discovery | 1.30 | 1.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery order and objection attorney is referring. Presuming regarding Order issued 9/11/15, Order pertains to discovery interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. |

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| Mark Ankcorn | 10/26/15 | travel to and from Riverside for motion hearing | 4.00 | 4.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what motion hearing attorney is referring. Per docket, motion hearing regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims.<br><br>Event also billed by attorney SDD. Renewed motion fails to articulate why it was necessary for two attorneys to attend a discovery hearing. |
| Mark Ankcorn | 10/26/15 | prepare for hearing; meeting with co-counsel | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what motion hearing attorney is referring. Per docket, motion hearing regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims.<br><br>Event also billed by attorney SDD. Renewed motion fails to articulate why it was necessary for two attorneys to attend a discovery hearing. |

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| Mark Ankcorn | 10/26/15 | appear at motion hearing | 1.30 | 1.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what motion hearing attorney is referring. Per docket, motion hearing regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims.<br><br>Event also billed by attorney SDD. Renewed motion fails to articulate why it was necessary for two attorneys to attend a discovery hearing. |
| Mark Ankcorn | 11/2/15 | review order on objection to Motion to Compel | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what document the attorney is referring. Per docket, ruling in favor of Defendant on 11/2/15 is regarding interrogatories 1-4, which sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. |

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| Mark Ankcorn | 11/2/15 | review resources re: CWS/CMS and CWS-NS on State's website | 1.10 | 1.10 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of task. Renewed motion fails to articulate why this task was a necessary step for the underlying claims and why it was necessary for a class action attorney billing at $650 per hour complete it. |
| Mark Ankcorn | 11/2/15 | communication with co-counsel re: Discovery | 0.30 | 0.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the communication entailed. |
| Mark Ankcorn | 11/13/15 | prepare draft of Joint Stipulation and Motion to Extend Deadlines | 1.60 | 1.60 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Document relates to extending class discovery deadlines. Renewed fee motion fails to articulate why this was a necessary step to the underlying claims. |
| Mark Ankcorn | 11/13/15 | email to opposing counsel with proposed joint motion | 0.20 | 0.20 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Document relates to extending class discovery deadlines. Renewed fee motion fails to articulate why this was a necessary step to the underlying claims. |

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| Mark Ankcorn | 11/13/15 | emails with co-counsel re: Communication with client | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case this pertains and what the communication pertained to. |
| Mark Ankcorn | 11/16/15 | revise and file Joint Stipulation to Amend Scheduling Order | 0.60 | 0.60 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Document relates to extending class discovery deadlines. Renewed fee motion fails to articulate why this was a necessary step to the underlying claims. |
| Mark Ankcorn | 11/16/15 | emails with opposing counsel | 0.30 | 0.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the emails concerned |
| Mark Ankcorn | 11/16/15 | review chambers procedures for motions | 0.20 | 0.20 | Excessive | Time includes noncompensable clerical work or simple task. Attorney should not charge for simple tasks. |
| Mark Ankcorn | 11/25/15 | review draft subpoena to state re CSW | 0.70 | 0.70 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case this task pertains. Renewed motion fails to articulate why this task was a necessary step to the underlying claims. |

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| Mark Ankcorn | 11/25/15 | investigate state database as reported by researchers at UC Berkeley | 2.00 | 2.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case this task pertains. Renewed motion fails to articulate why this task was a necessary step to the underlying claims. |
| Mark Ankcorn | 12/8/15 | Meeting with cocounsel re case management and discovery | 2.20 | 2.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what is meant by "case management" and what was discussed regarding the broad category of "discovery". |
| Mark Ankcorn | 12/9/15 | Review draft of 30(b)(6) deposition notice re CMS | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed motion fails to articulate why this deposition was a necessary step to the underlying claims. |
| Mark Ankcorn | 12/16/15 | draft letter to Doug Smith re: responses to Interrogatories 1-4 | 1.30 | 1.30 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Interrogatories 1-4 sought to obtain contact information for potential class members. Renewed motion fails to articulate why this discovery was a necessary step for the underlying claims. |

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| Mark Ankcorn | 12/18/15 | Review discovery dispute letter to Paul Burkhart re: Torres responses | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what set of discovery this task pertains. Renewed motion fails to articulate why it was necessary for a class action attorney billing at $650 per hour complete this task, if the discovery pertained primarily to individual claims as alleged. |
| Mark Ankcorn | 12/18/15 | Review draft interrogatories to Butler re: Identification of social workers | 0.30 | 0.30 | Duplicative; Excessivee; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what set of interrogatories this task pertains. Interrogatories to Butler 1-6 seeks information regarding all social workers supervised by her between 1995-2015 meeting certain criteria. Renewed fee motion fails to articulate why this discovery was a necessary step for the underlying claims. If discovery pertained primarily to the individual claims as alleged, fee motion fails to articulate why it was necessary for a class action attorney billing at $650 per hour to complete this task. |
| Mark Ankcorn | 2/29/16 | meeting with co-counsel re: Discovery | 1.30 | 1.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific discovery the meeting pertained. If discovery pertained primarily to the individual claims as alleged, fee motion fails to articulate why it was necessary for a class action attorney billing at $650 per hour to complete this task. |

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| Mark Ankcorn | 3/3/16 | prepare deposition notice template for social worker employees | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case this task pertains. If discovery pertained primarily to the individual claims as alleged, fee motion fails to articulate why it was necessary for a class action attorney billing at $650 per hour to complete this task. |
| Mark Ankcorn | 3/3/16 | email to co-counsel re: deposition notices for social worker employees | 0.20 | 0.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case this task pertains. If discovery pertained primarily to the individual claims as alleged, fee motion fails to articulate why it was necessary for a class action attorney billing at $650 per hour to complete this task. |
| Mark Ankcorn | 6/10/16 | review Maldonado deposition | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what was actually reviewed, who Maldonado is and how it relates to this case. If task pertained primarily to the individual claims as alleged, fee motion fails to articulate why it was necessary for a class action attorney billing at $650 per hour to complete this task. |

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| Mark Ankcorn | 6/10/16 | review supplemental filing by Riverside County; confer with co-counsel | 0.80 | 0.80 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what specific document the attorney is referring. If task pertained primarily to the individual claims as alleged, fee motion fails to articulate why it was necessary for a class action attorney billing at $650 per hour to complete this task. |
| Mark Ankcorn | 6/30/16 | Draft memorandum in support of motion to certify class | 3.60 | 3.60 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 7/11/16 | Continue to edit and revise class certification brief | 2.50 | 2.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Ann Marie Hansen | 7/12/16 | Continue to edit and revise class certification brief | 7.30 | 7.30 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 7/14/16 | Continue to edit and revise class certification brief | 2.00 | 2.00 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 7/15/16 | Pull cites re: warrant policy enactment in support of motion to strike | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what aspect of the case the task pertains. Fee motion fails to articulate why work related to motion to strike was a necessary step to the underlying claims. |
| Ann Marie Hansen | 8/8/16 | Draft class certification motion | 3.50 | 3.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Ann Marie Hansen | 10/25/16 | review authorities re: pre-certification discovery of absent class members | 2.50 | 2.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 3/17/17 | Review and analyze motion for class certification | 0.70 | 0.70 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 3/23/17 | Review and analyze Gravenberg Deposition | 1.10 | 1.10 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 3/30/17 | Review cases re: class certification | 0.50 | 0.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Ann Marie Hansen | 3/30/17 | Continue to review discovery | 0.50 | 0.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery was reviewed and for what purpose the review was completed. |
| Ann Marie Hansen | 4/10/17 | Review and analyze Maldonado Deposition | 2.50 | 2.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 4/11/17 | Review and analyze Pittman deposition | 2.50 | 2.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 4/11/17 | Review and analyze Snuggs deposition | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |

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| Ann Marie Hansen | 4/11/17 | Review and analyze Puentes II Deposition | 2.20 | 2.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 4/12/17 | Review and analyze Butler deposition | 3.60 | 3.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 4/12/17 | Review and analyze discovery responses and motions to compel same | 2.00 | 2.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what discovery was reviewed and for what purpose the review was completed. |
| Ann Marie Hansen | 4/13/17 | Pull class certification cases from Lexis | 0.50 | 0.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Ann Marie Hansen | 4/17/17 | Review and analyze Puentes Deposition | 2.00 | 2.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 4/17/17 | Begin to review and analyze Saldana Deposition | 2.00 | 2.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 4/17/17 | Review and analyze Torres Deposition | 3.10 | 3.10 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 5/22/17 | Strategize with M. Ankcorn | 0.20 | 0.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the meeting entailed and what aspect of the case it pertained. |

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| Ann Marie Hansen | 6/5/17 | Continue to work on motion for class certification | 3.00 | 3.00 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 6/6/17 | Continue to work on class certification brief | 5.50 | 5.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 6/6/17 | Continue to work on class certification brief | 4.30 | 4.30 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 6/6/17 | confer with co-counsel re Class Certification issues | 0.70 | 0.70 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Mark Ankcorn | 6/7/17 | conference call re: discovery | 1.00 | 1.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to whom the call was with and what the conversation entailed. |
| Ann Marie Hansen | 6/12/17 | Review and summarize O'Boyle Deposition | 2.50 | 2.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and summary was completed. |
| Ann Marie Hansen | 6/12/17 | Review and analyze Gravenberg Deposition Volume II | 1.60 | 1.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 6/12/17 | Review and summarize Pittman Deposition Vol. II | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |

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| Ann Marie Hansen | 6/12/17 | Edit and revise motion to certify class to include Pittman's recent deposition | 0.80 | 0.80 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 6/12/17 | Review and summarize deposition of S. Williams | 2.60 | 2.60 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and summary was completed. |
| Ann Marie Hansen | 6/12/17 | Continue to edit and revise motion to certify dass | 2.30 | 2.30 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 6/14/17 | Continue to draft motion to certify class | 6.10 | 6.10 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Ann Marie Hansen | 6/17/17 | Review comments and suggestions to motion to certify class | 0.70 | 0.70 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 6/22/17 | Strategize with M. Ankcorn | 0.20 | 0.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the meeting entailed and what aspect of the case it pertained. |
| Ann Marie Hansen | 6/22/17 | Draft motion to consolidate | 4.00 | 4.00 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br><br>Per Motion to Consolidate Plaintiff sought consolidation of the A.A. and P.H. lawsuits "solely for the purposes of moving for class certification and for no other purpose." Renewed fee motion fails to articulate how time spent seeking consolidation should now be considered a necessary step to the underlying claims. |

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| Mark Ankcorn | 6/25/17 | revise and finalize motion to consolidate, notice, and declaration of Shawn McMillan | 1.40 | 1.40 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br><br>Per Motion to Consolidate Plaintiff sought consolidation of the A.A. and P.H. lawsuits "solely for the purposes of moving for class certification and for no other purpose." Renewed fee motion fails to articulate how time spent seeking consolidation should now be considered a necessary step to the underlying claims. |
| Mark Ankcorn | 6/27/17 | Finalize review of Saldana Deposition; continue to draft motion to certify class | 2.30 | 2.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims.<br><br>Entry contains block billing. |
| Mark Ankcorn | 7/3/17 | Email correspondences re: co-counsel re: class certification brief | 0.20 | 0.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Ann Marie Hansen | 7/10/17 | Review opposition to motion to consolidate and draft reply to same | 2.50 | 2.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br><br>Per Motion to Consolidate Plaintiff sought consolidation of the A.A. and P.H. lawsuits "solely for the purposes of moving for class certification and for no other purpose." Renewed fee motion fails to articulate how time spent seeking consolidation should now be considered a necessary step to the underlying claims. |
| Ann Marie Hansen | 7/10/17 | Begin to review and analyze Shackleford deposition | 2.20 | 2.20 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Mark Ankcorn | 7/10/17 | Reply brief for motion to consolidate | 5.20 | 5.20 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br><br>Per Motion to Consolidate Plaintiff sought consolidation of the A.A. and P.H. lawsuits "solely for the purposes of moving for class certification and for no other purpose." Renewed fee motion fails to articulate how time spent seeking consolidation should now be considered a necessary step to the underlying claims. |

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| Ann Marie Hansen | 7/11/17 | Continue to review and analyze Shackleford deposition | 2.00 | 2.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 7/11/17 | Review and analyze Armijo deposition | 1.00 | 1.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 7/11/17 | Continue to edit and revise class certification brief | 2.50 | 2.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 7/12/17 | Continue to edit and revise class certification brief | 7.00 | 7.00 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Mark Ankcorn | 7/12/17 | review authorities re: class definition | 1.10 | 1.10 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 7/12/17 | communication with clients' guardian ad litem Erik Holmes | 0.30 | 0.30 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the communication entailed. |
| Mark Ankcorn | 7/12/17 | prepare declaration for Erik Holmes | 0.30 | 0.30 | Excessive Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of preparing said declaration.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Mark Ankcorn | 7/14/17 | review declaration of Paul Burkhart | 0.70 | 0.70 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of reviewing said declaration.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 7/14/17 | communication with co-counsel | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the communication entailed |
| Ann Marie Hansen | 7/14/17 | Continue to edit and revise class certification brief | 2.00 | 2.00 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Ann Marie Hansen | 7/15/17 | Review e-mail from M. Ankcorn and pull cites re: warrant enactment policy | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of task. Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 7/16/17 | review authorities re: Typicality and Commonality in Ninth Circuit | 2.50 | 2.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 7/16/17 | Ex Parte Application to Strike Deposition Errata and Declaration of Counsel | 3.00 | 3.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what work was done and for what purpose.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Mark Ankcorn | 7/17/17 | prepare declaration and exhibits, file application and memorandum | 1.10 | 1.10 | Clerical Excessive; Vague | Time includes noncompensable clerical work;<br><br>Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what the declaration was for. Entry contains block billing. |
| Mark Ankcorn | 7/17/17 | confer with co-counsel re Class Certification issues | 0.30 | 0.30 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 7/24/17 | Travel to hearing on motion | 4.00 | 4.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br>Vague as to what motion was being heard. Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Mark Ankcorn | 7/24/17 | Hearing on motion to consolidate | 0.50 | 0.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br><br>Per Motion to Consolidate Plaintiff sought consolidation of the A.A. and P.H. lawsuits "solely for the purposes of moving for class certification and for no other purpose." Renewed fee motion fails to articulate how time spent seeking consolidation should now be considered a necessary step to the underlying claims. |
| Mark Ankcorn | 7/24/17 | Return travel to San Diego | 3.50 | 3.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of travel. |
| Ann Marie Hansen | 7/24/17 | Review and analyze Kissleburg deposition | 3.50 | 3.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |
| Ann Marie Hansen | 7/25/17 | Continue to review and analyze Kissleburg deposition | 0.80 | 0.80 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to for what purpose the review and analysis was completed. |

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| Mark Ankcorn | 7/31/17 | revise Motion for Class Certification | 5.80 | 5.80 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 8/1/17 | revise Motion for Class Certification | 4.20 | 4.20 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 8/3/17 | review authorities re: Rule 23(b)(l) | 0.70 | 0.70 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Rule 23 is regarding class actions. Renewed fee motion fails to articulate how time spent researching Rule 23 was a necessary step to the underlying claims. |
| Mark Ankcorn | 8/3/17 | Calls with co-counsel re: class certification motion | 1.00 | 1.00 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Mark Ankcorn | 8/4/17 | revise Class Cert Motion | 4.20 | 4.20 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 8/4/17 | Review and analyze revised motion for class certification | 1.10 | 1.10 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 8/5/17 | review drafts and supplement | 1.50 | 1.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what drafts and supplement were reviewed and for what purpose. |
| Mark Ankcorn | 8/6/17 | review drafts and supplement, email to co-counsel | 2.50 | 2.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what drafts and supplement were reviewed and for what purpose. Entry contains block billing. |

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| Mark Ankcorn | 8/7/17 | review declaration, emails with co-counsel | 0.40 | 0.40 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to what declaration was reviewed and for what purpose. Vague as to what the emails concerned. Entry contains block billing. |
| Ann Marie Hansen | 8/7/17 | Review and analyze revised motion for class cert and statement of facts | 1.60 | 1.60 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 9/14/17 | Reply Brief in support of class certification | 9.30 | 9.30 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 9/15/17 | Reply Brief in support of class certification | 4.50 | 4.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Ann Marie Hansen | 9/18/17 | Reply Brief ISO class certification | 3.20 | 3.20 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Ann Marie Hansen | 9/19/17 | Edit and revise Reply, including Table of Contents and Authorities | 3.30 | 3.30 | Clerical Excessive; Vague | Time includes noncompensable clerical work; Vague as to what document the attorney is referring.<br><br>Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 11/5/17 | prepare for hearing on class cert motion | 1.50 | 1.50 | Excessive | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |

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| Mark Ankcorn | 11/6/17 | travel to and from USDC First Street Courthouse | 5.00 | 5.00 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory.<br><br>Vague as to purpose of travel.<br><br>Renewed fee motion fails to articulate how time spent preparing a motion for class certification was a necessary step to the underlying claims. |
| Mark Ankcorn | 11/6/17 | appear at hearing on Class cert motion | 1.20 | 1.20 | Excessive | Time spent by retained class action attorney on class certification work. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |
| Ann Marie Hansen | 11/15/17 | Draft motion to amend scheduling order for class cert motion | 4.50 | 4.50 | Excessive; Vague | Time spent by retained class action attorney. Renewed fee motion fails to articulate why obtaining expertise and work from a class action attorney was a necessary step for her ultimate victory. |

| OBJECTIONS TO NOAH MESSING, ESQ. AND PHILLIP SPECTOR, ESQ.BILLING | | | | | | |
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| Noah Messing | unknown | Prepare 23 (f) petition | 49.40 | 49.40 | Excessive Vague | Time spent on appealing class certification denial, preparing 23(f) petition not necessary to victory on individual claims.<br>Vague as to Attorney failing to attach in Renewed Motion for Attorneys' Fees itemized exhibit of hours spent. |
| Phillip Spector | unknown | Prepare 23 (f) petition | 62.47 | 62.47 | Excessive: Vague | Time spent on appealing class certification denial, preparing 23(f) petition not necessary to victory on individual claims.<br>Vague as to Attorney failing to attach in Renewed Motion for Attorneys' Fees itemized exhibit of hours spent. |