

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-20-2012	J. BLAIR	MEET WITH A. GRESSETT, REVIEW HER RECORDS	1.1	380.00	\$418.00			
08-01-2012	J. BLAIR	STUDY GRESSETT FILE, INCLUDING RECENT ORDER	0.5	380.00	\$190.00			
08-03-2012	J. BLAIR	TELEPHONE CALL WITH A. GESSETT [Privileged Communication]	1.2	380.00	\$456.00			
08-03-2012	J. BLAIR	REVIEW GRESSETT MATERIALS	0.2	380.00	\$76.00			
08-09-2012	J. BLAIR	LEARN WHAT I CAN REGARDING GRESSETT LITIGATION, EMAIL EXCHANGE WITH MS. GRESSETT	0.9	380.00	\$342.00	Block billing	First entry (.8); second entry (.1). (Ms. Gressett's counsel has retained all of these emails.)	
08-10-2012	J. BLAIR	TELEPHONE CALLS AND EMAILS WITH A. GRESSETT [Privileged Communication]	0.8	380.00	\$304.00			
08-10-2012	J. BLAIR	ANALYZE GRESSETT CLAIMS AND DEFENSES IN HOUSE WITH ATTORNEY MCDOWELL AND ATTORNEY MESAROS, RELATED EMAILS TO THE FILE	0.8	380.00	\$243.20	Internal Conference; Block billing	First entry, to confirm RCDM would agree to the representation by internal partners' meeting (.6); second entry (.2).	Block billing; reduced by 20%.
08-14-2012	J. BLAIR	EMAIL TO A. GRESSETT [Privileged Communication]	0.7	380.00	\$266.00			
08-15-2012	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.6	380.00	\$228.00			
08-15-2012	J. BLAIR	DISCUSS CLAIMS AND DEFENSES WITH T. COOK	0.5	380.00	\$190.00	Internal Conference	Analysis with trial counsel whether case can be prosecuted.	
08-15-2012	T. COOK	STUDY CASE DOCUMENTS, STATUTES, FACTUAL ALLEGATIONS AND OUTLINE ISSUES IN CASE AND STRENGTHS/WEAKNESSES TO ASSESS WHETHER TO TAKE OR NOT	2.5	380.00	\$950.00			
08-15-2012	T. COOK	CONTINUE STUDY OF DOCUMENTATION PRODUCED BY CLIENT, CONFER WITH ATTORNEY BLAIR, CONFERENCE WITH PROSPECTIVE CLIENT	3.5	380.00	\$1,064.00	Block billing, internal conference	First entry (3.0); second entry (.5) (discussed above).	Block billing; reduced by 20%.
08-16-2012	J. BLAIR	EMAIL EXCHANGE REGARDING REPRESENTATION, UNDERLYING FACTS	0.2	380.00	\$76.00	Vague	Email exchange with Plaintiff Amie Gressett (privileged communication).	
08-16-2012	J. BLAIR	REVIEW UNDERLYING FACTS FROM MATERIALS SENT BY A. GRESSETT	0.3	380.00	\$114.00			
08-16-2012	J. BLAIR	STUDY FMLA LAW AS APPLICABLE TO A. GRESSETT CLAIMS	0.3	380.00	\$114.00	Background research	Attorney Blair's .3 time entry is to apply FMLA law to the Gressett claims. It is not background research.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-16-2012	T. COOK	STUDY COMPLAINT, MOTION TO DISMISS, RESPONSE, COURT ORDER DENYING SAME, CREATE TIMELINE OF ALL EVENTS WITH DETAILED CONTENT OF SAME TO TRACK HOW EVENTS UNFOLDED TO IDENTIFY WHERE THINGS WENT WRONG, WHERE EMPLOYER VIOLATED FMLA AND POSSIBLY AMERICANS WITH DISABILITIES ACT, BEGIN DETAILED RESEARCH OF LAW AND REGULATIONS FOR FMLA AND AMERICANS WITH DISABILITIES ACT	8.3	380.00	\$2,523.20	Block billing, background research, excessive	First entry (.4); second entry (.4); third entry (.3); fourth entry (.2); fifth entry (timeline) (6.2); and last entry (.8). As to the research criticism, this time entry is absolutely necessary at the outset of litigation. As to this being an excessive charge, a full day's work should never be considered an excessive charge.	Block billing; reduced by 20%.
08-20-2012	J. BLAIR	STUDY MATERIALS FROM HER FORMER ATTORNEY, CONSIDER OPTIONS FOR REPRESENTATION OF MS. GRESSETT, TELEPHONE CALLS AND EMAILS WITH HER AND T. COOK	1.5	380.00	\$456.00	Block billing, excessive, vague	First entry (.4); second entry (.7); third entry (.4). As to this entry being excessive, there is no basis for that criticism, as for it being vague, the vagueness is due to privileged communications between RCDM and Ms. Gressett.	Block billing; reduced by 20%.
08-20-2012	T. COOK	STUDY EMAIL FROM CLIENT PROSPECT WITH QUESTIONS TO CLARIFY WHAT WE WILL AND WILL NOT DO WITH/FOR HER RELATING TO THE CASE AND HER INVOLVEMENT WITH THE BAR	0.1	380.00	\$38.00	Unrelated to case.	This time entry is absolutely related to the matter litigated before this Court, clarifying for Ms. Gressett (not an attorney) what RCDM could and could not do on her behalf.	
08-21-2012	J. BLAIR	REVIEW WITHDRAWAL LETTER FROM COUNSEL	0.2	380.00	\$76.00	Excessive	Securing an understanding of prior counsel's withdrawal is hardly excessive at .2.	
08-21-2012	J. BLAIR	REVIEW EXCHANGE BETWEEN T. COOK AND A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
08-29-2012	T. COOK	SEND EMAIL TO PLAINTIFF CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
09-07-2012	J. BLAIR	EMAIL AND TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.1	380.00	\$38.00			
09-10-2012	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
09-11-2012	J. BLAIR	TELEPHONE CALLS AND EMAILS WITH A. GRESSETT [Privileged Communication]	0.6	380.00	\$228.00			
09-12-2012	J. BLAIR	RESEARCH LOUDERMILL DECISION	0.3	380.00	\$114.00			
09-14-2012	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
09-18-2012	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.1	380.00	\$38.00			
09-19-2012	J. BLAIR	SET UP MEETING WITH T. COOK REGARDING A. GRESSETT'S REPRESENTATION	0.0	380.00	\$0.00	Clerical	This is a series of phone calls and emails that far exceeded .2.	Clerical

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-27-2012	T. COOK	MEETING WITH ATTORNEY MESAROS, MCDOWELL, BLAIR REGARDING NEW PLAINTIFF CASE REGARDING FMLA VIOLATION	1.6	380.00	\$608.00	Internal Conference	This is RCDM's method for determining what plaintiff cases it will take and what cases it will not take. Note that none of the other RCDM attorneys charged for this time.	
09-28-2012	J. BLAIR	PORTION OF MEETING WITH A. GRESSETT [Privileged Communication]	1.5	380.00	\$570.00	Vague	Vague because it is privileged.	
09-28-2012	T. COOK	REVIEW FILE MATERIALS FOR CONTENT AND MISSING INFORMATION TO AID WITH PROCEEDING WITH CLAIMS AND POSSIBLY ADDING MORE	1.5	380.00	\$570.00	Vague	This is basic file review in aid of discovery and/or amendments.	
09-28-2012	T. COOK	LENGTHY MEETING WITH CLIENT [Privileged Communication]	2.0	380.00	\$760.00			
09-29-2012	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
09-29-2012	T. COOK	RESEARCH AMERICANS WITH DISABILITIES ACT AS POSSIBLE CLAIM TO ADD TO THIS CASE	3.0	380.00	\$1,140.00	Background research, Excessive	This is what any good attorney would do early in a case to consider additional claims and their impact on existing claims. Early research like this cannot be considered excessive.	
09-29-2012	T. COOK	RESEARCH FMLA AND CASE LAW FOR SCOPE OF DAMAGES PERMITTED	2.0	380.00	\$760.00	Background research, Excessive	This is what any good attorney would do early in a case to consider additional claims and their impact on existing claims. Early research like this cannot be considered excessive.	
09-29-2012	T. COOK	RESEARCH RETALIATION CLAIM	1.5	380.00	\$570.00	Background research, Excessive	This is what any good attorney would do early in a case to consider additional claims and their impact on existing claims. Early research like this cannot be considered excessive.	
09-29-2012	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
09-29-2012	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
09-29-2012	T. COOK	PREPARE REPORT TO CLIENT WITH CC TO J. BLAIR [Privileged Communication]	0.9	380.00	\$342.00			
09-29-2012	T. COOK	REPORTS TO FILE/BLAIR REGARDING ADDITIONAL ANALYSIS OF AMERICANS WITH DISABILITIES ACT AND RETALIATION CLAIMS	0.6	380.00	\$228.00			
10-01-2012	J. BLAIR	ANALYZE SUMMARY MATERIALS FROM T. COOK REGARDING A. GRESSETT CLAIMS	0.6	380.00	\$228.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-01-2012	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-08-2012	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-08-2012	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative	Separate email.	
10-08-2012	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative	Separate email.	
10-08-2012	T. COOK	DRAFT DISCOVERY TO DEFENDANT	0.9	380.00	\$342.00			
10-15-2012	T. COOK	EMAIL EXCHANGE WITH DEFENDANT COUNSEL REGARDING THEIR RULE 26 REQUIREMENTS	0.3	380.00	\$114.00			
10-15-2012	T. COOK	STUDY EMAIL FROM DEFENDANT COUNSEL REGARDING RULE 16 REPORT DUE	0.1	380.00	\$38.00	Duplicative of above	Separate time entry as to Rule 16.	
10-15-2012	T. COOK	CONFER WITH ATTORNEY BLAIR REGARDING AREAS WHERE AMENDMENT TO COMPLAINT MAY BE WARRANTED	0.3	380.00	\$114.00	Internal Conference	Attorney Blair did not charge for this discussion.	
10-16-2012	T. COOK	SELECT DATES AND EMAIL TO PLAINTIFF'S ATTORNEY FOR RULE 16 MEMORANDUM	0.4	380.00	\$152.00	Excessive	Select dates (.2); email (.2).	
10-16-2012	T. COOK	DRAFT JOINT PROPOSED CASE MANAGEMENT PLAN	0.8	380.00	\$304.00			
10-16-2012	T. COOK	STUDY DEFENDANT'S ANSWER	0.4	380.00	\$152.00			
10-18-2012	J. BLAIR	STUDY DRAFT JOINT PRETRIAL STATEMENT, MAKE MINOR SUGGESTIONS	0.3	380.00	\$114.00	Duplicative of T. Cook 10/16/12 entry	This is a review of Attorney Cook's draft.	
10-18-2012	J. BLAIR	EMAIL COMMUNICATIONS ADDRESSING JOINT PRETRIAL QUESTIONS, REVIEW FINAL FILING	0.3	380.00	\$114.00	Block billing	First entry (.2); second entry (.1).	
10-18-2012	T. COOK	EVALUATE IMPLICATIONS OF CLIENT HAVING BEEN GRANTED UNEMPLOYMENT [Privileged Communication]	0.3	380.00	\$114.00			
10-18-2012	T. COOK	REVIEW COMPLAINT, ANSWER, MOTION TO DISMISS BRIEFS AND COURT ORDER FOR INFORMATION FOR JOINT CASE MANAGEMENT REPORT DUE TO THE COURT	2.0	380.00	\$760.00	Excessive	This entry represents a study of prior counsel's filings in advance of joint case management submission.	
10-18-2012	T. COOK	PREPARE FIRST ROUND OF DISCOVERY	2.2	380.00	\$836.00	Duplicative of 10/8/12 entry	This is a separate draft of discovery from Plaintiff to Defendant.	
10-18-2012	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-18-2012	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-22-2012	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.4	380.00	\$152.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-25-2012	T. COOK	EVALUATE SCOPE OF EARLY DISCOVERY TO BE DONE, DEPOSITIONS TO BE TAKEN, RESEARCH TO BE COMPLETED AND FORMULATE MASTER PLAN	0.4	380.00	\$152.00			
10-25-2012	T. COOK	RESEARCH SCOPE OF DAMAGES PERMITTED BY FMLA	1.2	380.00	\$456.00	Background research	FMLA damages are a key aspect of this case.	
10-26-2012	L. SIMONINI	IDENTIFY AND PREPARE PERTINENT PLEADINGS FOR ATTORNEY USE AT UPCOMING RULE 16 CONFERENCE	0.3	170.00	\$51.00			
10-26-2012	J. BLAIR	PLAN FOR RULE 16 HEARING ON MONDAY	0.2	380.00	\$76.00	Vague	Every court hearing involves preparation.	
10-26-2012	T. COOK	STUDY OFFER TO SETTLE LETTER FROM DEFENDANT	0.4	380.00	\$152.00			
10-26-2012	T. COOK	STUDY DEFENDANT'S OFFER TO SETTLE	0.1	380.00	\$38.00	Duplicative of above	Prior entry is an analysis of CAP's correspondence; this entry is a consideration of that offer in light of the stage of the litigation, prior to the next entry, a communication with Ms. Gressett.	
10-26-2012	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-29-2012	J. BLAIR	RULE 16 HEARING BEFORE JUDGE TEILBORG	1.6	380.00	\$608.00			
10-29-2012	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	1.5	380.00	\$570.00			
10-29-2012	T. COOK	ATTEND COURT HEARING ON RULE 16	1.6	380.00	\$608.00	Duplicative of above entry	It was appropriate, even necessary, that both litigation attorneys attend the Rule 16 hearing before Judge Teilborg.	
10-29-2012	T. COOK	LENGTHY TELEPHONE CALL WITH CLIENT [Privileged Communication]	1.5	380.00	\$570.00	Excessive, vague	This was a lengthy, privileged communication between Attorney Cook and Ms. Gressett.	
10-29-2012	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
11-07-2012	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
11-07-2012	T. COOK	EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative of above	This is a separate email.	
11-09-2012	L. SIMONINI	STUDY COURT FILINGS AND CLIENT DOCUMENTS IN ORDER TO DRAFT INITIAL DISCLOSURE	1.3	170.00	\$221.00			
11-09-2012	L. SIMONINI	DRAFT INITIAL DISCLOSURE	0.8	170.00	\$136.00			
11-09-2012	L. SIMONINI	IDENTIFY AND PREPARE EXHIBITS TO BE ATTACHED TO INITIAL DISCLOSURE	1.3	170.00	\$221.00	Duplicative of 11/9/12 entry	Separate time entry to draft the initial disclosure from the time entry to pull exhibits to be attached to the disclosure statement.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-13-2012	L. SIMONINI	DETERMINE WHETHER GRESSETT RECEIVED RIGHT TO SUE LETTER FROM EEOC	0.7	170.00	\$119.00	Excessive	This represents a review of the entire file for the EEOC right-to-sue correspondence.	
11-14-2012	J. BLAIR	PLAN M. COOK'S DEPOSITION	0.1	380.00	\$38.00	Clerical	Planning and preparing for a witness deposition is not clerical.	
11-14-2012	T. COOK	EDIT AND FINALIZE FIRST SET OF NON-UNIFORM INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT	0.3	380.00	\$114.00			
11-14-2012	T. COOK	ORDER DEPOSITION OF DEFENDANT WITNESS M. COOK	0.1	380.00	\$38.00	Clerical, vague	Attorney Cook's .1 time entry documents intent to notice the M. Cook deposition.	
11-15-2012	L. SIMONINI	ADDRESS ISSUES REGARDING DRAFT DISCLOSURE STATEMENT AND DAMAGES TO BE SOUGHT	0.4	170.00	\$68.00			
11-15-2012	L. SIMONINI	STUDY LIST RECEIVED FROM A. GRESSETT [Privileged Communication]	0.5	170.00	\$85.00	Vague	Privileged communication with client.	
11-15-2012	J. BLAIR	REVIEW WITNESSES IDENTIFIED BY A. GRESSETT	0.2	380.00	\$76.00	Duplicative of 11/15/12 entry	Attorney Blair's .2 time entry is to assess Ms. Gressett's identification of witnesses sought at trial.	
11-15-2012	T. COOK	EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
11-16-2012	L. SIMONINI	DRAFT E-MAIL TO GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
11-16-2012	L. SIMONINI	STUDY E-MAIL FROM GRESSETT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	A .1 time entry is not an excessive billing.	
11-16-2012	L. SIMONINI	DRAFT NOTICE OF SERVICE OF PLAINTIFF'S INITIAL DISCLOSURE	0.1	170.00	\$17.00	Clerical	A paralegal .1 entry to draft notice of service is not clerical.	
11-16-2012	L. SIMONINI	EDIT AND FINALIZE INITIAL DISCLOSURE	0.6	170.00	\$102.00			
11-16-2012	L. SIMONINI	REDACT AND FINALIZE EXHIBITS TO BE ATTACHED TO INITIAL DISCLOSURE	2.1	170.00	\$357.00			
11-16-2012	J. BLAIR	REVIEW, REVISE AND ARRANGE FILING OF INITIAL DISCLOSURE	0.3	380.00	\$114.00	Clerical re: arranging filing, block billing	Attorney Blair's .3 time entry for final review of Plaintiff's initial disclosure is neither clerical nor block billing.	
11-28-2012	T. COOK	EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
12-13-2012	T. COOK	EMAIL FROM CLIENT [Privileged Communication] □	0.1	380.00	\$38.00			
12-14-2012	T. COOK	EMAIL FROM CLIENT [Privileged Communication] □	0.1	380.00	\$38.00			

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12-21-2012	T. COOK	SEND AND RECEIVE EMAILS WITH DEFENDANT COUNSEL REGARDING RESPONSES DUE TO OUR DISCOVERY	0.2	380.00	\$76.00			
01-03-2013	J. BLAIR	CONFIRM CAP HAS COMPLETED AND FILED DISCOVERY RESPONSES	0.2	380.00	\$76.00	Clerical	Attorney Blair's .2 time entry to review CAP's discovery responses is not clerical.	
01-03-2013	T. COOK	SEND EMAIL TO DEFENDANT REGARDING NO DISCOVERY RECEIVED	0.1	380.00	\$38.00			
01-03-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-03-2013	T. COOK	STUDY KEY STATUTORY PROVISIONS AND DRAFT ADDITIONAL DISCOVERY TO LIMIT SCOPE OF DISPUTED ISSUES OF FACT AND LAW AND TO BEGIN TO IDENTIFY SCOPE OF DAMAGES CLAIM FOR DISCLOSURE	0.9	380.00	\$342.00			
01-03-2013	T. COOK	EMAIL FROM CLIENT [Privileged Communication] □	0.1	380.00	\$38.00			
01-04-2013	T. COOK	STUDY DEFENDANT'S RESPONSES TO FIRST SET OF NON-UNIFORM INTERROGATORIES	0.8	380.00	\$304.00			
01-04-2013	T. COOK	STUDY DEFENDANT RESPONSES TO FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS AND DOCUMENTS ATTACHED	3.7	380.00	\$1,406.00			
01-04-2013	T. COOK	TWO EMAILS FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-06-2013	T. COOK	STUDY MORE DOCUMENTS PRODUCED WITH DEFENDANT'S INITIAL RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS AND NOTATE KEY INFORMATION IN SAME AS SUPPORT FOR CASE AND FOLLOW-UP DISCOVERY	1.3	380.00	\$494.00			
01-07-2013	J. BLAIR	REVIEW CLAIMS AVAILABLE TO OUR CLIENT, INCLUDING TORTIOUS INTERFERENCE AND AMERICANS WITH DISABILITIES ACT	0.2	380.00	\$76.00	Duplicative of 9/29/12 entry	Attorney Blair's .2 time entry to consider separate claims against CAP is not duplicative of Attorney Cook's research of those potential claims.	
01-07-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-07-2013	T. COOK	SEND EMAIL TO J. BLAIR WITH STATUTORY LAW LIMITING DAMAGES BUT WITH AREAS WHERE WE MIGHT BE ABLE TO CALCULATE SIGNIFICANT DAMAGES BASED ON TERMINATION OF JOB AND TORTIOUS INTERFERENCE WITH CONTRACT	0.1	380.00	\$38.00	Internal Conference	Attorney Cook's .1 time entry regarding potential damages is not an internal conference. No one else billed for this time entry.	
01-07-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			

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01-08-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-08-2013	T. COOK	STUDY PLAINTIFF'S RESUME	0.1	380.00	\$38.00			
01-08-2013	T. COOK	EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-09-2013	J. BLAIR	RESEARCH ASSIGNMENT REGARDING TORTIOUS INTERFERENCE	0.2	380.00	\$76.00	Background research, duplicative of 1/7/13 entry, vague	Attorney Blair's .2 time entry describes a research assignment to an RCDM associate attorney.	
01-09-2013	T. COOK	IDENTIFY ISSUES RELATING TO CLAIM OF TORTIOUS INTERFERENCE THAT WE NEED TO RESEARCH ALONG WITH STATUTE OF LIMITATIONS FOR SAME	0.2	380.00	\$76.00	Duplicative of 1/7/13 and 1/9/13 entries	Attorney Cook's .2 time entry describes her efforts to see that proper research be conducted; this is separate from the other related entries.	
01-09-2013	T. COOK	EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-13-2013	T. COOK	EMAILS EXCHANGE WITH CLIENT [Privileged Communication]	0.3	380.00	\$114.00			
01-13-2013	T. COOK	TELEPHONE CALL WITH CLIENT [Privileged Communication]	0.5	380.00	\$190.00			
01-13-2013	T. COOK	EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-14-2013	T. COOK	EXCHANGE EMAILS WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
01-14-2013	T. COOK	TWO EMAILS FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excessive billing for email exchange, see 1/14/13 entry above	Attorney Cook's .1 privileged communication for 2 emails from Ms. Gressett could not be excessive.	
01-22-2013	T. COOK	EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-24-2013	T. COOK	EMAIL FROM CLIENT [Privileged Communication] □	0.1	380.00	\$38.00			
01-29-2013	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL EXPERTS TO BE NAMED, DISCOVERY TO BE PURSUED	0.7	170.00	\$119.00	Vague	Paralegal Simonini is explaining her efforts to address assignments from RCDM attorneys.	
01-29-2013	L. SIMONINI	STUDY DISCOVERY REQUESTS PROPOUNDED TO GRESSETT	0.4	170.00	\$68.00			
01-29-2013	J. BLAIR	PLAN DEPOSITIONS AND RETENTION OF HUMAN RESOURCES EXPERT	0.4	380.00	\$152.00			
01-29-2013	T. COOK	REVIEW STATUS OF CASE AND FUTURE ACTION PLANS IN LIGHT OF CLIENT'S UNEMPLOYMENT AND UPCOMING CALENDARING CONFLICTS AND UPDATE MASTER PLAN GOING FORWARD	0.8	380.00	\$304.00			
01-29-2013	T. COOK	EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-04-2013	L. SIMONINI	TELEPHONE CALL CLIENT [Privileged Communication]	0.2	170.00	\$34.00			
02-04-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
02-05-2013	L. SIMONINI	TELEPHONE CALL CLIENT [Privileged Communication]	0.2	170.00	\$34.00			
02-06-2013	L. SIMONINI	STUDY DOCUMENTS RECEIVED FROM A, GRESSETT TO PREPARE RESPONSES TO DISCOVERY	2.7	170.00	\$459.00			
02-08-2013	L. SIMONINI	STUDY DISCLOSURE STATEMENTS IN ADVANCE OF CLIENT MEETING REGARDING DISCOVERY RESPONSES	1.7	170.00	\$289.00	Excessive	This time entry represents Paralegal Simonini's review of file materials before meeting with Plaintiff Gressett (next entry).	
02-08-2013	L. SIMONINI	CONFERENCE WITH CLIENT [Privileged Communication]	1.8	170.00	\$306.00			
02-08-2013	L. SIMONINI	BEGIN DRAFTING RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS	1.1	170.00	\$187.00			
02-08-2013	L. SIMONINI	STUDY GRESSETT'S DRAFT RESPONSE TO NON-UNIFORM INTERROGATORIES	0.4	170.00	\$68.00			
02-08-2013	T. COOK	MEET AND CONFER WITH CLIENT [Privileged Communication]	0.6	380.00	\$228.00			
02-12-2013	L. SIMONINI	BEGIN STUDY OF DEFENDANT'S VOLUMINOUS REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES IN ORDER TO PREPARE RESPONSES TO PENDING DISCOVERY	3.7	170.00	\$629.00			
02-21-2013	L. SIMONINI	TELEPHONE CALL DEFENDANT'S ATTORNEY REGARDING EXTENSION FOR DISCOVERY RESPONSES	0.3	170.00	\$51.00	Excessive	This is time recorded for a phone conference with CAP's counsel.	
02-21-2013	L. SIMONINI	DRAFT E-MAIL TO DEFENDANT'S ATTORNEY CONFIRMING EXTENSION FOR DISCOVERY RESPONSES	0.1	170.00	\$17.00			
02-21-2013	L. SIMONINI	DRAFT E-MAIL TO A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
02-21-2013	L. SIMONINI	STUDY E-MAIL FROM A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00	Excessive billing for email exchange, see 2/21/13 entry above	Ms. Simonini's .1 time entry to study an email from Plaintiff Gressett could hardly be excessive.	
02-25-2013	L. SIMONINI	STUDY FOUR E-MAILS FROM A. GRESSETT [Privileged Communication]	1.2	170.00	\$204.00	Excessive	Paralegal Simonini's time to study 4 emails from Plaintiff Gressett, with privileged information in them, is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-28-2013	L. SIMONINI	STUDY VOLUMINOUS DOCUMENTS ATTACHED TO DEFENDANT'S REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSE IN ORDER TO DRAFT RESPONSE TO PENDING DISCOVERY REQUESTS	3.3	170.00	\$561.00	Excessive - no documents attached to discovery requests	This paralegal time entry references response materials from CAP, not discovery requests.	
02-28-2013	L. SIMONINI	STUDY VOLUMINOUS DOCUMENTS ATTACHED TO DEFENDANT'S INITIAL DISCLOSURE IN ORDER TO DRAFT RESPONSE TO PENDING DISCOVERY REQUESTS	2.3	170.00	\$391.00			
02-28-2013	L. SIMONINI	BEGIN IDENTIFYING AND PREPARING DOCUMENTS TO BE ATTACHED TO RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	0.8	170.00	\$136.00			
03-01-2013	L. SIMONINI	BEGIN DRAFTING RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	1.4	170.00	\$238.00			
03-05-2013	L. SIMONINI	STUDY VOLUMINOUS E-MAIL ATTACHED TO CAP'S INITIAL DISCLOSURE TO IDENTIFY POTENTIAL WITNESSES TO DISCLOSE	2.9	170.00	\$493.00	Excessive	Paralegal Simonini's review and analysis of a voluminous email from CAP and identification from that email of witnesses to be disclosed was not excessive; it was the time necessary to analyze CAP's materials to ensure proper and complete disclosure.	
03-07-2013	T. COOK	EMAIL EXCHANGE WITH CLIENT [Privileged Communication]	0.5	380.00	\$190.00			
03-12-2013	T. COOK	RESEARCH ON PERMISSIBLE SCOPE OF DAMAGES CLAIM	3.1	380.00	\$1,178.00	Background research, excessive, duplicative of 9/29/12 entry	This time entry represents additional research associated with Plaintiff Gressett's damages under the FMLA; should not be considered background research, but key to the claims asserted.	
03-12-2013	T. COOK	WORK ON RESPONSES TO DEFENDANT'S NON-UNIFORM INTERROGATORIES	3.0	380.00	\$1,140.00			
03-13-2013	L. SIMONINI	STUDY DRAFT NON-UNIFORM INTERROGATORIES RESPONSES TO DETERMINE WHETHER ADDITIONAL INFORMATION NEEDS TO BE INCORPORATED	0.6	170.00	\$102.00			
03-13-2013	J. BLAIR	REVIEW AND MAKE MINOR MODIFICATIONS TO DRAFT DISCOVERY RESPONSES	0.5	380.00	\$190.00	Duplicative of T. Cook 3/12/13 entry	Attorney Blair's .5 time entry is to review discovery responses before sending them out the door.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-14-2013	L. SIMONINI	STUDY VOLUMINOUS DOCUMENTS RECEIVED FROM A. GRESSETT IN ORDER TO DOCUMENT HER JOB SEARCHES TO BE INCLUDED IN NON-UNIFORM INTERROGATORIES RESPONSE	3.6	170.00	\$612.00			
03-14-2013	L. SIMONINI	DRAFT E-MAIL TO A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
03-14-2013	L. SIMONINI	UPDATE RESPONSE TO NON-UNIFORM INTERROGATORIES TO INCLUDE INFORMATION REGARDING CURRENT EMPLOYER AND PAY	0.5	170.00	\$85.00			
03-14-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.3	380.00	\$114.00			
03-14-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.3	380.00	\$114.00	Duplicative of 3/14/13 entry above, Excessive	This represents review of a separate email.	
03-15-2013	L. SIMONINI	DRAFT E-MAIL TO A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
03-15-2013	L. SIMONINI	TELEPHONE CALL A. GRESSETT [Privileged Communication]	0.3	170.00	\$51.00			
03-15-2013	L. SIMONINI	DRAFT VERIFICATION SUPPORTING NON-UNIFORM INTERROGATORIES RESPONSES	0.2	170.00	\$34.00			
03-15-2013	T. COOK	FINISH RESPONSES TO NON-UNIFORM INTERROGATORIES DUE TO DEFENDANT	0.9	380.00	\$342.00			
03-15-2013	T. COOK	REVIEW REQUEST FOR PRODUCTION OF DOCUMENTS DEMANDS FROM DEFENDANT AND PLAN FOLLOW-UP NEEDED FOR SAME	0.8	380.00	\$304.00			
03-15-2013	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING DISCOVERY DUE	0.1	380.00	\$38.00			
03-15-2013	T. COOK	SEND EMAIL TO DEFENDANT REGARDING NON-UNIFORM INTERROGATORIES RESPONSES	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry represents an email to CAP's attorney.	
03-18-2013	L. SIMONINI	STUDY DOCUMENTS RECEIVED FROM CLIENT AND IDENTIFY THOSE RESPONSIVE TO REQUEST FOR PRODUCTION OF DOCUMENTS	1.2	170.00	\$204.00			
03-18-2013	L. SIMONINI	FINALIZE RESPONSE TO NON-UNIFORM INTERROGATORIES	0.3	170.00	\$51.00			
03-18-2013	L. SIMONINI	DRAFT VERIFICATION TO NON-UNIFORM INTERROGATORIES	0.1	170.00	\$17.00			
03-18-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT ATTACHING VERIFICATION	0.1	170.00	\$17.00			
03-18-2013	L. SIMONINI	DRAFT NOTICE OF SERVICE OF DISCOVERY RESPONSE	0.1	170.00	\$17.00	Clerical	Paralegal preparation of a service notice, .1, is not clerical.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-19-2013	L. SIMONINI	DETERMINE WHETHER DES RECORDS HAVE BEEN RECEIVED AND CAN BE INCORPORATED INTO REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSE	1.0	170.00	\$170.00	Excessive	A paralegal's 1.0 time entry to ensure DES materials have been received for production is not excessive.	
03-19-2013	L. SIMONINI	DRAFT RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	2.1	170.00	\$357.00	Excessive	A paralegal's draft response to a discovery request, 2.1 hours, is not excessive.	
03-27-2013	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES	0.1	170.00	\$17.00			
03-27-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES	0.1	170.00	\$17.00	Excessive billing for email exchange	A paralegal's .1 time entry to prepare an email is not excessive.	
03-27-2013	L. SIMONINI	STUDY SECOND E-MAIL FROM CAP ATTORNEY REGARDING REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to review an email from CAP's attorney is not excessive.	
03-27-2013	L. SIMONINI	STUDY E-MAIL FROM A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
03-27-2013	L. SIMONINI	STUDY DAMAGES DOCUMENTS RECEIVED FROM A. GRESSETT TO DETERMINE WHETHER RESPONSIVE TO REQUEST FOR PRODUCTION OF DOCUMENTS REQUESTS	2.3	170.00	\$391.00	Excessive	A paralegal's review of materials from Plaintiff Gressett, a 2.3 hour time entry, as part of a response to CAP's request for documents, is not excessive.	
03-27-2013	T. COOK	EMAIL EXCHANGES WITH CLIENT [Privileged Communication]	0.5	380.00	\$190.00	Vague, excessive	Attorney Cook's .5 time entry to exchange numerous emails with Plaintiff Gressett (privileged communications) is neither vague nor excessive.	
03-28-2013	L. SIMONINI	REVISE RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	0.8	170.00	\$136.00			
03-28-2013	L. SIMONINI	STUDY PLEADINGS TO IDENTIFY GOVERNMENTAL AGENCIES AT WHICH A. GRESSETT FILED COMPLAINT AGAINST CAP IN ORDER TO INCLUDE INFORMATION IN REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSE	0.9	170.00	\$153.00	Excessive	A paralegal's review of file materials, a .9 time entry, to determine what should be included in a response to request for documents is not excessive.	
03-28-2013	L. SIMONINI	DRAFT LETTER TO A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
03-28-2013	L. SIMONINI	STUDY E-MAIL FROM A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
03-28-2013	L. SIMONINI	STUDY COURT ORDERS	0.2	170.00	\$34.00	Vague	A paralegal's .2 time entry to review court orders is not vague. Obviously, she was given an assignment to locate and review orders from this Court.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-28-2013	L. SIMONINI	DRAFT E-MAIL TO A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to prepare a privileged email to Plaintiff Gressett is not excessive.	
03-28-2013	L. SIMONINI	BEGIN PREPARING DOCUMENTS TO BE ATTACHED TO RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS; I.E., REDACT PRIVILEGED INFORMATION	1.7	170.00	\$289.00			
03-28-2013	T. COOK	ANALYZE AND FORMULATE STRATEGY TO PURSUE CASE ON ISSUE OF LIABILITY, ISSUES OF CONCERN, CONCERNS ABOUT PROOF AND HOW TO OVERCOME, SET UP ACTION PLANS	3.0	380.00	\$1,140.00	Excessive	This time entry, 3.0 hours, is obviously a planning effort, to determine how the case should be prepared and presented and to set up action plans to aid the preparation and presentation. It is not excessive.	
03-29-2013	L. SIMONINI	TWO LENGTHY TELEPHONE CALLS A. GRESSETT [Privileged Communication]	0.7	170.00	\$119.00			
03-29-2013	L. SIMONINI	ADDRESS ISSUES AS TO WHETHER RECORDING OF CONVERSATIONS IS LAWFUL	0.4	170.00	\$68.00	Vague	This was an assignment to Paralegal Simonini to determine whether Plaintiff Gressett's recording of conversations with her supervisors was lawful under Arizona and/or federal law. The vagueness objection is not well-founded.	
03-29-2013	L. SIMONINI	PREPARE DOCUMENTS RECEIVED FROM A. GRESSETT TO BE ATTACHED TO REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSE	1.4	170.00	\$238.00			
03-29-2013	L. SIMONINI	STUDY CAP'S EMPLOYEE HANDBOOK TO DETERMINE WHETHER AUDIO RECORDING VIOLATED COMPANY POLICY	0.5	170.00	\$85.00			
03-29-2013	L. SIMONINI	STUDY E-MAIL FROM A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
03-29-2013	L. SIMONINI	REVISE RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	0.4	170.00	\$68.00			
03-29-2013	J. BLAIR	REVIEW AND APPROVE DISCOVERY RESPONSES	0.3	380.00	\$114.00			
03-29-2013	J. BLAIR	ADDRESS ARIZONA LAW REGARDING TAPING CONVERSATIONS	0.2	380.00	\$76.00	Vague, duplicative of 3/29/13 entry	Attorney Blair's .2 time entry to address the taping issue, referenced above, is neither vague nor duplicative. It is an attorney reviewing what a paralegal located.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-29-2013	T. COOK	STUDY DOCUMENTS TO BE PRODUCED IN DISCOVERY	4.5	380.00	\$1,710.00	Vague, duplicative	Attorney Cook's 4.5 hours represents a full review of the file before anything was produced in discovery. The effort was necessary to ensure completeness without duplication.	
03-29-2013	T. COOK	IDENTIFY WHAT FOLLOW-UP IS NEEDED FROM CONTENT OF DOCUMENTS REVIEWED FOR PRODUCTION IN DISCOVERY AND DELEGATE FOLLOW-UP PROJECTS ACCORDINGLY	1.0	380.00	\$380.00			
03-29-2013	T. COOK	SET UP PLAN OF ACTION REGARDING DISCOVERY AND ISSUE INSTRUCTIONS ACCORDINGLY	0.3	380.00	\$114.00	Duplicative of entry above	Attorney Cook's .3 time entry put in motion action plans developed above.	
03-30-2013	T. COOK	IDENTIFY QUESTIONS FOR CLIENT AND SEND EMAIL WITH SAME [Privileged Communication]	0.4	380.00	\$152.00			
03-30-2013	T. COOK	EMAIL EXCHANGES WITH CLIENT [Privileged Communication]	0.5	380.00	\$190.00	Excessive, vague	Attorney Cook's email exchanges with Ms. Gressett, a .5 time entry, are privileged and therefore not vague. Also, this represents several email exchanges with Ms. Gressett.	
04-01-2013	L. SIMONINI	PREPARE ADDITIONAL RECORDS TO BE ATTACHED TO RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	1.1	170.00	\$187.00			
04-01-2013	L. SIMONINI	DRAFT E-MAIL TO GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
04-01-2013	L. SIMONINI	STUDY E-MAIL FROM GRESSETT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from the client is not excessive.	
04-01-2013	L. SIMONINI	STUDY SECOND E-MAIL FROM GRESSETT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from the client is not excessive.	
04-01-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to send an email to Plaintiff Gressett is not excessive.	
04-02-2013	L. SIMONINI	DRAFT LETTER TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
04-02-2013	J. BLAIR	STUDY LEGAL THEORY DOCUMENTED BY A. GRESSETT	0.3	380.00	\$114.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-02-2013	T. COOK	TWO TELEPHONE CALLS WITH ATTORNEY LEVINE REGARDING CAUSES OF ACTION FOR CLIENT TO CONSIDER	0.6	380.00	\$228.00	Internal Conference	This .6 time entry represents 2 conversations Attorney Cook had with outside attorney Jack Levine, a former employer of Ms. Gressett (to discuss claims Mr. Levine believed Ms. Gressett should pursue). It is not an internal conference.	
04-02-2013	T. COOK	RESEARCH 1983 CLAIM AND STATUTE OF LIMITATIONS WHICH RAN BEFORE OUR INVOLVEMENT	1.7	380.00	\$646.00	Excessive, unnecessary	This time entry from Ms. Cook represents effort to determine whether what she learned from attorney Levine could be useful in this case. It was neither excessive nor unnecessary.	
04-03-2013	L. SIMONINI	DRAFT AND ELECTRONICALLY SUBMIT EEOC FREEDOM OF INFORMATION ACT REQUEST	0.2	170.00	\$34.00			
04-03-2013	J. BLAIR	TELEPHONE CALL WITH J. LEVINE REGARDING CONTRACT CLAIM	0.2	380.00	\$76.00	Internal Conference	Attorney Blair's short phone conversation with attorney Levine, .2, is not an internal conference.	
04-03-2013	J. BLAIR	DISCUSS CONTRACT CLAIM WITH T. COOK	0.2	380.00	\$76.00	Internal Conference	Attorney Blair's .2 time entry to review the contract claim with Attorney Cook is not an internal conference because Ms. Cook did not charge for this discussion.	
04-03-2013	J. BLAIR	STUDY DEMASSE DECISION, POTENTIAL FOR CONTRACT CLAIM VS. CAP, RELATED EMAIL TO T. COOK	0.5	380.00	\$190.00	Block Billing	First entry (.2); second entry (.2); and third entry (.1).	
04-03-2013	T. COOK	EVALUATE THE PROPRIETY OF 1983 CLAIM, CONFIRM TWO YEAR STATUTE OF LIMITATIONS WHICH RAN BEFORE OUR INVOLVEMENT	0.3	380.00	\$114.00	Duplicative of entry on 4/2/13	Attorney Cook's .3 time entry to evaluate her research is not duplicative of any entry, i.e., the research.	
04-03-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
04-05-2013	L. SIMONINI	PREPARE SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSE REGARDING TAX RETURNS	0.4	170.00	\$68.00			
04-05-2013	T. COOK	STUDY CLIENT'S 2011 TAXES WITH ZERO WAGES AND APPROVE DISCLOSURE OF SAME	0.3	380.00	\$114.00			
04-05-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
04-10-2013	L. SIMONINI	STUDY CLIENT DOCUMENTS TO IDENTIFY DOCUMENTS TO SUPPORT DAMAGES	1.3	170.00	\$221.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-10-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
04-11-2013	L. SIMONINI	STUDY CLIENT'S DETAILED E-MAIL [Privileged Communication]	0.3	170.00	\$51.00	Excessive	Paralegal Simonini's .3 time entry to study a privileged communication from attorney Gressett (which was detailed) is not excessive.	
04-11-2013	J. BLAIR	REVIEW EMAIL COMMUNICATION FROM A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00	Excessive	Attorney Blair's separate review of the Gressett email, a .2 time entry, is likewise not excessive.	
04-11-2013	T. COOK	STUDY LENGTHY EMAIL FROM CLIENT [Privileged Communication]	0.2	380.00	\$76.00	Duplicative of entry above	Attorney Cook's separate review of the Gressett communication, .2, does not duplicate any time entry. It is the trial attorney's study of Ms. Gressett's privileged communication.	
04-15-2013	L. SIMONINI	STUDY LETTER FROM EEOC RESPONDING TO FREEDOM OF INFORMATION ACT REQUEST AND SEEKING ADDITIONAL INFORMATION	0.1	170.00	\$17.00			
04-17-2013	L. SIMONINI	DRAFT E-MAIL TO EEOC REGARDING FREEDOM OF INFORMATION ACT REQUEST	0.1	170.00	\$17.00			
04-17-2013	L. SIMONINI	IDENTIFY PLEADINGS TO BE SENT TO EEOC TO SUPPORT FREEDOM OF INFORMATION ACT REQUEST	0.4	170.00	\$68.00	Excessive	Paralegal Simonini's .4 time entry to determine how to support an EEOC FOIA request is not excessive.	
04-17-2013	L. SIMONINI	STUDY E-MAIL FROM EEOC REGARDING PENDING FREEDOM OF INFORMATION ACT REQUEST	0.1	170.00	\$17.00	Excessive	A paralegal's .1 time entry to review an email from EEOC is not excessive.	
04-17-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
04-22-2013	L. SIMONINI	MEETING WITH CLIENT [Privileged Communication]	0.3	170.00	\$51.00			
04-22-2013	L. SIMONINI	BEGIN STUDY OF DISCLOSURE DOCUMENTS TO CREATE ANALYSIS FOR DAMAGES TO BE SOUGHT	2.6	170.00	\$442.00	Duplicative of 2/28/13 entry	Paralegal Simonini's analysis of documents disclosed to date to prepare a damage analysis is not duplicative of any prior effort on her part.	
04-22-2013	T. COOK	MEET AND CONFER WITH CLIENT [Privileged Communication]	1.5	380.00	\$570.00			
04-23-2013	L. SIMONINI	LISTEN TO AUDIO RECORDS OF CONVERSATIONS WITH CLIENT AND M. COOK IN ADVANCE OF HAVING SAME TRANSCRIBED	0.9	170.00	\$153.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-23-2013	L. SIMONINI	COMPARE AUDIO FILES RECEIVED FROM CLIENT YESTERDAY TO HARD COPY TRANSCRIPTS AND ELECTRONIC FILES RECEIVED PREVIOUSLY TO DETERMINE WHETHER ALL AUDIO HAD BEEN IDENTIFIED AND RECEIVED	1.7	170.00	\$289.00			
04-24-2013	L. SIMONINI	STUDY LETTER FROM EEOC RESPONDING TO FREEDOM OF INFORMATION ACT REQUEST	0.1	170.00	\$17.00			
04-24-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
04-26-2013	L. SIMONINI	CONTINUE STUDY OF DISCLOSURE DOCUMENTS TO CREATE ANALYSIS OF POTENTIAL DAMAGES	1.7	170.00	\$289.00	Excessive, duplicative of 4/22/13 entry	This time entry represents Paralegal Simonini's continuing effort to create a damages analysis for the attorneys on this matter. It is neither duplicative nor excessive.	
04-26-2013	L. SIMONINI	STUDY TRANSCRIPTS PREPARED BY OUR OFFICE OF AUDIO RECORDINGS	0.9	170.00	\$153.00	Duplicative of entry on 4/23/13	Paralegal Simonini's review of office transcripts is a continuation of her 4/23 review, not duplicative of that effort.	
04-29-2013	L. SIMONINI	ADDRESS ISSUES REGARDING UPCOMING EXPERT DISCLOSURE DEADLINE	1.7	170.00	\$289.00	Excessive	Paralegal Simonini's assignment to determine how to meet Plaintiff Gressett's expert disclosure deadline, 1.7 hours, is not excessive. She was asked to confirm the deadlines and consider what areas of expertise might be necessary in this case.	
04-29-2013	L. SIMONINI	TELEPHONE CALL EXPERT G. MCRAE REGARDING EXPERT DISCLOSURE	0.1	170.00	\$17.00	Duplicative of below entry	Paralegal Simonini's telephone call and message to Expert McRae, .1, is not duplicative of the conversation she had in the next time entry.	
04-29-2013	L. SIMONINI	LENGTHY TELEPHONE CALL EXPERT G. MCRAE REGARDING EXPERT DISCLOSURE	0.3	170.00	\$51.00			
04-29-2013	L. SIMONINI	STUDY SCHEDULING ORDER TO VERIFY THAT PROPER DISCLOSURE IS BEING MADE REGARDING EXPERTS	0.2	170.00	\$34.00			
04-29-2013	J. BLAIR	CONFIRM EXPERT G. MCRAE IS MEETING BY PHONE WITH T. COOK TOMORROW AM, REPORT DUE BY END OF THE WEEK	0.0	380.00	\$0.00	Clerical; Excessive	Attorney Blair's .3 time entry to confirm Expert McRae's views would be shared with Attorney Cook in a timely manner is neither clerical nor excessive.	Clerical

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-30-2013	L. SIMONINI	TELEPHONE CALL EXPERT G. MCRAE REGARDING UPCOMING EXPERT DISCLOSURE	0.2	170.00	\$34.00			
04-30-2013	L. SIMONINI	SECOND TELEPHONE CALL EXPERT G. MCRAE REGARDING UPCOMING EXPERT DISCLOSURE	0.1	170.00	\$17.00			
04-30-2013	L. SIMONINI	THIRD TELEPHONE CALL EXPERT G. MCRAE REGARDING UPCOMING EXPERT DISCLOSURE	0.1	170.00	\$17.00			
04-30-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT G. MCRAE REGARDING UPCOMING EXPERT DISCLOSURE DEADLINE	0.1	170.00	\$17.00			
04-30-2013	L. SIMONINI	TELEPHONE CALL ATTORNEY BIDDLE REGARDING STIPULATION TO EXTEND EXPERT DISCLOSURE DEADLINES	0.1	170.00	\$17.00			
04-30-2013	L. SIMONINI	SECOND TELEPHONE CALL ATTORNEY BIDDLE REGARDING STIPULATION TO EXTEND DEADLINES	0.1	170.00	\$17.00			
04-30-2013	L. SIMONINI	DRAFT E-MAIL TO ATTORNEY BIDDLE REGARDING STIPULATION	0.1	170.00	\$17.00	Excessive	A paralegal's .1 time entry to prepare an email to CAP's attorney is not excessive.	
04-30-2013	L. SIMONINI	STUDY E-MAIL FROM ATTORNEY BIDDLE REGARDING STIPULATION	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to review an email from counsel is likewise not excessive.	
04-30-2013	L. SIMONINI	DRAFT STIPULATION TO EXTEND EXPERT DISCLOSURE DEADLINES	0.2	170.00	\$34.00			
04-30-2013	L. SIMONINI	DRAFT ORDER GRANTING STIPULATION TO EXTEND EXPERT DISCLOSURE DEADLINES	0.1	170.00	\$17.00			
04-30-2013	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS TO IDENTIFY MATERIALS TO BE SENT TO EXPERT MCRAE FOR HER USE IN PROVIDING EXPERT REPORT	1.6	170.00	\$272.00			
04-30-2013	L. SIMONINI	ADDRESS ISSUES REGARDING IMPACT ON PRETRIAL DATES IF EXPERT DISCLOSURE DEADLINE IS MOVED	0.5	170.00	\$85.00	Excessive, vague	Paralegal Simonini's .5 time entry to advise attorneys how other pretrial dates might be impacted if the expert disclosure deadline is pushed back is neither excessive nor vague.	
04-30-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING DEADLINE FOR EXPERT DISCLOSURE	0.1	170.00	\$17.00	Excessive billing for email exchange of 4/30/13 entry	A paralegal's .1 time entry to review an email is not excessive.	
04-30-2013	J. BLAIR	STUDY GRESSETT FILE, PULL MATERIALS THAT MAY BE HELPFUL TO EXPERT MCRAE	0.6	380.00	\$228.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-30-2013	J. BLAIR	EMAIL COMMUNICATIONS REGARDING EXPERT REPORT, TIMING AND FORMAT	0.5	380.00	\$190.00	Vague, excessive, internal conference (email)	Attorney Blair's .5 time entry to understand that the McRae expert report would be timely available and in a format acceptable to the federal court is neither vague nor excessive. It is not an internal conference.	
04-30-2013	J. BLAIR	TELEPHONE CALL WITH DEFENSE ATTORNEY CONFIRMING ONE WEEK EXTENSION, REVIEW AND APPROVE FOR FILING STIPULATION DOCUMENTING SAME	0.4	380.00	\$152.00	Block Billing, Excessive	First entry (.1); second entry (.3).	
05-01-2013	J. BLAIR	REVIEW RESEARCH REGARDING HUMAN FACTORS EXPERTISE	0.5	380.00	\$190.00	Vague	Attorney Blair's .5 time entry to determine whether a human factors expert was necessary in this case is not vague.	
05-02-2013	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT AND WHETHER SHE CAN TESTIFY ON GRESSETT'S BEHALF	1.2	170.00	\$204.00	Excessive, vague	Paralegal Simonini's 1.2 time entry to address assignments from attorneys about Expert McRae's ability to testify on human resources issues is neither excessive nor vague.	
05-03-2013	L. SIMONINI	TWO TELEPHONE CALLS P. BJORKLUND REGARDING DAMAGES ANALYSIS	0.4	170.00	\$68.00			
05-03-2013	L. SIMONINI	STUDY WESTLAW INFORMATION TO IDENTIFY DAMAGES ALLOWED RELATED TO FMLA DAMAGES	1.1	170.00	\$187.00	Excessive, duplicative of 3/12/13 entry, background research	Paralegal Simonini's 1.1 time entry to supplement her earlier damages analysis based on Westlaw information is neither excessive nor duplicative of earlier efforts to perform the analysis. Further, it is not background research, but FMLA damages research.	
05-03-2013	L. SIMONINI	THREE TELEPHONE CALLS G. MCRAE REGARDING EXPERT DISCLOSURE	0.4	170.00	\$68.00			
05-03-2013	L. SIMONINI	DRAFT E-MAIL TO P. BJORKLUND REGARDING DAMAGES ANALYSIS	0.1	170.00	\$17.00			
05-03-2013	L. SIMONINI	STUDY E-MAIL FROM P. BJORKLUND REGARDING DAMAGES DISCLOSURE	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to review an email is not excessive.	
05-03-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT BJORKLUND CONFIRMING NO CONFLICTS	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to review an email is not excessive.	
05-03-2013	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS TO BE ELECTRONICALLY SENT TO G. MCRAE IN ORDER FOR HER TO PREPARE EXPERT DISCLOSURE	2.6	170.00	\$442.00	Excessive	Paralegal Simonini's 2.6 time entry to create a subfile for Expert McRae is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
05-03-2013	L. SIMONINI	BEGIN TO IDENTIFY FINANCIAL DAMAGES FOR P. BJORKLUND'S USE IN PREPARING DAMAGES ANALYSIS	1.3	170.00	\$221.00			
05-03-2013	L. SIMONINI	DRAFT E-MAIL TO P. BJORKLUND REGARDING COMPLAINT AND ANSWER	0.1	170.00	\$17.00			
05-03-2013	L. SIMONINI	DRAFT E-MAIL TO G. MCRAE REGARDING MATERIALS TO BE ANALYZED TO PREPARE EXPERT REPORT	0.1	170.00	\$17.00			
05-03-2013	J. BLAIR	PLAN EXPERT WITNESS TESTIMONY, INCLUDING DAMAGES EXPERT BJORKLUND	0.5	380.00	\$190.00	Vague	Attorney Blair's .5 time entry to develop a plan for use of damages Expert Bjorklund is not vague.	
05-04-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
05-06-2013	L. SIMONINI	FOUR TELEPHONE CALLS P. BJORKLUND REGARDING EXPERT DISCLOSURE	0.6	170.00	\$102.00			
05-06-2013	L. SIMONINI	STUDY E-MAIL FROM G. MCRAE REGARDING ELECTRONIC DOCUMENTS	0.1	170.00	\$17.00	Vague	A paralegal's .1 time entry to review an email from Expert McRae is not vague.	
05-06-2013	L. SIMONINI	DRAFT E-MAIL TO G. MCRAE REGARDING RETAINER AND AGREEMENT	0.1	170.00	\$17.00			
05-06-2013	L. SIMONINI	CONFERENCE CALL P. BJORKLUND AND ATTORNEY COOK REGARDING EXPERT DISCLOSURE	0.3	170.00	\$51.00			
05-06-2013	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT MCRAE'S FEES	0.4	170.00	\$68.00	Excessive, vague	Paralegal Simonini's assignment to address Expert McRae's fees is neither excessive nor vague.	
05-06-2013	L. SIMONINI	STUDY CAP'S DISCLOSURE DOCUMENTS AND REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES TO IDENTIFY RECORDS FOR EXPERT BJORKLUND'S USE IN DRAFTING DAMAGES ANALYSIS	2.6	170.00	\$442.00	Excessive	Paralegal Simonini's 2.6 time entry to create a subfile for Expert Bjorklund's use is not excessive.	
05-06-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING DOCUMENTS SUPPORTING DISCLOSURE	0.1	170.00	\$17.00			
05-06-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING DOCUMENTS SUPPORTING DAMAGES	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to prepare emails for Plaintiff Gressett's experts is not excessive.	
05-06-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING FEDERAL REQUIREMENTS FOR EXPERT DISCLOSURE	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to prepare emails for Plaintiff Gressett's experts is not excessive.	
05-06-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING FEDERAL REQUIREMENTS FOR EXPERT DISCLOSURE	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
05-06-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING DISCLOSURE DOCUMENTS SUPPORTING DAMAGES CALCULATION	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to prepare emails for Plaintiff Gressett's experts is not excessive.	
05-06-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING MISCELLANEOUS DOCUMENTS SUPPORTING DAMAGES CALCULATION	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to prepare emails for Plaintiff Gressett's experts is not excessive.	
05-06-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING ADDITIONAL TAX RETURNS FOR DAMAGES ANALYSIS	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to prepare emails for Plaintiff Gressett's experts is not excessive.	
05-06-2013	L. SIMONINI	TWO TELEPHONE CALLS CLIENT [Privileged Communication]	0.4	170.00	\$68.00			
05-06-2013	L. SIMONINI	STUDY FACSIMILE FROM CLIENT [Privileged Communication]	0.8	170.00	\$136.00	Excessive	A paralegal's .8 time entry to study a facsimile from Plaintiff Gressett is not excessive because it attached numerous documents.	
05-06-2013	L. SIMONINI	PREPARE TAX DOCUMENTS RETURNS TO BE FORWARDED TO EXPERT BJORKLUND AND TO BE DISCLOSED	0.0	170.00	\$0.00			
05-06-2013	L. SIMONINI	PREPARE SUMMARY OF RECORDS SENT TO EXPERT MCRAE TO BE INCORPORATED INTO EXPERT DISCLOSURE	0.8	170.00	\$136.00			
05-06-2013	L. SIMONINI	PREPARE SUMMARY OF RECORDS SENT TO EXPERT BJORKLUND TO BE INCORPORATED INTO EXPERT DISCLOSURE	0.8	170.00	\$136.00			
05-06-2013	L. SIMONINI	ADDRESS ISSUES REGARDING ADDITIONAL DAMAGES DOCUMENTS NEEDED	0.4	170.00	\$68.00	Excessive, vague	Paralegal Simonini's .4 time entry to address additional damages documents is neither excessive nor vague, but part of her damages analysis referenced and discussed above.	
05-06-2013	J. BLAIR	REVIEW EXPERT REQUIREMENTS UNDER FEDERAL RULES	0.2	380.00	\$76.00			
05-06-2013	T. COOK	TELEPHONE CALL WITH EXPERT BJORKLUND REGARDING WHAT IS NEEDED FOR DAMAGE CALCULATIONS	0.4	380.00	\$152.00			
05-06-2013	T. COOK	EMAILS WITH CLIENT [Privileged Communication]	0.3	380.00	\$114.00			
05-07-2013	L. SIMONINI	LENGTHY TELEPHONE CALL STATE RETIREMENT SYSTEM REGARDING CLIENTS BENEFITS	0.4	170.00	\$68.00	Unrelated to lawsuit	Paralegal Simonini's .4 time entry to seek to understand Plaintiff Gressett's benefits is related to this suit.	
05-07-2013	L. SIMONINI	TWO TELEPHONE CALLS CLIENT [Privileged Communication]	0.3	170.00	\$51.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
05-07-2013	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING REPORT	0.3	170.00	\$51.00			
05-07-2013	L. SIMONINI	STUDY CLIENT'S E-MAIL [Privileged Communication]	0.1	170.00	\$17.00			
05-07-2013	L. SIMONINI	CONFERENCE CALL ATTORNEY COOK, EXPERT BJORKLUND AND CLIENT REGARDING DAMAGES ANALYSIS	0.4	170.00	\$68.00			
05-07-2013	L. SIMONINI	TELEPHONE CALL EXPERT MCRAE REGARDING EXPERT DISCLOSURE	0.3	170.00	\$51.00			
05-07-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING EXPERT DISCLOSURE	0.1	170.00	\$17.00			
05-07-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING EXPERT DISCLOSURE	0.1	170.00	\$17.00	Excessive billing for email exchange	A paralegal's .1 time entry to review an email from an expert is not excessive.	
05-07-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
05-07-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	A paralegal's .1 time entry to prepare an email to Plaintiff Gressett is not excessive.	
05-07-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.2	380.00	\$76.00	Duplicative	This represents a separate email and is not duplicative of any other review by Attorney Cook.	
05-07-2013	T. COOK	STUDY SECOND EMAIL FROM CLIENT [Privileged Communication]	0.2	380.00	\$76.00	Duplicative	This represents a separate email and is not duplicative of any other review by Attorney Cook.	
05-08-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
05-08-2013	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING DAMAGES ANALYSIS	0.4	170.00	\$68.00			
05-08-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING RETIREMENT STATEMENT	0.1	170.00	\$17.00			
05-08-2013	L. SIMONINI	TELEPHONE CALL CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
05-08-2013	L. SIMONINI	CONFERENCE CALL ATTORNEY COOK AND EXPERT BJORKLUND REGARDING REPORT	0.5	170.00	\$85.00			
05-08-2013	L. SIMONINI	TELEPHONE CALL G. McRae REGARDING PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES	0.1	170.00	\$17.00			
05-08-2013	L. SIMONINI	DRAFT E-MAIL TO G. McRae REGARDING PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES	0.1	170.00	\$17.00			
05-08-2013	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL DAMAGES DOCUMENTS TO BE ATTACHED TO SUPPLEMENTAL DISCLOSURE STATEMENT	1.6	170.00	\$272.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
05-08-2013	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL DISCOVERY RECORDS TO BE FORWARDED TO EXPERT MCRAE	1.8	170.00	\$306.00	Excessive	A paralegal's assignment to create an additional subfile for Expert McRae is not excessive.	
05-08-2013	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL DAMAGES DOCUMENTS TO BE FORWARDED TO EXPERT BJORKLUND	1.6	170.00	\$272.00	Excessive	A paralegal's assignment to create an additional subfile for Expert Bjorklund is not excessive.	
05-08-2013	T. COOK	TWO TELEPHONE CALLS WITH CLIENT [Privileged Communication]	0.5	380.00	\$190.00			
05-09-2013	L. SIMONINI	CONFERENCE CALL EXPERT BJORKLUND AND ATTORNEY COOK REGARDING DAMAGES CALCULATION	0.4	170.00	\$68.00			
05-09-2013	L. SIMONINI	TWO TELEPHONE CALLS CLIENT [Privileged Communication]	0.3	170.00	\$51.00			
05-09-2013	L. SIMONINI	DRAFT SUMMARY OF MATERIALS TO EXPERT BJORKLUND TO BE INCLUDED WITH EXPERT DISCLOSURE	0.8	170.00	\$136.00	Duplicative of entry on 5/6/13	Paralegal Simonini's .8 time entry to prepare a portion of the expert disclosure is not duplicative of any work she had done before.	
05-09-2013	L. SIMONINI	DRAFT SUMMARY OF MATERIALS TO EXPERT MCRAE TO BE INCLUDED WITH EXPERT DISCLOSURE	0.9	170.00	\$153.00	Duplicative of entry on 5/6/13	Paralegal Simonini's .9 time entry to prepare a portion of the expert disclosure is not duplicative of any work she had done before.	
05-09-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING ADDITIONAL DAMAGES MATERIALS	0.1	170.00	\$17.00			
05-09-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING TRANSCRIPTS	0.1	170.00	\$17.00			
05-09-2013	L. SIMONINI	TELEPHONE CALL EXPERT MCRAE REGARDING TRANSCRIPTS	0.3	170.00	\$51.00			
05-09-2013	L. SIMONINI	CONFERENCE CALL EXPERT BJORKLUND AND ATTORNEY COOK REGARDING REPORT	0.4	170.00	\$68.00			
05-09-2013	L. SIMONINI	STUDY E-MAIL AND ATTACHMENT FROM CLIENT [Privileged Communication]	0.2	170.00	\$34.00			
05-09-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING W-2	0.1	170.00	\$17.00			
05-09-2013	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING W-2	0.2	170.00	\$34.00			
05-09-2013	L. SIMONINI	STUDY BJORKLUND'S DRAFT EXPERT REPORT	0.8	170.00	\$136.00	Duplicative of 5/9/13 entry by T. Blair	Paralegal Simonini's .8 time entry to review Bjorklund's draft expert report for formatting issues is not duplicative of Attorney Blair's review of the Bjorklund draft report.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
05-09-2013	L. SIMONINI	STUDY EXPERT MCRAE'S DRAFT EXPERT REPORT	0.8	170.00	\$136.00	Duplicative of 5/9/13 entry by T. Blair	Paralegal Simonini's .8 time entry to review McRae's draft expert report for formatting issues is not duplicative of Attorney Blair's review of the Bjorklund draft report.	
05-09-2013	J. BLAIR	STUDY DRAFT REPORT FROM EXPERT MCRAE, MAKE MINOR SUGGESTIONS	0.9	380.00	\$342.00			
05-09-2013	J. BLAIR	STUDY DRAFT REPORT FROM EXPERT BJORKLUND	0.5	380.00	\$190.00			
05-09-2013	T. COOK	TELEPHONE CALL WITH P. BJORKLUND REGARDING ECONOMIC LOSSES	0.4	380.00	\$152.00			
05-09-2013	T. COOK	TELEPHONE CALL WITH G. MCRAE REGARDING STANDARD OF CARE ANALYSIS	0.6	380.00	\$228.00			
05-09-2013	T. COOK	STUDY REPORTS FROM BOTH EXPERTS, EDIT SAME AND APPROVE SAME	1.2	380.00	\$456.00	Duplicative of J. Blair 5/9/13 entries	Attorney Cook's separate review of the expert reports and editing of same is not duplicative of Attorney Blair's analysis of those reports.	
05-10-2013	L. SIMONINI	TELEPHONE CALL EXPERT MCRAE REGARDING DRAFT REPORT	0.4	170.00	\$68.00			
05-10-2013	L. SIMONINI	PREPARE BJORKLUND'S EXPERT REPORT TO BE ATTACHED TO SUPPLEMENTAL DISCLOSURE STATEMENT	0.3	170.00	\$51.00	Clerical	Paralegal Simonini's .3 time entry to prepare the supplemental disclosure for the expert report is not clerical.	
05-10-2013	L. SIMONINI	PREPARE EXPERT MCRAE'S REPORT TO BE ATTACHED TO SUPPLEMENTAL DISCLOSURE STATEMENT	0.3	170.00	\$51.00	Clerical	Paralegal Simonini's .3 time entry to prepare the supplemental disclosure for the expert report is not clerical.	
05-10-2013	L. SIMONINI	DRAFT SUPPLEMENTAL DISCLOSURE STATEMENT REGARDING EXHIBITS	0.4	170.00	\$68.00			
05-10-2013	L. SIMONINI	PREPARE ADDITIONAL DAMAGES MATERIALS TO BE ATTACHED TO SUPPLEMENTAL DISCLOSURE STATEMENT	0.7	170.00	\$119.00			
05-10-2013	L. SIMONINI	DRAFT NOTICE OF SERVICE OF SUPPLEMENTAL DISCLOSURE STATEMENT	0.1	170.00	\$17.00	Clerical	A paralegal's .1 time entry to prepare a notice of service is not clerical.	
05-10-2013	L. SIMONINI	STUDY E-MAIL FROM GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
05-10-2013	L. SIMONINI	DRAFT E-MAIL TO GRESSETT [Privileged Communication]	0.1	170.00	\$17.00	Excessive billing for email exchange	A paralegal's .1 time entry to prepare an email is not excessive.	
05-10-2013	L. SIMONINI	DRAFT 26(A)(2) DISCLOSURE OF EXPERTS	0.3	170.00	\$51.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
05-10-2013	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT DISCLOSURE AND FINALIZATION OF SAME	2.3	170.00	\$391.00	Excessive, vague	Paralegal Simonini's 2.3 time entry represents her assignment to confirm the final expert reports conform to the federal rules and the issues relevant to this case is neither excessive nor vague.	
05-10-2013	J. BLAIR	REVIEW AND APPROVE EXPERT REPORTS, ARRANGE FILING AND NOTICE, RELATED EMAIL EXCHANGE WITH A. GRESSETT	0.6	380.00	\$182.40	Block Billing, clerical re: arranging filing	First entry (.2); second entry (to review and approve the filing notification) (.2); third entry (.2).	Block billing; reduced by 20%.
05-10-2013	J. BLAIR	REVIEW AND APPROVE SUPPLEMENTAL DISCLOSURE	0.2	380.00	\$76.00	Excessive, duplicative	Attorney Blair's (.2) time entry to review and approve the entire supplemental disclosure is neither excessive nor duplicative.	
05-13-2013	L. SIMONINI	ADDRESS ISSUES REGARDING SUPPLEMENTATION OF REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES	0.8	170.00	\$136.00	Excessive	Paralegal Simonini's .8 time entry, an assignment to determine whether supplementation of discovery responses was necessary, is not excessive.	
05-14-2013	L. SIMONINI	CONTINUED STUDY OF DEFENDANT'S VOLUMINOUS REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSE TO IDENTIFY M. COOK ISSUES, ADDITIONAL DAMAGES SUPPORT	3.2	170.00	\$544.00	Excessive, block billing	First time entry (2.5); second time entry (.7). This paralegal effort was not excessive in light of the size of the file reviewed.	
05-14-2013	L. SIMONINI	CONTINUED STUDY OF DEFENDANT'S VOLUMINOUS INITIAL DISCLOSURE STATEMENT AND SUPPLEMENTAL DISCLOSURE STATEMENT TO IDENTIFY M. COOK ISSUES, ADDITIONAL DAMAGES SUPPORT	3.2	170.00	\$544.00	Excessive, duplicative of entry above	Paralegal Simonini's 3.2 time entry to continue the substantial assignment described above is neither excessive nor duplicative.	
05-14-2013	J. BLAIR	STUDY SEVENTH CIRCUIT DECISION SUPPORTIVE OF OUR FMLA CLAIMS	1.0	380.00	\$380.00	Excessive	Attorney Blair's 1.0 time entry to review a relevant 7th Circuit decision is not excessive.	
05-15-2013	L. SIMONINI	STUDY MARICOPA COUNTY AND FEDERAL DISTRICT COURTS TO DETERMINE WHETHER FORMER SUPERVISOR M. COOK HAS ADDITIONAL ALLEGATIONS REGARDING HARASSMENT	1.7	170.00	\$289.00	Excessive	Paralegal Simonini's 1.7 time entry to study court files for any other claims against CAP's supervisor Cook is not excessive, particularly given the allegations in this litigation.	
05-20-2013	J. BLAIR	ADDRESS POTENTIAL CONTRACT CLAIM VS. CAP □	0.2	380.00	\$76.00	Duplicative of 1/9/13 and 4/13/13 entries	Attorney Blair's .2 time entry to revisit the potential contract claim vs. CAP is not duplicative of the earlier efforts.	
05-21-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DISCOVERY TO BE COMPLETED, DEPOSITIONS TO BE TAKEN IN ADVANCE OF DISCOVERY CUTOFF	1.7	170.00	\$289.00	Excessive	Paralegal Simonini's assignment to address discovery issues given the upcoming discovery cutoff, at 1.7 hours, is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
05-21-2013	L. SIMONINI	DRAFT E-MAIL TO DEFENSE COUNSEL REGARDING DEPOSITIONS	0.1	170.00	\$17.00			
05-21-2013	L. SIMONINI	STUDY CAP'S VOLUMINOUS RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES TO IDENTIFY DOCUMENTS SUPPORTING PREVIOUS ISSUES WITH MANAGEMENT	4.3	170.00	\$731.00	Excessive, duplicative of 5/14/13 and 1/4/13 entries	Paralegal Simonini's assignment to identify documents supporting claims against CAP's management, which took 4.3 hours, is not excessive or duplicative of other paralegal assignments.	
05-21-2013	T. COOK	TELEPHONE CALL WITH CLIENT [Privileged Communication]	0.5	380.00	\$190.00			
05-21-2013	T. COOK	EVALUATE AND UPDATE ACTION PLANS BASED ON RESULTS FROM EXPERTS, DEADLINES, FACTUAL ISSUES TO NAIL DOWN, COST CONTAINMENT AS POSSIBLE; UPDATE PLAN OF ACTION	1.0	380.00	\$380.00			
05-22-2013	L. SIMONINI	STUDY CAP'S NARRATIVE REPORTS SUBMITTED TO DEPARTMENT OF LABOR AND COMPARE TO CORRESPONDENCE AND TRANSCRIPTS TO IDENTIFY DISCREPANCIES IN CAP'S SUBMISSIONS	3.5	170.00	\$595.00	Vague	Paralegal Simonini's assignment to review CAP's submissions to the Department of Labor and test them for consistency, which took 3.5 hours, is not vague.	
05-23-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING REBUTTAL DEADLINE	0.1	170.00	\$17.00			
05-23-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING REBUTTAL DEADLINE	0.1	170.00	\$17.00			
05-23-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEPOSITIONS TO BE TAKEN, DISCOVERY TO BE PROPOUNDED	1.2	170.00	\$204.00	Excessive	Paralegal Simonini's 1.2 time entry to follow-up on work to be completed before the discovery deadline, is not excessive.	
05-23-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING REBUTTAL DEADLINE	0.1	170.00	\$17.00	Excessive	A paralegal's .1 time entry to review an email from an expert is not excessive.	
05-23-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT BJORKLUND REGARDING REBUTTAL DEADLINE	0.1	170.00	\$17.00	Excessive	A paralegal's .1 time entry to review an email from an expert is not excessive.	
05-23-2013	L. SIMONINI	STUDY STATE AND FEDERAL COURT DOCKETS TO DETERMINE WHETHER CAP HAS PREVIOUSLY HAD SUIT BROUGHT REGARDING EMPLOYMENT MATTERS	3.3	170.00	\$561.00	Excessive	Paralegal Simonini's 3.3 time entry to study the court dockets to determine whether CAP has previously been sued on employment matters is not excessive, but necessary for this litigation.	
05-28-2013	L. SIMONINI	STUDY MATERIALS FROM CLIENT RECEIVED VIA E-MAIL TO DETERMINE WHETHER ADDITIONAL DOCUMENTS SHOULD BE DISCLOSED	2.7	170.00	\$459.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
05-28-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
05-30-2013	L. SIMONINI	DRAFT FOLLOW-UP E-MAIL TO DEFENSE COUNSEL REGARDING DEPOSITIONS	0.1	170.00	\$17.00			
05-30-2013	L. SIMONINI	STUDY E-MAIL FROM DEFENSE ATTORNEY REGARDING DEPOSITIONS, MEET AND CONFER	0.1	170.00	\$17.00	Excessive billing for email exchange	A paralegal's .1 time entry to review an email from defense counsel is not excessive.	
05-30-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEPOSITIONS TO BE TAKEN	0.5	170.00	\$85.00	Excessive, vague	Paralegal Simonini's .5 time entry to take on an assignment regarding persons yet to be deposed is neither excessive nor vague. She was doing what her attorneys asked her to do.	
05-30-2013	J. BLAIR	COMMUNICATIONS WITH DEFENSE ATTORNEY REGARDING DEPOSITIONS AND DISCOVERY	0.2	380.00	\$76.00			
05-31-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEFENDANT'S MEET AND CONFER REQUEST	0.5	170.00	\$85.00	Excessive	Paralegal Simonini's .5 time entry to address plaintiff's appropriate response to defendant's meet and confer request is not excessive.	
05-31-2013	L. SIMONINI	ADDRESS ISSUES REGARDING BACKGROUND CHECKS FOR POTENTIAL EMPLOYEES	0.8	170.00	\$136.00	Excessive, vague	Paralegal Simonini's .8 time entry to learn what background checks are conducted for potential employees is neither excessive nor vague.	
05-31-2013	L. SIMONINI	CONDUCT BACKGROUND CHECK REGARDING A. GRESSETT	1.2	170.00	\$204.00	Excessive, unrelated to lawsuit	Paralegal Simonini's 1.2 time entry to determine whether Plaintiff Gressett would pass a background check given her claim against CAP and her termination by CAP is not excessive and certainly related to this lawsuit.	
06-03-2013	L. SIMONINI	"RESEARCH" CLIENT TO DETERMINE WHETHER CAP'S POTENTIAL NEGATIVE INFORMATION WOULD SHOW UP ON A BACKGROUND CHECK	3.7	170.00	\$629.00	Excessive, duplicative of entry above	Paralegal Simonini's 3.7 time entry is a research assignment in follow-up to the background check conducted in the prior time entry. It is not excessive, not duplicative and critical to this lawsuit.	
06-03-2013	J. BLAIR	SERIES OF EMAILS TO INVESTIGATE WHY A. GRESSETT IS NOT GETTING JOBS THAT SHE SHOULD BE GETTING, CONSIDER DAMAGES ASSOCIATED WITH SAME	0.4	380.00	\$152.00	Vague	Attorney Blair's .4 time entry is his attempt to understand Ms. Simonini's findings. It is not vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-03-2013	T. COOK	MULTIPLE EMAILS WITH CLIENT AND TEAM [Privileged Communication]	0.4	380.00	\$152.00	Block billing, internal conference (email)	Attorney Cook's .4 time entry represents multiple .1 time entries. They are emails to and from Plaintiff Gressett with copies to the attorney team.	
06-03-2013	T. COOK	STUDY EMAIL FROM DEFENDANT ATTORNEY REGARDING DISCOVERY FOLLOW-UP	0.1	380.00	\$38.00	Excessive billing for email exchange below	An attorney's .1 time entry to review an email is not excessive.	
06-03-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING TIMING OF DISCOVERY FOLLOW-UP AND NEED FOR DETAILS TO AID WITH INVESTIGATION AND POSSIBLE SUPPLEMENTATION	0.2	380.00	\$76.00			
06-03-2013	T. COOK	STUDY EMAIL FROM DEFENDANT ATTORNEY REGARDING DISCOVERY	0.1	380.00	\$38.00	Duplicative of entry above	Attorney Cook's .1 time entry to study an email is separate from the prior time entry.	
06-04-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEFENDANT'S REQUEST FOR ADDITIONAL DISCOVERY RESPONSES	0.5	170.00	\$85.00	Excessive	Paralegal Simonini's .5 time entry to address CAP's request for supplemental discovery responses is not excessive.	
06-04-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEPOSITIONS	0.4	170.00	\$68.00	Excessive	Paralegal Simonini's .4 time entry to take on a depositions assignment is not excessive.	
06-04-2013	T. COOK	ASSESS BEST WAYS TO PROVE CLIENT MAY BE DEFAMED BY FORMER EMPLOYER	0.4	380.00	\$152.00	Vague	Attorney Cook's .4 time entry to address defamation by a former employer is not vague.	
06-05-2013	L. SIMONINI	DRAFT E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00			
06-05-2013	L. SIMONINI	STUDY E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00	Excessive billing for email exchange	A paralegal's .1 time entry to review an email from counsel is not excessive.	
06-05-2013	L. SIMONINI	STUDY DISCLOSURE DOCUMENTS AND PREPARE COLLECTION OF KEY DOCUMENTS FOR ATTORNEY USE IN UPDATING TIME LINE	3.2	170.00	\$544.00	Excessive	Paralegal Simonini's 3.2 time entry to assist Attorney Cook in preparing a litigation timeline is not excessive.	
06-05-2013	J. BLAIR	CONFIRM FURTHER EMAIL TO DEFENSE COUNSEL SEEKING DEPOSITION DATES IN JUNE	0.2	380.00	\$76.00	Excessive billing for email exchange	Attorney Blair's .2 time entry to address what June deposition dates could be met by CAP's attorneys is not excessive.	
06-10-2013	L. SIMONINI	DRAFT TWO E-MAILS TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00			
06-10-2013	L. SIMONINI	STUDY E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.0	170.00	\$0.00	Excessive	Agreed. This is a typographical error and was intended to be 0.1	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-10-2013	L. SIMONINI	RESEARCH TO IDENTIFY NEBRASKA LOCATION FOR DEPOSITION OF M. COOK	1.2	170.00	\$204.00	Clerical, Excessive	Paralegal Simonini's 1.2 time entry to determine where CAP's supervisor Mike Cook could be deposed is neither clerical nor excessive. Mr. Cook would not travel to Phoenix and his deposition was absolutely necessary. RCDM has no office in Nebraska, nor does it have any attorneys that have Nebraska residences.	
06-10-2013	L. SIMONINI	DRAFT LETTER FOR ATTORNEY BLAIR'S SIGNATURE REGARDING EMPLOYER SUBPOENAS	0.2	170.00	\$34.00			
06-10-2013	J. BLAIR	PLAN FOR JUNE DEPOSITIONS	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to confirm coverage of the June depositions is not vague.	
06-10-2013	J. BLAIR	REVIEW EMAIL EXCHANGE REGARDING DATES AVAILABLE FOR DEPOSITIONS	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to confirm the dates finally agreed to for June depositions is not excessive.	
06-10-2013	T. COOK	RESEARCH CASE LAW CITED BY EXPERT ON STANDARD OF CARE	0.4	380.00	\$152.00	Duplicative of entry below	Attorney Cook's .4 time entry to research standard of care is not duplicative of her next time entry in which she did "additional research" on this and other issues.	
06-10-2013	T. COOK	ADDITIONAL RESEARCH ON SCOPE OF CLAIM TO BE MADE REGARDING DAMAGES AND BREACH OF STANDARD OF CARE	1.4	380.00	\$532.00			
06-10-2013	T. COOK	TELEPHONE CALL WITH EXPERT BJORKLUND REGARDING DAMAGES AND PROOF AND SCOPE OF SAME	0.5	380.00	\$190.00			
06-10-2013	T. COOK	CONFER WITH J. BLAIR REGARDING LEGAL AND FACTUAL ISSUES OF CASE, WAYS TO BOLSTER SAME, DEPOSITIONS TO BE TAKEN, STRATEGY GOING FORWARD	0.8	380.00	\$304.00	Internal Conference	Attorney Cook's .8 time entry to confer with Attorney Blair about strategies going forward is not an internal conference; Attorney Blair did not bill for this strategy session.	
06-11-2013	L. SIMONINI	INTERNET RESEARCH TO IDENTIFY ANY CIVIL, CRIMINAL OR BANKRUPTCY HISTORY FOR WITNESS M. RUZICH	1.4	170.00	\$238.00	Excessive	Paralegal Simonini's assignment to check the litigation history for Attorney Ruzich is not excessive.	
06-11-2013	L. SIMONINI	INTERNET RESEARCH TO IDENTIFY ANY CIVIL, CRIMINAL OR BANKRUPTCY HISTORY FOR WITNESS M. LUDKE	1.7	170.00	\$289.00	Excessive	Paralegal Simonini's assignment to check the litigation history for Attorney Ludke is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-11-2013	L. SIMONINI	INTERNET RESEARCH TO IDENTIFY ANY CIVIL, CRIMINAL, BANKRUPTCY BAR LICENSE ISSUES AND HISTORY FOR WITNESS T. DELGADO	1.8	170.00	\$306.00	Excessive	Paralegal Simonini's 1.8 time entry to determine the litigation history for witness Delgado is not excessive.	
06-11-2013	J. BLAIR	ADDRESS JUNE DEPOSITIONS OF DEFENSE WITNESSES, CONFIRM AVAILABILITY	0.3	380.00	\$114.00	Vague, clerical	Attorney Blair's .3 time entry to confirm CAP's witnesses would in fact be available for depositions in June is neither vague nor clerical.	
06-11-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
06-11-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative of entry above, excessive	Attorney Cook's .1 time entry relates to a separate email and is therefore not duplicative. Also, it is not excessive to bill .1 to prepare and send an email.	
06-12-2013	L. SIMONINI	STUDY E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00			
06-12-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEFENDANT'S SUBPOENA DUCES TECUM TO FORMER EMPLOYERS ABSENT A RELEASE	1.2	170.00	\$204.00	Excessive, vague	Paralegal Simonini's 1.2 time entry to complete the assignment addressing CAP's subpoenas to former Gressett employers is neither excessive nor vague.	
06-12-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
06-12-2013	L. SIMONINI	STUDY E-DISCLOSURE AND DISCOVERY DOCUMENTS AND IDENTIFY MATERIALS FOR ATTORNEY USE DURING DEPOSITION OF M. COOK	2.9	170.00	\$493.00			
06-12-2013	L. SIMONINI	INTERNET RESEARCH TO IDENTIFY ANY CIVIL, CRIMINAL OR BANKRUPTCY HISTORY FOR WITNESS M. COOK	2.9	170.00	\$493.00	Excessive	Paralegal Simonini's 2.9 time entry to research litigation to CAP witness Cook is not excessive, but extremely relevant to the issues in this case.	
06-12-2013	J. BLAIR	LETTER FROM CAP'S COUNSEL REGARDING SUBPOENA RELEASES	0.2	380.00	\$76.00			
06-13-2013	L. SIMONINI	DRAFT TWO E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00	Excessive	Paralegal Simonini's .2 time entry to draft two emails to CAP's counsel is not excessive.	
06-13-2013	L. SIMONINI	STUDY E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-13-2013	L. SIMONINI	STUDY DEFENDANT DISCLOSURE STATEMENT TO IDENTIFY PERTINENT MATERIALS FOR ATTORNEY USE IN PREPARING FOR DEPOSITIONS	2.7	170.00	\$459.00	Excessive	Paralegal Simonini's 2.7 time entry to review the file and identify materials for attorney use at depositions is not excessive and necessary paralegal work prior to depositions.	
06-13-2013	L. SIMONINI	STUDY VOLUMINOUS REQUEST FOR PRODUCTION OF DOCUMENTS RECORDS AND IDENTIFY MATERIALS FOR ATTORNEY USE DURING DEPOSITIONS	3.7	170.00	\$629.00			
06-13-2013	J. BLAIR	REVIEW MATERIALS/TIMELINE FOR DEPOSITIONS	0.5	380.00	\$190.00			
06-14-2013	L. SIMONINI	STUDY E-MAIL AND ATTACHMENTS FROM CLIENT [Privileged Communication]	1.1	170.00	\$187.00	Excessive, vague	Paralegal Simonini's 1.1 time entry to study an email with attachments from Plaintiff Gressett is neither excessive nor vague given its privileged nature.	
06-14-2013	L. SIMONINI	IDENTIFY DISCLOSURE MATERIALS FOR ATTORNEY BLAIR'S USE IN PREPARING FOR DEPOSITIONS	2.3	170.00	\$391.00			
06-14-2013	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.3	380.00	\$114.00			
06-14-2013	J. BLAIR	CHECK OUT AUDIO TAPE ISSUE	0.3	380.00	\$114.00	Clerical, vague	Attorney Blair's .3 time entry to address the audiotape issue prior to depositions is neither clerical nor vague, but necessary in preparation for those depositions.	
06-14-2013	J. BLAIR	REVIEW FILE IN PREPARATION FOR DEPOSITIONS OF THREE HUMAN RESOURCE WITNESSES	1.9	380.00	\$722.00	Vague	Attorney Blair's 1.9 time entry to review the file in advance of human resource witness depositions is not vague. It explains in some detail the preparation that is necessary for any depositions.	
06-17-2013	L. SIMONINI	INTERNET SEARCH TO LOCATE COURT REPORTER WITH VIDEO CONFERENCE CAPABILITY LOCAL TO NORTH PLATTE, NEBRASKA FOR THE DEPOSITION OF M. COOK	1.0	170.00	\$170.00	Clerical, Excessive, Duplicative of 6/10/13 entry	Paralegal Simonini's 1.0 time entry to contact an appropriate court reporter in Nebraska is neither clerical, excessive or duplicative of her earlier search for a deposition location.	
06-17-2013	L. SIMONINI	TELEPHONE CALL NEBRASKA COURT REPORTER REGARDING ARRANGEMENTS FOR M. COOK DEPOSITION	0.3	170.00	\$51.00			
06-17-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO M. RUZICH	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-17-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO M. LUDKE	0.1	170.00	\$17.00			
06-17-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO M. COOK	0.1	170.00	\$17.00			
06-17-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO T. DELGADO	0.1	170.00	\$17.00			
06-17-2013	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.3	380.00	\$114.00			
06-17-2013	J. BLAIR	STUDY MATERIALS ATTACHED TO CAP'S INITIAL DISCLOSURE STATEMENT, MARK SAME FOR DEPOSITIONS UPCOMING	2.6	380.00	\$988.00	Duplicative of L. Simonini 6/13/13 entry	Attorney Blair's 2.6 time entry to study CAP's initial disclosure statement and prepare materials for upcoming depositions is not duplicative of the paralegal's pre-deposition file review.	
06-17-2013	J. BLAIR	STUDY MCRAE EXPERT REPORT FOR DEPOSITION QUESTIONS	0.8	380.00	\$304.00			
06-17-2013	J. BLAIR	REVIEW DEPOSITION NOTICES	0.1	380.00	\$38.00	Excessive	Attorney Blair's .1 time entry to review upcoming deposition notices is not excessive but necessary to confirm the accuracy of those notices prior to any deposition.	
06-18-2013	L. SIMONINI	DRAFT TWO E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00	Excessive	Paralegal Simonini's .2 time entry to draft two emails to CAP's counsel is not excessive.	
06-18-2013	L. SIMONINI	STUDY TWO E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00	Excessive	Paralegal Simonini's .2 time entry to review two emails from CAP's counsel is similarly not excessive.	
06-18-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
06-18-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email to Plaintiff Gressett is not excessive.	
06-18-2013	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR REGARDING DEPOSITIONS AND DISCOVERY TO BE SUPPLEMENTED	1.3	170.00	\$221.00	Internal Conference	Paralegal Simonini's 1.3 time entry conference with Attorney Blair is not an internal conference. Attorney Blair did not bill for this discussion of depositions and supplemental discovery.	
06-18-2013	L. SIMONINI	TELEPHONE CALL EXPERT MCRAE REGARDING EXTENSION FOR SUBPOENA DUCES TECUM RESPONSE	0.2	170.00	\$34.00			
06-18-2013	L. SIMONINI	DRAFT E-MAIL TO DEFENDANT'S ATTORNEY SEEKING EXTENSION FOR EXPERT MCRAE'S SUBPOENA DUCES TECUM RESPONSE	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-18-2013	L. SIMONINI	STUDY E-MAIL FROM DEFENDANT GRANTING EXTENSION	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry is not excessive to review an email from CAP's attorneys.	
06-18-2013	L. SIMONINI	DRAFT AMENDED NOTICE OF DEPOSITION TO M. RUZICH	0.1	170.00	\$17.00			
06-18-2013	L. SIMONINI	DRAFT AMENDED NOTICE OF DEPOSITION FOR M. LUDKE	0.1	170.00	\$17.00			
06-18-2013	L. SIMONINI	TELEPHONE CALL DEFENDANT'S ATTORNEY REGARDING DEPOSITION SCHEDULE, PROPOSITION TO EXTEND DISCOVERY CUTOFF	0.3	170.00	\$51.00			
06-18-2013	J. BLAIR	STUDY TRANSCRIPTS OF DISCUSSIONS WITH M. COOK, MAKE NOTES REGARDING SAME	1.3	380.00	\$494.00			
06-18-2013	J. BLAIR	REVIEW MATERIALS FROM A. GRESSETT REGARDING DEPOSITIONS	0.6	380.00	\$228.00			
06-18-2013	J. BLAIR	ADDRESS EXTENSION ISSUE RAISED BY CAP	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to address CAP's request for an extension is not excessive.	
06-19-2013	L. SIMONINI	DRAFT THREE E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.3	170.00	\$51.00			
06-19-2013	L. SIMONINI	STUDY TWO E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00	Excessive billing for email exchange	Paralegal Simonini's .2 time entry to study two emails from CAP's counsel is not excessive.	
06-19-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEPOSITIONS AND DEFENDANT'S FAILURE TO COOPERATE REGARDING SCHEDULE	0.6	170.00	\$102.00	Excessive	Paralegal Simonini's .6 time entry to address her assignment to confront CAP's failure to cooperate regarding pretrial schedule is not excessive.	
06-19-2013	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S LETTER SEEKING ADDITIONAL DISCOVERY RESPONSES	1.2	170.00	\$204.00	Excessive, vague	Paralegal Simonini's 1.2 time entry to address the appropriateness of CAP's request for additional discovery responses is neither excessive nor vague.	
06-19-2013	L. SIMONINI	ADDRESS ISSUES REGARDING ADDITIONAL DISCOVERY TO BE PURSUED	0.9	170.00	\$153.00	Excessive	Paralegal Simonini's .9 time entry to address whether Plaintiff Gressett should pursue additional discovery is not excessive.	
06-19-2013	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS AND IDENTIFY RECORDS FOR ATTORNEY USE AT DEPOSITION OF M. LUDKE	3.5	170.00	\$595.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-19-2013	J. BLAIR	STUDY DISCOVERY ISSUES, TELEPHONE CALL AND MESSAGE TO CAP'S ATTORNEY	0.5	380.00	\$190.00	Block Billing, vague	Attorney's Blair .5 time entry to study pending discovery issues, then leave a message with CAP's counsel is not vague. First entry (.4); second entry (.1).	
06-19-2013	J. BLAIR	EXTENDED TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	1.5	380.00	\$570.00			
06-19-2013	J. BLAIR	STUDY MATERIALS DISCLOSED BY CAP	0.7	380.00	\$266.00	Vague	Attorney Blair's .7 time entry to study CAP's disclosures is not vague but describes the work performed.	
06-19-2013	J. BLAIR	EMAIL FROM CAP'S COUNSEL REGARDING DISCOVERY ISSUES	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to study an email from CAP's counsel regarding the pending discovery issues is not excessive.	
06-20-2013	L. SIMONINI	CONFERENCE WITH CLIENT AND ATTORNEY BLAIR [Privileged Communication]	3.4	170.00	\$578.00			
06-20-2013	L. SIMONINI	DRAFT TWO E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00	Excessive	Paralegal Simonini's .2 time entry to prepare two emails to CAP's counsel is not excessive (.1 per email).	
06-20-2013	L. SIMONINI	STUDY FOUR E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.4	170.00	\$68.00	Excessive	Paralegal Simonini's .4 time entry to review four emails from CAP's attorney is not excessive (.1 per email).	
06-20-2013	L. SIMONINI	IDENTIFY DOCUMENTS FOR ATTORNEY USE DURING CLIENT MEETING	1.2	170.00	\$0.00	Vague	Paralegal Simonini's 1.2 time entry to locate documents for use by an RCDM attorney during a meeting with Ms. Gressett is not vague.	Vague.
06-20-2013	J. BLAIR	STUDY EMAIL COMMUNICATIONS WITH COUNSEL FOR CAP REGARDING DISCOVERY ISSUES	0.2	380.00	\$76.00			
06-20-2013	J. BLAIR	MEET WITH A. GRESSETT [Privileged Communication]	3.3	380.00	\$1,254.00			
06-20-2013	J. BLAIR	EMAIL TO CAP'S ATTORNEY REGARDING DISCOVERY RESPONSES	0.1	380.00	\$38.00			
06-20-2013	J. BLAIR	ANALYZE TIMING ISSUES FOR DEPOSITIONS, MOTIONS, DISCOVERY RESPONSES	0.3	380.00	\$114.00			
06-21-2013	L. SIMONINI	DRAFT TWO E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00	Excessive	Paralegal Simonini's .2 time entry to prepare two emails to CAP's counsel is not excessive (.1 per email).	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-21-2013	L. SIMONINI	PREPARE SUMMARY OF MEETING NOTES IN ORDER TO PURSUE ADDITIONAL DISCOVERY, PREPARE DISCLOSURE STATEMENTS	1.2	170.00	\$163.20	Block billing	First entry (.7); second entry (.5).	Block billing; reduced by 20%.
06-21-2013	L. SIMONINI	PREPARE SUPPLEMENTAL RESPONSE TO NON-UNIFORM INTERROGATORIES IN RESPONSE TO CAP'S REQUEST FOR ADDITIONAL DISCOVERY	1.3	170.00	\$221.00			
06-21-2013	L. SIMONINI	DRAFT SECOND SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSE IN RESPONSE TO CAP'S REQUEST FOR ADDITIONAL DOCUMENTS	2.3	170.00	\$391.00			
06-21-2013	L. SIMONINI	IDENTIFY AND PREPARE RECORDS TO BE ATTACHED TO SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	1.4	170.00	\$238.00			
06-21-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
06-21-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Plaintiff Gressett is not excessive.	
06-21-2013	J. BLAIR	REVIEW AND APPROVE STIPULATION TO EXTEND DATES	0.2	380.00	\$76.00			
06-21-2013	J. BLAIR	REVIEW AND APPROVE FOR FILING DISCOVERY REQUESTS AND DISCOVERY RESPONSES AND SUPPLEMENTAL DISCLOSURE	0.5	380.00	\$190.00			
06-21-2013	J. BLAIR	REVIEW EMAIL FROM A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
06-24-2013	L. SIMONINI	STUDY PLAINTIFF'S MEDICAL RECORDS TO DETERMINE WHETHER NOTES EXIST DOCUMENTING TELEPHONE CALL WITH CAP EMPLOYEES	2.7	170.00	\$459.00	Excessive - records consisted of only 218 pages	Paralegal Simonini's assignment to study the medical records file seeking documentation of phone calls between medical office and CAP employees, 2.7 hours, is not excessive. This became a key issue in the trial presentation, and needed to be performed carefully at that stage of the litigation.	
06-24-2013	L. SIMONINI	DRAFT THREE E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.3	170.00	\$51.00			
06-24-2013	L. SIMONINI	STUDY TWO E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00	Excessive billing for email exchange	Paralegal Simonini's .2 time entry to study two emails from CAP's counsel is not excessive (.1 per email).	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-24-2013	L. SIMONINI	STUDY DISCLOSURE STATEMENTS AND DISCOVERY DOCUMENTS AND IDENTIFY DOCUMENTS FOR ATTORNEY USE AT DEPOSITION OF T. DELGADO	1.6	170.00	\$272.00			
06-24-2013	J. BLAIR	REVIEW EMAIL EXCHANGE REGARDING DEPOSITION SCHEDULING AND REMAINING DISCOVERY ISSUE	0.2	380.00	\$76.00			
06-24-2013	J. BLAIR	EMAIL FROM A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
06-25-2013	L. SIMONINI	DRAFT TWO E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00			
06-25-2013	L. SIMONINI	STUDY TWO E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS	0.2	170.00	\$34.00	Excessive billing for email exchange	Paralegal Simonini's .2 time entry to study two emails from CAP's counsel is not excessive (.1 per email).	
06-25-2013	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S EXPERT DISCLOSURE	0.3	170.00	\$51.00	Vague	Paralegal Simonini's .3 time entry to study CAP's expert disclosure is not vague, but was assigned to her by an RCDM attorney.	
06-25-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING CAP'S EXPERT DISCLOSURE	0.2	170.00	\$34.00			
06-25-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT BJORKLUND REGARDING CAP'S DISCLOSURE	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Expert Bjorklund is not excessive.	
06-25-2013	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING CAP'S DISCLOSURE	0.3	170.00	\$51.00			
06-25-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING CAP'S EXPERT DISCLOSURE	0.1	170.00	\$17.00			
06-25-2013	L. SIMONINI	TELEPHONE CALL EXPERT MCRAE REGARDING CAP'S EXPERT DISCLOSURE	0.3	170.00	\$51.00			
06-25-2013	L. SIMONINI	DRAFT SECOND REQUEST FOR PRODUCTION OF DOCUMENTS	1.9	170.00	\$323.00	Excessive	Paralegal Simonini's 1.9 hour time entry to draft a second request for production of documents from CAP counsel is not excessive.	
06-25-2013	L. SIMONINI	STUDY EXPERT BJORKLUND'S REPRODUCTION OF HIS FILE PURSUANT TO SUBPOENA DUCES TECUM	1.2	170.00	\$204.00			
06-25-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
06-25-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.2	170.00	\$34.00	Excessive billing for email exchange	Paralegal Simonini's .2 time entry to prepare an email to Plaintiff Gressett is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-25-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Duplicative	Paralegal Simonini's .1 time entry to prepare a separate email to Plaintiff Gressett is not duplicative. It was a separate email.	
06-25-2013	L. SIMONINI	STUDY DISCLOSURE STATEMENTS AND IDENTIFY DOCUMENTS FOR ATTORNEY USE AT DEPOSITION OF M. RUZICH	2.1	170.00	\$357.00			
06-25-2013	J. BLAIR	STUDY EXPERT'S CRITICISM OF P. BJORKLUND'S ANALYSIS	1.0	380.00	\$380.00			
06-25-2013	J. BLAIR	ADDRESS DEPOSITION ISSUES WITH CAP	0.2	380.00	\$76.00			
06-26-2013	L. SIMONINI	DRAFT E-MAIL TO CAP'S ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00			
06-26-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEPOSITIONS TO BE ARRANGED, ORDER OF SAME AS IT RELATES TO DEFENDANT'S REQUESTING ADDITIONAL DISCOVERY RESPONSES	1.2	170.00	\$204.00	Vague, clerical	Paralegal Simonini's 1.2 time entry to take on the assignment to propose an order for upcoming depositions so as to conform to CAP's additional discovery responses is neither vague nor clerical.	
06-26-2013	L. SIMONINI	STUDY FMLA LANGUAGE IN ORDER TO INCORPORATE RECORD KEEPING LANGUAGE INTO REQUEST FOR PRODUCTION OF DOCUMENTS	1.8	170.00	\$306.00	Excessive	Paralegal Simonini's 1.8 time entry to ensure that appropriate FMLA language was incorporated into Plaintiff Gressett's request for documents is not excessive.	
06-26-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING SUBPOENA FOR RECORDS	0.1	170.00	\$17.00			
06-26-2013	L. SIMONINI	TWO TELEPHONE CALLS NEBRASKA COURT REPORTER REGARDING ARRANGEMENTS FOR M. COOK DEPOSITION	0.4	170.00	\$68.00	Clerical	Paralegal Simonini's .4 time entry for two calls to the Nebraska court reporter in anticipation of the Cook deposition is not clerical, but a paralegal responsibility.	
06-26-2013	L. SIMONINI	STUDY TWO E-MAIL FROM NEBRASKA COURT REPORTER REGARDING M. COOK DEPOSITION	0.2	170.00	\$34.00	Clerical, excessive	Paralegal Simonini's .2 time entry to study two emails from the Nebraska court reporter is neither clerical nor excessive (.1 per email).	
06-26-2013	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT RESPONSE TO SUBPOENA	0.7	170.00	\$119.00	Vague	Paralegal Simonini's .7 time entry to address the issues raised by experts attempting to understand how to respond to third party subpoena is not vague.	
06-26-2013	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.4	380.00	\$152.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-26-2013	J. BLAIR	CONFIRM MATERIALS TO CAP FROM EXPERT MCRAE	0.0	380.00	\$0.00	Vague, Clerical	Attorney Blair's .2 time entry to address materials sought from Expert McRae by CAP's attorneys is neither vague nor clerical.	Clerical
06-27-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
06-27-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excessive billing for email change	Paralegal Simonini's .1 time entry to prepare email to Plaintiff Gressett is not excessive.	
06-27-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING REBUTTAL REPORT	0.1	170.00	\$17.00			
06-27-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT BJORKLUND REGARDING REBUTTAL DISCLOSURE	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review email from Expert Bjorklund is not excessive.	
06-27-2013	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING REBUTTAL REPORT TO BE DRAFTED	0.2	170.00	\$34.00			
06-27-2013	T. COOK	FOLLOW-UP PLAN OF ACTION IN LIGHT OF IMMINENT DEADLINES	0.3	380.00	\$114.00	Vague	Attorney Cook's review of her prior plans of action in light of deadlines approaching is not vague.	
06-27-2013	J. BLAIR	ANALYZE MATERIALS FROM EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.5	380.00	\$190.00			
06-28-2013	L. SIMONINI	TELEPHONE CALL ATTORNEY BLAIR AND EXPERT BJORKLUND REGARDING REBUTTAL REPORT	1.2	170.00	\$204.00			
06-28-2013	L. SIMONINI	DRAFT SUBPOENA DUCES TECUM. LETTER TO CUSTODIAN OF RECORDS, NOTICE OF DEPOSITION AND DECLARATION OF CUSTODIAN OF RECORDS FOR DEFENDANT'S EXPERT C. CAMERON	0.3	170.00	\$51.00			
06-28-2013	L. SIMONINI	STUDY CAP'S DISCLOSURE OF TRIAL EXHIBITS, INCLUDING SUBPOENA RESPONSE FROM ATTORNEY KRUMWEIDE	1.7	170.00	\$289.00	Excessive, vague	Paralegal Simonini's 1.7 hours to review CAP's trial exhibit disclosures, in particular the subpoena response from Attorney Krumwiede (Plaintiff Gressett's former employer) is neither excessive nor vague.	
06-28-2013	L. SIMONINI	ADDRESS ISSUES REGARDING ATTORNEY KRUMWEIDE'S INFLAMMATORY STATEMENT	0.6	170.00	\$102.00	Vague	Paralegal Simonini's .6 time entry to analyze the significance of Krumwiede's inflammatory statement about Plaintiff Gressett is not vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-28-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING SUBPOENA DUCES TECUM FOR RECORDS	0.1	170.00	\$17.00			
06-28-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING SUBPOENA DUCES TECUM FOR RECORDS	0.1	170.00	\$17.00	Excessive	Paralegal Simonini's .1 to prepare an email to Expert McRae is not excessive.	
06-28-2013	L. SIMONINI	WESTLAW RESEARCH TO IDENTIFY SUPREME COURT CASE LAW REGARDING DAMAGES FOR EXPERT BJORKLUND	0.7	170.00	\$119.00			
06-28-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING CASE LAW	0.1	170.00	\$17.00			
06-28-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING TAX RETURNS	0.1	170.00	\$17.00			
06-28-2013	L. SIMONINI	DRAFT AMENDED NOTICE OF DEPOSITION TO T. DELGADO	0.1	170.00	\$17.00			
06-28-2013	L. SIMONINI	STUDY DEFENDANT'S EXPERT DISCLOSURE AND NOTE AREAS TO BE CHALLENGED BY EXPERT BJORKLUND	1.2	170.00	\$204.00	Duplicative of T. Cook entry 6/30/13	Paralegal Simonini's 1.2 time entry to review CAP's expert disclosure and identify areas Expert Bjorklund should address is not duplicative of Attorney Cook's subsequent review of this same issue. Attorney Cook's time entry was shortened by Paralegal Simonini's prior effort.	
06-28-2013	J. BLAIR	REVIEW CRITICISM OF BJORKLUND	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry represents an overview of what CAP's expert had to say about Expert Bjorklund. It is not vague.	
06-28-2013	J. BLAIR	TELEPHONE CALL WITH P. BJORKLUND REGARDING REBUTTAL	1.2	380.00	\$456.00			
06-29-2013	T. COOK	STUDY MULTIPLE EMAILS WITH CLIENT [Privileged Communication]	1.8	380.00	\$684.00	Excessive	Attorney Cook's 1.8 time entry to review multiple emails exchanged with Plaintiff Gressett is not excessive. It represents an efficient review of constant communication between attorney and client.	
06-30-2013	J. BLAIR	EMAIL EXCHANGES WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00	Duplicative of above entry	Attorney Blair's .2 time entry to review email exchanges with Plaintiff Gressett is not duplicative of Attorney Cook's communications with Plaintiff Gressett, but an overview of those multiple emails.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
06-30-2013	T. COOK	STUDY DEFENDANTS SUPPLEMENTAL DISCLOSURE STATEMENT WITH 140 PAGES PRODUCED	1.8	380.00	\$684.00			
06-30-2013	T. COOK	STUDY DEFENDANTS EXPERT DISCLOSURE REGARDING DAMAGES WITH REPORT AND SUPPORTING DOCUMENTS; CONSIDER NEED FOR REBUTTAL	1.4	380.00	\$532.00			
07-01-2013	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING REBUTTAL REPORT	0.3	170.00	\$51.00			
07-01-2013	L. SIMONINI	PREPARE 2009 W-2 FOR PRODUCTION	0.1	170.00	\$17.00	Vague	Paralegal Simonini's .1 time entry to prepare to produce Plaintiff Gressett's 2009 W-2 form is not vague.	
07-01-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING W-2	0.1	170.00	\$17.00			
07-01-2013	L. SIMONINI	DRAFT E-MAIL TO CAP'S ATTORNEY REGARDING 2009 W-2	0.1	170.00	\$17.00			
07-01-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING REBUTTAL DISCLOSURE	0.1	170.00	\$17.00			
07-01-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
07-01-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING SUBPOENA DUCES TECUM RESPONSE	0.1	170.00	\$17.00			
07-01-2013	L. SIMONINI	DRAFT REBUTTAL EXPERT DISCLOSURE	0.3	170.00	\$51.00			
07-01-2013	T. COOK	STUDY DEFENDANT'S EXPERT DISCLOSURE	1.8	380.00	\$684.00	Excessive, duplicative of 6/30/13 entry	Attorney Cook's 1.8 time entry to review CAP's expert disclosure is not excessive or duplicative of the review she began the prior day.	
07-02-2013	T. COOK	LENGTHY TELEPHONE CALL WITH CLIENT [Privileged Communication]	1.0	380.00	\$380.00			
07-03-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING REBUTTAL REPORT	0.1	170.00	\$17.00			
07-03-2013	L. SIMONINI	ADDRESS ISSUES REGARDING tEXPERT BJORKLUND'S REBUTTAL REPORT	0.7	170.00	\$119.00	Vague	Paralegal Simonini's .7 time entry to complete assignments relating to a rebuttal report by Expert Bjorklund is not vague, but explains the nature of the assignment.	
07-03-2013	T. COOK	TELEPHONE CALL WITH EXPERT BJORKLUND REGARDING REBUTTAL REPORT	0.5	380.00	\$190.00			
07-03-2013	T. COOK	STUDY COURT ORDER GRANTING NEW DEADLINES	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-03-2013	J. BLAIR	STUDY DRAFT MATERIALS FROM EXPERT BJORKLUND, APPROVE WITH REQUEST FOR NEW TOTAL DAMAGES FIGURE	0.3	380.00	\$114.00			
07-05-2013	L. SIMONINI	ADDRESS ISSUES REGARDING FINALIZATION OF EXPERT BJORKLUND'S REBUTTAL REPORT	0.4	170.00	\$68.00	Vague, clerical	Paralegal Simonini's .4 time entry to conform Expert Bjorklund's rebuttal analysis is neither vague nor clerical.	
07-05-2013	T. COOK	STUDY EXPERT REBUTTAL AS COMPARED TO CHALLENGES MADE BY DEFENDANT EXPERT	0.9	380.00	\$342.00			
07-05-2013	T. COOK	SEND EMAIL TO EXPERT BJORKLUND APPROVING REBUTTAL REPORT AND INQUIRING ABOUT NEW CALCULATIONS	0.1	380.00	\$38.00			
07-05-2013	T. COOK	STUDY DES FILE PRODUCED BY CLIENT	0.8	380.00	\$304.00			
07-06-2013	J. BLAIR	EMAIL IDEAS FROM A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00	Clerical	Attorney Blair's .2 time entry to consider the ideas from Plaintiff Gressett at that stage of the litigation is not clerical, but illustrative of communications between attorney and client.	
07-06-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative of J. Blair 7/6/13 entry	Attorney Cook's .1 time entry to study an email from Plaintiff Gressett is not duplicative, but a review of the email ideas relating to trial presentation.	
07-06-2013	T. COOK	STUDY AFFIDAVIT FROM J. MURRAY REGARDING CLIENT'S EFFORTS TO GET A NEW JOB IN INDUSTRY	0.1	380.00	\$38.00			
07-08-2013	L. SIMONINI	STUDY EXPERT BJORKLUND'S SUPPLEMENTAL REPORT AND NOTE NEW DAMAGES FIGURES	1.1	170.00	\$187.00	Excessive, duplicative of J. Blair 7/3/13 entry	Paralegal Simonini's 1.1 time entry to review damage materials from Expert Bjorklund's supplemental report is not excessive or duplicative, but part of the paralegal assignment to summarize damages.	
07-08-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
07-08-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Vague	Paralegal Simonini's .1 time entry to prepare email to Plaintiff Gressett is not vague, but privileged.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-08-2013	L. SIMONINI	STUDY PRODUCTION MATERIALS AND BEGIN TO IDENTIFY POTENTIAL EXHIBITS TO RUZICH AND LUDKE DEPOSITIONS	3.7	170.00	\$629.00	Duplicative of 6/19/13 entry, block billing	Paralegal Simonini's 3.7 time entry to review the file for materials to be used in the depositions of Ruzich and Ludke is not duplicative of work Ms. Simonini did weeks earlier for another purpose. This was an obvious search to support the attorney prior to deposition.	
07-08-2013	T. COOK	STUDY LETTER FROM DEFENDANT COUNSEL REGARDING DEMAND FOR CONFLICT RESOLUTION	0.1	380.00	\$38.00			
07-09-2013	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY MATERIALS AND IDENTIFY EXHIBITS FOR RUZICH DEPOSITION	3.8	170.00	\$646.00	Duplicative of entry on 6/25/13	Paralegal Simonini's 3.8 time entry to pull materials for the Ruzich deposition is not duplicative of assignments to Paralegal Simonini on June 25.	
07-09-2013	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL RUZICH TESTIMONY	1.8	170.00	\$306.00	Vague	Paralegal Simonini's 1.8 time entry to support deposition preparation for Ruzich deposition is not vague. This was paralegal effort in support of an assignment from her attorney.	
07-09-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
07-09-2013	L. SIMONINI	STUDY SECOND E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
07-09-2013	L. SIMONINI	WESTLAW SEARCH TO IDENTIFY STATUTORY PROVISIONS FOR FMLA	1.4	170.00	\$238.00	Background research, duplicative	Paralegal Simonini's 1.4 time entry to identify FMLA statutory provisions is not duplicative, but an assignment from her attorney.	
07-09-2013	J. BLAIR	EMAIL COMMUNICATIONS REGARDING DEPOSITIONS AND DAMAGES CALCULATIONS BY EXPERT BJORKLUND	0.4	380.00	\$152.00			
07-09-2013	T. COOK	BEGIN DETAILED STUDY IN PREPARATION FOR DEPOSITION OF WITNESS M. RUZICH WITH DEFENDANT	3.5	380.00	\$1,330.00	Vague	Attorney Cook's 3.5 time entry to review the file in preparation for the Ruzich deposition is not vague. It is routine deposition preparation.	
07-10-2013	L. SIMONINI	PREPARE ADDITIONAL MATERIALS FOR RUZICH DEPOSITION	1.2	170.00	\$204.00			
07-10-2013	L. SIMONINI	ADDRESS ISSUES RAISED BY RUZICH TESTIMONY	1.2	170.00	\$204.00	Vague, excessive	Paralegal Simonini's 1.2 time entry to help prepare for the Ruzich deposition is neither vague nor excessive, but a separate assignment from her attorney.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-10-2013	L. SIMONINI	CONFER WITH ATTORNEY COOK REGARDING ITEMS NEEDED FOR DEPOSITION; IDENTIFY ADDITIONAL POTENTIAL EXHIBITS AND NOTE ADDITIONAL DISCOVERY TO BE SOUGHT	3.1	170.00	\$421.60	Block Billing	First entry (.3); second entry (2.8).	Block billing; reduced by 20%.
07-10-2013	T. COOK	COMPLETE STUDY OF VOLUMINOUS RECORDS PRODUCED BY DEFENDANT TO REQUEST FOR PRODUCTION OF DOCUMENTS IN PREPARATION FOR DEPOSITION OF DEFENDANTS	3.5	380.00	\$1,330.00			
07-10-2013	T. COOK	OUTLINE FOR DEPOSITION OF DEFENDANT WITNESS M. RUZICH	1.0	380.00	\$380.00			
07-10-2013	T. COOK	TAKE DEPOSITION OF DEFENDANT WITNESS M. RUZICH	3.5	380.00	\$1,330.00			
07-10-2013	T. COOK	MEET AND CONFER WITH CLIENT POST DEPOSITION [Privileged Communication]	0.5	380.00	\$190.00			
07-11-2013	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY MATERIALS AND IDENTIFY EXHIBITS FOR LUDKE DEPOSITION	3.8	170.00	\$646.00	Duplicative of 7/8/13 entry, excessive	Paralegal Simonini's 3.8 time entry to review and pull materials for the Ludke deposition is neither duplicative nor excessive. This is file review in advance of the Ludke deposition.	
07-11-2013	L. SIMONINI	DETERMINE CAP REPRESENTATIVE THAT HAS VERIFIED DISCOVERY	0.3	170.00	\$51.00	Excessive	Paralegal Simonini's .3 time entry to determine who verified CAP's discovery is not excessive.	
07-11-2013	L. SIMONINI	ADDRESS ISSUES REGARDING AUDIO OF COOK MEETINGS	1.2	170.00	\$204.00	Vague	Paralegal Simonini's 1.2 time entry to review the audio recording for the Gressett meetings with Cook is not vague.	
07-11-2013	L. SIMONINI	STUDY DEPARTMENT OF ECONOMIC SECURITY MATERIALS TO IDENTIFY EXHIBIT REGARDING CAP'S TERMINATION COMMITTEE	1.6	170.00	\$272.00	Excessive	Paralegal Simonini's 1.6 time entry to search the DES files for a document summarizing CAP's determination of Gressett is not excessive.	
07-11-2013	T. COOK	STUDY KEY FILE MATERIALS AND LEGAL RESEARCH TO PREPARE FOR DEPOSITION OF M. LUDKE AND OUTLINE ISSUES FOR SAME, SELECT EXHIBITS FOR SAME	4.2	380.00	\$1,596.00			
07-11-2013	T. COOK	SET UP PLAN OF ACTION FOLLOWING DEPOSITION OF M. LUDKE AND OBTAIN CLIENT APPROVAL AND INPUT	0.5	380.00	\$190.00	Vague	Attorney Cook's .5 time entry to modify the litigation plan of action after the Ludke deposition is not vague.	
07-12-2013	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL MATERIALS FOR DEPOSITION OF M. LUDKE	1.2	170.00	\$204.00			
07-12-2013	L. SIMONINI	CONFER WITH ATTORNEY COOK AND CLIENT [Privileged Communication]	1.2	170.00	\$204.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-12-2013	L. SIMONINI	ADDRESS ISSUES REGARDING PLAN FOR CASE GOING FORWARD IN LIGHT OF FAVORABLE DEPOSITION TESTIMONY	2.3	170.00	\$391.00	Vague	Paralegal Simonini's 2.3 time entry reflecting assignments given her after the Ludke deposition is not vague. She was to implement Attorney Cook's modified plan of action.	
07-12-2013	T. COOK	EVALUATE QUALITY OF AUDIO TAPE FOR AUTHENTICATION WITH M. LUDKE BUT OPTED TO POSTPONE FOR COOK DEPOSITION	0.7	380.00	\$266.00	Excessive, duplicate of L. Simonini 7/11/13 entry	Attorney Cook's .7 time entry reflects Attorney Cook's analysis of the optimal use of the audiotape in depositions of CAP witnesses. This is not duplicative of a paralegal assignment nor excessive in any way.	
07-12-2013	T. COOK	TAKE DEPOSITION OF M. LUDKE, SR. HR GENERALIST FOR DEFENDANT	4.0	380.00	\$1,520.00			
07-12-2013	T. COOK	MEET AND CONFER WITH CLIENT AND PARALEGAL [Privileged Communication]	0.7	380.00	\$266.00	Vague	Attorney Cook's .7 time entry reflects a meet and confer with Plaintiff Gressett and is only vague in that it is privileged.	
07-12-2013	T. COOK	BEGIN COMPREHENSIVE MEMORANDUM TO FILE OF ARGUMENT FOR CASE WITH FACTUAL DEVELOPMENTS AND CHRONOLOGY OF EVENTS IDENTIFIED	2.0	380.00	\$760.00			
07-13-2013	J. BLAIR	STUDY DRAFT SUMMARY OF CLAIMS AND DEFENSES	0.4	380.00	\$152.00			
07-13-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
07-13-2013	T. COOK	STUDY DOCUMENTS SENT FROM CLIENT [Privileged Communication]	0.2	380.00	\$76.00			
07-13-2013	T. COOK	PREPARE COMPREHENSIVE MEMORANDUM OF INFORMATION OBTAINED FROM ALL DATA POSSESSED AT THIS TIME FOR USE IN STRATEGY WORK UP, FUTURE DEPOSITIONS, VALUATION	2.1	380.00	\$798.00			
07-13-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative of 7/15/13 entry above	Attorney Cook's .1 time entry represents a separate email and is therefore not duplicative.	
07-13-2013	T. COOK	STUDY DOCUMENTS FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative of above entry	Attorney Cook's .1 time entry represents a review of documents, not the email, and is therefore not duplicative.	
07-15-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING DEPOSITIONS OF SIGMON, COOK AND MODEER	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-15-2013	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry represents review of an email from CAP's attorney, and is not excessive.	
07-15-2013	L. SIMONINI	TELEPHONE CALL ATTORNEY BLAIR AND ATTORNEY COOK REGARDING DEPOSITIONS, PLAN FOR CASE GOING FORWARD	2.1	170.00	\$357.00	Internal Conference	Paralegal Simonini's 2.1 time entry for an extensive phone call with attorneys Blair and Cook about the case going forward is not an internal conference because Attorney Cook did not bill for the conversation and Paralegal Simonini's role was to take assignments regarding the case going forward.	
07-15-2013	L. SIMONINI	STUDY MASTER MEMORANDUM TO IDENTIFY PLAN FOR CASE GOING FORWARD	0.7	170.00	\$119.00			
07-15-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE	0.1	170.00	\$17.00			
07-15-2013	J. BLAIR	EXTENDED TELEPHONE CALL WITH T. COOK TO DISCUSS EARLY DEPOSITIONS	2.0	380.00	\$760.00	Internal Conference, excessive	Attorney Blair's 2.0 time entry for an extended phone call with Attorney Cook is not an internal conference because Attorney Cook did not bill for the call. Further, it is not excessive because it was an important step in the case and it lasted 2 hours.	
07-15-2013	J. BLAIR	ARRANGE SCHEDULING FURTHER DEPOSITIONS	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry for addressing and resolving the need for further depositions is not excessive.	
07-15-2013	J. BLAIR	EMAIL FROM CAP REGARDING DEPOSITIONS	0.1	380.00	\$38.00			
07-16-2013	L. SIMONINI	STUDY CAP'S REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES TO IDENTIFY POTENTIAL EXHIBITS FOR D. SIGMON	3.2	170.00	\$544.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-16-2013	L. SIMONINI	INTERNET RESEARCH REGARDING D. MODEER	2.7	170.00	\$459.00	Excessive, Vague	Paralegal Simonini's 2.7 time entry to research what she could learn about key CAP official Modeer is neither vague nor excessive, recognizing Mr. Modeer was the individual who terminated Plaintiff Gressett and was a key witness at trial. The vagueness criticism is not well-taken because Paralegal Simonini was given the assignment of learning all she could about Mr. Modeer's management and experiences, and that is what the time entry implies.	
07-16-2013	L. SIMONINI	STUDY CAP'S PRODUCTION FILES FOR POTENTIAL DEPOSITION EXHIBITS FOR D. MODEER	1.2	170.00	\$204.00			
07-17-2013	L. SIMONINI	STUDY EXPERT CAMERON'S RESPONSE TO SUBPOENA DUCES TECUM	4.4	170.00	\$748.00	Excessive	Paralegal Simonini's 4.4 time entry to study the 826 page response by CAP's expert to Plaintiff's subpoena is not excessive given the extent of Expert Cameron's response.	
07-18-2013	L. SIMONINI	STUDY GRESSETT'S DEPARTMENT OF ECONOMIC SECURITY MATERIALS TO IDENTIFY POTENTIAL DEPOSITION EXHIBITS	1.3	170.00	\$221.00	Excessive, duplicative of 7/11/13 entry	Paralegal Simonini's 1.3 time entry is not duplicative of the earlier entry because this time entry is specifically to identify potential deposition exhibits. Further, it is not an excessive time to identify deposition exhibits.	
07-18-2013	L. SIMONINI	DRAFT THIRD SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	0.3	170.00	\$51.00			
07-18-2013	L. SIMONINI	STUDY ADDITIONAL PRODUCTION MATERIALS AND IDENTIFY RECORDS TO BE INCLUDED IN TIME LINE	3.2	170.00	\$544.00	Vague	Paralegal Simonini's 3.2 time entry to study additional production materials to be included in the Gressett timeline is not vague; Paralegal Simonini was tasked with providing support for the litigation timeline.	
07-18-2013	T. COOK	SELECT DOCUMENTS TO GO TO EXPERTS FOR REVIEW AND ANALYSIS	0.4	380.00	\$152.00			
07-18-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-18-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative	Attorney Cook's .1 time entry to study an email from Plaintiff Gressett is not duplicative; it is a separate email.	
07-18-2013	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00	Duplicative, excessive billing re: above entry	Attorney Blair's .2 time entry for email exchange with Plaintiff Gressett is not duplicative or excessive, it is Attorney Blair's process for staying in tune with privileged communications with the firm's client.	
07-19-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
07-19-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Vague	Paralegal Simonini's .1 time entry to prepare an email to Plaintiff Gressett is not vague; it is privileged.	
07-19-2013	L. SIMONINI	STUDY DEPOSITION OF M. RUZICH AND NOTE DOCUMENTS TO BE REQUESTED IN LIGHT OF HER TESTIMONY	2.3	170.00	\$391.00	Excessive	Paralegal Simonini's 2.3 time entry to study the deposition of Ruzich and identify documents to request from CAP in light of her deposition testimony is not excessive. Ruzich was a key witness and her deposition testimony led to key documents to be requested.	
07-19-2013	L. SIMONINI	CONFER WITH ATTORNEYS REGARDING DOCUMENTS IDENTIFIED DURING RUZICH AND LUDKE DEPOSITIONS	1.3	170.00	\$221.00	Internal Conference	Paralegal Simonini's 1.3 time entry to confer with attorneys regarding Ruzich and Ludke documents is not an internal conference; no other attorney billed for that discussion.	
07-22-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00			
07-22-2013	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review an email is not excessive billing.	
07-22-2013	L. SIMONINI	IDENTIFY DEPOSITION MATERIALS FROM RUZICH AND LUDKE DEPOSITIONS FOR ATTORNEY BLAIR'S REVIEW	0.8	170.00	\$136.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-22-2013	L. SIMONINI	STUDY CAP'S EMPLOYEE MANUAL TO IDENTIFY REPORTING DIRECTIVES	2.3	170.00	\$391.00	Excessive, vague	Paralegal Simonini's 2.3 hours to study and identify materials from CAP's employment manual is neither excessive nor vague. Those materials were critical to the case and an appropriate assignment for a paralegal.	
07-22-2013	L. SIMONINI	STUDY DEPARTMENT OF LABOR RECORDS TO IDENTIFY SOURCE OF GRESSETT'S ABSENCES	2.3	170.00	\$391.00	Excessive - records consisted of only 127 pages	Paralegal Simonini's 2.3 hours to identify Gressett's absences in the DOL records is not excessive. This was an appropriate amount of time to review these files for this key issue.	
07-22-2013	J. BLAIR	PLAN DEPOSITIONS AFTER INITIAL DISCUSSIONS OF EARLY SETTLEMENT	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to plan depositions going forward after settlement discussions is not vague. It is what attorneys do at critical stages of the case.	
07-22-2013	J. BLAIR	REVIEW RUZICH DEPOSITION TRANSCRIPT AND SUPPORTING EXHIBITS, MAKE NOTES FOR USE IN DELGADO DEPOSITION	2.7	380.00	\$1,026.00			
07-23-2013	L. SIMONINI	STUDY CAP'S DISCLOSURE DOCUMENTS TO IDENTIFY ITEMS TO BE INCLUDED IN TIMELINE	2.7	170.00	\$459.00			
07-23-2013	L. SIMONINI	CONFER WITH ATTORNEY BLAIR REGARDING ITEMS NEEDED FOR DEPOSITION OF DELGADO	0.2	170.00	\$34.00			
07-23-2013	L. SIMONINI	STUDY TRANSCRIPT OF LUDKE DEPOSITION AND IDENTIFY ITEMS TO BE SOUGHT VIA REQUEST FOR PRODUCTION OF DOCUMENTS	2.1	170.00	\$357.00			
07-23-2013	T. COOK	BEGIN COMPREHENSIVE STUDY OF ALL FILE MATERIALS TO OUTLINE CURRENT THEORIES OF LIABILITY AND DAMAGES	2.0	380.00	\$760.00			
07-23-2013	T. COOK	BEGIN LEGAL RESEARCH TO VERIFY SCOPE OF CLAIM GOING FORWARD	2.0	380.00	\$760.00	Vague, Excessive, duplicative of previous research	Attorney Cook's 2.0 hours of legal research to assess the scope of Plaintiff Gressett's claim at this stage of the litigation is neither vague nor excessive, nor duplicative of prior research.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-23-2013	J. BLAIR	PARALEGAL ASSIGNMENTS REGARDING MATERIALS FROM CAP	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to Paralegal Simonini to perform reviews of materials received from CAP is not vague. It represents the time taken by an attorney to outline assignments for a paralegal, an efficient use of both disciplines.	
07-23-2013	J. BLAIR	STUDY PORTION OF LUDKE DEPOSITION, MAKE NOTES REGARDING SAME	0.6	380.00	\$228.00			
07-24-2013	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS AND IDENTIFY POTENTIAL EXHIBITS FOR DEPOSITION OF T. DELGADO	3.7	170.00	\$629.00			
07-24-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DOCUMENTS TO BE SOUGHT THAT WERE DISCUSSED BY DEPONENTS LUDKE AND RUZICH	0.8	170.00	\$136.00	Vague	Paralegal Simonini's .8 time entry to address how to seek and/or use documents discussed by CAP employees Ludke and Ruzich is not vague. It is a natural assignment after their depositions.	
07-24-2013	L. SIMONINI	ADDRESS ISSUES REGARDING EXHIBITS NEEDED FOR DEPOSITION OF DELGADO	1.1	170.00	\$187.00	Vague, excessive	Paralegal Simonini's 1.1 time entry to begin her preparation for the Delgado deposition is neither vague nor excessive. It represents a sharing of responsibilities between attorneys and paralegals.	
07-24-2013	T. COOK	CONTINUE RESEARCH RE FMLA	2.8	380.00	\$1,064.00	Background research, excessive, vague	Attorney Cook's 2.8 hours to research FMLA issues is a continuation of earlier research by Attorney Cook, neither background research, nor excessive, nor vague.	
07-24-2013	J. BLAIR	STUDY DOCUMENTS FOR DEPOSITIONS NEXT WEEK	1.1	380.00	\$418.00	Vague	Attorney Blair's 1.1 hours to review documents prior to upcoming depositions is not vague.	
07-24-2013	J. BLAIR	STUDY LUDKE TRANSCRIPT AND MAKE NOTES REGARDING SAME	2.0	380.00	\$760.00	Duplicative of entry on 7/23/13	Attorney Blair's 2.0 hours to review the Ludke transcript and make notes regarding that transcript is not duplicative of work begun the prior day, but a continuation of that work.	
07-24-2013	T. COOK	SEND EMAIL TO DEFENDANT REGARDING PENDING DISCOVERY INQUIRIES	0.1	380.00	\$38.00			
07-25-2013	L. SIMONINI	IDENTIFY CAP POLICY DOCUMENTS FOR ATTORNEY USE IN PREPARING FOR DELGADO DEPOSITION	0.4	170.00	\$68.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-25-2013	J. BLAIR	COMPLETE REVIEW OF LUDKE DEPOSITION AND MARKED EXHIBITS, MAKE NOTES FOR TOM DELGADO DEPOSITION	1.1	380.00	\$334.40	Block billing	First entry (.6); second entry (.5)	Block billing; reduced by 20%.
07-25-2013	J. BLAIR	STUDY GRESSETT FILE, MARK EXHIBITS FOR DEPOSITION NEXT WEEK	1.5	380.00	\$570.00	Vague, clerical, block billing	Attorney Blair's 1.5 hours to review the Gressett file and pull exhibits for an upcoming deposition is neither vague, nor clerical nor block billing. It is one time entry to begin preparation for the deposition.	
07-25-2013	J. BLAIR	STUDY EMAIL FROM CAP'S ATTORNEY REGARDING DEPOSITIONS SCHEDULED	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to review an email from CAP's counsel is not excessive, but the time needed.	
07-25-2013	J. BLAIR	PLAN SIGMON DEPOSITION	0.7	380.00	\$266.00	Vague	Attorney Blair's .7 time entry to plan for the Sigmon deposition is not vague, but time necessary to consider question areas for that deposition.	
07-25-2013	J. BLAIR	STUDY GRESSETT PERSONNEL FILE	0.5	380.00	\$190.00			
07-25-2013	J. BLAIR	STUDY GRESSETT MEDICAL FILE	0.5	380.00	\$190.00			
07-25-2013	J. BLAIR	PARALEGAL ASSIGNMENTS FOR DEPOSITION NEXT WEEK	0.2	380.00	\$76.00	Vague, clerical	Attorney Blair's .2 time entry to seek assistance from Paralegal Simonini prior to upcoming depositions is neither vague nor clerical. It is what attorneys and paralegals do.	
07-26-2013	L. SIMONINI	STUDY VOLUMINOUS PRODUCTION AND DISCLOSURE DOCUMENTS AND IDENTIFY MATERIALS AND INFORMATION TO BE INCLUDED IN TIME LINE	4.7	170.00	\$799.00	Duplicative to 6/5/13 and 7/18/13 entries	Paralegal Simonini's 4.7 to study discovery and disclosure materials to supplement the litigation timeline is not duplicative of prior efforts but a continuation of those efforts.	
07-26-2013	L. SIMONINI	DRAFT TIMELINE	0.7	170.00	\$119.00			
07-26-2013	L. SIMONINI	IDENTIFY CORRECTIVE ACTIONS MATERIALS FOR ATTORNEY USE AT DEPOSITION OF DELGADO	0.8	170.00	\$136.00			
07-26-2013	J. BLAIR	STUDY CHARTS DISCLOSED BY CAP	0.5	380.00	\$190.00			
07-26-2013	J. BLAIR	EXTENDED TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	1.4	380.00	\$532.00			
07-26-2013	J. BLAIR	REVIEW EMPLOYMENT AND MEDICAL FILES	0.8	380.00	\$304.00	Duplicative of 7/25/15 entry	Attorney Blair's .8 time entry to review employment and medical files is a continuation of prior work, not duplicative of that work.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-26-2013	J. BLAIR	STUDY NOTES FOR DELGADO DEPOSITION	1.1	380.00	\$418.00			
07-26-2013	J. BLAIR	EMAIL EXCHANGE WITH T. COOK REGARDING DEPOSITIONS	0.2	380.00	\$76.00	Internal Conference (email)	Attorney Blair's .2 time entry for an email exchange with Attorney Cook is not an attorney conference, Attorney Cook did not bill for this time.	
07-26-2013	J. BLAIR	REVIEW POLICIES HIGHLIGHTED BY A. GRESSETT	0.2	380.00	\$76.00			
07-28-2013	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
07-29-2013	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL EXHIBITS FOR ATTORNEY USE AT DEPOSITION OF T. DELGADO	2.7	170.00	\$459.00			
07-29-2013	L. SIMONINI	UPDATE TIMELINE TO INCLUDE ADDITIONS FROM ATTORNEY COOK	0.9	170.00	\$153.00			
07-29-2013	L. SIMONINI	DRAFT NOTICE OF SERVICE OF SECOND SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	0.1	170.00	\$17.00	Clerical	Paralegal Simonini's .1 time entry to prepare a notice of service document is not clerical.	
07-29-2013	L. SIMONINI	DRAFT NOTICE OF SERVICE OF THIRD SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS	0.1	170.00	\$17.00	Clerical	Paralegal Simonini's .1 time entry to prepare a notice of service document is not clerical.	
07-29-2013	L. SIMONINI	STUDY ATTACHMENTS TO CAP'S SUPPLEMENTAL DISCLOSURE STATEMENT	1.7	170.00	\$289.00			
07-29-2013	J. BLAIR	TELEPHONE CALL WITH T. COOK REGARDING DEPOSITION	0.5	380.00	\$190.00	Internal Conference	Attorney Blair's .5 time entry for a phone conference with Attorney Cook is not an internal conference. Attorney Cook did not bill for this discussion.	
07-29-2013	J. BLAIR	PREPARE FOR DEPOSITION OF DELGADO, REVIEW FILE, DOCUMENTS, EMAIL EXCHANGES WITH PARALEGAL AND A. GRESSETT	5.2	380.00	\$1,580.80	Block billing	Time entry 1 (3.8); time entry 2 (.8); time entry (.6)	Block billing; reduced by 20%.
07-29-2013	T. COOK	EDIT TIME LINE	1.8	380.00	\$684.00			
07-29-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
07-29-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative of above entry	Attorney Cook's .1 to review an email from Plaintiff Gressett is not duplicative; it is a separate email.	
07-29-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excessive	Attorney Cook's .1 time entry to prepare an email to Plaintiff Gressett is not excessive; it is part of the representation.	
07-29-2013	T. COOK	STUDY JOB DESCRIPTION PRODUCED BY CLIENT	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-30-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
07-30-2013	L. SIMONINI	MEET WITH ATTORNEY BLAIR AND CLIENT [Privileged Communication]	0.6	170.00	\$102.00			
07-30-2013	L. SIMONINI	STUDY BJORKKLUND'S SUPPLEMENTAL REPORT AND APPLY TO FMLA STATUTE TO DETERMINE POTENTIAL RANGE OF SETTLEMENT NUMBERS TO CONVEY TO DEFENDANT	2.7	170.00	\$459.00	Excessive, vague	Paralegal Simonini's 2.7 hours to complete an assignment to develop a range of settlement numbers to convey to CAP by studying Bjorklund's supplemental report is neither excessive nor vague.	
07-30-2013	L. SIMONINI	ASSIST ATTORNEY BLAIR REGARDING PREPARATION FOR DEPOSITION OF T. DELGADO	1.3	170.00	\$221.00	Vague, duplicative of L. Simonini 7/26/13 and 7/29/13 entries	Paralegal Simonini's 1.3 hour time entry to assist in preparation for the Delgado deposition is not vague or duplicative of prior entries but a continuation of that assignment.	
07-30-2013	L. SIMONINI	DOCUMENT SOURCE OF SETTLEMENT NUMBERS USING BJORKKLUND'S REPORT AND ACCOUNTING INFORMATION	1.3	170.00	\$221.00	Vague, excessive	Paralegal Simonini's 1.3 hour to document her analysis referenced above is neither vague nor excessive.	
07-30-2013	J. BLAIR	REVIEW FILE MATERIALS FOR DEPOSITION THIS AM	0.5	380.00	\$190.00			
07-30-2013	J. BLAIR	DEPOSITION OF TOM DELGADO	4.1	380.00	\$1,558.00			
07-30-2013	J. BLAIR	MEET WITH A. GRESSETT [Privileged Communication]	2.1	380.00	\$798.00			
07-30-2013	J. BLAIR	EMAIL EXCHANGE WITH T. COOK REGARDING DEPOSITIONS	0.1	380.00	\$38.00	Internal Conference	Attorney Blair's .1 time entry to exchange emails with Attorney Cook is not an internal conference. Attorney Cook did not bill for this exchange.	
07-30-2013	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING SETTLEMENT DEMAND AND MEDICAL RECORDS	0.1	380.00	\$38.00			
07-30-2013	T. COOK	STUDY CALCULATIONS OF CASE VALUE STARTING WITH EXPERT NUMBERS, ASSESS COMPONENTS OF RISK, ADDITIONS PER THE STATUTE, REALISTIC VALUATION FOR THIS CASE TO PROPOSE TO CLIENT FOR INITIAL CASE DEMAND	0.9	380.00	\$342.00			
07-31-2013	L. SIMONINI	TELEPHONE CALL ATTORNEY BLAIR, ATTORNEY COOK AND CLIENT [Privileged Communication]	1.0	170.00	\$170.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-31-2013	L. SIMONINI	TELEPHONE CALL ATTORNEY BLAIR AND CAP'S ATTORNEY REGARDING SETTLEMENT OFFER AND OUTSTANDING MEDICAL RECORDS ISSUE	0.2	170.00	\$34.00			
07-31-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO D. MODEER	0.1	170.00	\$17.00			
07-31-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO D. SIGMON	0.1	170.00	\$17.00			
07-31-2013	L. SIMONINI	DRAFT NOTICE OF VIDEO CONFERENCE DEPOSITION OF M. COOK	0.1	170.00	\$17.00			
07-31-2013	L. SIMONINI	TWO TELEPHONE CALLS COURT REPORTER REGARDING VIDEO CONFERENCE DEPOSITION IN NEBRASKA	0.3	170.00	\$51.00	Clerical	Paralegal Simonini's .3 time entry for two phone calls to the court reporter in Nebraska concerning depositions is not clerical; it what paralegals do to make cases operate efficiently.	
07-31-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
07-31-2013	L. SIMONINI	SUMMARIZE NOTES REGARDING TELEPHONE CALL WITH CLIENT AND TELEPHONE CALL WITH CAP ATTORNEY	0.6	170.00	\$81.60	Block billing	First time entry (.4); second time entry (.2).	Block billing; reduced by 20%.
07-31-2013	J. BLAIR	VALUE A. GRESSETT'S CASE	1.1	380.00	\$418.00	Vague, excessive, duplicative of T. Cook 7/30/13 entry	Attorney Blair's 1.1 hour time entry to value Gressett's case at that point of the litigation is neither vague, nor excessive, nor duplicative of Attorney Cook's estimate of the case value at that stage of the litigation. It is what attorneys do to attempt to resolve a case early.	
07-31-2013	J. BLAIR	TELEPHONE CALL WITH CAP'S ATTORNEY RE MEDICAL RECORDS AND DEMAND	0.5	380.00	\$190.00			
07-31-2013	J. BLAIR	NOTE TO THE FILE REGARDING TELEPHONE CALL WITH CAP'S ATTORNEY	0.2	380.00	\$76.00			
07-31-2013	J. BLAIR	ADDRESS MEDICAL RECORDS ISSUE, MATERIALS POST TERMINATION	0.3	380.00	\$114.00	Vague	Attorney Blair's .3 time entry to address the medical records issue is reference to the issue that came before the Court. It is not vague. It is this attorney's effort to determine whether the matter should be directed to the Court's attention.	
07-31-2013	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
07-31-2013	T. COOK	TELEPHONE CALL WITH J. BLAIR, CLIENT [Privileged Communication]	1.0	380.00	\$380.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
07-31-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
07-31-2013	T. COOK	EMAIL TO FILE AND TEAM REGARDING BASIS FOR DENYING MEDICAL RECORDS TO DEFENDANT	0.2	380.00	\$76.00			
08-01-2013	L. SIMONINI	STUDY CAP'S CORRECTIVE ACTION POLICY TO DETERMINE ITS IMPACT ON CLIENT'S 2007 WRITE-UP	0.6	170.00	\$102.00	Excessive	Paralegal Simonini's .6 time entry to review CAP's corrective action policy is not excessive. It is the time taken by the paralegal to assist her attorneys.	
08-01-2013	L. SIMONINI	IDENTIFY REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSE DOCUMENTS FOR CLIENTS REVIEW IN ADVANCE OF HER DEPOSITION	2.1	170.00	\$357.00	Vague	Paralegal Simonini's 2.1 time entry to pull materials for Plaintiff Gressett's review prior to her deposition is not vague.	
08-01-2013	L. SIMONINI	IDENTIFY PERTINENT DOCUMENTS RECEIVED IN RESPONSE TO REQUEST FOR PRODUCTION FOR USE AT DEPOSITION OF M. COOK	1.6	170.00	\$272.00			
08-01-2013	J. BLAIR	ADDRESS MEDICAL RECORDS ISSUES	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to address medical records issue is a continuation of the time entry challenged above. It is not vague.	
08-01-2013	J. BLAIR	REVIEW EMAIL TO CAP ADVISING IT HAS NO RIGHT TO A. GRESSETT'S MEDICAL FILE	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to review the correspondence to CAP concerning the Gressett medical file is not excessive. It is this attorney's brief analysis of the issues between the parties.	
08-01-2013	T. COOK	STUDY DEFENDANT'S SECOND SUPPLEMENTAL DISCLOSURE STATEMENT WITH ATTACHMENTS	0.8	380.00	\$304.00			
08-01-2013	T. COOK	SEND EMAIL TO DEFENDANT REGARDING NO PRODUCTION OF MEDICAL RECORDS TO BE MADE	0.3	380.00	\$114.00	Excessive	Attorney Cook's .3 time entry to send an email to CAP's counsel regarding the medical records issue is not excessive. It is an effort to seek agreement with counsel regarding those records.	
08-02-2013	L. SIMONINI	STUDY CAP'S VOLUMINOUS POLICY AND PROCEDURE HANDBOOK TO IDENTIFY PERTINENT POLICIES FOR USE AT UPCOMING DEPOSITIONS	1.5	170.00	\$255.00			
08-05-2013	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF M. RUZICH TO IDENTIFY ITEMS TO BE ADDRESSED AT D. SIGMON DEPOSITION	1.1	170.00	\$187.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-05-2013	L. SIMONINI	STUDY REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES REGARDING CLIENT'S E-MAIL FILES TO IDENTIFY POTENTIAL EXHIBITS FOR D. SIGMON DEPOSITION	2.4	170.00	\$408.00			
08-05-2013	J. BLAIR	STUDY BACHELDER NINTH CIRCUIT DECISION, EMAIL TO LITIGATION TEAM REGARDING SAME	1.2	380.00	\$456.00	Block Billing	First time entry (.9); second time entry (.3).	
08-05-2013	J. BLAIR	STUDY TRANSCRIPT OF TAPE FROM MEETINGS WITH MIKE COOK	1.8	380.00	\$684.00	Duplicative of 6/14/13 and 7/12/13 entries	Attorney Blair's 1.8 time entry to review the transcript of Ms. Gressett's meetings with her supervisor Cook is not duplicative of earlier time entries. This is Attorney Blair's only review of the content of those meetings.	
08-05-2013	J. BLAIR	PLAN LITIGATION THIS AND NEXT MONTH, INCLUDING DEPOSITIONS AND MOTIONS	0.6	380.00	\$228.00	Vague	Attorney Blair's .6 time entry to plan the discovery and motions practice for the next two months is not vague. It is what attorneys do.	
08-05-2013	J. BLAIR	STUDY LETTER FROM CAP'S ATTORNEY REGARDING RIGHT TO MEDICAL RECORDS	0.4	380.00	\$152.00			
08-05-2013	T. COOK	EVALUATE CURRENT STATUS, UPCOMING DEADLINES AND UPDATE PLAN OF ACTION	0.5	380.00	\$190.00			
08-05-2013	T. COOK	PREPARE SECOND SUPPLEMENTAL DISCLOSURE STATEMENT TO CLARIFY SCOPE OF CLIENT'S TESTIMONY, SCOPE OF CLAIM TO EXCLUDE EMOTIONAL DISTRESS	0.9	380.00	\$342.00			
08-05-2013	T. COOK	UPDATE MASTER PLAN	0.6	380.00	\$228.00			
08-05-2013	T. COOK	STUDY DEFENDANT'S NOTICE OF DEPOSITION OF CLIENT	0.1	380.00	\$38.00	Excessive	Attorney Cook's .1 time entry to review a deposition notice for Plaintiff Gressett is not excessive.	
08-06-2013	L. SIMONINI	ADDRESS ISSUES REGARDING VIDEOCONFERENCE OF M. COOK DEPOSITION	0.7	170.00	\$119.00	Excessive	Paralegal Simonini's .7 time entry to determine whether the Cook deposition should be conducted by videoconference is not excessive.	
08-06-2013	L. SIMONINI	STUDY DEPARTMENT OF ECONOMIC SECURITY FILE TO IDENTIFY PERTINENT RECORDS TO BE USED AT DEPOSITION	1.7	170.00	\$289.00	Excessive, vague, duplicative of 6/14/13 and 7/12/13 entries	Paralegal Simonini's 1.7 hours to pull DES materials for the Cook deposition is not excessive and not duplicative of Paralegal Simonini's assignments for other depositions.	
08-06-2013	L. SIMONINI	STUDY E-MAIL FROM CAP'S ATTORNEY REGARDING DEPOSITION OF D. MODEER	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-06-2013	J. BLAIR	STUDY LETTER FROM CAP REGARDING MEDICAL RECORDS	0.4	380.00	\$152.00	Duplicative of entry on 8/5/13	Attorney Blair's .4 time entry to analyze CAP's position regarding production of medical records is not duplicative of other time entries relating to this issue.	
08-06-2013	J. BLAIR	STUDY SEVENTH CIRCUIT DECISION REGARDING ACCESS TO MEDICAL RECORDS	0.6	380.00	\$228.00			
08-06-2013	J. BLAIR	REVIEW AND APPROVE DROPPING EMOTIONAL DISTRESS CLAIM	0.2	380.00	\$76.00			
08-06-2013	T. COOK	STUDY EMAIL FROM COUNSEL FOR DEFENDANT REGARDING DEPOSITION OF D. MODEER	0.1	380.00	\$38.00			
8/6/2013	T. COOK	STUDY NOTICE OF DEPOSITION OF CLIENT	0.0	380.00	\$0.00	Duplicative of entry on 8/5/13	Agreed.	
08-06-2013	T. COOK	STUDY EMAIL FROM COUNSEL FOR DEFENDANT REGARDING MOVING DEPOSITION OF D. MODEER	0.1	380.00	\$38.00	Excessive billing of email exchange	Attorney Cook's .1 time entry to review an email from CAP's attorney is not excessive.	
08-07-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO D. MODEER	0.1	170.00	\$17.00			
08-07-2013	L. SIMONINI	DRAFT LETTER TO EXPERT BJORKLUND REGARDING SUBPOENA RESPONSE FROM CAP'S EXPERT	0.1	170.00	\$17.00			
08-07-2013	L. SIMONINI	IDENTIFY PERTINENT DOCUMENTS FROM C. CAMERON'S SUBPOENA RESPONSE TO BE FORWARDED TO EXPERT BJORKLUND	1.2	170.00	\$204.00			
08-07-2013	L. SIMONINI	PREPARE COLLECTION OF EXHIBITS MARKED AT PREVIOUS DEPOSITIONS FOR USE AT UPCOMING DEPOSITIONS	3.2	170.00	\$544.00			
08-07-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
08-07-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING RUZICH DEPOSITION	0.1	170.00	\$17.00			
08-07-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING LUDKE DEPOSITION	0.1	170.00	\$17.00	Excessive billing of email exchange	Paralegal Simonini's .1 time entry to prepare an email to Expert McRae is not excessive.	
08-07-2013	J. BLAIR	ANALYZE MEDICAL RECORDS ISSUE, EMAIL TO T. COOK	0.9	380.00	\$273.60	Block Billing	Time entry 1 (.9); time entry 2 (no charge).	Block billing; reduced by 20%.
08-07-2013	J. BLAIR	REVIEW PROGRESS TOWARD SETTING DEPOSITIONS	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to determine what depositions have been set when is not vague.	
08-07-2013	T. COOK	STUDY DEFENDANT'S JANUARY 2010 POLICY CHANGE NOTIFICATION MEMO FROM D. MARTIN FOR CONTENT, INCONSISTENCIES TO FMLA LAW AND PRACTICES AT CAP, IDENTIFY FOLLOW-UP NEEDED	0.9	380.00	\$342.00	Block billing	Time entry 1 (.6); time entry 2 (.3).	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-07-2013	T. COOK	STUDY SIX PAGE LETTER FROM DEFENDANT REGARDING MEDICAL RECORDS AND WHY THEY ARE RELEVANT FOR PRODUCTION IN THIS CASE	0.5	380.00	\$190.00	Duplicative of J. Blair 8/5/13 and 8/6/13 entries	Attorney Cook's .5 time entry to review CAP's position regarding production of the Gressett medical file is not duplicative of Attorney Blair's separate review of this issue.	
08-07-2013	T. COOK	BEGIN RESEARCH AND STUDY OF 13 CASES (AND SUBSEQUENT CHALLENGES TO THE CASES) CITED BY DEFENDANT FOR WHY MEDICAL RECORDS MUST BE PRODUCED	4.5	380.00	\$1,710.00			
08-08-2013	J. BLAIR	ANALYZE MEDICAL RECORDS ISSUE, CONFIRM WE WILL HOLD BACK CLIENT'S MEDICAL FILE	2.4	380.00	\$912.00	Excessive, duplicative of T. Cook 8/7/13 entry	Attorney Blair's 2.4 hours to analyze whether the Gressett medical file would be ordered produced and establish Ms. Gressett's position is not excessive or duplicative of Attorney Cook's review of this issue.	
08-08-2013	J. BLAIR	REVIEW EMAIL COMMUNICATIONS WITH CAP'S ATTORNEY REGARDING MEDICAL RECORDS	0.2	380.00	\$76.00			
08-08-2013	T. COOK	CONTINUE STUDY AND NOTATION OF CASE LAW CITED BY DEFENDANT FOR PRODUCTION OF MEDICAL RECORDS AND SCOPE OF CLAIMS	1.8	380.00	\$684.00			
08-08-2013	T. COOK	MEET AND CONFER WITH J. BLAIR REGARDING ISSUE OF MEDICAL RECORDS RAISED BY DEFENDANT, STRATEGIC AND LEGAL ISSUES, SCOPE OF CLAIM IN THIS CASE, RATIONALE FOR AND AGAINST PRODUCTION, REVIEW OF CASE LAW, REVIEW OF STATUTORY AND REGULATORY LAW, RESOLVE TO CONTINUE WITH DENIAL OF PRODUCTION OF MEDICAL RECORDS	1.5	380.00	\$570.00	Internal Conference	Attorney Cook's 1.5 hours to meet and confer with Attorney Blair regarding the medical records issue is not a an internal conference; Attorney Blair did not bill for this discussion.	
08-08-2013	T. COOK	SEND EMAIL TO DEFENDANT REGARDING DECISION TO CONTINUE WITH NON-DISCLOSURE OF MEDICAL RECORDS	0.2	380.00	\$76.00			
08-08-2013	T. COOK	AMEND AND FINALIZE SUPPLEMENTAL DISCLOSURE STATEMENT REGARDING NO CLAIM FOR EMOTIONAL DAMAGES AND NO CLAIM FOR REINSTATEMENT	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-08-2013	T. COOK	CONTINUE STUDY OF VOLUMINOUS CASE LAW ON SCOPE OF FMLA CLAIMS, DAMAGES, BURDEN OF PROOF FOR EACH	3.5	380.00	\$1,330.00	Background research	Attorney Cook's 3.5 time entry to analyze case law on FMLA claims, damages, and the burden of proof is not background research but application of that research to this case.	
08-08-2013	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING MEDICAL RECORDS	0.1	380.00	\$38.00			
08-08-2013	T. COOK	PREPARE MEMORANDUM TO FILE OF FACTUAL ARGUMENT SUPPORTING BASIS FOR NON-DISCLOSURE OF MEDICAL RECORDS	0.7	380.00	\$266.00	Excessive	Attorney Cook's .7 time entry to draft the memorandum regarding disclosure of the Gressett medical file is not excessive.	
08-08-2013	T. COOK	STUDY NOTICE OF DEPOSITION OF PLAINTIFF'S FORMER EMPLOYER	0.1	380.00	\$38.00			
08-08-2013	T. COOK	FOLLOW-UP WITH PLAINTIFF'S MEDICAL PROVIDER IN CASE COURT RULES FOR DEFENDANT ON MOTION TO COMPEL	0.3	380.00	\$114.00			
08-08-2013	T. COOK	STUDY COURT ORDER REGARDING ORAL ARGUMENT ON MOTION TO COMPEL	0.1	380.00	\$38.00			
08-08-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-08-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excessive billing of email exchange	Attorney Cook's .1 time entry to prepare an email to Plaintiff Gressett is not excessive.	
08-08-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excessive billing of email exchange	Attorney Cook's .1 time entry to review the email response from Plaintiff Gressett is not excessive.	
08-09-2013	J. BLAIR	ANALYZE MEDICAL RECORDS ISSUE AND CONFIRM HEARING SET FOR TUESDAY AFTERNOON	0.5	380.00	\$190.00			
08-09-2013	J. BLAIR	REVIEW EMAIL COMMUNICATIONS FROM CAP ATTEMPTING TO GET CLIENT'S DEPOSITION SET AHEAD OF COOK'S DEPOSITION	0.2	380.00	\$76.00			
08-09-2013	J. BLAIR	ADDRESS DEPOSITION NOTICE OF CLIENT'S PRIOR EMPLOYER/ATTORNEY NOW BEFORE THE BAR	0.3	380.00	\$114.00	Vague, excessive	Attorney Blair's .3 time entry to analyze whether Plaintiff Gressett's prior employer and attorney can be deposed is neither vague nor excessive.	
08-09-2013	T. COOK	STUDY AMENDED NOTICE FOR CLIENT DEPOSITION	0.1	380.00	\$38.00			
08-09-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-09-2013	T. COOK	SEND EMAILS TO DEFENDANT REGARDING COOK DEPOSITION	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-09-2013	T. COOK	EVALUATE SCOPE OF ISSUES TO RAISE IN VERY LIMITED MEMORANDUM PERMITTED BY COURT IN CONNECTION WITH MOTION TO COMPEL PRODUCTION OF MEDICAL RECORDS	0.3	380.00	\$114.00			
08-11-2013	T. COOK	STUDY NOTICE OF DEPOSITION OF CLIENT'S FORMER ATTORNEY/ EMPLOYER	0.1	380.00	\$38.00	Duplicative of J. Blair 8/9/13 entry	Attorney Cook's .1 time entry to assess the defendant's ability to depose prior counsel in this case is not duplicative of Attorney Blair's review of that issue.	
08-12-2013	J. BLAIR	REVIEW DRAFT PAPER REGARDING MEDICAL RECORDS, DISCUSS WITH T. COOK	0.5	380.00	\$190.00	Block billing; Internal conference	First time entry (.3); second time entry (.2). This is not an internal conference; Attorney Cook did not bill for this discussion.	
08-12-2013	J. BLAIR	REVIEW FILINGS BY GRESSETT AND CAP, MAKE NOTES FOR ARGUMENT TOMORROW	1.1	380.00	\$418.00	Vague	Attorney Blair's 1.1 time entry to review the filings by both parties in advance of the hearing before Judge Teilborg is not vague.	
08-12-2013	J. BLAIR	STUDY FAVORABLE ILLINOIS DISTRICT COURT DECISION REGARDING MEDICAL RECORDS	0.3	380.00	\$114.00			
08-12-2013	T. COOK	DRAFT MEMORANDUM TO COURT TO DISPUTE DEFENDANT'S DISCOVERY DEMAND FOR PLAINTIFF'S MEDICAL RECORDS	4.3	380.00	\$1,634.00			
08-12-2013	T. COOK	STUDY ADDITIONAL CASE LAW REGARDING FMLA CLAIMS, INTERFERENCE VS RETALIATION, BURDEN OF PROOF, DUTIES OF EMPLOYEE AND EMPLOYER TO AID WITH CLOSING IN ON KEY CLAIMS	2.0	380.00	\$760.00			
08-12-2013	T. COOK	PREPARE OUTLINE FOR COURT APPEARANCE ON DEFENDANT'S DEMAND FOR PLAINTIFF'S MEDICAL RECORDS	0.9	380.00	\$342.00	Duplicative of J. Blair 8/12/13 entry	Attorney Cook's .9 time entry to prepare an outline for oral argument is not duplicative of Attorney Blair's review of the issues.	
08-12-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL TO WITHDRAW KRUMWIEDE DEPOSITION NOTICE	0.2	380.00	\$76.00			
08-12-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-12-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excessive billing of email exchange	Attorney Cook's .1 time entry to send an email to Plaintiff Gressett is not excessive billing.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-13-2013	J. BLAIR	REVIEW MEDICAL RECORDS ISSUES WITH T. COOK PRIOR TO HEARING	0.5	380.00	\$190.00	Internal Conference	Attorney Blair's .5 time entry to discuss the medical records issue with Attorney Cook is not an internal conference, Attorney Cook did not bill for this review.	
08-13-2013	J. BLAIR	HEARING BEFORE JUDGE TEILBORG REGARDING MEDICAL RECORDS ISSUE, POST HEARING DISCUSSIONS WITH CAP'S ATTORNEY, PLAN LITIGATION GOING FORWARD	1.7	380.00	\$516.80	Block Billing	First time entry (1.3); second time entry (.2); third time entry (.2).	Block billing; reduced by 20%.
08-13-2013	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.1	380.00	\$38.00			
08-13-2013	T. COOK	STUDY DEPOSITION OF M. LUDKE IN PREPARATION FOR FOLLOW-UP ON DISCOVERY AND FOR DEPOSITION OF D. SIGMON	2.3	380.00	\$874.00			
08-14-2013	J. BLAIR	REVIEW DEPOSITION RESULTS THIS MORNING	1.4	380.00	\$532.00	Vague	Attorney Blair's 1.4 time entry is to review what was learned at the deposition that date, and is not vague.	
08-14-2013	J. BLAIR	REVIEW COURT ORDER REGARDING MEDICAL RECORDS	0.1	380.00	\$38.00			
08-14-2013	T. COOK	COMPLETE OUTLINE FOR DEPOSITION OF D. SIGMON, IDENTIFY AREAS TO DEVELOP REGARDING FMLA NON-COMPLIANCE, FOLLOW-UP DISCOVERY AND EXHIBITS TO USE AT DEPOSITION	2.8	380.00	\$851.20	Block billing	First time entry (1.8); second time entry (.5); third time entry (.5).	Block billing; reduced by 20%.
08-14-2013	T. COOK	TAKE DEPOSITION OF D. SIGMON	2.5	380.00	\$950.00			
08-14-2013	T. COOK	MEET AND CONFER WITH CLIENT [Privileged Communication]	1.5	380.00	\$570.00			
08-14-2013	T. COOK	TELEPHONE CALL WITH EXPERT G. MCRAE REGARDING STUDY OF DEPOSITIONS SO FAR; ALL ISSUES COVERED IN FIRST REPORT	0.5	380.00	\$190.00			
08-14-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING DEADLINES TO MOVE, KRUMWIEDE DEPOSITION POSTPONED, COOK DEPOSITION	0.1	380.00	\$38.00			
08-14-2013	T. COOK	EMAIL EXCHANGE WITH CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-14-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING SUBPOENA DUCES TECUM OF SOUTHWEST FAMILY PRACTICE	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-14-2013	T. COOK	BEGIN STUDY OF DEPOSITION OF M. LUDKE FOR DISCOVERY FOLLOW-UP, DEVELOPMENT OF ISSUES, SCOPE OF POSSIBLE DEFENSES, PREPARATION FOR DEPOSITION OF D. MODEER	1.8	380.00	\$547.20	Block billing	First time entry (.5); second time entry (.5); third time entry (.8).	Block billing; reduced by 20%.
08-14-2013	T. COOK	BEGIN STUDY OF LATEST UPDATED DISCOVERY RESPONSES WITH ATTACHMENTS FROM DEFENDANT	1.3	380.00	\$494.00			
08-15-2013	J. BLAIR	STUDY BASIS FOR MOTION FOR SUMMARY JUDGMENT SUPPORTED BY CAP'S RECORDS REGARDING FMLA	1.1	380.00	\$418.00			
08-15-2013	J. BLAIR	EMAIL EXCHANGE REGARDING EMPLOYEE WITNESSES	0.2	380.00	\$76.00	Vague, internal conference	Attorney Blair's .2 time entry, an internal email related to CAP employee witnesses, is neither vague nor an internal conference; Attorney Cook did not bill for this email.	
08-15-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-15-2013	T. COOK	CONTINUE DETAILED STUDY OF DOCUMENTS PRODUCED WITH DEFENDANT'S RESPONSES TO PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, CREATE CHART OF TIME SHEETS, BEGIN TO INCORPORATE DETAILS OF OTHER EVENTS WITHIN EACH PAY PERIOD TO TRACK EVENTS AND TIME OFF AND FMLA DESIGNATIONS (OR LACK THEREOF)	5.4	380.00	\$2,052.00			
08-16-2013	J. BLAIR	STUDY DELGADO DEPOSITION, MAKE NOTES REGARDING IMPLICATIONS FOR DISCOVERY AND MOTIONS PRACTICE	2.2	380.00	\$836.00			
08-16-2013	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
08-16-2013	T. COOK	STUDY COURT ORDER GRANTING EXTENSIONS TO DEADLINES	0.1	380.00	\$38.00			
08-16-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING DEADLINES AND PLAN OF ACTION	0.1	380.00	\$38.00			
08-17-2013	T. COOK	STUDY DEFENDANT'S SECOND SUPPLEMENTAL DISCLOSURE STATEMENT WITH EXHIBITS RELATING TO PLAINTIFF'S PRIOR EMPLOYERS	0.9	380.00	\$342.00			
08-17-2013	T. COOK	STUDY PLAINTIFF'S MEDICAL RECORDS FOR 2011, 2012 FROM SOUTHWEST FAMILY MEDICAL	0.9	380.00	\$342.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-19-2013	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF T. DELGADO TO IDENTIFY ADDITIONAL DISCOVERY TO BE PURSUED	2.3	170.00	\$391.00			
08-19-2013	L. SIMONINI	MEET WITH CLIENT [Privileged Communication]	2.3	170.00	\$391.00			
08-19-2013	L. SIMONINI	STUDY CAP'S RESPONSE TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS AND ATTACHMENTS	2.8	170.00	\$476.00			
08-19-2013	L. SIMONINI	DRAFT SUBPOENA DUCES TECUM, LETTER TO CUSTODIAN OF RECORDS AND DECLARATION TO CUSTODIAN OF RECORDS TO SOUTHWEST FAMILY PRACTICE	0.3	170.00	\$51.00	Excessive, duplicative - counsel already had records and were reviewing them, see T. Cook 8/17/13 entry	Paralegal Simonini's .3 time entry to prepare materials supporting production of records by Southwest Family Practice is not excessive nor duplicative of Attorney Cook's prior review of the file materials.	
08-19-2013	L. SIMONINI	STUDY DEPOSITION OF M. LUDKE TO IDENTIFY ADDITIONAL DISCOVERY TO BE PURSUED, TRIAL EXHIBITS TO BE IDENTIFIED	2.1	170.00	\$357.00	Duplicative of T. Cook 8/14/13 entry	Paralegal Simonini's 2.1 hours to review the Ludke deposition and identify necessary discovery is not duplicative of Attorney Cook's review of that deposition the same day as the Sigmon deposition. The paralegal assignment came from the attorney review.	
08-19-2013	J. BLAIR	ANALYZE DES FILE, RELATED EMAIL COMMUNICATIONS WITH T. COOK	0.5	380.00	\$190.00			
08-19-2013	J. BLAIR	MEET WITH A. GRESSETT [Privileged Communication]	0.6	380.00	\$228.00			
08-19-2013	J. BLAIR	ANALYZE DAMAGES CLAIMS, DEFENSES TO SAME	0.3	380.00	\$114.00			
08-20-2013	L. SIMONINI	STUDY DISCOVERY MATERIALS TO IDENTIFY POTENTIAL EXHIBITS FOR USE DURING D. MODEER DEPOSITION	1.5	170.00	\$255.00			
08-20-2013	L. SIMONINI	STUDY CLIENT'S MEDICAL RECORDS TO IDENTIFY DOCTOR VISITS AND NOTES THAT SUPPORT HER ABSENCES	2.5	170.00	\$425.00			
08-20-2013	J. BLAIR	REVIEW EMAIL FROM A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
08-20-2013	J. BLAIR	CONFIRM INADEQUATE DISCOVERY RESPONSES FROM CAP, ANALYZE RESPONSE PROCEDURE	0.3	380.00	\$114.00			
08-20-2013	T. COOK	COMPLETE STUDY AND NOTATIONS OF DEPOSITION OF M. LUDKE	1.8	380.00	\$684.00	Vague	Attorney Cook's 1.8 time entry to analyze and mark up the Ludke transcript is not vague.	
08-20-2013	T. COOK	STUDY EXISTING EXHIBITS TO SELECT FOR USE WITH D. MODEER	1.0	380.00	\$380.00	Vague	Attorney Cook's 1.0 time entry to review exhibits for use in the Modeer deposition is not vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-20-2013	T. COOK	STUDY REPORT OF EXPERT MCRAE TO AID WITH PREPARATION OF DEPOSITION OF D. MODEER	0.4	380.00	\$152.00			
08-20-2013	T. COOK	SEARCH VOLUMINOUS CASE RECORDS FOR MORE DOCUMENTS TO MAKE WITH D. MODEER	0.7	380.00	\$266.00	Vague	Attorney Cook's .7 time entry of additional records for the Modeer deposition is not vague.	
08-20-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING MISSING DOCUMENTS AND POSTPONING RECORDS PRODUCTION	0.1	380.00	\$38.00			
08-20-2013	T. COOK	STUDY LETTER FROM DEFENDANT COUNSEL THAT RECORDS TO BE PRODUCED LATER THIS WEEK WILL NOT IMPACT MODEER DEPOSITION OR OTHERS	0.1	380.00	\$38.00			
08-21-2013	L. SIMONINI	CONTINUE TO IDENTIFY AND PREPARE MATERIALS FOR USE AT DEPOSITION OF D. MODEER	3.1	170.00	\$527.00	Duplicative of 8/14/13 and 8/20/13 entries, excessive	Paralegal Simonini's continuation of the assignment to pull materials for the Modeer deposition is not duplicative of her earlier efforts.	
08-21-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING HER DEPOSITION	0.1	170.00	\$17.00			
08-21-2013	J. BLAIR	CONFER WITH A. GRESSETT AND T. COOK [Privileged Communication]	2.7	380.00	\$1,026.00			
08-21-2013	J. BLAIR	DRAFT MOTION FOR SUMMARY JUDGMENT BASED ON CAP'S "FMLA LEAVE" CHART	2.3	380.00	\$874.00			
08-21-2013	T. COOK	BEGIN STUDY OF DEPOSITION OF T. DELGADO	2.0	380.00	\$760.00			
08-21-2013	T. COOK	TAKE DEPOSITION OF D. MODEER	2.6	380.00	\$988.00			
08-21-2013	T. COOK	CONFER WITH CLIENT, L. SIMONINI, J. BLAIR [Privileged Communication]	1.0	380.00	\$380.00			
08-21-2013	T. COOK	STUDY EMAIL FROM DEFENDANT COUNSEL REGARDING DEPOSITIONS	0.1	380.00	\$38.00			
08-22-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
08-22-2013	L. SIMONINI	STUDY SECOND E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excessive billing of email exchange	Paralegal Simonini's .1 time entry to prepare an email for Plaintiff Gressett is not excessive.	
08-22-2013	L. SIMONINI	STUDY DISTRICT COURT'S DOCKET TO IDENTIFY ALL LITIGATION INVOLVING CAP	2.1	170.00	\$357.00	Duplicative of 5/23/13 entry	Paralegal Simonini's analysis of the district court docket regarding all litigation involving CAP is not duplicative of an earlier entry but a continuation of that earlier assignment.	
08-22-2013	J. BLAIR	REVISE DRAFT MOTION FOR SUMMARY JUDGMENT AND SUPPORTING FACTS AND EXHIBITS	1.1	380.00	\$418.00			
08-22-2013	J. BLAIR	EMAIL COMMUNICATION WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-22-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative of J. Blair 8/22/13 entry	Attorney Cook's .1 time entry to review an email from Plaintiff Gressett is not duplicative. The email was directed to Attorney Blair and Attorney Cook.	
08-22-2013	T. COOK	STUDY SECOND EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-23-2013	L. SIMONINI	ADDRESS ISSUES REGARDING CLIENT'S DEPOSITION	0.4	170.00	\$68.00	Vague	Paralegal Simonini's .4 time entry to address issues relating to Plaintiff Gressett's deposition is not vague. These assignments were all in support of Attorney Cook's deposition of Plaintiff Gressett.	
08-23-2013	L. SIMONINI	IDENTIFY E-MAIL, REQUEST FOR PRODUCTION OF DOCUMENTS AND CORRESPONDENCE DOCUMENTING DISCOVERY POSITION, DEPOSITIONS TO BE TAKEN IN ORDER TO COMPLETE DISCOVERY	2.2	170.00	\$374.00	Vague, block billing	Paralegal Simonini's 2.2 hours to analyze what work needed to be done before discovery deadline is neither vague nor block billing.	
08-23-2013	J. BLAIR	FINALIZE DRAFT MOTION FOR SUMMARY JUDGMENT AND DISTRIBUTE FOR CONSIDERATION	0.3	380.00	\$114.00			
08-23-2013	T. COOK	STUDY EMAIL FROM DEFENDANT COUNSEL REGARDING DISCOVERY AND DEPOSITIONS	0.1	380.00	\$38.00			
08-26-2013	L. SIMONINI	STUDY DRAFT MOTION FOR SUMMARY JUDGMENT AND NOTE DOCUMENT REFERENCES TO BE INCLUDED IN STATEMENT OF FACTS	2.1	170.00	\$357.00			
08-26-2013	J. BLAIR	EMAIL EXCHANGE WITH T. COOK REGARDING TIMING OF DISPOSITIVE MOTIONS, DEFENSES TO SAME	0.2	380.00	\$76.00	Internal Conference (email)	Attorney Blair's .2 time entry for an email exchange with Attorney Cook is not an attorney conference; Attorney Cook did not bill for this exchange.	
08-26-2013	J. BLAIR	ANALYZE DISCOVERY NEEDS GOING FORWARD	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to assess discovery issues going forward is not vague.	
08-26-2013	J. BLAIR	CONFIRM ADDITIONAL DISCOVERY NOTICE FROM CAP	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to review additional discovery from CAP is not excessive.	
08-26-2013	T. COOK	STUDY DRAFT MOTION FOR SUMMARY JUDGMENT AND STATEMENT OF FACTS AND ATTACHMENTS AND NOTATE AREAS OF FACTUAL AND LEGAL FOLLOW-UP	1.1	380.00	\$418.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-27-2013	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF D. SIGMON TO IDENTIFY AREAS FOR FURTHER DISCOVERY	1.7	170.00	\$289.00	Duplicative of 8/14/13 entry	Paralegal Simonini's 1.7 time entry to review the Sigmon deposition transcript for other areas of discovery is not duplicative of any entry on 8/14/13, the date of the Sigmon deposition.	
08-27-2013	L. SIMONINI	STUDY DEFENDANT'S SUPPLEMENTAL DISCLOSURE STATEMENT REGARDING EXPERT MCRAE'S FILE	0.3	170.00	\$51.00			
08-27-2013	J. BLAIR	ANALYZE CASE VALUE, WORK TO BE DONE, CAP'S DEFENSES WITH T. COOK	0.8	380.00	\$304.00	Internal Conference	Attorney Blair's .8 time entry to analyze the case value at that stage of the litigation is not an internal conference; Attorney Cook did not bill for that discussion.	
08-28-2013	L. SIMONINI	STUDY E-MAIL FROM DEFENDANT'S ATTORNEY REGARDING DEPOSITIONS	0.1	170.00	\$17.00			
08-28-2013	L. SIMONINI	STUDY REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES TO IDENTIFY DOCUMENTS TO BE IDENTIFIED AS TRIAL EXHIBITS AND ADDED TO DISCLOSURE STATEMENT	3.6	170.00	\$612.00			
08-28-2013	J. BLAIR	REVIEW DEPOSITION SCHEDULE, PLAINTIFF'S EMAIL [Privileged Communication]	0.1	380.00	\$38.00	Block Billing	Attorney Blair's .1 time entry to review the deposition schedule and an email from Plaintiff Gressett is not block billing.	
08-28-2013	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING DEPOSITIONS	0.1	380.00	\$38.00			
08-30-2013	L. SIMONINI	IDENTIFY PENDING DISCOVERY ISSUES, DISCOVERY TO BE SOUGHT, DEPOSITIONS TO BE TAKEN	2.1	170.00	\$357.00	Duplicative of J. Blair 8/26/13 entry	Paralegal Simonini's 2.1 time entry to address issues that needed to resolved before the discovery cutoff is not duplicative of Attorney Blair's separate consideration of that issue. It is an assignment from Attorney Blair.	
08-30-2013	L. SIMONINI	TELEPHONE CALL OFFICE OF CAROL ELDRIDGE REGARDING FMLA FORM	0.1	170.00	\$17.00			
08-30-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
08-30-2013	T. COOK	DETAILED STUDY, NOTATE ALL REGULATORY PROVISIONS RELATING TO FMLA IN LIGHT OF ALL EVIDENCE NOW ON RECORD TO PLOT STATUS OF CLAIMS, POSSIBLE DEFENSE AND FINAL PUSH TO COMPLETE DISCOVERY	2.6	380.00	\$988.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-30-2013	T. COOK	RESEARCH AND STUDY CASE LAW ON VARIOUS CODE OF FEDERAL REGULATIONS PROVISIONS AND LEGAL SCENARIOS REGARDING SAME TO BUILD RESPONSE TO DEFENDANT'S DEFENSES	3.0	380.00	\$1,140.00	Vague, background research	Attorney Cook's 3.0 time entry to study the CFR provisions that affect this litigation is neither vague nor background research.	
08-30-2013	T. COOK	MEET AND CONFER WITH BLAIR AND SIMONINI REGARDING CASE STATUS AND STRATEGY	2.1	380.00	\$798.00	Internal Conference	Attorney Cook's 2.1 time entry to meet with the litigation team to assess case status and strategy is a conference between the attorneys and Paralegal Simonini to plan the litigation going forward near the time of discovery cutoff. This time entry and Attorney Blair's time entry below is one of the very few conferences both attorneys charged for and is appropriate at this stage of the litigation. Plaintiff Gressett approved these entries.	
08-30-2013	J. BLAIR	MEETING TO DISCUSS CLAIMS AND DEFENSES AND PLAN DISCOVERY AND DEPOSITIONS FOR NEXT 3 MONTHS	2.1	380.00	\$798.00	Internal Conference, duplicative	Attorney Blair's 2.1 time entry to meet with the litigation team to assess case status and strategy is a conference between the attorneys and Paralegal Simonini to plan the litigation going forward near the time of discovery cutoff. This time entry and Attorney Blair's time entry below is one of the very few conferences both attorneys charged for and is appropriate at this stage of the litigation. Plaintiff Gressett approved these entries.	
08-30-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL WITH LIST OF INCOMPLETE DISCOVERY TO BE DONE	0.2	380.00	\$76.00			
08-30-2013	T. COOK	PREPARE UPDATED LIST OF ADDITIONAL DISCOVERY TO BE REQUESTED OF DEFENDANT	1.0	380.00	\$380.00			
08-31-2013	T. COOK	STUDY KEY FILE MATERIALS FOR CONTENT, SUPPORT FOR POSSIBLE DEFENSE, SUPPORT FOR CLAIMS, IDENTIFY FOLLOW-UP NEEDED	3.6	380.00	\$1,368.00	Vague	Attorney Cook's 3.6 time entry to perform a separate review of the entire file at this litigation stage is not vague. It is what attorneys do at key points of the litigation.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-31-2013	T. COOK	SEND LENGTHY EMAIL TO DEFENDANT COUNSEL WITH DISCOVERY FOLLOW-UP	0.8	380.00	\$304.00	Excessive	Attorney Cook's .8 time entry to prepare a lengthy email to CAP's counsel alongside the need for follow-up discovery is not excessive.	
08-31-2013	T. COOK	DRAFT THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT	0.9	380.00	\$342.00			
09-01-2013	T. COOK	STUDY AND FOLLOW-UP ON 25 EMAILS FROM CLIENT OVER LAST 30 DAYS	2.6	380.00	\$988.00	Excessive, duplicative of email exchanges over past 30 days already billed above.	Attorney Cook's 2.6 time entry is a separate, concentrated communication with Plaintiff Gressett relating to all of the issues that had come up during the past 30 days. It is not excessive nor duplicative, because the earlier emails, while responded to, were not analyzed as a group as was done for this time entry.	
09-03-2013	L. SIMONINI	STUDY DEPOSITION OF M. RUZICH TO IDENTIFY AREAS FOR EXPERT MCRAE TO CHALLENGE	1.3	170.00	\$221.00			
09-03-2013	L. SIMONINI	STUDY DEPOSITION OF T. DELGADO TO IDENTIFY AREAS FOR EXPERT MCRAE TO CHALLENGE	1.6	170.00	\$272.00			
09-03-2013	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S REQUEST TO DEPOSE CLIENT'S FORMER ATTORNEY AND EMPLOYER	0.3	170.00	\$51.00	Vague	Paralegal Simonini's .3 time entry to address an assignment relating to CAP's ability to depose Plaintiff Gressett's former attorney is not vague.	
09-03-2013	J. BLAIR	REVIEW MATERIALS FROM A. GRESSETT [Privileged Communication]	0.3	380.00	\$114.00			
09-03-2013	J. BLAIR	GO THROUGH THE PRODUCTION OF GRESSETT EMAILS FROM CAP, MARK CERTAIN FILES FOR DISCOVERY PURPOSES	0.6	380.00	\$228.00	Duplicative of 8/15/13 and 8/19/13 entries	Attorney Blair's .6 time entry to review the Gressett emails disclosed by CAP is not duplicative of earlier review of CAP disclosures. Those were file reviews by other members of the RCDM team for other purposes.	
09-03-2013	J. BLAIR	STUDY CORRESPONDENCE TO CAP REGARDING MATERIALS NOT YET DISCLOSED OR PRODUCED	0.5	380.00	\$190.00			
09-04-2013	L. SIMONINI	STUDY CAP'S REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES TO IDENTIFY POTENTIAL TRIAL EXHIBITS	3.7	170.00	\$629.00	Duplicative to 8/28/13 entry	Paralegal Simonini's 3.7 time entry to attempt to single out potential trial exhibits is not duplicative of other prior reviews of discovery from CAP.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-05-2013	L. SIMONINI	STUDY E-MAIL DISCLOSED BY CAP TO IDENTIFY AREAS OF NEEDED SUPPORT FROM CLIENT	3.1	170.00	\$527.00	Excessive, duplicative of 9/3/13 entry	Paralegal Simonini's 3.1 time entry, her assignment to seek support from Plaintiff Gressett regarding disclosures from CAP, is not excessive or duplicative of other file review for other purposes.	
09-05-2013	L. SIMONINI	CONTINUE STUDY OF CAP'S REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES TO IDENTIFY DOCUMENTS TO USE AS TRIAL EXHIBITS	3.4	170.00	\$578.00	Duplicative to 8/28/13 and 9/4/13 entries	Paralegal Simonini's 3.4 time entry is a continuation of prior assignments, not duplicative of the earlier efforts on those assignments.	
09-06-2013	L. SIMONINI	STUDY DEFENDANT'S SUPPLEMENTAL RESPONSE TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO IDENTIFY AREAS FOR FOLLOW-UP	1.3	170.00	\$221.00	Duplicative to 8/15/13 and 8/19/13 entries	Paralegal Simonini's 1.3 time entry to assess whether additional discovery was necessary based on CAP's responses to discovery is not duplicative, but supplemental, to the prior efforts related to discovery responses from CAP.	
09-06-2013	L. SIMONINI	IDENTIFY DOCUMENTS TO BE INCORPORATED INTO TIME LINE THAT HAVE BEEN PRODUCED BY CAP	1.1	170.00	\$187.00			
09-08-2013	L. SIMONINI	STUDY E-MAILS FROM EXPERT BJORKLUND REGARDING CAP EXPERT	0.2	170.00	\$34.00			
09-09-2013	L. SIMONINI	ADDRESS ISSUES REGARDING NURSE PRACTITIONER'S REFUSAL TO MEET	0.4	170.00	\$68.00	Vague	Paralegal Simonini's .4 time entry regarding her assignments in light of the nurse practitioner's unwillingness to meet with this office is not vague.	
09-09-2013	J. BLAIR	STUDY EMAIL EXCHANGE REGARDING MEDICAL TESTIMONY	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry relating to emails to and from Plaintiff's nurse practitioner, is not vague.	
09-09-2013	T. COOK	TELEPHONE CALL WITH CLIENT [Privileged Communication]	0.4	380.00	\$152.00			
09-09-2013	T. COOK	STUDY EMAILS WITH OFFICE AND DEFENSE ATTORNEY REGARDING DEPOSITIONS AND DISCOVERY	0.1	380.00	\$38.00			
09-09-2013	T. COOK	FOLLOW-UP PLANNING FOR COMMUNICATIONS WITH C. ELDRIDGE	0.1	380.00	\$38.00			
09-10-2013	L. SIMONINI	STUDY DEFENDANT'S RESPONSE TO THIRD REQUEST FOR PRODUCTION OF DOCUMENTS AND ATTACHED DOCUMENTS	1.4	170.00	\$238.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-10-2013	L. SIMONINI	MEMO TO FILE REGARDING CAP'S VOLUMINOUS PRODUCTION	2.2	170.00	\$374.00	Excessive	Paralegal Simonini's 2.2 time entry to summarize CAP's "voluminous production" is not excessive.	
09-10-2013	J. BLAIR	REVIEW RECENT MATERIALS FROM CAP	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to overview the "voluminous production" from CAP is not vague.	
09-11-2013	L. SIMONINI	DRAFT LETTER TO EXPERT MCRAE REGARDING CAP DISCOVERY RESPONSES	0.1	170.00	\$17.00			
09-11-2013	L. SIMONINI	DRAFT LETTER TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
09-11-2013	L. SIMONINI	IDENTIFY DISCOVERY DOCUMENTS TO BE SENT TO EXPERT MCRAE	0.8	170.00	\$136.00			
09-11-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING DEPOSITION	0.1	170.00	\$17.00			
09-11-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT BJORKLUND REGARDING CAP'S EXPERT	0.1	170.00	\$17.00			
09-12-2013	L. SIMONINI	LENGTHY TELEPHONE CALL EXPERT BJORKLUND REGARDING CAP EXPERT	0.7	170.00	\$119.00			
09-12-2013	L. SIMONINI	TELEPHONE CALL EXPERT MCRAE REGARDING DEPOSITION	0.2	170.00	\$34.00			
09-12-2013	L. SIMONINI	STUDY LENGTHY E-MAIL FROM CAP ATTORNEY AND DOCUMENTS REFERENCED IN SAME ADDRESSING DISCOVERY ISSUES	0.9	170.00	\$153.00	Excessive	Paralegal Simonini's .9 time entry to review an email from CAP's attorney and the references to documents at issue in that email is not excessive.	
09-12-2013	J. BLAIR	REVIEW EMAIL FROM CAP'S ATTORNEY REGARDING SCHEDULING DEADLINES AND CAP'S ADDITIONAL DISCLOSURES	0.2	380.00	\$76.00			
09-13-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING HER DEPOSITION	0.1	170.00	\$17.00			
09-13-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY OFFERING DATES FOR EXPERT DEPOSITIONS	0.1	170.00	\$17.00			
09-13-2013	L. SIMONINI	STUDY CAP'S RESPONSE TO THIRD REQUEST FOR PRODUCTION OF DOCUMENTS AND VOLUMINOUS ATTACHMENTS (450 PAGES)	4.7	170.00	\$799.00	Duplicative of 9/10/13 entry	Paralegal Simonini's 4.7 time entry to study the CAP recent production of documents (450 pages) is a continuation of an earlier task, not duplicative of the task.	
09-13-2013	L. SIMONINI	STUDY CAP'S SUPPLEMENTAL RESPONSE TO NON-UNIFORM INTERROGATORIES	0.6	170.00	\$102.00			
09-13-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING DEPOSITION	0.1	170.00	\$17.00	Excessive billing for email exchange on 9/13/13	Paralegal Simonini's .1 time entry to prepare an email to Expert McRae is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-13-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DISPOSITIVE MOTIONS DEADLINE, POTENTIAL TO SEEK EXTENSION OF TIME FOR DISCOVERY	0.6	170.00	\$102.00	Vague	Paralegal Simonini's .6 time entry to address what needed to be done before the dispositive motions deadline as well as whether an extension of the discovery deadline was possible is not vague.	
09-13-2013	J. BLAIR	ANALYZE LATEST PRODUCTION BY CAP, ITS CHARACTERIZATION OF SAME	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to assess CAP's characterization of its most recent voluminous production is not vague.	
09-16-2013	L. SIMONINI	DRAFT FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS TO CAP	1.2	170.00	\$204.00			
09-16-2013	L. SIMONINI	STUDY DEPOSITION OF D. SIGMON TO DETERMINE WHETHER ADDITIONAL DOCUMENTS NEED TO BE SOUGHT	1.9	170.00	\$323.00	Excessive - deposition consists of only 89 pages	Paralegal Simonini's 1.9 time entry to review the Sigmon deposition and assess whether additional documents need be requested is not excessive. This assignment is not just a review of the transcript but a comparison with what materials have already been produced.	
09-17-2013	J. BLAIR	REVIEW LATEST PRODUCTION FROM CAP, CONFIRM FURTHER PRODUCTION HAS BEEN SOUGHT	0.3	380.00	\$114.00			
09-18-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING EXPERT DEPOSITIONS	0.1	170.00	\$17.00			
09-18-2013	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING EXPERT DEPOSITIONS	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review an email from CAP's counsel is not excessive.	
09-18-2013	J. BLAIR	STUDY EMAIL EXCHANGE WITH CAP'S ATTORNEY REGARDING DEPOSITION SCHEDULE	0.2	380.00	\$76.00	Excessive billing for email exchange	Attorney Blair's .2 time entry to study emails to and from CAP's counsel regarding remaining depositions is not excessive.	
09-18-2013	J. BLAIR	PLAN PROSECUTION OF MS. GRESSETT'S CLAIMS, ADDRESS DISCUSSIONS WITH ARIZONA BAR REGARDING DISPARAGING COMMENTS BY HER PRIOR ATTORNEY	0.5	380.00	\$0.00	Unrelated to this lawsuit - deals with Plaintiff's malpractice case	Attorney Blair's .5 time entry is not related to Plaintiff Gressett's malpractice case. This time entry addresses whether the disparaging comments by her prior employer/attorney are admissible in this case.	Disallowed as block billed and partially unrelated to this case.
09-19-2013	L. SIMONINI	TELEPHONE CALL CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
09-19-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO CAP'S EXPERT	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-19-2013	J. BLAIR	CONFIRM TIMING OF KEY EXPERT DEPOSITIONS	0.0	380.00	\$0.00	Clerical	Attorney Blair's .2 time entry is to determine when the expert depositions will in fact occur. It is not clerical.	Clerical
09-20-2013	L. SIMONINI	TWO TELEPHONE CALLS EXPERT BJORKLUND REGARDING HIS DEPOSITION	0.4	170.00	\$68.00			
09-20-2013	L. SIMONINI	STUDY SUPPLEMENTAL RESPONSE TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO IDENTIFY DOCUMENTS TO BE FOLLOWED UP ON AND RECORDS TO BE INCORPORATED INTO TIME LINE	1.9	170.00	\$323.00	Duplicative of 9/6/13 entry	Paralegal Simonini's 1.9 time entry represents her assignment to update the litigation timeline based on additional documents from CAP and follow up on whether all relevant/discoverable documents have now been produced by CAP.	
09-20-2013	J. BLAIR	PLAN FOR P. BJORKLUND DEPOSITION	0.2	380.00	\$76.00			
09-23-2013	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING DEPOSITION	0.2	170.00	\$34.00			
09-23-2013	L. SIMONINI	STUDY SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS TO IDENTIFY DOCUMENTS TO BE FOLLOWED UP ON AND RECORDS TO BE INCORPORATED INTO TIME LINE	2.3	170.00	\$391.00	Duplicative of 9/20/13 entry	Paralegal Simonini's 2.3 time entry is a continuation of the 9/20/13 entry, not a duplication of that time entry.	
09-24-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING DISCOVERY MATERIALS	0.1	170.00	\$17.00			
09-24-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING DISCOVERY MATERIALS	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email to Expert McRae is not excessive.	
09-25-2013	L. SIMONINI	CONFERENCE WITH CLIENT [Privileged Communication]	4.7	170.00	\$799.00			
09-25-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
09-25-2013	L. SIMONINI	STUDY CAP RESPONSE TO THIRD REQUEST FOR PRODUCTION OF DOCUMENTS AND IDENTIFY DOCUMENTS TO BE INCORPORATED INTO TIME LINE	1.3	170.00	\$221.00	Duplicative of 9/10/13 and 9/13/13 entries	Paralegal Simonini's 1.3 time entry is a continuation of her effort to maintain a litigation timeline, not duplicative of other efforts toward that assignment.	
09-25-2013	J. BLAIR	DISCUSSION WITH A. GRESSETT [Privileged Communication]	0.3	380.00	\$114.00			
09-25-2013	J. BLAIR	REVIEW EMAIL COMMUNICATIONS FROM A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
09-26-2013	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL DEPOSITION OF CAP ATTORNEY GROUSE	0.5	170.00	\$85.00	Vague	Paralegal Simonini's .5 time entry represents her assignment to learn what she can whether CAP's attorney Grouse can be deposed. It is not vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-26-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
09-26-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Duplicative	Paralegal Simonini's .1 time entry to review an email from Plaintiff Gressett is not duplicative; it is a separate email.	
09-26-2013	L. SIMONINI	STUDY RESPONSE TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO IDENTIFY DOCUMENTS TO BE FOLLOWED UP ON AND RECORDS TO BE INCORPORATED INTO TIME LINE	3.4	170.00	\$578.00	Duplicative of L. Simonini 9/20/13 entry	Paralegal Simonini's 3.4 time entry is a continuation of her responsibility to prepare and supplement a litigation timeline, and is not duplicative of other efforts in that regard.	
09-26-2013	J. BLAIR	CONFIRM GROUSE PREPARED THE FMLA CHART AND REVIEW EMAILS REGARDING SCHEDULING GROUSE DEPOSITION	0.2	380.00	\$60.80	Block Billing	First time entry (.1); second time entry (.1)	Block billing; reduced by 20%.
09-27-2013	L. SIMONINI	STUDY DOCUMENTS RECEIVED IN RESPONSE TO SUBPOENA DUCES TECUM AND IDENTIFY PERSONAL INFORMATION TO BE REDACTED	2.3	170.00	\$391.00	Vague - who's subpoena?	Paralegal Simonini's 2.3 time entry represents her assignment to review and identify materials to be redacted from records subpoenaed from Plaintiff's medical provider.	
09-27-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING DEPOSITION OF GROUSE	0.1	380.00	\$38.00	Duplicative of J. Blair 9/26/13 entry	Attorney Cook's .1 time entry to prepare an email to defense counsel regarding Grouse deposition is not duplicative of Attorney Blair's 9/23/13 entry. He did not prepare any such email.	
09-29-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
09-30-2013	L. SIMONINI	STUDY RECORDS CITED BY CAP ATTORNEY REGARDING THE PREPARATION OF CAP000373 AND CONFIRM CHART CANNOT BE RECREATED USING THE CITED SUPPORT RECORDS	2.8	170.00	\$476.00	Vague	Paralegal Simonini's 2.8 time entry reflects her assignment to attempt to find support for the Grouse "leave time taken" chart. It is not vague.	
09-30-2013	J. BLAIR	ANALYZE CORRESPONDENCE FROM CAP'S ATTORNEY REGARDING GROUSE CHART	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to review CAP's explanation for the Grouse chart is not excessive.	
10-02-2013	L. SIMONINI	STUDY COURT'S MINUTE ENTRY FOR GUIDANCE ON PRODUCING MEDICAL RECORDS	0.2	170.00	\$34.00	Excessive	Paralegal Simonini's .2 time entry to review a Court minute entry regarding the medical records production is not excessive.	
10-02-2013	J. BLAIR	REVIEW REQUEST FOR EXTENSION OF TIME	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-02-2013	T. COOK	FOLLOW-UP ON RETRIEVAL OF CLIENT'S MEDICAL RECORDS, WHAT TO BE DISCLOSED, WHAT COURT DEMANDS BE PRODUCED, PRIVILEGE LOG	0.4	380.00	\$152.00	Excessive	Attorney Cook's .4 time entry to comply with the Court's order regarding production of Plaintiff Gressett's medical records is not excessive.	
10-03-2013	L. SIMONINI	BEGIN TO REDACT PLAINTIFF'S MEDICAL RECORDS TO EXCLUDE CONFIDENTIAL INFORMATION IN ADVANCE OF PRODUCING SAME	2.9	170.00	\$493.00			
10-04-2013	L. SIMONINI	REDACT PLAINTIFF'S MEDICAL RECORDS TO EXCLUDE CONFIDENTIAL INFORMATION IN ADVANCE OF PRODUCING SAME	2.9	170.00	\$493.00	Duplicative, excessive - records consist of only 218 pages	Paralegal Simonini's 2.9 time entry to redact medical records so as to exclude confidential information is supplemental to the prior assignment regarding these records, not duplicative.	
10-04-2013	J. BLAIR	CONFIRM EXTENSION TO JANUARY TO COMPLETE DISCOVERY	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to confirm discovery must be completed by early 2014 is not excessive.	
10-04-2013	T. COOK	STUDY COURT ORDER GRANTING PARTIAL EXTENSION OF DEADLINES	0.1	380.00	\$38.00			
10-07-2013	J. BLAIR	ADDRESS CAP'S SUBPOENA REQUEST FOR SCHOOL RECORDS	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to assess CAP's subpoena of Gressett's school records is not vague.	
10-08-2013	T. COOK	STUDY MEDICAL RECORDS FOR CLIENT FOR REDACTIONS AND FIXES BEFORE DISCLOSURE	1.7	380.00	\$646.00	Duplicative of L. Simonini 10/3/13 and 10/4/13 entries	Attorney Cook's 1.7 time entry to make sure the medical records file is clean for disclosure is not duplicative of the paralegal assignments.	
10-10-2013	J. BLAIR	TELEPHONE CALL WITH P. BJORKLUND REGARDING EX PARTE CONTACT WITH CAP'S ATTORNEY	0.3	380.00	\$114.00			
10-10-2013	J. BLAIR	NOTE TO THE FILE REGARDING EX PARTE CONTACT	0.1	380.00	\$38.00			
10-11-2013	J. BLAIR	REVIEW JOB PROGRESS FROM A. GRESSETT	0.2	380.00	\$76.00	Vague	Attorney Blair's determination of Ms. Gressett's ability to find work is not vague.	
10-14-2013	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING ASU RELEASE	0.1	170.00	\$17.00			
10-14-2013	L. SIMONINI	DRAFT E-MAIL TO CAP COUNSEL REGARDING ASU RELEASE	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email to CAP's counsel is not excessive billing.	
10-14-2013	L. SIMONINI	IDENTIFY MATERIALS FOR ATTORNEY USE IN PREPARING FOR DEPOSITION OF EXPERT BJORKLUND	2.3	170.00	\$391.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-14-2013	J. BLAIR	PLAN KEY EXPERT DEPOSITIONS	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to determine which experts will be deposed when is not vague.	
10-14-2013	T. COOK	STUDY EMAIL FROM DEFENDANT ATTORNEY REGARDING MEDICAL RECORDS	0.1	380.00	\$38.00			
10-15-2013	L. SIMONINI	CONTINUE REDACTING PLAINTIFF'S MEDICAL RECORDS TO EXCLUDE CONFIDENTIAL INFORMATION	2.7	170.00	\$459.00	Excessive - records consist of only 218 pages (see entries on 10/3/13 and 10/4/13 for same.)	Paralegal Simonini's 2.7 time entry to continue the records redaction process is not excessive; this is a continuation of the earlier assignment.	
10-15-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT BJORKLUND REGARDING HIS DEPOSITION	0.1	170.00	\$17.00			
10-15-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING HIS DEPOSITION	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email to Expert Bjorklund is not excessive billing.	
10-15-2013	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING HIS DEPOSITION	0.4	170.00	\$68.00			
10-15-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING PAYMENT OF EXPERT BJORKLUND'S DEPOSITION FEE	0.1	170.00	\$17.00			
10-15-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING MEDICAL RECORDS	0.1	170.00	\$17.00			
10-15-2013	J. BLAIR	PLAN P. BJORKLUND DEPOSITION FRIDAY OF THIS WEEK	0.0	380.00	\$0.00	Clerical	Attorney Blair's .2 time entry to plan for the defense of Paul Bjorklund at deposition later that week is not clerical.	Clerical
10-16-2013	L. SIMONINI	STUDY CAP'S SUPPLEMENTAL DISCOVERY RESPONSES TO IDENTIFY RECORDS TO BE FORWARDED TO EXPERTS	2.8	170.00	\$476.00	Vague, excessive	Paralegal Simonini's 2.8 time entry to pull materials from CAP's supplemental discovery responses to identify records for the experts' review is neither vague nor excessive.	
10-16-2013	J. BLAIR	TELEPHONE CALLS WITH P. BJORKLUND REGARDING HIS AVAILABILITY FOR DEPOSITION, TIMING OF SAME, DOCUMENTS TO BE PROVIDED	0.5	380.00	\$190.00			
10-16-2013	J. BLAIR	TELEPHONE CALLS WITH CAP'S ATTORNEYS REGARDING DEPOSITION OF BJORKLUND, DELAY UNTIL NEXT WEEK, AMENDED NOTICE REGARDING SAME	0.7	380.00	\$266.00			
10-16-2013	J. BLAIR	STUDY P. BJORKLUND'S DISCLOSED REPORT AND DISCLOSED REBUTTAL OF CAP'S EXPERT, NOTE QUESTIONS REGARDING SAME	1.1	380.00	\$418.00			
10-16-2013	J. BLAIR	STUDY PORTION OF CAMERON'S OPINIONS, MAKE NOTES FOR HER DEPOSITION	1.0	380.00	\$380.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-17-2013	J. BLAIR	STUDY PORTION OF EXPERT CAMERON'S REPORT, MAKE NOTES REGARDING SAME	0.8	380.00	\$304.00			
10-17-2013	J. BLAIR	PARALEGAL ASSIGNMENTS REGARDING QUESTIONS FROM EXPERT EXCHANGE	0.2	380.00	\$76.00	Vague, clerical	Attorney Blair's .2 time entry to outline assignments for Paralegal Simonini in light of the questions that arose from the differences of opinion by the damages experts is neither vague nor clerical.	
10-18-2013	J. BLAIR	TELEPHONE CALL WITH P. BJORKLUND REGARDING HIS DISCLOSED OPINIONS, UPCOMING DEPOSITION	0.6	380.00	\$228.00			
10-18-2013	J. BLAIR	WORK ON NOTES FOR CAMERON DEPOSITION, ARRANGE FOR REVIEW OF HER FILE	0.7	380.00	\$266.00	Clerical	Attorney Blair's .7 time entry to prepare for the Cameron deposition is not clerical.	
10-21-2013	L. SIMONINI	STUDY PLAINTIFF'S SUPPLEMENTAL RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS	2.8	170.00	\$476.00	Vague, excessive, duplicative of 6/21/13, 9/20/13, and 9/23/13 entries	Paralegal Simonini's 2.8 time entry is a continuation of her assignment to review Plaintiff's supplemental responses is not vague and is not excessive or duplicative of the prior efforts in that regard.	
10-21-2013	J. BLAIR	MAKE NOTES FOR EXPERT DEPOSITIONS, STUDY BJORKLUND AND CAMERON'S REPORTS	1.6	380.00	\$608.00			
10-22-2013	L. SIMONINI	ADDRESS ISSUES REGARDING RELEASE FOR ASU RECORDS	0.6	170.00	\$102.00	Vague	Paralegal Simonini's .6 time entry to prepare for the release of Plaintiff Gressett's ASU records is not vague.	
10-22-2013	L. SIMONINI	STUDY CAP'S DISCOVERY RESPONSES AND IDENTIFY RECORDS TO BE FORWARDED ELECTRONICALLY TO EXPERT BJORKLUND	1.7	170.00	\$289.00			
10-22-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND REGARDING MATERIALS FOR CONSIDERATION	0.1	170.00	\$17.00			
10-22-2013	J. BLAIR	CONFIRM PAYROLL RECORDS SENT TO P. BJORKLUND	0.0	380.00	\$0.00	Excessive, clerical	Attorney Blair's .2 time entry to assign to Paralegal Simonini that additional materials be sent to Expert Bjorklund is neither excessive nor clerical.	Clerical
10-22-2013	J. BLAIR	STUDY CAMERON'S OPINION OF GRESSETT'S DAMAGES, MAKE NOTES REGARDING SAME	0.7	380.00	\$266.00			
10-23-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT BJORKLUND REGARDING SUPPLEMENT TO HIS FILE	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-23-2013	L. SIMONINI	STUDY EXPERT BJORKLUND'S SUPPLEMENTAL FILE MATERIALS AND IDENTIFY ADDITIONAL MATERIALS TO BE FORWARDED TO SAME	1.1	170.00	\$187.00			
10-23-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING SUPPLEMENT TO EXPERT BJORKLUND'S FILE	0.1	170.00	\$17.00			
10-23-2013	L. SIMONINI	PREPARE SUPPLEMENT TO EXPERT BJORKLUND'S FILE TO BE DISCLOSED	0.5	170.00	\$85.00			
10-23-2013	J. BLAIR	REVIEW ADDITIONAL MATERIALS FROM P. BJORKLUND	0.2	380.00	\$76.00			
10-24-2013	J. BLAIR	STUDY BJORKLUND AND CAMERON FILES IN ADVANCE OF BJORKLUND DEPOSITION THIS MORNING	0.5	380.00	\$190.00			
10-24-2013	J. BLAIR	DEPOSITION OF EXPERT P. BJORKLUND	4.2	380.00	\$1,596.00			
10-24-2013	J. BLAIR	MEETING WITH P. BJORKLUND AND A.GRESSETT AFTER EXPERT DEPOSITION	0.7	380.00	\$266.00			
10-24-2013	J. BLAIR	MEETING WITH A. GRESSETT [Privileged Communication]	1.3	380.00	\$494.00			
10-24-2013	J. BLAIR	CONFIRM WE WILL PROMPTLY DISCLOSE CLIENT'S SCHOOL FILE	0.2	380.00	\$76.00	Clerical	Attorney Blair's .2 time entry to agree Plaintiff Gressett's school file needs to be produced is not clerical.	
10-25-2013	J. BLAIR	REVIEW CAMERON'S OPINIONS REGARDING P. BJORKLUND'S ANALYSIS	0.7	380.00	\$266.00			
10-27-2013	J. BLAIR	REVIEW PORTION OF EXPERT CAMERON'S FILE, MAKE NOTES REGARDING SAME	0.5	380.00	\$190.00	Duplicative of 10/17/13 entry	Attorney Blair's .5 time entry to review a portion of Expert Cameron's file and make notes about that file [in preparation for her deposition] is not duplicative of earlier efforts in that regard.	
10-28-2013	L. SIMONINI	DRAFT E-MAIL TO EXPERT CAMERON SEEKING FURTHER PRODUCTION UNDER SUBPOENA DUCES TECUM	0.1	170.00	\$17.00			
10-28-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT CAMERON REGARDING SUBPOENA DUCES TECUM RESPONSE	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Expert Cameron is not excessive billing.	
10-28-2013	L. SIMONINI	TELEPHONE CALL EXPERT CAMERON REGARDING INVOICE FOR SUBPOENA RESPONSE	0.2	170.00	\$34.00			
10-28-2013	L. SIMONINI	ADDRESS ISSUES REGARDING PAYMENT OF EXPERT CAMERON'S NEGLIGIBLE INVOICE AMOUNT	0.5	170.00	\$85.00	Vague	Paralegal Simonini's .5 time entry to follow up on Expert Cameron's request for payment is not vague.	
10-28-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING RELEASE FOR ASU RECORDS	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-28-2013	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY SEEKING DATE FOR M. COOK DEPOSITION	0.1	170.00	\$17.00			
10-28-2013	L. SIMONINI	BEGIN PREPARING RECORDS TO BE USED AS EXHIBITS FOR EXPERT CAMERON'S DEPOSITION	1.8	170.00	\$306.00			
10-28-2013	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT CAMERON'S CLAIM OF PRIVILEGE	0.5	170.00	\$85.00	Vague	Paralegal Simonini's .5 time entry to address the assignment to consider the viability of Expert Cameron's privilege claim is not vague.	
10-28-2013	J. BLAIR	SHORT TELEPHONE CALL WITH P. BJORKLUND REGARDING CAMERON DEPOSITION	0.1	380.00	\$38.00			
10-28-2013	J. BLAIR	TELEPHONE CALL WITH P. BJORKLUND REGARDING AREAS TO DISCUSS WITH EXPERT CAMERON	1.0	380.00	\$380.00			
10-28-2013	J. BLAIR	PREPARE FOR CAMERON DEPOSITION, REVIEW BACKUP MATERIALS SHE SENT US	3.1	380.00	\$1,178.00	Duplicative of 10/16/13, 10/17/13, 10/22/13, and 10/24/13 entries	Attorney Blair's 3.1 time entry to prepare for Expert Cameron's deposition and review additional materials from her office is not duplicative, but additional effort in that regard.	
10-28-2013	J. BLAIR	ARRANGE FOR ANY SUPPLEMENTAL FILES CAMERON HAS	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry is to confirm the office will arrange for pick up of additional files from Expert Cameron. It is not vague.	
10-28-2013	J. BLAIR	CONFIRM WORK PRODUCT PROTECTS EXPERT COMMUNICATIONS WITH COUNSEL	0.2	380.00	\$76.00			
10-29-2013	L. SIMONINI	STUDY OUTLINE OF EXPERT CAMERON DEPOSITION AND IDENTIFY AND PREPARE RECORDS TO BE MARKED AS EXHIBITS	3.3	170.00	\$561.00			
10-29-2013	L. SIMONINI	RESEARCH TO DETERMINE WHETHER EXPERT CAMERON HAS PREVIOUSLY FILED FOR BANKRUPTCY	0.4	170.00	\$68.00	Excessive, unnecessary	Paralegal Simonini's .4 time entry to determine whether Expert Cameron had filed bankruptcy is neither excessive nor unnecessary. She was given that assignment because it was thought to be true.	
10-29-2013	L. SIMONINI	STUDY E-MAIL FROM EXPERT CAMERON REGARDING SUPPLEMENTAL PRODUCTION AND INVOICE FOR SAME	0.1	170.00	\$17.00			
10-29-2013	L. SIMONINI	STUDY SUPPLEMENTAL SUBPOENA DUCES TECUM PRODUCTION FROM EXPERT CAMERON AND IDENTIFY ADDITIONAL DOCUMENTS TO BE USED AT DEPOSITION	1.2	170.00	\$204.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-29-2013	L. SIMONINI	STUDY DRAFT DEPOSITION TRANSCRIPT OF EXPERT BJORKLUND TO IDENTIFY ISSUES TO BE ADDRESSED DURING EXPERT CAMERON'S DEPOSITION	2.1	170.00	\$357.00			
10-29-2013	J. BLAIR	TELEPHONE CALL WITH P. BJORKLUND REGARDING DEPOSITION OF CAMERON	0.2	380.00	\$76.00			
10-29-2013	J. BLAIR	REVIEW MATERIALS JUST DISCLOSED BY EXPERT CAMERON	0.3	380.00	\$114.00	Duplicative of L. Simonini 10/2/13 entry	Attorney Blair's .3 time entry to review additional materials from Expert Cameron is not duplicative of Paralegal Simonini's assignment to pull together the earlier materials.	
10-29-2013	J. BLAIR	STUDY FILE, PREPARE OUTLINE OF QUESTIONS FOR EXPERT CAMERON DEPOSITION	3.3	380.00	\$1,254.00	Duplicative of J. Blair 10/28/13 entry	Attorney Blair's 3.3 time entry to prepare for the Expert Cameron deposition is not duplicative of earlier efforts in that regard but further efforts to prepare for the deposition.	
10-30-2013	L. SIMONINI	STUDY EXPERT CAMERON'S ADDITIONAL MATERIALS AND PREPARE SAME FOR DEPOSITION	2.3	170.00	\$391.00	Duplicative of L. Simonini 10/29/13 entry	Paralegal Simonini's 2.3 time entry to review supplemental materials from Expert Cameron is not duplicative of her earlier efforts but a continuation of that assignment.	
10-30-2013	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
10-30-2013	J. BLAIR	PREPARE NOTES FOR CAMERON DEPOSITION, MARK DOCUMENTS FOR HER CONSIDERATION	1.8	380.00	\$684.00			
10-31-2013	L. SIMONINI	IDENTIFY ADDITIONAL MATERIALS FOR ATTORNEY USE AT EXPERT DEPOSITION	0.6	170.00	\$102.00			
10-31-2013	J. BLAIR	REVIEW RECORDS AND OUTLINE PRIOR TO DEPOSITION OF C. CAMERON	1.0	380.00	\$380.00			
10-31-2013	J. BLAIR	DEPOSITION OF C. CAMERON	3.4	380.00	\$1,292.00			
10-31-2013	J. BLAIR	SUMMARY OF DEPOSITION TO LITIGATION TEAM	0.4	380.00	\$152.00	Internal Conference	Attorney Blair's .4 time entry is the preparation of a summary to the litigation team file after the completion of the Cameron deposition. It is not an internal conference; no one else billed for preparation of the summary.	
11-01-2013	L. SIMONINI	STUDY SUMMARY OF C. CAMERON DEPOSITION	0.2	170.00	\$34.00			
11-01-2013	L. SIMONINI	STUDY CAP'S SUPPLEMENTAL PRODUCTION TO IDENTIFY DOCUMENTS TO BE FORWARDED TO EXPERT MCRAE	1.3	170.00	\$221.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-01-2013	J. BLAIR	SERIES OF EMAIL COMMUNICATIONS WITH A. GRESSETT [Privileged Communication]	0.3	380.00	\$114.00			
11-07-2013	J. BLAIR	STUDY "LEAVE TAKEN" CHART ALONGSIDE CAP'S APPARENT SOURCE OF THE CHART, MAKE NOTES REGARDING SAME	1.2	380.00	\$456.00			
11-08-2013	J. BLAIR	ARRANGE EXHIBIT TO COURT REPORTER FOR CAMERON DEPOSITION	0.0	380.00	\$0.00	Clerical	Attorney Blair .2 time entry to complete a request from the court reporter at the Cameron deposition is not a clerical assignment.	Clerical
11-11-2013	J. BLAIR	ANALYZE "LEAVE TIME TAKEN" REPORT AND SOURCES FOR SAME, ADDRESS DEPOSITION OF K.GROUSE, CAP'S INSIDE COUNSEL	0.8	380.00	\$243.20	Block Billing, duplicative of 11/7/13 entry	Time entry 1 (.5); time entry 2 (.3).	Block billing; reduced by 20%.
11-11-2013	T. COOK	EVALUATE CURRENT STATUS OF CASE IN LIGHT OF ALL RECENT DEPOSITIONS, PLAN OF ACTION GOING FORWARD	0.5	380.00	\$190.00	Vague	Attorney Cook's .5 time entry, to evaluate the case at this stage of the litigation and plan the case going forward is not vague.	
11-12-2013	J. BLAIR	ANALYZE HOW TO TAKE TESTIMONY FROM M. COOK, WHETHER VIDEO IS NECESSARY	0.3	380.00	\$114.00	Excessive	Attorney Blair's .3 time entry is to assess the pluses and minuses of conducting the Mike Cook deposition by video, i.e., whether we anticipate he will be available at trial. It is not excessive.	
11-12-2013	J. BLAIR	REVIEW A. GRESSETT'S MEDICAL FILE, MAKE NOTES REGARDING KEY DOCUMENTS	1.8	380.00	\$684.00	Duplicative of J. Blair 7/25/13 entry	Attorney Blair's 1.8 time entry to review the Gressett medical file is not duplicative of Attorney Blair's July overview of the file (.5) but an analysis that included identifying key documents for trial.	
11-13-2013	L. SIMONINI	DRAFT NOTICE OF DEPOSITION TO M. COOK	0.1	170.00	\$17.00			
11-13-2013	L. SIMONINI	ADDRESS ISSUES REGARDING CONTACT WITH MEDICAL PROVIDER	0.8	170.00	\$136.00	Vague	Paralegal Simonini's .8 time entry, her assignment to determine how the office can contact and stay in touch with Plaintiff Gressett's medical provider, is not vague.	
11-13-2013	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING DEPOSITIONS	0.1	380.00	\$38.00			
11-14-2013	L. SIMONINI	STUDY CAP'S FOURTH SUPPLEMENTAL DISCLOSURE STATEMENT AND DOCUMENTS ATTACHED AND IDENTIFIED AS TRIAL EXHIBITS	3.2	170.00	\$544.00	Excessive - production consists of only 27 pages	Paralegal Simonini's 3.2 time entry to review CAP's Fourth Supplemental Disclosure is not excessive, it was the time that was necessary to review the materials and identify those that could be potential trial exhibits.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-14-2013	L. SIMONINI	STUDY DEPOSITION OF C. CAMERON TO IDENTIFY TESTIMONY TO BE USED AT FUTURE DEPOSITIONS	2.3	170.00	\$391.00			
11/14/2013	J. BLAIR	REVIEW PORTION OF MS. GRESSETT'S WORK FILE, MAKE NOTES REGARDING SAME	0.6	380.00	\$228.00	Vague, duplicative of 7/25/13 entry	Attorney Blair's .6 time entry to review a portion of Ms. Gressett's employment file is not vague or duplicative of any earlier task of overviewing that file.	
11-15-2013	L. SIMONINI	ADDRESS ISSUES REGARDING PAYMENT FOR M. COOK TRAVEL	0.7	170.00	\$119.00	Vague	Paralegal Simonini's .7 time entry to determine how and if this office was responsible for paying Mike Cook's travel expenses is not vague.	
11-15-2013	L. SIMONINI	ADDRESS ISSUES REGARDING CAP DISCLOSURE OF GRESSETT'S E-MAIL, AREAS TO BE ADDRESSED PRIOR TO HER DEPOSITION	2.7	170.00	\$459.00	Vague	Paralegal Simonini's 2.7 time entry to determine how Plaintiff Gressett will defend the "Gressett emails" prior to her deposition is not vague.	
11-15-2013	J. BLAIR	REVIEW ADDITIONAL FILE MATERIALS FROM CAP, MAKE NOTES REGARDING SAME AND DO SUMMARY TO THE FILE	1.2	380.00	\$456.00	Vague	Attorney Blair's 1.2 time entry to analyze CAP's supplemental discovery material and do a summary to the file about those discovery materials is not vague.	
11-15-2013	T. COOK	STUDY EMAIL FROM DEFENSE ATTORNEY REGARDING DEPOSITION OF M. COOK	0.1	380.00	\$38.00			
11-15-2013	T. COOK	SEND EMAIL TO DEFENSE ATTORNEY REGARDING DEPOSITION OF M. COOK	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to prepare an email to defense counsel is not excessive billing.	
11-17-2013	T. COOK	EVALUATE CURRENT STATUS OF CASE AND FOLLOW-UP NEEDED IN PLAN FOR DEPOSITION OF COOK	0.7	380.00	\$266.00			
11-18-2013	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL DEPOSITION OF K. GROUSE	0.7	170.00	\$119.00	Vague, excessive	Paralegal Simonini's .7 entry reflects assignments she received from the attorneys to determine whether CAP's Grouse could be deposed. It is neither vague nor excessive.	
11-18-2013	L. SIMONINI	ADDRESS ISSUES REGARDING M. COOK TRAVEL ARRANGEMENTS FOR DEPOSITION	0.7	170.00	\$119.00	Vague, excessive	Paralegal Simonini's .7 and time entry reflects assignments she received to confirm Mike Cook could make travel arrangements for his deposition in Phoenix. It is neither vague or excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-18-2013	K. MYER	BRIEF BANK RESEARCH ON ABILITY TO DEPOSE OPPOSING COUNSEL IN EMPLOYMENT CASE	1.4	360.00	\$504.00			
11-18-2013	J. BLAIR	ADDRESS DEPOSITION OF K. GROUSE	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry reflects his consideration whether attorney Grouse should be deposed. It is not vague.	
11-18-2013	J. BLAIR	PLAN FOR DEPOSITIONS OF CLIENT AND MIKE COOK	0.2	380.00	\$76.00			
11-18-2013	J. BLAIR	STRATEGIZE REGARDING MEDIATION AND TIMING OF SAME	0.2	380.00	\$76.00			
11-18-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
11-18-2013	T. COOK	SEND EMAIL TO CLIENT AND TEAM [Privileged Communication]	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to send an email to plaintiff Gressett is not excessive billing.	
11-18-2013	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING DEPOSITION OF COOK	0.1	380.00	\$38.00			
11-18-2013	T. COOK	SEND EMAIL TO DEFENDANT REGARDING COOK □	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to send an email to CAP's counsel is not excessive billing.	
11-18-2013	T. COOK	STUDY CASE LAW RELATING TO WAIVER OF ATTORNEY-CLIENT COMMUNICATIONS FOR DEFENSE IN-HOUSE COUNSEL K. GROUSE FOR HER DEPOSITION	0.9	380.00	\$342.00			
11-18-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
11-19-2013	L. SIMONINI	ADDRESS ISSUES REGARDING DEPOSITION OF ATTORNEY GROUSE, POTENTIAL FOR 30(B)(6) DEPOSITION	0.5	170.00	\$85.00	Vague	Paralegal Simonini's .5 time entry to consider whether attorney Grouse can be deposed as a fact witness or a 30(b)(6) witness is not vague.	
11-19-2013	J. BLAIR	CONSIDER 30(B)(6) DEPOSITION AND DEPOSITION OF K. GROUSE	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry is to question whether the Grouse deposition is an appropriate 30(b)(6) deposition. It is not vague.	
11-20-2013	T. COOK	STUDY NOTICE OF DEPOSITION OF CLIENT	0.1	380.00	\$38.00			
11-26-2013	J. BLAIR	EMAIL EXCHANGE REGARDING DEPOSITION OF CLIENT'S TREATING MEDICAL PROFESSIONAL	0.3	380.00	\$114.00	Vague	Attorney Blair's .3 time entry to review the email exchange between the parties about the deposition of plaintiff Gressett's treating medical professional is not vague.	
11-26-2013	T. COOK	STUDY DEFENDANT'S NOTICE OF DEPOSITION OF C. ELDRIDGE	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-26-2013	T. COOK	SEND EMAIL TO CLIENT AND TEAM [Privileged Communication]	0.1	380.00	\$38.00			
11-26-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
11-28-2013	T. COOK	TELEPHONE CALL WITH ATTORNEY FOR C. ELDRIDGE	0.1	380.00	\$38.00			
11-28-2013	T. COOK	PREPARE FOR DEPOSITION OF M. COOK	1.3	380.00	\$494.00			
12-02-2013	L. SIMONINI	STUDY CAP DISCLOSURE STATEMENTS AND TRIAL EXHIBITS TO IDENTIFY POTENTIAL TRIAL EXHIBITS TO COUNTER SAME	2.7	170.00	\$459.00	Duplicative of 9/4/13 entry	Paralegal Simonini's 2.7 time entry to review CAP's disclosure statements and trial exhibits in those disclosure statements to identify trial exhibits is not duplicative of her earlier entry, but supplemental to that entry	
12-02-2013	J. BLAIR	ANALYZE JUDGE SNOW'S DECISION REGARDING DEPOSING ATTORNEYS	1.5	380.00	\$570.00	Excessive, vague, Judge Snow is not the Judge in this case	Attorney Blair's 1.5 time entry to review a separate decision by Judge Snow concerning the depositions of attorneys is neither excessive nor vague. Judge Snow is a judge in this District Court and his decision and his consideration was considered relevant to the possible deposition of attorney Grouse.	
12-02-2013	J. BLAIR	EMAIL REGARDING DEPOSITION OF GROUSE	0.1	380.00	\$38.00	Vague	Attorney Blair's .1 time entry to review an email regarding the Grouse deposition is not vague.	
12-02-2013	J. BLAIR	STUDY PORTION OF C. CAMERON DEPOSITION, NOTE MATERIALS SHE OWES US	0.9	380.00	\$342.00			
12-02-2013	J. BLAIR	LEARN WHAT I CAN REGARDING MS. CAMERON AT GRANT THORNTON	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry reflects his interest in determining what Ms. Cameron's role while at Grant Thornton was. It is not vague.	
12-03-2013	J. BLAIR	ANALYZE CAMERON TRANSCRIPT, MAKE NOTES REGARDING SAME AND CONFIRM COPIES TO A. GRESSETT AND P. BJORKLUND	1.9	380.00	\$722.00	Duplicative of entry on 12/2/13	Attorney Blair's 1.9 time entry reflects his continuation of the review of the Cameron deposition transcript; the earlier time entry refers to the first "portion" of that deposition.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-04-2013	L. SIMONINI	STUDY RECORDS ATTACHED TO SUPPLEMENT TO SECOND REQUEST FOR PRODUCTION AND RESPONSE TO THIRD REQUEST FOR PRODUCTION OF DOCUMENTS AND INCORPORATE PERTINENT RECORDS INTO TIMELINE	4.7	170.00	\$799.00	Duplicative of 8/15/13, 8/19/13, 9/6/13, 9/20/13, and 9/26/13 entries	Paralegal Simonini's 4.7 time entry reflects her ongoing effort to update the litigation timeline for all records received from CAP. It is not duplicative of other efforts in that regard.	
12-05-2013	J. BLAIR	STUDY COURT DECISIONS PULLED BY A. GRESSETT	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry, to review court decisions sent to the office by plaintiff Gressett, is not vague.	
12-09-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
12-09-2013	L. SIMONINI	PREPARE COLLECTION OF DISCOVERY RESPONSES, DISCLOSURE STATEMENTS AND PERTINENT DEPOSITION TESTIMONY FOR Attorney Cook'S USE IN PREPARING FOR DEPOSITION OF M. COOK	3.4	170.00	\$578.00			
12-09-2013	L. SIMONINI	PREPARE COLLECTION OF PREVIOUSLY MARKED DEPOSITION EXHIBITS FOR ATTORNEY USE IN DEPOSING M. COOK	2.7	170.00	\$459.00	Duplicative of entry above		
12-09-2013	T. COOK	STUDY NOTICE OF DEPOSITION OF C. ELDRIDGE	0.1	380.00	\$38.00			
12-10-2013	L. SIMONINI	STUDY ARTICLE WRITTEN BY CAP EXPERT AND ADDRESS ISSUES REGARDING DISCLOSURE OF SAME	0.9	170.00	\$153.00			
12-10-2013	J. BLAIR	PLAN LITIGATION THROUGH END OF THE YEAR	1.0	380.00	\$380.00			
12-10-2013	J. BLAIR	NOTE TO THE FILE REGARDING WORK TO BE DONE	0.2	380.00	\$76.00			
12-10-2013	J. BLAIR	STUDY CAMERON TRANSCRIPT FOR MATERIALS SHE PROMISED TO PROVIDE	0.3	380.00	\$114.00	Duplicative of entry on 12/2/13	Attorney Blair's .3 time entry is documenting his review of the Cameron transcript to identify materials she promised to provide after the deposition. It is not duplicative.	
12-10-2013	J. BLAIR	EMAIL COMMUNICATIONS WITH CAP'S ATTORNEY AND DAMAGES EXPERT REGARDING MATERIALS PROMISED	0.3	380.00	\$114.00			
12-10-2013	J. BLAIR	STUDY ARTICLE FROM CAMERON REGARDING DAMAGES CONSULTING WORK	0.5	380.00	\$190.00			
12-10-2013	J. BLAIR	NOTE TO THE FILE REGARDING CROSS EXAMINATION OF CAMERON BASED ON HER REVIEW OF AN INCOMPLETE FILE	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-11-2013	L. SIMONINI	STUDY DISCLOSURE STATEMENTS AND IDENTIFY MATERIALS FOR USE DURING DEPOSITION OF CLIENT AND M. COOK	2.9	170.00	\$493.00	Duplicative of 6/12/13 and 6/13/13 entries	Paralegal Simonini's 2.9 time entry reflects her assignment to pull records for the Mike Cook deposition. It is not duplicative but supplemental to the earlier related time entries.	
12-11-2013	L. SIMONINI	IDENTIFY PERTINENT DEPOSITION TESTIMONY FOR CLIENT REVIEW IN ADVANCE OF DEPOSITIONS	3.4	170.00	\$578.00	Vague	Paralegal Simonini's 3.4 time entry reflects her review of prior depositions of other parties to share that information with plaintiff Gressett in advance of upcoming depositions. It is not vague.	
12-11-2013	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.1	380.00	\$38.00			
12-11-2013	T. COOK	STUDY DEFENDANT RESPONSE TO PLAINTIFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS	0.9	380.00	\$342.00			
12-11-2013	T. COOK	STUDY AND NOTATE DEFENDANT RESPONSE TO PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS	2.8	380.00	\$1,064.00			
12-12-2013	L. SIMONINI	STUDY CAP'S RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS AND SUPPLEMENTS AND IDENTIFY MATERIALS FOR ATTORNEY COOK'S USE DURING DEPOSITION OF M. COOK	2.6	170.00	\$442.00	Duplicative of entry on 12/9/13	Paralegal Simonini's 2.6 time entry is a continuation of her efforts to provide materials for the Mike Cook deposition. It is not duplicative of the 12/9 time entry.	
12-12-2013	L. SIMONINI	STUDY CAP'S RESPONSE TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS AND SUPPLEMENTS AND IDENTIFY MATERIALS FOR ATTORNEY COOK USE DURING DEPOSITION OF M. COOK	2.3	170.00	\$391.00	Duplicative of entry on 12/9/13	Paralegal Simonini's 2.3 time entry is a continuation of her efforts to provide materials for the Mike Cook deposition. It is not duplicative of the 12/9 time entry.	
12-12-2013	L. SIMONINI	STUDY CAP'S RESPONSE TO THIRD REQUEST FOR PRODUCTION OF DOCUMENTS AND SUPPLEMENTS AND IDENTIFY MATERIALS FOR ATTORNEY COOK'S USE DURING DEPOSITION OF M. COOK	1.7	170.00	\$289.00	Duplicative of entry on 12/9/13	Paralegal Simonini's 1.7 is a continuation of efforts to provide materials for the Mike Cook deposition. It is not duplicative of the 12/9 time entry.	
12-12-2013	L. SIMONINI	STUDY CAP'S RESPONSE TO FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS AND SUPPLEMENTS AND IDENTIFY MATERIALS FOR ATTORNEY COOK'S USE DURING DEPOSITION OF M. COOK	1.1	170.00	\$187.00	Duplicative of entry on 12/9/13	Paralegal Simonini's 1.1 time entry is a continuation of efforts to provide materials for the Mike Cook deposition. It is not duplicative of the 12/9 time entry.	
12-12-2013	J. BLAIR	MEET WITH A.GRESSETT [Privileged Communication]	2.3	380.00	\$874.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-12-2013	J. BLAIR	REVIEW ADDITIONAL MATERIALS FOR COOK DEPOSITION IN THE AM	0.3	380.00	\$114.00			
12-12-2013	T. COOK	STUDY DEPOSITION OF M. RUZICH IN PREPARATION FOR DEPOSITION OF M. COOK	2.4	380.00	\$912.00			
12-12-2013	T. COOK	DETAILED STUDY OF DEFENDANT'S RESPONSES TO PLAINTIFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (>400 PAGES)	3.7	380.00	\$1,406.00			
12-12-2013	T. COOK	STUDY DEPOSITION OF M. LUDKE IN PREPARATION FOR DEPOSITION OF M. COOK	2.0	380.00	\$760.00			
12-12-2013	T. COOK	PREPARE OUTLINE FOR DEPOSITION OF M. COOK	2.5	380.00	\$950.00			
12-13-2013	L. SIMONINI	ATTEND DEPOSITION OF M. COOK AND ASSIST ATTORNEY T. COOK WITH EXHIBITS	3.0	170.00	\$510.00	Duplicative, excessive	Paralegal Simonini's attendance at the Mike Cook deposition was neither duplicative nor excessive, but to facilitate the deposition by assisting Attorney Cook.	
12-13-2013	L. SIMONINI	CONTINUE TO PREPARE EXHIBITS FOR DEPOSITION OF M. COOK	3.1	170.00	\$527.00	Excessive, duplicative	Paralegal Simonini's 3.1 time entry is neither excessive nor duplicative. Paralegal Simonini pulled exhibits for the Cook deposition, so this time entry should have preceded the one just above it.	
12-13-2013	L. SIMONINI	ADDRESS ISSUES RAISED DURING M. COOK DEPOSITION AND IMPACT ON CASE	1.3	170.00	\$221.00	Vague, excessive	Paralegal Simonini's 1.3 time entry reflects her responsibility to address issues that were raised by Mike Cook during his deposition. This assignment is neither vague nor excessive.	
12-13-2013	L. SIMONINI	IDENTIFY AND PREPARE EXHIBITS FOR DEPOSITION OF C. ELDRIDGE	0.4	170.00	\$68.00			
12-13-2013	J. BLAIR	PREPARE NOTES FOR COOK DEPOSITION	1.2	380.00	\$456.00	Duplicative of T. Cook 12/12/13 entry	Attorney Blair's 1.2 time entry reflects his separate notes prepared prior to the Mike Cook deposition to assist Attorney Cook. This time entry is not duplicative of Attorney Cook's deposition preparation.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-13-2013	J. BLAIR	ATTEND PORTION OF DEPOSITION OF M. COOK	0.2	380.00	\$76.00	Duplicative	Attorney Blair's .2 time entry to attend a short portion of the Mike Cook deposition was to measure his credibility, and was not duplicative of Attorney Cook's control of that deposition.	
12-13-2013	J. BLAIR	REVIEW CASE AFTER COOK DEPOSITION	0.6	380.00	\$228.00			
12-13-2013	T. COOK	SELECT FINAL LIST OF EXHIBITS FOR DEPOSITION OF M. COOK	0.1	380.00	\$38.00			
12-13-2013	T. COOK	TAKE DEPOSITION OF M. COOK	3.0	380.00	\$1,140.00			
12-13-2013	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING REFUSAL TO PRODUCE PERSONNEL FILE OF M. COOK	0.1	380.00	\$38.00			
12-13-2013	T. COOK	EMAIL FROM DEFENDANT REGARDING DEPOSITIONS AND PRODUCTION OF RECORDS	0.1	380.00	\$38.00			
12-16-2013	L. SIMONINI	STUDY CLIENT REQUEST FOR PRODUCTION OF DOCUMENTS RESPONSES AND DISCLOSURES AND IDENTIFY MATERIALS FOR USE DURING DEPOSITION PREPARATION	2.8	170.00	\$476.00	Vague, excessive	Paralegal Simonini's 2.8 hours reflects her pulling of records for plaintiff Gressett's deposition for her review prior to deposition preparation. It is neither vague nor excessive.	
12-16-2013	L. SIMONINI	ADDRESS ISSUES REGARDING PROVIDER ELDRIDGE'S ATTORNEY AND FAILURE TO RESPOND TO NUMEROUS MESSAGES	0.3	170.00	\$51.00	Vague	Paralegal Simonini's .3 time entry reflects her assignment to determine how to make contact with care provider Eldridge. It is not vague.	
12-16-2013	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
12-16-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email is not excessive billing.	
12-16-2013	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email is not excessive billing.	
12-16-2013	L. SIMONINI	TELEPHONE CALL C. ELDRIDGE ATTORNEY REGARDING DEPOSITION	0.2	170.00	\$34.00			
12-16-2013	L. SIMONINI	STUDY CAP'S SUPPLEMENTS TO REQUEST FOR PRODUCTION OF DOCUMENTS TO IDENTIFY RECORDS CRITICAL OF M. COOK	2.9	170.00	\$493.00	Excessive - post deposition of M. Cook, duplicative	Paralegal Simonini's 2.9 time entry documents her assignment to review the file for materials critical of Mike Cook, as a consequence of his deposition testimony. It is not duplicative of earlier pre-deposition file searches.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-16-2013	J. BLAIR	STUDY COOK DEPOSITION, MAKE NOTES REGARDING SAME	2.1	380.00	\$798.00			
12-16-2013	J. BLAIR	CONFIRM CONTACT WITH CLIENT'S MEDICAL PROVIDER	0.0	380.00	\$0.00	Vague, internal conference, clerical	Attorney Blair's .2 time entry to document this office's ability to contact plaintiff Gressett's medical provider is neither vague nor an internal conference, nor is it clerical. No one else billed for this time entry.	Clerical
12-17-2013	L. SIMONINI	ATTEND DEPOSITION PREPARATION SESSION WITH CLIENT AND ATTORNEY COOK	3.2	170.00	\$544.00			
12-17-2013	L. SIMONINI	COMPARE MEDICAL RECORDS TO M. COOK NOTES DOCUMENTING CLIENT'S ABSENCES TO IDENTIFY ABSENCES THAT TO NOT MATCH WITH NOTES	2.9	170.00	\$493.00			
12-17-2013	T. COOK	MEET AND CONFER WITH CLIENT [Privileged Communication]	4.3	380.00	\$1,634.00			
12-17-2013	J. BLAIR	MEET WITH A. GRESSETT [Privileged Communication]	1.5	380.00	\$570.00			
12-18-2013	T. COOK	TELEPHONE CALL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
12-18-2013	T. COOK	COMMUNICATIONS WITH DEFENDANT COUNSEL REGARDING PLAINTIFF'S DEPOSITION	0.1	380.00	\$38.00			
12-18-2013	T. COOK	ORDER DEPOSITION OF K. GROUSE REGARDING FMLA LIST MADE BY HER FOR DEPARTMENT OF LABOR	0.1	380.00	\$38.00	Vague, no deposition of K. Grouse taken	Attorney Cook's .1 time entry to propose the deposition of attorney Grouse is not vague and is appropriate because at the time, this office intended to depose attorney Grouse.	
12-18-2013	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING DEPOSITION OF K. GROUSE	0.1	380.00	\$38.00			
12-18-2013	T. COOK	DETAILED STUDY AND NOTATE EVERY MEDICAL RECORD FOR PLAINTIFF FOR TREATMENT RELATED TO ANXIETY AND DEPRESSION, CAUSES CHARTED, TREATMENT CHARTED, REACTIONS CHARTED, WHEN FMLA WAS RAISED, WHAT WAS DONE FOR FMLA SUPPORT TO ASSIST WITH PREPARATION FOR MEETING	5.3	380.00	\$2,014.00			
12-18-2013	T. COOK	SEND EMAIL TO EXPERT MCRAE REGARDING FINAL DISCLOSURES	0.1	380.00	\$38.00			
12-18-2013	T. COOK	SEND EMAIL TO EXPERT BJORKLUND REGARDING FINAL DISCLOSURES	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-18-2013	T. COOK	STUDY EMAIL FROM EXPERT BJORKLUND REGARDING HIS ANALYSIS OF LATEST DOCUMENTS	0.1	380.00	\$38.00			
12-18-2013	J. BLAIR	REVIEW EMAILS ADVISING OF A. GRESSETT'S ILLNESS, CONFIRM NEW DATE FOR DEPOSITION	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry documents a review of several emails confirming plaintiff Gressett was ill and that her deposition was going to be pushed back. It is not excessive.	
12-18-2013	J. BLAIR	ANALYZE HOW TO USE FMLA CHART AT TRIAL, CONFIRM WE CAN USE EXPERT TO OPINE RE CHART AND NOT NEED TO DEPOSE CAP'S ATTORNEY	1.2	380.00	\$456.00	Vague	Attorney Blair's 1.2 time entry reflects his analysis of how to use the "leave taken" chart prepared by attorney Grouse if attorney Grouse was not deposed. It is not vague, but reflects appropriate attorney analysis.	
12-18-2013	J. BLAIR	STUDY T. COOK'S NOTES REGARDING MEDICAL FILE, MAKE NOTES	0.3	380.00	\$114.00	Duplicative	Attorney Blair's .3 time entry reflects his analysis of Attorney Cook's review of the Gressett medical file. It is not duplicative, but supplemental.	
12-18-2013	T. COOK	SEND EMAIL TO EXPERT MCRAE REGARDING SCOPE OF ANALYSIS	0.1	380.00	\$38.00	Vague	Attorney Cook's .1 time entry to send an email to Expert McRae about the scope of the case is not vague.	
12-18-2013	T. COOK	SEND EMAIL TO DEFENDANT REGARDING DISCOVERY	0.1	380.00	\$38.00	Vague	Attorney Cook's .1 time entry to send an email to CAP's counsel about discovery issues is not vague.	
12-18-2013	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING DISCOVERY	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to review an email from CAP's counsel about discovery, is not excessive billing.	
12-19-2013	L. SIMONINI	STUDY CAP'S RESPONSE TO SECOND, THIRD AND FOURTH REQUESTS FOR PRODUCTION OF DOCUMENTS AND SUPPLEMENTS THERETO AND IDENTIFY RECORDS TO BE FORWARDED TO EXPERT MCRAE	3.7	170.00	\$629.00	Duplicative of 8/15/13, 8/19/13, 9/6/13, 9/10/13, 9/13/13, 9/20/13, 9/25/13, 9/26/13, 12/4/13, 12/11/13, and 12/12/13 entries	Paralegal Simonini's 3.7 time entry reflects her assignment to pull materials for Expert McRae's review, it is not duplicative of Paralegal Simonini's other assignments for other purposes.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-19-2013	L. SIMONINI	STUDY CAP'S RESPONSE TO SECOND, THIRD AND FOURTH REQUESTS FOR PRODUCTION OF DOCUMENTS AND SUPPLEMENTS THERETO AND IDENTIFY RECORDS TO BE FORWARDED TO EXPERT BJORKLUND	2.8	170.00	\$476.00	Duplicative; Excessive	Paralegal Simonini's 2.8 time entry to pull supplemental materials for Expert Bjorklund's review is not duplicative of Paralegal Simonini's separate efforts to pull records for other purposes. It is not excessive time for the same reason.	
12-19-2013	T. COOK	WORK ON COMPREHENSIVE TIME LINE FROM ALL DEPOSITION EXHIBITS	4.5	380.00	\$1,710.00			
12-19-2013	T. COOK	CONFER WITH J BLAIR REGARDING MEDICAL RECORDS, ADMISSION OF FMLA LIST, WORK WITH EXPERT MCRAE	0.5	380.00	\$190.00	Internal Conference	Attorney Cook's .5 time entry reflects discussion with Attorney Blair regarding the medical records and Expert McRae. It is not an internal conference; Attorney Blair did not bill for this discussion.	
12-19-2013	T. COOK	TRAVEL TO CONFER WITH C. ELDRIDGE BEFORE DEPOSITION	0.7	380.00	\$266.00	Excessive	Attorney Cook's .7 time entry reflects time to travel to meet with plaintiff Gressett's care provider. It is not excessive.	
12-19-2013	T. COOK	MEET WITH C. ELDRIDGE FOR BASIC FACT REVIEW BEFORE DEPOSITION	1.4	380.00	\$532.00			
12-19-2013	T. COOK	TRAVEL BACK FROM WEST SIDE INTERVIEW WITH C. ELDRIDGE	1.0	380.00	\$380.00	Excessive	Attorney Cook's .7 time entry reflects time to travel to meet with plaintiff Gressett's care provider. It is not excessive.	
12-19-2013	T. COOK	STUDY RECORDS TO IDENTIFY WHEN DEFENDANT CORPORATE COUNSEL FIRST APPEARS TO HAVE BECOME INVOLVED IN MATTER TO AID WITH DEMAND FOR HER DEPOSITION	0.5	380.00	\$190.00	Unnecessary - duplicative of J. Blair 12/18/13 entry	Attorney Cook's .5 time entry reflects her review of the file as to when in house attorney Grouse became involved in the Gressett termination process. It is not duplicative of any entry by Attorney Blair and was critically relevant to whether attorney Grouse could be deposed.	
12-19-2013	T. COOK	STUDY ALL PAYROLL RELATED RECORDS TO IDENTIFY AND TRACK RATES OF ABSENCE FOR VACATION, HOLIDAYS, SICK, PERSONAL DAYS, FMLA TO ASSIST WITH CLAIM THAT DEFENDANT INDEED FIRED PLAINTIFF FOR USING FMLA	1.0	380.00	\$380.00			
12-19-2013	J. BLAIR	ANALYZE WHAT TESTIMONY WE NEED FROM CLIENT'S MEDICAL PROVIDER, DEVELOP QUESTIONS FOR HER	0.9	380.00	\$342.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-19-2013	J. BLAIR	DISCUSS FINDINGS FROM MEDICAL PROVIDER AFTER MEETING WITH T. COOK TODAY	0.5	380.00	\$190.00	Internal Conference	Attorney Blair's .5 time entry to discuss the medical provider meeting with Attorney Cook is not an internal conference, Attorney Cook did not bill for this discussion.	
12-19-2013	J. BLAIR	ANALYZE A. GRESSETT'S HOURS WORKED BASED ON CALCULATIONS FROM T. COOK	0.4	380.00	\$152.00			
12-20-2013	J. BLAIR	EMAIL EXCHANGE WITH T. COOK REGARDING DEPOSITION OF CLIENT'S MEDICAL PROVIDER	0.2	380.00	\$76.00	Internal Conference	Attorney Blair's email exchange with Attorney Cook regarding deposing plaintiff Gressett's medical provider is not an internal conference; Attorney Cook did not bill for this matter.	
12-20-2013	J. BLAIR	CONFIRM TESTIMONY FROM MEDICAL PROVIDER IS ON BALANCE POSITIVE FOR CLIENT	0.5	380.00	\$190.00	Vague, Internal conference	Attorney Blair's .5 time entry reflecting his confidence that plaintiff Gressett's medical provider would be a strong witness is neither vague or an internal conference. There is no testimony from anyone else on this subject.	
12-20-2013	T. COOK	TRAVEL TO WEST SIDE FOR DEPOSITION OF C. ELDRIDGE	0.8	380.00	\$304.00	Excessive	Attorney Cook's .8 time entry to travel to the Eldridge deposition is not excessive, but necessary.	
12-20-2013	T. COOK	ATTEND/TAKE DEPOSITION OF C. ELDRIDGE	4.5	380.00	\$1,710.00			
12-20-2013	T. COOK	TRAVEL BACK FROM DEPOSITION OF C. ELDRIDGE	1.0	380.00	\$380.00	Excessive	Attorney Cook's 1.0 time entry to return from the Eldridge deposition is not excessive, but necessary.	
12-20-2013	T. COOK	TELEPHONE CALL WITH J. BLAIR REGARDING DEPOSITION OF C. ELDRIDGE	0.3	380.00	\$114.00	Internal Conference	Attorney Cook's .3 time entry to discuss the Eldridge deposition with Attorney Blair is not an internal conference, Attorney Blair did not bill for that discussion.	
12-21-2013	T. COOK	STUDY EMAIL WITH DRAFT OF TRANSCRIPT FOR C. ELDRIDGE	0.1	380.00	\$38.00			
12-21-2013	T. COOK	PRELIMINARY READ OF DRAFT TRANSCRIPT OF WITNESS ELDRIDGE	0.9	380.00	\$342.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-22-2013	L. SIMONINI	STUDY DRAFT OF DEPOSITION OF C. ELDRIDGE FOR USE IN PREPARING FOR DEPOSITION OF CLIENT	2.9	170.00	\$493.00	Duplicative of T. Cook 12/22/13 entry, excessive	Paralegal Simonini's 2.9 time entry reflects her assignment to study the Eldridge deposition in preparation for plaintiff Gressett's deposition. It is not duplicative of Attorney Cook's preparation for the deposition, nor is it an excessive time to review the Eldridge deposition and assist Attorney Cook.	
12-24-2013	J. BLAIR	STUDY EMAIL EXCHANGE REGARDING CLIENT'S CONTINUED ILLNESS, UNCERTAINTY OF DEPOSITION	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry is to learn plaintiff Gressett's health issues is not excessive.	
12-26-2013	T. COOK	FINALIZE REVIEW OF EXHIBITS IN ANTICIPATION OF DEPOSITION OF CLIENT	1.6	380.00	\$608.00			
12-26-2013	T. COOK	ATTEND AND DEFEND DEPOSITION OF CLIENT	8.0	380.00	\$3,040.00			
12-27-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
12-28-2013	T. COOK	WORK ON COMPREHENSIVE OUTLINE OF ISSUES, EVIDENCE, DEFENSES, STRENGTHS AND WEAKNESSES OF CASE IN LIGHT OF APPROACHING CLOSE OF DISCOVERY	3.0	380.00	\$1,140.00			
12-30-2013	J. BLAIR	CONFIRM TIMING OF ANY SUPPLEMENTAL DISCLOSURES BEFORE JANUARY DEADLINE	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to determine what if any supplemental disclosures could be made before the disclosure deadline is not vague.	
12-30-2013	T. COOK	STUDY SEND EMAIL TO DEFENDANT REGARDING DISCOVERY	0.1	380.00	\$38.00	Vague	Attorney Cook's .1 time entry to send an email to CAP's counsel is not vague. (The word "study" should be omitted).	
12-30-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.2	380.00	\$76.00			
12-30-2013	T. COOK	IDENTIFY ALL REMAINING RECORDS TO BE ANALYZED BY EXPERTS IN PREPARATION FOR FINAL DISCLOSURES	0.1	380.00	\$38.00			
12-30-2013	T. COOK	SEND EMAIL TO DEFENDANT REQUESTING DATES FOR DEPOSITION OF DEFENDANT CORPORATE COUNSEL GROUSE	0.1	380.00	\$38.00			
12-31-2013	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
12/31/2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to send an email to plaintiff Gressett is not excessive billing.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-31-2013	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to send a separate email to plaintiff Gressett is not excessive billing.	
12-31-2013	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00	Excess billing for email exchange	Attorney Blair's .2 time entry for an email exchange with Plaintiff Gressett is not excessive billing.	
12-31-2013	J. BLAIR	ANALYZE ADDITIONAL OPINIONS FROM HUMAN RESOURCES EXPERT	0.6	380.00	\$228.00			
01-03-2014	J. BLAIR	EMAIL COMMUNICATION WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
01-03-2014	J. BLAIR	STUDY PORTION OF ELDRIDGE DEPOSITION, MAKE NOTES	0.7	380.00	\$266.00	Duplicative of T. Cook 12/21/13 entry	Attorney Blair's .7 time entry to review a portion of the Eldridge deposition, make notes about that deposition is not duplicative of Attorney Cook's efforts associated with that deposition.	
01-06-2014	L. SIMONINI	TELEPHONE CALL ATTORNEY BLAIR AND EXPERT MCRAE REGARDING ADDITIONAL DISCLOSURE TO BE MADE	0.3	170.00	\$51.00			
01-06-2014	L. SIMONINI	STUDY DISCOVERY RESPONSES AND CORRESPONDENCE FROM CAP'S ATTORNEY TO DETERMINE WHETHER APPROPRIATE FOR EXPERT MCRAE TO TESTIFY REGARDING CAP'S FMLA CHART SUBMITTED TO THE DEPARTMENT OF LABOR	0.6	170.00	\$102.00			
01-06-2014	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S FMLA CHART SUBMITTED TO THE DEPARTMENT OF LABOR	0.4	170.00	\$68.00	Vague	Paralegal Simonini's .4 time entry to complete an assignment related to CAP's FMLA chart to DOL is not vague.	
01-06-2014	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
01-06-2014	L. SIMONINI	ADDRESS ISSUES REGARDING PLAINTIFF'S EMPLOYERS SUBSEQUENT TO CAP	0.3	170.00	\$51.00	Vague	Paralegal Simonini's .3 time entry to review plaintiff Gressett's employment status after CAP is not vague.	
01-06-2014	L. SIMONINI	IDENTIFY CORRESPONDENCE RELATING TO ATTORNEY GROUSE AND HER PROPOSED DEPOSITION	0.4	170.00	\$68.00	Vague	Paralegal Simonini's .4 time entry to pull and review all of the correspondence that related to attorney Grouse's DOL chart and her proposed deposition is not vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-06-2014	J. BLAIR	STUDY PORTION OF ELDRIDGE DEPOSITION AND MAKE NOTES	1.5	380.00	\$570.00	Duplicative of 1/3/14 entry	Attorney Blair's 1.5 time entry to study another portion of the Eldridge deposition and make notes about that deposition is not duplicative of the earlier entry studying an earlier portion of the deposition.	
01-06-2014	J. BLAIR	EMAIL EXCHANGE WITH T. COOK REGARDING SUPPLEMENTAL HUMAN RESOURCES OPINIONS	0.2	380.00	\$76.00	Internal Conference	Attorney Blair's .2 time entry to exchange emails with Attorney Cook about supplemental HR opinions from Expert McRae is not an internal conference. Attorney Cook did not bill for that exchange.	
01-06-2014	J. BLAIR	REVIEW G. MCRAE REPORTS	0.2	380.00	\$76.00			
01-06-2014	J. BLAIR	ARRANGE ADDITIONAL MATERIALS TO G. MCRAE'S ATTENTION, TELEPHONE CALL WITH HER REGARDING SUPPLEMENTAL OPINIONS	0.7	380.00	\$212.80	Block Billing	Task 1 - (.2); Task 2 (.5).	Block billing; reduced by 20%.
01-06-2014	T. COOK	IDENTIFY LIST OF WITNESSES FOR FINAL DISCLOSURE	0.3	380.00	\$114.00			
01-07-2014	L. SIMONINI	UPDATE COLLECTION OF MATERIALS FORWARDED TO EXPERT MCRAE	1.2	170.00	\$204.00	Vague, excessive	Paralegal Simonini's 1.2 time entry reflects her assignment to collect additional materials for Expert McRae's consideration. It is neither vague nor excessive.	
01-07-2014	J. BLAIR	STUDY DRAFT SUPPLEMENTAL REPORT FROM G. MCRAE, CONFIRM APPROVAL OF SAME	0.8	380.00	\$304.00			
01-07-2014	J. BLAIR	STUDY PORTION OF ELDRIDGE DEPOSITION	0.6	380.00	\$228.00	Duplicative of 1/3/14 and 1/6/14 entries	Attorney Blair's .6 time entry to review a third portion of the Eldridge deposition is not duplicative of the earlier efforts to review other portions.	
01-07-2014	J. BLAIR	ANALYZE WHETHER WE CAN SECURE ADDITIONAL OPINIONS FROM G. MCRAE REGARDING CAP'S HUMAN RESOURCES FUNCTION	0.3	380.00	\$114.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-07-2014	T. COOK	STUDY SUPPLEMENTAL REPORT FROM EXPERT MCRAE	0.6	380.00	\$228.00	Duplicative of J. Blair 1/7/14 entry	Attorney Cook's .6 time entry to review Expert McRae's supplemental report is not duplicative of Attorney Blair's review of that draft report. Both attorneys worked closely with Expert McRae because of the key HR testimony from CAP's witnesses.	
01-07-2014	T. COOK	IDENTIFY ADDITIONAL AREAS OF OPINION TO BE COVERED BY EXPERT MCRAE OF DEFENDANT NEGLIGENCE	0.3	380.00	\$114.00			
01-07-2014	T. COOK	SEND EMAIL TO EXPERT MCRAE REGARDING REVIEW OF ADDITIONAL OPINIONS AND UPDATE REPORT	0.1	380.00	\$38.00			
01-08-2014	L. SIMONINI	UPDATE COLLECTION OF DEPOSITION TRANSCRIPTS FOR USE IN DRAFTING MOTION FOR SUMMARY JUDGMENT	1.1	170.00	\$187.00			
01-08-2014	J. BLAIR	PLAN DEFENSES AND FINAL DISCLOSURE AT THE END OF THIS WEEK	0.7	380.00	\$266.00			
01-08-2014	J. BLAIR	CONFIRM A. GRESSETT'S DEPOSITION WENT WELL	0.2	380.00	\$76.00	Vague, excessive, internal conference	Attorney Blair's .2 time entry to assess the Gressett deposition is neither vague nor excessive. No one else billed for this assessment.	
01-08-2014	J. BLAIR	STUDY REMAINDER OF C. ELDRIDGE DEPOSITION, MAKE NOTES REGARDING SAME	1.2	380.00	\$456.00	Excessive, duplicative	Attorney Blair's 1.2 time entry to review the last portion of the Eldridge deposition and make notes about that deposition is neither excessive nor duplicative.	
01-08-2014	J. BLAIR	STUDY PORTION OF A. GRESSETT DEPOSITION	0.5	380.00	\$190.00			
01-09-2014	L. SIMONINI	ADDRESS ISSUES REGARDING DISCLOSURE OF AUDIO TAPES	0.3	170.00	\$51.00	Vague, duplicative of 6/14/13 entry	Paralegal Simonini's .3 time entry to assess whether the Gressett audio tapes would be disclosed is neither vague nor duplicative. It reflects an assignment she was given as the deadlines were approaching.	
01-09-2014	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT MCRAE'S SUPPLEMENTAL REPORT	0.6	170.00	\$102.00	Vague	Paralegal Simonini's .6 time entry reflects her involvement in disclosing the supplemental report from Expert McRae. It is not vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-09-2014	L. SIMONINI	IDENTIFY DEPOSITION TRANSCRIPTS TO BE FORWARDED TO EXPERT MCRAE	0.8	170.00	\$136.00	Vague	Paralegal Simonini's .8 time entry reflects her assignment to pull other relevant deposition transcripts to forward same to Expert McRae. It is not vague.	
01-09-2014	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING DEPOSITIONS	0.1	170.00	\$17.00			
01-09-2014	J. BLAIR	ANALYZE EXPERT MCRAE'S DRAFT SUPPLEMENTAL REPORT, EMAIL COMMUNICATIONS REGARDING FINALIZING AND FILING SAME	1.2	380.00	\$456.00			
01-09-2014	J. BLAIR	STUDY PORTION OF A. GRESSETT TRANSCRIPT AND MAKE NOTES REGARDING SAME	1.1	380.00	\$418.00			
01-09-2014	T. COOK	EVALUATE STATUS OF CASE, DISCOVERY, DISCLOSURES, EXPERT DISCLOSURE, UPDATE PLAN OF ACTION	1.0	380.00	\$380.00			
01-09-2014	T. COOK	STUDY EMAIL FROM EXPERT MCRAE REGARDING SUPPLEMENTAL REPORT	0.1	380.00	\$38.00			
01-10-2014	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING SUPPLEMENTAL REPORT	0.0	170.00	\$0.00	Duplicative of above entry	This entry is duplicative and should not be considered.	Duplicative
01-10-2014	L. SIMONINI	TELEPHONE CALL CLIENT [Privileged Communication]	0.3	170.00	\$51.00			
01-10-2014	L. SIMONINI	STUDY CLIENT'S DEPOSITION TRANSCRIPT TO IDENTIFY CO-WORKER THAT WAS KNOWLEDGEABLE OF ATTORNEY KRUMWEIDE ISSUES	0.4	170.00	\$68.00			
01-10-2014	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
01-10-2014	L. SIMONINI	STUDY CORRESPONDENCE FROM CLIENT [Privileged Communication]	2.3	170.00	\$391.00	Excessive	Paralegal Simonini's 2.3 time entry reflects her assignment to review correspondence from Plaintiff Gressett in order to identify potential witnesses. It is not excessive, but reflects all of the time she gave to that assignment.	
01-10-2014	L. SIMONINI	STUDY CLIENT FILES AND IDENTIFY ADDITIONAL RECORDS TO BE DISCLOSED AS TRIAL EXHIBITS	1.3	170.00	\$221.00			
01-10-2014	L. SIMONINI	DRAFT FINAL CUMULATIVE DISCLOSURE STATEMENT	0.5	170.00	\$85.00			
01-10-2014	J. BLAIR	TELEPHONE CALL WITH G. MCRAE REGARDING SUPPLEMENTAL REPORT	0.2	380.00	\$76.00			
01-10-2014	J. BLAIR	REVIEW EXPERT REPORT AND APPROVE FOR FILING EXPERT REPORT	0.4	380.00	\$152.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-10-2014	J. BLAIR	REVIEW PORTIONS OF A. GRESSETT DEPOSITION, EMAIL COMMUNICATIONS WITH MS. GRESSETT [Privileged Communication]	1.1	380.00	\$418.00	Block Billing	First time entry (.8); second time entry (.3).	
01-10-2014	J. BLAIR	ADDRESS ISSUES RELATING TO FINAL DISCLOSURE	0.5	380.00	\$190.00	Vague	Attorney Blair's .5 time entry reflects his time to determine what if any supplemental disclosures were necessary at the final disclosure deadline. It is not vague.	
01-13-2014	L. SIMONINI	STUDY DEPOSITION OF CLIENT TO IDENTIFY DISCOVERY ISSUES, MOTION FOR SUMMARY JUDGMENT TO BE ADDRESSED AT TRIAL	1.7	170.00	\$289.00	Vague	Paralegal Simonini's 1.7 time entry reflects her assignment to study the Gressett deposition as it impacts discovery issues as well as dispositive motions.	
01-13-2014	L. SIMONINI	IDENTIFY MATERIALS FOR ATTORNEY BLAIR'S USE IN PREPARING FOR MOTION FOR SUMMARY JUDGMENT	0.3	170.00	\$51.00			
01-13-2014	L. SIMONINI	STUDY DEPOSITION OF C. ELDRIDGE TO IDENTIFY DISCOVERY ISSUES, ITEMS TO BE ADDRESSED AT TRIAL	1.3	170.00	\$221.00			
01-13-2014	L. SIMONINI	PREPARE MATERIALS FOR USE AT FIRM DOCKET CALL RE UPCOMING TRIAL AND ISSUES TO BE PRESENTED	1.5	170.00	\$255.00	Vague, internal conference	Paralegal Simonini's 1.5 time entry reflects her assignment to prepare materials for use at a firm docket call relating to the Gressett litigation. The firm routinely does 1-2 hour "docket calls" to get case assessments from other attorneys in the office. Paralegal Simonini's assistance in preparation for the docket call is neither vague nor an internal conference.	
01-13-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF M. COOK TO IDENTIFY TESTIMONY COUNTER TO CLIENT'S DEPOSITION	1.6	170.00	\$272.00	Vague	Paralegal Simonini's 1.6 time entry reflects her assignment to see if there are conflicts between the deposition of Mike Cook and that of plaintiff Gressett. It is not vague.	
01-13-2014	J. BLAIR	STUDY GRESSETT'S FINAL DISCLOSURE OF WITNESSES AND EXHIBITS	0.5	380.00	\$190.00			
01-13-2014	J. BLAIR	STUDY PORTION OF A. GRESSETT TRANSCRIPT	0.9	380.00	\$342.00	Vague	Attorney Blair's .9 time entry reflects his review of a portion of the Gressett transcript. It is not vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-14-2014	L. SIMONINI	DRAFT NOTICE OF SERVICE OF THIRD SUPPLEMENTAL DISCLOSURE STATEMENT	0.1	170.00	\$17.00	Clerical	Paralegal Simonini's .1 time entry to prepare a service notice is not clerical.	
01-14-2014	L. SIMONINI	BEGIN STUDY OF CAP'S DISCOVERY RESPONSES AND IDENTIFY POTENTIAL TRIAL EXHIBITS TO BE INCORPORATED IN JOINT PRETRIAL MEMORANDUM	3.3	170.00	\$561.00	Duplicative of 9/4/13 and 12/2/13 entries	Paralegal Simonini's 3.3 time entry reflects her initial preparation of identification of trial exhibits for the joint pretrial memorandum. It is not duplicative of any efforts she made before that date.	
01-14-2014	J. BLAIR	EMAILS TO A.GRESSETT [Privileged Communication]	0.3	380.00	\$114.00			
01-14-2014	J. BLAIR	STUDY PORTION OF GRESSETT TRANSCRIPT, MAKE NOTES REGARDING SAME	1.8	380.00	\$684.00	vague	Attorney Blair's 1.8 time entry reflects his review of another portion of the Gressett transcript and make notes about key parts of that transcript. It is not vague.	
01-15-2014	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
01-15-2014	J. BLAIR	REVIEW FILE TO PREPARE FOR DOCKET CALL THIS AFTERNOON, PULL TIMELINE AND CASE SUMMARY	1.5	380.00	\$570.00	Vague, internal conference	Attorney Blair's 1.5 time entry reflects his file review in advance of the docket call referenced above. It is neither vague nor an internal conference, but an attempt to determine the firm's valuation of this litigation.	
01-15-2014	J. BLAIR	DOCKET CALL TO EVALUATE GRESSETT LITIGATION	1.8	380.00	\$684.00	Vague, internal conference	Attorney Blair's 1.8 time entry reflects his interaction at the docket call referenced above. It is neither vague nor an internal conference, but an attempt to determine the firm's valuation of this litigation.	
01-15-2014	J. BLAIR	CONFIRM CLIENT'S RIGHT TO LIQUIDATED DAMAGES	0.3	380.00	\$114.00	Vague	Attorney Blair's .3 time entry reflects his initial review whether plaintiff Gressett is entitled to liquidated damages. It is not vague.	
01-16-2014	L. SIMONINI	ADDRESS TRIAL AND MOTION FOR SUMMARY JUDGMENT ISSUES WITH ATTORNEY BLAIR	0.8	170.00	\$136.00	Internal Conference	Paralegal Simonini's .8 time entry reflects her assignment for Attorney Blair to find support for summary judgment issues. It is not an internal conference; no one else billed for this time.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-16-2014	J. BLAIR	ASSESS DOCKET CALL, ISSUES TO BE ADDRESSED PRETRIAL	0.9	380.00	\$342.00	Internal Conference	Attorney Blair's .9 time entry to analyze the results of the docket call and relate them to the issues necessary to be addressed at pretrial is not an internal conference. No one else billed for this analysis.	
01-16-2014	J. BLAIR	STUDY REVISED OFFER FROM CAP	0.1	380.00	\$38.00			
01-16-2014	J. BLAIR	REVIEW REMAINDER OF GRESSETT TRANSCRIPT, ADD NOTES REGARDING FMLA LEAVE CHART FROM A. GRESSETT'S TESTIMONY	1.8	380.00	\$684.00	Vague	Attorney Blair's 1.8 time entry to review the remainder of the Gressett deposition transcript and make notes from that testimony is not vague.	
01-16-2014	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING OFFER	0.1	380.00	\$38.00	Duplicative of 1/16/14 entry	Attorney Cook's .1 time entry to study an email from CAP's attorneys is not duplicative of any other entry that same date.	
01-17-2014	J. BLAIR	REVIEW AND MAKE SUGGESTIONS TO LETTER TO IRS	0.0	380.00	\$0.00	unrelated to lawsuit	Agreed.	
01-17-2014	J. BLAIR	STUDY REMAINDER OF GRESSETT DEPOSITION, MAKE NOTES REGARDING OTHER FMLA LEAVE DAYS	0.0	380.00	\$0.00	Duplicative of 1/16/14 entry	Agreed.	
01-20-2014	T. COOK	DETAILED STUDY OF DEFENDANT'S RESPONSE TO THIRD REQUEST FOR PRODUCTION OF DOCUMENTS	2.7	380.00	\$1,026.00			
01-20-2014	T. COOK	STUDY DEFENDANT'S FIRST SUPPLEMENTAL RESPONSE TO OUR SECOND REQUEST FOR PRODUCTION OF DOCUMENTS	0.9	380.00	\$342.00			
01-20-2014	T. COOK	STUDY DEFENDANT'S THIRD SUPPLEMENTAL DISCLOSURE STATEMENT	0.3	380.00	\$114.00			
01-20-2014	T. COOK	STUDY DEFENDANT'S FIRST SUPPLEMENTAL RESPONSES TO OUR FIRST REQUEST FOR PRODUCTION OF DOCUMENTS	1.0	380.00	\$380.00			
01-21-2014	L. SIMONINI	STUDY DRAFT MOTION FOR SUMMARY JUDGMENT AND CONFIRM ACCURACY OF CASE CITATIONS AND DETERMINE WHETHER ADDITIONAL RECORD SUPPORT IS NECESSARY	1.7	170.00	\$289.00	Duplicative of 8/15/13, 8/21/13, 8/22/13, 8/23/13, 8/26/13, 1/8/14, 1/13/14 and 1/16/14 entries	Paralegal Simonini's 1.7 time entry reflects her assignment to support the draft summary judgment motion and is not duplicative of the other time entries indicated.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-21-2014	J. BLAIR	PLAN MOTION FOR SUMMARY JUDGMENT FILING NEXT WEEK, CONFIRM CAP WILL FILE ONE AS WELL	0.2	380.00	\$76.00	Block Billing, clerical, vague	Attorney Blair's .2 time entry reflects his analysis of a proposed summary judgment filing as well as confirmation from CAP's counsel that they will be filing one as well. This entry is neither clerical nor vague. Each entry is a .1 time entry.	
01-21-2014	T. COOK	STUDY EMAIL FROM DEFENDANT WITH COUNTER OFFER	0.1	380.00	\$38.00			
01-21-2014	T. COOK	ASSESS BEST COURSE OF ACTION TO RESPOND TO DEFENDANT'S COUNTER OFFER AND PROSPECTS FOR MEDIATION	0.2	380.00	\$76.00	Internal Conference	Attorney Cook's .2 time entry reflects her analysis of Plaintiff Gressett's ability to counter CAP's settlement offer and consider mediation. No one else billed for this time. It is not an internal conference.	
01-21-2014	T. COOK	TELEPHONE CALL WITH COUNSEL FOR DEFENDANT REGARDING THEIR COUNTER OFFER, MOTION FOR SUMMARY JUDGMENT, COSTS GOING FORWARD	0.2	380.00	\$76.00			
01-21-2014	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
01-21-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to study an email from Plaintiff Gressett is not an excessive billing.	
01-22-2014	L. SIMONINI	IDENTIFY MATERIALS FOR ATTORNEY USE IN ADDRESSING SETTLEMENT OFFER BY DEFENDANT	1.9	170.00	\$323.00	Vague, excessive	Paralegal Simonini's 1.9 time entry documents an assignment she received to pull materials to assess CAP's latest settlement offer. It is neither vague nor excessive.	
01-22-2014	J. BLAIR	ANALYZE CASE VALUE FOR MEDIATION PURPOSES, REVIEW EMAIL FROM T. COOK TO A. GRESSETT	0.2	380.00	\$76.00	Block Billing	First entry (.1); second entry (.1).	
01-22-2014	J. BLAIR	STUDY A. GRESSETT'S EMAILS [Privileged Communication]	0.2	380.00	\$76.00			
01-22-2014	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.2	380.00	\$76.00			
01-22-2014	T. COOK	FOLLOW-UP INSTRUCTIONS REGARDING COUNTEROFFER AND MEDIATION	0.1	380.00	\$38.00	Vague	Attorney Cook's .1 time entry documents instructions to the trial team regarding a counter-offer and mediation. It is not vague.	
01-22-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-23-2014	J. BLAIR	REVIEW DRAFT MOTION FOR SUMMARY JUDGMENT	0.3	380.00	\$114.00			
01-23-2014	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
01-23-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excessive billing for email exchange	Attorney Cook's .1 time entry reflects an email to Plaintiff Gressett and is not excessive billing.	
01-24-2014	L. SIMONINI	STUDY DISCOVERY MATERIALS AND PREPARE DOCUMENTS TO BE ATTACHED TO STATEMENT OF FACTS	1.6	170.00	\$272.00	Duplicative of 8/26/13 entries	Paralegal Simonini's 1.6 time entry reflects her continued review of file materials for the statement of facts for Plaintiff Gressett's dispositive motion. It is not duplicative of her earlier efforts related to this motion.	
01-24-2014	J. BLAIR	WORK ON REDRAFT AND EXHIBITS FOR MOTION FOR SUMMARY JUDGMENT	1.8	380.00	\$684.00			
01-24-2014	J. BLAIR	EMAIL COMMUNICATIONS WITH A. GRESSETT [Privileged Communication]	0.4	380.00	\$152.00			
01-24-2014	J. BLAIR	RESEARCH LIQUIDATED DAMAGES ISSUE, WHETHER AND WHEN COURT CAN RULE ON THE ISSUE AND WHAT THE ELEMENTS ARE	2.2	380.00	\$836.00	Duplicative of 1/15/14 entry, background research	Attorney Blair's 2.2 time entry identifies his research of the liquidated damages issue, whether it is a court or jury issue. It is not duplicative of his earlier overview of liquidated damages and is not background research.	
01-24-2014	T. COOK	MEET AND CONFER WITH Attorney Blair REGARDING MOTION FOR SUMMARY JUDGMENT AND ISSUES TO RAISE	0.6	380.00	\$228.00	Internal Conference	Attorney Cook's .6 time entry reflects a discussion of the dispositive motion with Attorney Blair. It is not an internal conference because Attorney Blair did not bill for this discussion.	
01-24-2014	T. COOK	STUDY MULTIPLE EMAILS FROM CLIENT [Privileged Communication]	0.4	380.00	\$152.00			
01-24-2014	T. COOK	EVALUATE STRATEGY FOR RAISING ISSUE OF LIQUIDATED DAMAGES	0.4	380.00	\$152.00	Vague, duplicative	Attorney Cook's .4 time entry reflects her review when the liquidated damages should be addressed. It is neither vague nor duplicative of any other effort.	
01-27-2014	L. SIMONINI	CONTINUE TO IDENTIFY AND PREPARE EXHIBITS TO BE ATTACHED TO STATEMENT OF FACTS	3.2	170.00	\$544.00			
01-27-2014	L. SIMONINI	CONFIRM ACCURACY OF CASE CITATIONS IN MOTION FOR SUMMARY JUDGMENT	0.4	170.00	\$68.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-27-2014	L. SIMONINI	STUDY CAP'S 281 STATEMENTS OF FACTS AND SUPPORTING EVIDENCE TO IDENTIFY FACTS TO BE CHALLENGED	2.3	170.00	\$391.00			
01-27-2014	J. BLAIR	MAKE REVISIONS AND FINALIZE MOTION FOR SUMMARY JUDGMENT	1.2	380.00	\$456.00			
01-27-2014	J. BLAIR	ADD CASE LAW RELEVANT TO BACHELDER DECISION	1.1	380.00	\$418.00	Excessive	Attorney Blair's 1.1 time entry reflects his modifications to the dispositive motion to reflect Bachelder. It is not excessive, but necessary to this motion.	
01-27-2014	J. BLAIR	DISCUSS LIQUIDATED DAMAGES ISSUE WITH T. COOK	0.2	380.00	\$76.00	Internal Conference	Attorney Blair's .2 time entry to discuss the liquidated damages issue with Attorney Cook is not an internal conference. No one else billed for this time entry.	
01-27-2014	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.5	380.00	\$190.00			
01-28-2014	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S MOTION FOR SUMMARY JUDGMENT AND CLAIMS REGARDING NON-FMLA LEAVE TAKEN, NUMBER OF HOURS ABSENT	2.1	170.00	\$357.00	Vague	Paralegal Simonini's 2.1 time entry to address issues in CAP's dispositive motion is not vague, but laid out in specifics.	
01-28-2014	L. SIMONINI	COMPARE CAP'S STATEMENT OF FACTS TO ITS MOTION FOR SUMMARY JUDGMENT AND IDENTIFY NEARLY 40% OF THEIR STATEMENTS OF FACT NOT CITED IN THE MOTION FOR SUMMARY JUDGMENT	4.8	170.00	\$816.00			
01-28-2014	J. BLAIR	STUDY CAP'S MOTION FOR SUMMARY JUDGMENT AND SEPARATE STATEMENT OF FACTS	2.6	380.00	\$988.00	Duplicative	Attorney Blair's 2.6 time entry to study CAP's motion for summary judgment and separate statement of facts is not duplicative of any other time entry.	
01-28-2014	J. BLAIR	ANALYZE CASE WITH T. COOK, DEVELOP WORK TO BE DONE TO PREPARE FOR A MEDIATION	0.8	380.00	\$243.20	Internal Conference, Block Billing	Attorney Blair's .8 time entry to analyze the case with Attorney Cook is not an internal conference because no one else billed for that time. The first time entry (.2); second time entry .6).	Block billing: reduced by 20%.
01-28-2014	J. BLAIR	STUDY CASE VALUE IN LIGHT OF PENDING MOTIONS, COMMENTS BY A. GRESSETT, DOCKET CALL	0.6	380.00	\$228.00	Vague, internal conference	Attorney Blair's .6 time entry reflects his analysis of the case value in light of recent activities in the case and in the office, and comments from Plaintiff Gressett. It is not vague and no one else billed for this time.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-28-2014	J. BLAIR	ADDRESS CAP'S UNNECESSARY SEPARATE STATEMENT OF FACTS, NOT USED IN ITS MOTION FOR SUMMARY JUDGMENT	0.4	380.00	\$152.00	Vague	Attorney Blair's .4 time entry, to identify the CAP statement of facts that are not used in its dispositive motion is not vague.	
01-28-2014	T. COOK	ASSESS CLIENT'S CURRENT ASSESSMENT OF CASE POSTURE AND VALUATION FOR SETTLEMENT TALKS; UPDATE PLAN OF ACTION FOR MEDIATION	0.6	380.00	\$228.00	Vague, block billing	Attorney Cook's .6 time entry to value the case from her perspective is not vague. First entry (.3); second entry (.3).	
01-28-2014	T. COOK	EVALUATE STATUS OF DISPOSITIVE MOTION PRACTICE REGARDING LIABILITY, DEFENDANT'S DEFENSES, STRENGTH OF OUR MOTION FOR SUMMARY JUDGMENT; UPDATE PLAN OF ACTION GOING FORWARD	0.8	380.00	\$304.00	Block billing	First entry (.4); second entry (.4).	
01-29-2014	L. SIMONINI	STUDY DISCOVERY MATERIALS TO IDENTIFY RECORDS TO COURT CAP'S STATEMENT OF FACTS NUMBERED 1-22	2.9	170.00	\$493.00			
01-29-2014	J. BLAIR	EMAIL COMMUNICATIONS WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
01-29-2014	J. BLAIR	IDENTIFY ISSUES TO BE ADDRESSED IN RESPONSE TO CAP'S MOTION FOR SUMMARY JUDGMENT	0.2	380.00	\$76.00			
01-30-2014	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.5	380.00	\$190.00			
01-30-2014	J. BLAIR	MEMO TO FILE REGARDING CASE VALUE	0.1	380.00	\$38.00			
01-30-2014	J. BLAIR	STUDY TAX MATERIALS FROM A. GRESSETT, CONSIDER IMPACT ON SETTLEMENT NUMBERS	0.3	380.00	\$114.00			
01-31-2014	L. SIMONINI	CONFERENCE WITH ATTORNEYS BLAIR AND COOK REGARDING STRATEGY FOR RESPONDING TO MOTION FOR SUMMARY JUDGMENT AND POTENTIAL MEDIATION	0.7	170.00	\$119.00	Internal Conference	Paralegal Simonini's .7 time entry is not an internal conference; the attorneys that met with Ms. Simonini did not bill for this discussion.	
01-31-2014	J. BLAIR	PLAN LITIGATION AND OPPOSITION TO CAP'S MOTION FOR SUMMARY JUDGMENT	1.2	380.00	\$456.00	Duplicative of 1/29/14 entry	Attorney Blair's 1.2 time entry to plan the litigation going forward and Ms. Gressett's opposition to CAP's dispositive motion is not duplicative of any other entry.	
01-31-2014	T. COOK	ANALYZE ISSUES RAISED IN DEFENDANT MOTION FOR SUMMARY JUDGMENT AND SET UP PLAN FOR CHALLENGING SAME	0.7	380.00	\$266.00			
01-31-2014	T. COOK	BEGIN EVALUATION OF CASE VALUATION AND CONTINUED EFFORTS TO HELP CLIENT APPRECIATE RISKS	0.4	380.00	\$152.00			
01-31-2014	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING MEDIATION	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-31-2014	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING WITHDRAWAL OF FACTS HAVING NOTHING TO DO WITH ISSUES IN MOTION FOR SUMMARY JUDGMENT	0.1	380.00	\$38.00			
02-03-2014	L. SIMONINI	STUDY E-MAIL FROM ATTORNEY KREIGSFELD REGARDING CAP'S STATEMENT OF FACTS	0.1	170.00	\$17.00			
02-03-2014	L. SIMONINI	STUDY E-MAIL FROM ATTORNEY KREIGSFELD REGARDING MEDIATION	0.1	170.00	\$17.00			
02-03-2014	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S STATEMENT OF FACTS AND WHETHER MOTION TO STRIKE SHOULD BE FILED	0.4	170.00	\$68.00	Vague	Paralegal Simonini's .4 time entry to determine which of CAP's statement of facts were in fact used in its motion is not vague.	
02-03-2014	T. COOK	SEND EMAIL TO DEFENDANT REGARDING MEDIATION	0.1	380.00	\$38.00	Excessive billing for 2/3/14 email exchange	Attorney Cook's .1 time entry to send an email to CAP's counsel concerning a mediation is not excessive billing.	
02-03-2014	J. BLAIR	CONFIRM EMAILS TO CAP'S ATTORNEYS REGARDING MEDIATION, MOTION TO STRIKE	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to review and assess the exchange of emails concerning possible mediation and a motion to strike is not vague.	
02-04-2014	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S REFUSAL TO STRIKE NON-CITED STATEMENTS OF FACTS	0.3	170.00	\$51.00	Vague	Paralegal Simonini's .3 time entry reflects her new assignments after CAP refused to strike the fact statements not used in its motion is not vague.	
02-04-2014	L. SIMONINI	RESEARCH TO IDENTIFY INFORMATION REGARDING CAP'S PROPOSED MEDIATOR	0.4	170.00	\$68.00			
02-04-2014	J. BLAIR	STUDY EMAIL EXCHANGE REGARDING MEDIATORS	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to review the email exchange regarding potential mediators is not excessive.	
02-04-2014	J. BLAIR	EVALUATE AMY LIEBERMAN AS MEDIATOR, STUDY WEBSITE, DISCUSS WITH ATTORNEY COOK, REVIEW WITH T. MCKAY	0.6	380.00	\$182.40	Internal Conference, Block billing	Attorney Blair's .6 time entry to consider Amy Lieberman as a mediator and discuss the possible mediator internally is not an internal conference. No one else billed for this time. First entry (.2); second entry (.1); third entry (.3).	Block billing; reduced by 20%.
02-05-2014	L. SIMONINI	CONTINUE PREPARING RESPONSE TO CAP'S STATEMENT OF FACTS	0.4	170.00	\$68.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-06-2014	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S INSISTENCE ON KEEPING 111 STATEMENTS OF FACT NOT CITED IN ITS MOTION FOR SUMMARY JUDGMENT	0.5	170.00	\$85.00	Vague	Paralegal Simonini's .5 time entry reflects her assignment to review the statements of fact not cited in CAP's motion and analyze which, if any, have anything to do with the motion. This reference is not vague.	
02-06-2014	J. BLAIR	STUDY EMAIL FROM CAP REGARDING EXTRANEOUS FACT STATEMENTS	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to review CAP's refusal to pull its extraneous facts is not excessive.	
02-06-2014	J. BLAIR	STUDY FEDERAL RULES, ANALYZE BASIS FOR STRIKING EXTRANEOUS FACT ALLEGATIONS	0.6	380.00	\$228.00			
02-07-2014	J. BLAIR	REVIEW HOW TO ADDRESS EXCESSIVE "FACTS"	0.2	380.00	\$76.00	Duplicative from above	Attorney Blair's .2 time entry to address how to bring the issue of excessive facts to the court's attention is not duplicative of the prior time entries.	
02-10-2014	J. BLAIR	ANALYZE ISSUES TO BE ADDRESSED IN MOTION FOR SUMMARY JUDGMENT OPPOSITION BRIEF, EMAIL REGARDING SAME	1.1	380.00	\$418.00			
02-10-2014	J. BLAIR	ANALYZE WHETHER MOTION TO STRIKE IS APPROPRIATE	0.8	380.00	\$304.00			
02-11-2014	L. SIMONINI	CONFER WITH ATTORNEY BLAIR REGARDING CAP'S 111 STATEMENTS NOT CITED IN ITS MOTION FOR SUMMARY JUDGMENT	0.4	170.00	\$68.00	Internal Conference	Paralegal Simonini's .4 time entry to discuss the extraneous facts not cited by CAP is not an internal conference; no one else billed for this discussion.	
02-11-2014	L. SIMONINI	IDENTIFY AND PREPARE CORRESPONDENCE TO BE ATTACHED TO MOTION TO STRIKE	0.4	170.00	\$68.00			
02-11-2014	J. BLAIR	ANALYZE MOTION TO STRIKE ISSUES, DRAFT SAME	1.7	380.00	\$646.00			
02-11-2014	J. BLAIR	MAKE REVISIONS TO MOTION TO STRIKE	0.3	380.00	\$114.00			
02-12-2014	L. SIMONINI	STUDY DRAFT MOTION TO STRIKE AND CONFIRM STATEMENTS CITED IN SAME ARE NOT REFERENCED IN CAP'S MOTION FOR SUMMARY JUDGMENT	0.9	170.00	\$153.00			
02-12-2014	T. COOK	EDIT MOTION TO STRIKE	0.8	380.00	\$304.00			
02-12-2014	J. BLAIR	MAKE REVISIONS TO DRAFT MOTION TO STRIKE	0.3	380.00	\$114.00			
02-13-2014	L. SIMONINI	BEGIN STUDY OF RECORDS ATTACHED TO CAP'S STATEMENT OF FACTS TO VERIFY THAT CITED RECORDS DO IN FACT SUPPORT STATEMENTS	2.7	170.00	\$459.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-13-2014	J. BLAIR	PLAN FURTHER ADDITIONS TO MOTION TO STRIKE	0.2	380.00	\$76.00			
02-18-2014	J. BLAIR	REVISE AND FINALIZE AND FILE MOTION TO STRIKE 111 EXTRANEIOUS FACTS	0.6	380.00	\$228.00	Clerical in part	Attorney Blair's .6 time entry to revise and finalize Plaintiff Gressett's motion to strike the extraneous facts is not clerical in part. Attorney Blair did not "file" the motion to strike.	
02-19-2014	L. SIMONINI	DETERMINE WHETHER COURT HAS ORDERED MEDIATION	0.4	170.00	\$68.00	Excessive	Paralegal Simonini's .4 time entry reflects her assignment to determine whether or not the court had ordered mediation, which is not excessive for this task.	
02-19-2014	L. SIMONINI	ADDRESS ISSUES REGARDING RESPONSE TO MOTION FOR SUMMARY JUDGMENT	0.5	170.00	\$85.00	Vague	Paralegal Simonini's .5 time entry to set up the response process to oppose CAP's dispositive motion is not vague.	
02-19-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
02-19-2014	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excessive	Attorney Cook's .1 time entry to email Plaintiff Gressett is not excessive.	
02-19-2014	J. BLAIR	ADVISE A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
02-20-2014	J. BLAIR	STUDY EMAIL FROM A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
02-24-2014	T. COOK	PRELIMINARY READ OF MOTION FOR SUMMARY JUDGMENT FILED BY DEFENDANT	1.0	380.00	\$380.00	Duplicative of 1/28/14, 1/29/14, 1/31/14, 2/6/14, 2/10/14, 2/11/14, 2/12/14, and 2/19/14 entries	Attorney Cook's initial review of CAP's dispositive motion is not duplicative of other time entries, many of which took place well before the dispositive motion was filed. At any rate, this was her preliminary read of the motion.	
02-24-2014	J. BLAIR	PLAN RESPONSE TO CAP'S MOTION FOR SUMMARY JUDGMENT	0.8	380.00	\$304.00	Duplicative of 1/28/14, 1/29/14, 1/31/14, 2/6/14, 2/10/14, 2/11/14, 2/12/14, and 2/19/14 entries	Attorney Blair's .8 time entry documents his overview of the response necessary to oppose CAP's dispositive motion. It is not duplicative of any earlier time entry, particularly those that predate the filing of CAP's motion.	
02-24-2014	T. COOK	STUDY CASE LAW CITED BY DEFENDANT IN MOTION FOR SUMMARY JUDGMENT	3.4	380.00	\$1,292.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-24-2014	T. COOK	CONFER WITH ATTORNEY BLAIR REGARDING DEFENDANT'S MOTION FOR SUMMARY JUDGMENT, STRATEGY FOR FILING, STRATEGY FOR RESPONDING	1.0	380.00	\$380.00	Internal Conference	Attorney Cook's 1.0 time entry to discuss CAP's dispositive motion with Attorney Blair is not an internal conference; Attorney Blair did not bill for this discussion.	
02-25-2014	L. SIMONINI	CONTINUE PREPARING RESPONSE TO CAP'S COUNTER STATEMENT OF FACTS	3.9	170.00	\$663.00			
02-25-2014	T. COOK	WORK ON OUTLINE FOR RESPONSE TO MOTION FOR SUMMARY JUDGMENT	1.0	380.00	\$380.00			
02-25-2014	T. COOK	BEGIN STUDY OF VOLUMINOUS STATEMENT OF FACTS AND ATTACHMENTS	1.0	380.00	\$380.00			
02-26-2014	L. SIMONINI	ADDITIONAL STUDY OF DELGADO DEPOSITION TO IDENTIFY TESTIMONY TO SUPPORT COUNTER STATEMENT OF FACTS	1.7	170.00	\$289.00			
02-26-2014	L. SIMONINI	CONTINUE DRAFTING RESPONSE TO COUNTER STATEMENT OF FACTS	1.6	170.00	\$272.00			
02-26-2014	K. MYER	BRIEF BANK RESEARCH ON APPLICABLE REGULATIONS TO FAMILY MEDICAL LEAVE ACT CASE ARISING IN 2010	2.2	360.00	\$792.00	Background research, vague	Attorney Myer's research of FMLA regs that are relevant to the pending CAP dispositive motion is not background research nor is it vague. Attorney Myer was added to the Gressett team specifically for the CAP dispositive motion.	
02-26-2014	T. COOK	STUDY ADDITIONAL CASE LAW CITED IN DEFENDANT MOTION FOR SUMMARY JUDGMENT	3.9	380.00	\$1,482.00	Excessive - see 2/24/14 entry	Attorney Cook's 3.9 time entry to study the case law cited by CAP in its dispositive motion is not excessive. It was the time necessary to review the cases cited by CAP.	
02-27-2014	L. SIMONINI	DRAFT STIPULATION TO EXTEND MOTION FOR SUMMARY JUDGMENT RESPONSE DEADLINE	0.2	170.00	\$34.00			
02-27-2014	L. SIMONINI	DRAFT ORDER GRANTING STIPULATION TO EXTEND DEADLINE	0.1	170.00	\$17.00			
02-27-2014	L. SIMONINI	TELEPHONE CALL JUDGE'S JUDICIAL ASSISTANT REGARDING STIPULATION TO EXTEND RESPONSE DEADLINE	0.2	170.00	\$34.00			
02-27-2014	L. SIMONINI	PREPARE DEPOSITION TRANSCRIPTS AND EXHIBITS FOR ATTORNEY USE IN DRAFTING RESPONSE TO MOTION FOR SUMMARY JUDGMENT	2.7	170.00	\$459.00	Excessive, vague	Paralegal Simonini's 2.7 time entry to pull deposition materials and exhibits for the dispositive motion response is neither excessive nor vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-27-2014	T. COOK	COMPLETE STUDY OF CASE LAW CITED IN DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND NOTATE CASE LAW TO FOLLOW-UP ON	2.2	380.00	\$836.00	Excessive - see 2/24/14 and 2/26/14 entries	Attorney Cook's 2.2 time entry to complete the case law review (see above) is not excessive. It was the time necessary to review the cases cited.	
02-27-2014	T. COOK	DETAILED STUDY OF STATUTE AND REGULATIONS TO IDENTIFY AREAS REFERENCED BY DEFENDANT IN MOTION FOR SUMMARY JUDGMENT, FAILURE TO COMPLY BY DEFENDANT	4.2	380.00	\$1,596.00	Vague, excessive - see 2/24/14 and 2/26/14 entries	Attorney Cook's 4.2 time entry to study the impact of relevant statutes and regulations on CAP's dispositive motion is neither vague nor excessive. It was separate review necessitated by CAP's motion.	
02-27-2014	T. COOK	FOLLOW-UP RESEARCH ON FMLA AND WAYS TO DEFEND AGAINST DEFENDANT'S MOTION FOR SUMMARY JUDGMENT REGARDING INTERFERENCE AND RETALIATION	1.6	380.00	\$608.00			
02-27-2014	T. COOK	BEGIN OUTLINE OF RESPONSE TO MOTION FOR SUMMARY JUDGMENT	2.0	380.00	\$760.00	Duplicative of entry on 2/25/14	Attorney Cook's 2.0 time entry to outline a response to CAP's motion is not duplicative of any other time entry.	
02-27-2014	J. BLAIR	CONFIRM STIPULATION TO EXTEND DEADLINE BY ONE WEEK	0.2	380.00	\$76.00	Vague, internal conference, excessive	Attorney Blair's .2 time entry to confirm the response deadline was pushed back one week is neither vague, an internal conference or excessive. No one else billed for this time.	
02-27-2014	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
02-27-2014	T. COOK	STUDY MULTIPLE EMAILS FROM CLIENT [Privileged Communication]	0.3	380.00	\$114.00	Duplicative of above	Attorney Cook's .3 time entry to study multiple emails from Plaintiff Gressett is not duplicative. These are separate emails between Attorney Cook and Plaintiff Gressett.	
02-28-2014	L. SIMONINI	ADDRESS ISSUES REGARDING RESPONSE TO MOTION FOR SUMMARY JUDGMENT	1.2	170.00	\$204.00	Vague	Paralegal Simonini's 1.2 time entry to assist the attorneys in the response to CAP's dispositive motion is not vague.	
02-28-2014	L. SIMONINI	PREPARE GRESSETT DEPOSITION EXHIBITS FOR USE IN PREPARING RESPONSE TO MOTION FOR SUMMARY JUDGMENT	0.7	170.00	\$119.00	Excessive, vague	Paralegal Simonini's .7 time entry to pull Gressett deposition exhibits for use in her response to CAP's dispositive motion is neither excessive nor vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-28-2014	L. SIMONINI	TELEPHONE CALL COURT REGARDING STIPULATION TO EXTEND DEADLINE FOR MOTION FOR SUMMARY JUDGMENT RESPONSE	0.2	170.00	\$34.00	Duplicative of L. Simonini 2/27/14 entry	Paralegal Simonini's .2 time entry to phone the court regarding the stipulation to extend deadlines is not duplicative of the prior time entry. That was a separate phone conversation the prior date.	
02-28-2014	L. SIMONINI	STUDY PORTIONS OF GRESSETT DEPOSITION TO BE CITED IN COUNTER STATEMENT OF FACTS	1.2	170.00	\$204.00			
02-28-2014	J. BLAIR	PLAN OPPOSITION TO CAP'S MSJ	0.8	380.00	\$304.00	Duplicative of J. Blair 2/24/14 entry	Attorney Blair's .8 time entry reflects his review of the progress toward a response filing as of that date. It is not duplicative of his earlier review of the requirements in a response brief.	
02-28-2014	J. BLAIR	STUDY PRIMER ON INTERMITTENT FMLA	0.5	380.00	\$190.00	Background research	Attorney Blair's .5 time entry reflects his analysis whether intermittent FMLA would be treated differently in this case than a standard FMLA case. It is not background research.	
03-03-2014	L. SIMONINI	STUDY DISCLOSURE RECORDS TO IDENTIFY DOCUMENTS TO SUPPORT COUNTER STATEMENT OF FACTS	2.4	170.00	\$408.00			
03-03-2014	T. COOK	STUDY COURT ORDER GRANTING EXTENSION OF TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT	0.1	380.00	\$38.00			
03-04-2014	T. COOK	WORK ON FACTUAL BACKGROUND FOR BOTH RESPONSE AND STATEMENT OF FACTS	7.0	380.00	\$2,660.00			
03-04-2014	J. BLAIR	ADDRESS CAP POLICIES AS THEY IMPACT RESPONSE TO MOTION FOR SUMMARY JUDGMENT	0.3	380.00	\$114.00	Vague	Attorney Blair's .3 time entry to review CAP's internal policies as they impact its pending motion is not vague.	
03-05-2014	L. SIMONINI	STUDY DEPOSITION OF D. SIGMON TO IDENTIFY RECORD SUPPORT FOR COUNTER STATEMENT OF FACTS	1.1	170.00	\$187.00			
03-05-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF CLIENT TO IDENTIFY RECORD SUPPORT FOR COUNTER STATEMENT OF FACTS	2.3	170.00	\$391.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-05-2014	L. SIMONINI	STUDY CAP DISCLOSURE DOCUMENTS TO IDENTIFY VERSION OF SUSPENSION CORRECTIVE ACTION LACKING FMLA LANGUAGE	1.2	170.00	\$204.00	Excessive, vague	Paralegal Simonini's 1.2 time entry reflects her assignment to locate the Gressett corrective action that had been modified by CAP and document that modification. The assignment is neither excessive nor vague.	
03-05-2014	L. SIMONINI	PREPARE EEXPERT MCRAE MATERIALS TO BE INCORPORATED INTO SEPARATE STATEMENT OF FACTS	0.4	170.00	\$68.00			
03-05-2014	T. COOK	WORK ON FACTUAL BACKGROUND FOR RESPONSE TO MSJ	4.2	380.00	\$1,596.00			
03-05-2014	T. COOK	WORK ON LEGAL ARGUMENT FOR RESPONSE TO MOTION FOR SUMMARY JUDGMENT	7.8	380.00	\$2,964.00			
03-05-2014	J. BLAIR	REVIEW AND MAKE MINOR REVISIONS TO DRAFT OPPOSITION FACTS	1.1	380.00	\$418.00			
03-06-2014	L. SIMONINI	CONTINUE DRAFTING COUNTER STATEMENT OF FACTS	3.9	170.00	\$663.00			
03-06-2014	L. SIMONINI	STUDY DEPOSITION OF CLIENT TO IDENTIFY SUPPORT TO COUNTER STATEMENT OF FACTS	1.7	170.00	\$289.00	Duplicative of L. Simonini 3/5/14 entry	Paralegal Simonini's 1.7 time entry to review Plaintiff Gressett's deposition to locate counter-statement facts is not duplicative of her initial work on that assignment the day before, it is a continuation of that work.	
03-06-2014	L. SIMONINI	STUDY DEPOSITION OF T. DELGADO TO IDENTIFY SUPPORT TO COUNTER STATEMENT OF FACTS	1.3	170.00	\$221.00			
03-06-2014	L. SIMONINI	STUDY DEPOSITION OF M. COOK TO IDENTIFY SUPPORT TO COUNTER STATEMENT OF FACTS	1.6	170.00	\$272.00			
03-06-2014	L. SIMONINI	STUDY CAP'S DISCLOSURE DOCUMENTS TO IDENTIFY RECORDS SUPPORTING COUNTER STATEMENT OF FACTS AND SEPARATE STATEMENT OF FACTS	0.8	170.00	\$136.00	Duplicative of L. Simonini 3/3/14 entry	Paralegal Simonini's .8 time entry to pull disclosure materials for the counter-statement of facts is not duplicative of her earlier work. It is a continuation of that work.	
03-06-2014	T. COOK	WORK ON RESPONSE TO MOTION FOR SUMMARY JUDGMENT	12.0	380.00	\$4,560.00	Excessive - see T. Cook 3/4/14, 3/5/14 entries (19 hours)	Attorney Cook's 12.0 time entry to work on the response brief is not excessive. It was a solid block of time to ensure the response materials were efficiently presented. Further, CAP's motion was defeated.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-06-2014	J. BLAIR	STUDY STATEMENT OF FACTS FOR RESPONSE BRIEF	0.4	380.00	\$152.00	Duplicative of T. Cook 2/25/14 entry	Attorney Blair's .4 time entry to review the statement of facts alongside Plaintiff Gressett's draft response is not duplicative of Attorney Cook's efforts. It is supportive of those efforts.	
03-07-2014	L. SIMONINI	STUDY LUDKE DEPOSITION FOR TESTIMONY SUPPORTING COUNTER STATEMENT OF FACTS	1.2	170.00	\$204.00			
03-07-2014	L. SIMONINI	STUDY RUZICH DEPOSITION FOR ADDITIONAL TESTIMONY SUPPORTING COUNTER STATEMENT OF FACTS	1.1	170.00	\$187.00			
03-07-2014	L. SIMONINI	CONTINUE STUDY OF DISCLOSURE AND DISCOVERY RECORDS TO SUPPORT SEPARATE STATEMENT OF FACTS	4.7	170.00	\$799.00	Excessive, duplicative of L. Simonini 3/6/14 entry	Paralegal Simonini's 4.7 time entry to locate additional support for Plaintiff Gressett's separate statement of facts is not excessive, or duplicative, but a continuation of that assignment.	
03-07-2014	L. SIMONINI	CONTINUE DRAFTING COUNTER STATEMENT OF FACTS	2.7	170.00	\$459.00			
03-07-2014	L. SIMONINI	TELEPHONE CALL CLIENT [Privileged Communication]	0.2	170.00	\$34.00			
03-07-2014	L. SIMONINI	DRAFT AFFIDAVIT OF CLIENT SUPPORTING SEPARATE STATEMENT OF FACTS	0.3	170.00	\$51.00			
03-07-2014	L. SIMONINI	STUDY DRAFT RESPONSE TO VERIFY ACCURACY OF RECORD CITES	1.1	170.00	\$187.00			
03-07-2014	K. MYER	STUDY STATEMENT OF FACTS TO ASSIST IN ALIGNING FACTS AND EXHIBITS TO FINALIZE RESPONSE TO MOTION FOR SUMMARY JUDGMENT	3.4	360.00	\$1,224.00	Duplicative of J. Blair 3/6/14 entry and T. Cook 2/25/14 entry	Attorney Myer's 3.4 time entry reflects his efforts to modify, then finalize, Plaintiff Gressett's response to CAP's dispositive motion. It is not duplicative of any of the prior efforts, but a polishing of those efforts.	
03-07-2014	K. MYER	SUPPLEMENT RESPONSE TO MOTION FOR SUMMARY JUDGMENT WITH REFERENCE TO FACTS AND NEW ORGANIZATIONAL SECTION	7.2	360.00	\$2,592.00	Excessive, duplicative of above, block billing	Attorney Myer's 7.2 time entry to assist in supplementing and finalizing Plaintiff Gressett's response is neither excessive nor duplicative. It is also not block billing in that the entire effort was to supplement.	
03-07-2014	J. BLAIR	REVIEW AND MAKE SUGGESTED REVISIONS TO DRAFT OPPOSITION TO MOTION FOR SUMMARY JUDGMENT	1.7	380.00	\$646.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-07-2014	T. COOK	WORK TO COMPLETE STATEMENT OF FACTS, CONTROVERTING STATEMENT OF FACTS, SELECTION OF EXHIBITS, RESPONSE TO MOTION FOR SUMMARY JUDGMENT FROM DEFENDANT	14.0	380.00	\$5,320.00	Block billing, excessive, duplicative of K. Myer 3/7/14 entry	Attorney Cook's 14.0 time entry to finalize response brief for filing is not block billing, not excessive, and not duplicative. As lead attorney for the response filing, Attorney Cook was responsible to finalize before filing; Plaintiff successfully defeated CAP's motion.	
03-11-2014	J. BLAIR	STUDY CAP'S OPPOSITION TO GRESSETT'S MOTION FOR SUMMARY JUDGMENT	0.7	380.00	\$266.00			
03-11-2014	J. BLAIR	STUDY CAP'S OPPOSITION TO MOTION TO STRIKE AND CASE CITED THEREIN	0.4	380.00	\$152.00			
03-12-2014	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING STATUS OF CASE	0.1	170.00	\$17.00			
03-12-2014	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING STATUS OF CASE	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to send an email to Expert McRae is not excessive billing.	
03-14-2014	L. SIMONINI	DRAFT E-MAIL TO A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
03-14-2014	J. BLAIR	STUDY CAP'S OPPOSITION TO MOTION TO STRIKE, DRAFT REPLY TO SAME	1.8	380.00	\$684.00	Duplicative of J. Blair 3/11/14 entry, block billing	Attorney Blair's 1.8 time entry is a continuation of Attorney Blair's review of CAP's opposition to motion to strike, and a beginning of the draft reply. It is not duplicative of any earlier entry. First entry (.9); second entry (.9).	
03-14-2014	J. BLAIR	RESEARCH ARIZONA LOCAL RULE FOR SUMMARY JUDGMENT FILINGS	1.2	380.00	\$456.00	Excessive, background research	Attorney Blair's 1.2 time entry to confirm consistency with Arizona Federal Court's Local Rule 56 is neither excessive nor background research. It was the firm's check that CAP's filing followed the local rules as did Plaintiff Gressett's filing.	
03-17-2014	J. BLAIR	REVIEW, REVISE AND FINALIZE REPLY BRIEF SUPPORTING MOTION TO STRIKE	1.4	380.00	\$532.00			
03-19-2014	L. SIMONINI	STUDY E-MAIL FROM A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
03-19-2014	L. SIMONINI	DRAFT E-MAIL TO A. GRESSETT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email for Plaintiff Gressett is not excessive billing.	
03-19-2014	L. SIMONINI	STUDY CAP OBJECTIONS TO OUR STATEMENTS OF FACT TO IDENTIFY THOSE WHICH ARE TO BE CHALLENGED AND IDENTIFY DOCUMENT SUPPORT FOR SAME	3.3	170.00	\$561.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-19-2014	J. BLAIR	STUDY CAP'S OPPOSITION BRIEF, SUPPORTING FACTS RELATING THE DEPARTMENT OF LABOR LETTER AND DISCUSS REPLY ISSUES WITH K. MYER AND L. SIMONINI	1.1	380.00	\$334.40	Internal Conference, Block Billing	Attorney Blair's 1.1 time entry to study CAP's opposition brief to Plaintiff Gressett's dispositive motion as well as those supporting facts, followed by a discussion with attorney Myer and Paralegal Simonini, is not an internal conference. First entry (.8); second entry (.3). No other RCDM attorney or paralegal billed for this discussion.	Block billing; reduced by 20%.
03-24-2014	L. SIMONINI	STUDY CAP COUNTER STATEMENT OF FACTS TO IDENTIFY ITEMS TO BE CHALLENGED IN REPLY BRIEF	2.7	170.00	\$459.00			
03-24-2014	J. BLAIR	STUDY CAP'S ARGUMENTS IN PREPARATION FOR REPLY BRIEF, PULL CASES CITED	1.6	380.00	\$608.00			
03-25-2014	L. SIMONINI	STUDY DEPARTMENT OF LABOR MATERIALS TO IDENTIFY RECORDS SUPPORTING LEAVE TIME TAKEN CHART AND FURTHER DOCUMENTATION REGARDING GROUSE'S WORK PRODUCT	2.0	170.00	\$340.00	Duplicative of 11/11/13 entry	Paralegal Simonini's 2.0 time entry is an assignment she received as a consequence of the position taken by CAP in its opposition to Plaintiff Gressett's motion for summary judgment. It is not duplicative of an assignment Paralegal Simonini received in November 2013.	
03-25-2014	L. SIMONINI	STUDY ATTORNEY OUTLINE FOR REPLY BRIEF AND IDENTIFY FACTUAL SUPPORT FOR SAME	2.8	170.00	\$476.00			
03-25-2014	J. BLAIR	PLAN REPLY BRIEF, DRAFT OUTLINE OF SAME	1.1	380.00	\$418.00			
03-25-2014	J. BLAIR	REVIEW CAP'S SEPARATE STATEMENT OF FACTS, COUNTERSTATEMENT TO OUR FACTS	0.5	380.00	\$190.00			
03-26-2014	L. SIMONINI	ADDRESS ISSUES REGARDING CAP COUNTER STATEMENT THAT GRESSETT RESPONSIBLE FOR TRACKING FMLA LEAVE	2.3	170.00	\$391.00	Excessive, vague	Paralegal Simonini's 2.3 time entry reflects her assignment to find evidence that CAP was wrong to suggest Gressett was responsible for tracking her own FMLA leave. The time was not excessive and the description was not vague.	
03-26-2014	L. SIMONINI	STUDY COUNTER STATEMENT OF FACTS TO IDENTIFY SUPPORTIVE TESTIMONY FOR REPLY BRIEF	3.7	170.00	\$629.00			
03-26-2014	J. BLAIR	DRAFT REPLY BRIEF	3.5	380.00	\$1,330.00			
03-26-2014	J. BLAIR	REVIEW CASE LAW CITED BY CAP	1.1	380.00	\$418.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-26-2014	J. BLAIR	ASSIGNMENTS TO PARLEGAL SIMONINI TO SUPPORT REPLY FILING	0.3	380.00	\$114.00	Excessive, clerical	Attorney Blair's .3 time entry, to seek Paralegal Simonini's support for the reply filing in support of Plaintiff Gressett's dispositive motion is not excessive nor clerical. It is efficient to assign to paralegals work that lawyers need not be responsible for.	
03-26-2014	J. BLAIR	STUDY CAP'S FILINGS AND SUPPORTING STATEMENT OF FACTS, INCORPORATE SAME INTO REPLY ARGUMENTS	0.8	380.00	\$304.00			
03-27-2014	L. SIMONINI	STUDY DRAFT REPLY BRIEF AND CONFIRM ACCURACY OF CASE LAW AND FACT CITES	2.3	170.00	\$391.00			
03-27-2014	L. SIMONINI	CONTINUED STUDY OF COUNTER STATEMENT OF FACTS TO IDENTIFY SUPPORTIVE TESTIMONY FOR REPLY BRIEF	2.2	170.00	\$374.00	Excessive - see L. Simonini 3/26/14 entry	Paralegal Simonini's 2.2 time entry reflects her assignment to locate "facts" in Plaintiff Gressett's counter-statement that support Plaintiff Gressett's reply brief. The assignment is not excessive, but a continuation of her responsibilities.	
03-27-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF M. COOK TO IDENTIFY TESTIMONY REGARDING CLIENT PERFORMANCE	1.2	170.00	\$204.00			
03-27-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF T. DELGADO TO IDENTIFY TESTIMONY REGARDING CLIENT PERFORMANCE	0.9	170.00	\$153.00			
03-27-2014	T. COOK	STUDY, EDIT AND APPROVE REPLY TO MOTION FOR SUMMARY JUDGMENT	0.3	380.00	\$114.00			
03-27-2014	J. BLAIR	REVIEW AND REVISE AND FINALIZE REPLY FILING AND SUPPORTING ADDITIONAL EVIDENCE, INCLUDING INTERACTION WITH LITIGATION TEAM REGARDING SAME	2.4	380.00	\$912.00	Internal Conference, Block Billing	Attorney Blair's 2.4 time entry to revise and finalize the reply filing and discuss same with the Gressett litigation team is not an internal conference; no one else billed for this time. First entry (2.1); second entry (.3).	
04-04-2014	J. BLAIR	CONFIRM NATURE OF A. GRESSETT'S EMPLOYMENT AS SAFETY SPECIALIST	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to understand Plaintiff Gressett's responsibilities at CAP is not vague.	
04-10-2014	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
05-12-2014	J. BLAIR	CONFIRM DISCOVERY UPDATE FOR A. GRESSETT	0.2	380.00	\$76.00			
06-17-2014	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.3	380.00	\$114.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-18-2014	L. SIMONINI	STUDY SCHEDULING ORDER TO IDENTIFY PRETRIAL DATES TRIGGERED BY COURT'S RULING ON PENDING MOTIONS FOR SUMMARY JUDGMENT	0.7	170.00	\$119.00	Excessive	Paralegal Simonini's .7 time entry to determine what pretrial dates are impacted by the pending motions is not excessive.	
08-18-2014	J. BLAIR	STUDY JUDGE TEILBORG'S RULING REGARDING MOTIONS FOR SUMMARY JUDGMENT, MAKE NOTES REGARDING PRETRIAL SCHEDULE	1.4	380.00	\$532.00	Excessive	Attorney Blair's 1.4 time entry to analyze Judge Teilborg's ruling on both motions and assess its impact on the pretrial schedule is not excessive.	
08-18-2014	J. BLAIR	STUDY COURT ORDER SETTING FINAL PRETRIAL CONFERENCE	0.2	380.00	\$76.00			
08-19-2014	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-19-2014	T. COOK	SEND STATUS TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Duplicative	Attorney Cook's separate status email to Plaintiff Gressett is not duplicative.	
08-19-2014	T. COOK	SEND EMAIL TO DEFENDANT REGARDING MOTIONS, MEDIATION	0.1	380.00	\$38.00			
08-19-2014	T. COOK	STUDY AND OUTLINE COURT ORDER ON MOTIONS FOR SUMMARY JUDGMENT FOR EFFECT ON THEME FOR TRIAL, MOTIONS IN LIMINE, PLANNING STRATEGIES FOR TRIAL AND WITNESSES	1.0	380.00	\$304.00	Block billing	First entry (.8); second entry (.2).	Block billing; reduced by 20%.
08-19-2014	J. BLAIR	EMAIL EXCHANGE REGARDING EARLY MEDIATION	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry reflects a review of emails between the parties concerning an early mediation. It is not vague.	
08-20-2014	L. SIMONINI	CONFERENCE REGARDING CASE GOING FORWARD IN LIGHT OF COURT'S RULING ON MOTIONS FOR SUMMARY JUDGMENT	0.5	170.00	\$85.00	Internal Conference	Paralegal Simonini's .5 time entry reflects a discussion with the litigation team about work going forward in light of the court's ruling. It is not an internal conference because no one else on the litigation team billed for this time.	
08-20-2014	L. SIMONINI	TELEPHONE CALL JUDGE TEILBORG'S JUDICIAL ASSISTANT REGARDING FILINGS TO BE MADE IN LIGHT OF COURT'S RULING ON MOTION FOR SUMMARY JUDGMENT	0.2	170.00	\$34.00	Excessive	Paralegal Simonini's .2 time entry documents a phone conversation with Judge Teilborg's chambers about additional filings in light of the court's ruling. It is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-20-2014	L. SIMONINI	ADDRESS ISSUES REGARDING TRIAL READINESS FILINGS TO BE MADE IN LIGHT OF COURT'S RULING ON MOTION FOR SUMMARY JUDGMENT	0.6	170.00	\$102.00	Vague, duplicative	Paralegal Simonini's .6 time entry reflects her responsibilities to work on getting the case ready for trial in light of her conversation with Judge Teilborg's chambers. It is neither vague nor duplicative.	
08-20-2014	T. COOK	MEET AND CONFER WITH CO-COUNSEL BLAIR REGARDING COURT RULING, IMPLICATIONS OF COURT'S RATIONALE, MEDIATION PLANS, TRIAL STRATEGY AND PLANNING FOR SAME	1.9	380.00	\$722.00	Internal Conference	Attorney Cook's 1.9 time entry to discuss the court's ruling and the case going forward in light of that ruling is not an internal conference. Attorney Blair did not bill for this discussion.	
08-20-2014	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-20-2014	J. BLAIR	ANALYZE RESULTS OF MOTIONS, PLAN FOR MEDIATION, THEN TRIAL	1.5	380.00	\$456.00	Vague, block billing, duplicative of J. Blair 8/18/14 entry	Attorney Blair's 1.5 time entry documents a further review of the rulings, the impact, if any, on a mediation, and the impact, if any, on trial issues. The time entries are not vague or duplicative of earlier analysis. First entry (.7); second entry (.3); third entry (.5).	Block billing; reduced by 20%.
08-20-2014	J. BLAIR	EMAIL EXCHANGE REGARDING MEDIATORS FOR THIS MATTER	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry reflects his review of the emails between the parties concerning mediators that could be assigned for this case. The description is not vague.	
08-20-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-21-2014	T. COOK	STUDY EMAIL FROM DEFENSE COUNSEL REGARDING MEDIATION	0.1	380.00	\$38.00			
08-21-2014	T. COOK	STUDY SECOND EMAIL FROM DEFENSE COUNSEL REGARDING MEDIATION	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to review an email from defense counsel is not excessive billing.	
08-21-2014	T. COOK	SEND EMAIL TO DEFENSE COUNSEL REGARDING MEDIATION	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's email to defense counsel concerning mediation is not excessive billing.	
08-21-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-21-2014	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry for an email to Plaintiff Gressett is not excessive billing.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
08-21-2014	T. COOK	CONFER WITH ATTORNEY BLAIR REGARDING MEDIATION	0.2	380.00	\$76.00	Internal Conference	Attorney Cook's .2 time entry to discuss mediation with Attorney Blair is not an internal conference; Attorney Blair did not bill for this discussion.	
08-21-2014	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-21-2014	J. BLAIR	REVIEW EMAILS SCHEDULING MEDIATION WITH A. LIEBERMAN	0.2	380.00	\$76.00			
08-21-2014	J. BLAIR	PLAN MEDIATION AND TRIAL IN LIGHT OF COMMUNICATIONS WITH CAP'S ATTORNEY	0.5	380.00	\$190.00			
08-25-2014	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.8	380.00	\$304.00			
08-25-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
08-26-2014	L. SIMONINI	STUDY AND IDENTIFY PERTINENT EEOC RECORDS FOR ATTORNEY USE AT MEDIATION	1.6	170.00	\$272.00			
09-02-2014	L. SIMONINI	STUDY DEPOSITION OF C. ELDRIDGE TO IDENTIFY TESTIMONY FOR USE AT MEDIATION	0.9	170.00	\$153.00			
09-05-2014	L. SIMONINI	CONFER WITH ATTORNEY COOK REGARDING UPCOMING MEDIATION	0.8	170.00	\$136.00	Internal Conference	Paralegal Simonini's .8 time entry to discuss the upcoming mediation with Attorney Cook Is not an internal conference; Attorney Cook did not bill for this discussion.	
09-07-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF M. RUZICH TO IDENTIFY TESTIMONY FOR USE AT MEDIATION	1.8	170.00	\$306.00	Excessive - see L. Simonini 3/7/14 entry, duplicative	Paralegal Simonini's 1.8 time entry to review the Ruzich transcript for use at mediation is not excessive or duplicative. Her prior review of that transcript was 6 months prior.	
09-13-2014	L. SIMONINI	STUDY CLIENT'S DEPOSITION TRANSCRIPT	2.4	170.00	\$408.00	Excessive, duplicative of L. Simonini 3/5/14 and 3/6/14 entries	Paralegal Simonini's 2.4 time entry to study Plaintiff Gressett's deposition transcript is also not excessive nor duplicative. This was an assignment specifically for the upcoming mediation, and her prior review was more than 6 months earlier.	
09-14-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF C. ELDRIDGE	1.3	170.00	\$221.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-14-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF T. DELGADO	1.7	170.00	\$289.00	Excessive, duplicative of L. Simonini 3/27/14 entry, vague	Paralegal Simonini's 1.7 time entry to review the Delgado deposition is likewise neither vague nor excessive. This assignment was for the upcoming mediation and Paralegal Simonini's prior review was almost 6 months earlier.	
09-15-2014	L. SIMONINI	BEGIN DRAFTING OUTLINE OF MEDIATION BRIEF	4.1	170.00	\$697.00			
09-15-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
09-15-2014	T. COOK	SEND EMAIL TO DEFENSE COUNSEL REGARDING MEDIATION	0.1	380.00	\$38.00			
09-15-2014	T. COOK	STUDY LETTER FROM MEDIATOR	0.1	380.00	\$38.00			
09-15-2014	J. BLAIR	PLAN FOR MEDIATION NEXT WEEK	0.2	380.00	\$76.00			
09-16-2014	L. SIMONINI	ADDRESS ISSUES REGARDING MEDIATION MEMO AND ITEMS TO BE DISCUSSED	1.6	170.00	\$272.00	Excessive, vague	Paralegal Simonini's 1.6 time entry to address how the mediator manages her mediations is neither excessive nor vague. She reviewed the file alongside the mediator's plan for mediating the case.	
09-16-2014	J. BLAIR	SCHEDULE MEDIATION ANALYSIS FOR NEXT MONDAY	0.0	380.00	\$0.00	Clerical	Attorney Blair's .1 time entry to confirm his availability for the Monday mediation is not clerical.	Clerical
09-17-2014	L. SIMONINI	STUDY E-MAIL FROM CLIENT'S EMPLOYEE FILE TO IDENTIFY ITEMS TO BE ADDRESSED AT MEDIATION	3.6	170.00	\$612.00	Excessive, duplicative of L. Simonini 3/7/14 entry	Paralegal Simonini's 3.6 time entry to review the emails in Plaintiff Gressett's employment file for the mediation is neither excessive nor duplicative. Her prior review of those emails was more than six months earlier.	
09-17-2014	L. SIMONINI	NOTE ITEMS FROM EMPLOYEE FILE TO BE ADDRESSED VIA MOTION IN LIMINE	1.2	170.00	\$204.00			
09-18-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF M. LUDKE TO IDENTIFY SUPPORT FOR MEDIATION BRIEF	1.3	170.00	\$221.00			
09-18-2014	L. SIMONINI	PREPARE COLLECTION OF KEY DEPOSITION TESTIMONY FOR USE AT MEDIATION	1.1	170.00	\$187.00	Vague	Paralegal Simonini's 1.1 time entry to collect and organize key deposition testimony for use at the mediation is not vague. It enables the attorneys to quickly explain witness testimony.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-19-2014	L. SIMONINI	PREPARE DRAFT OF CONFIDENTIAL MEDIATION MEMO	3.1	170.00	\$527.00	Excessive, duplicative of L. Simonini 9/15/14 entry	Paralegal Simonini's 3.1 time entry to start the initial draft of the confidential mediation memo is neither excessive nor duplicative. Paralegal Simonini prepared an earlier outline and this was the draft memo.	
09-19-2014	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS TO IDENTIFY EXHIBITS TO SUPPORT MEDIATION MEMO	2.9	170.00	\$493.00			
09-19-2014	T. COOK	WORK ON MEDIATION BRIEF	0.9	380.00	\$342.00			
09-20-2014	L. SIMONINI	STUDY PORTIONS OF M. COOK DEPOSITION TO IDENTIFY SUPPORT FOR MEDIATION MEMO	1.1	170.00	\$187.00			
09-22-2014	L. SIMONINI	CONFERENCE CALL WITH ATTORNEY BLAIR AND CLIENT [Privileged Communication]	1.0	170.00	\$170.00			
09-22-2014	L. SIMONINI	ADDRESS ISSUES REGARDING MATERIALS TO BE PRESENTED TO MEDIATOR	2.1	170.00	\$357.00	Vague, excessive	Paralegal Simonini's 2.1 time entry to identify materials to be attached to the memorandum and/or made available for the mediator is neither vague nor excessive.	
09-22-2014	J. BLAIR	REVIEW MATERIALS NEEDED FOR MEDIATION LATER THIS WEEK, TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	1.0	380.00	\$304.00	Block billing	First entry (.7); second entry (.3).	Block billing; reduced by 20%.
09-23-2014	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS TO SUPPORT CONFIDENTIAL MEDIATION MEMO	1.3	170.00	\$221.00			
09-23-2014	L. SIMONINI	STUDY CORRESPONDENCE TO IDENTIFY HISTORY OF SETTLEMENT OFFERS MADE IN CASE	0.7	170.00	\$119.00			
09-23-2014	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
09-23-2014	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excessive	Paralegal Simonini's .1 time entry to review an email from Plaintiff Gressett is not excessive.	
09-23-2014	J. BLAIR	DISCUSSION WITH T. COOK AND A. GRESSETT [Privileged Communication]	0.7	380.00	\$266.00			
09-23-2014	T. COOK	STUDY DEPOSITION OF A. GRESSETT, D. MODEER, BEGIN M. LUDKE	3.0	380.00	\$1,140.00	Excessive, vague	Attorney Cook's 3.0 time entry to study deposition transcripts of Gressett, Modeer, and Ludke prior to the mediation is neither excessive nor vague.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-24-2014	L. SIMONINI	RESEARCH FEDERAL DISTRICT COURT DOCKET TO IDENTIFY CASES FILED ON FMLA CHARGES TO IDENTIFY THOSE THAT WENT TO TRIAL	2.6	170.00	\$442.00			
09-24-2014	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
09-24-2014	L. SIMONINI	ADDRESS ISSUES WITH ATTORNEYS COOK AND BLAIR REGARDING EXPERT BJORKLUND'S NEW ANALYSIS OF DAMAGES	0.0	170.00	\$0.00	Internal Conference	Agreed (see below).	
09-24-2014	J. BLAIR	EXTENDED TELEPHONE CALL WITH P. BJORKLUND REGARDING SETTLEMENT VALUES	0.8	380.00	\$304.00			
09-24-2014	J. BLAIR	NOTE TO FILE REGARDING BJORKLUND ASSUMPTIONS	0.2	380.00	\$76.00			
09-24-2014	J. BLAIR	PLAN FOR MEDIATION WITH T. COOK AND L. SIMONINI	0.8	380.00	\$304.00	Internal conference	Attorney Blair's .8 time entry for planning the mediation with Attorney Cook and Paralegal Simonini is not an internal conference. Attorney Cook did not bill for this meeting and the paralegal time is not duplicative (see above).	
09-24-2014	T. COOK	WORK ON MEDIATION MEMORANDUM AND SELECTION OF EXHIBITS FOR SAME	4.2	380.00	\$1,596.00	Duplicative of L. Simonini and T. Cook 9/19/14 entries, excessive	Attorney Cook's 4.2 time entry to prepare the mediation memorandum and select exhibits to be attached is not duplicative of earlier time entries and is not excessive. This is the trial attorney's finalization of the mediation product.	
09-24-2014	T. COOK	RUN CALCULATIONS FOR RANGE OF POSSIBLE SETTLEMENT VALUES IN ANTICIPATION OF MEDIATION	1.2	380.00	\$456.00			
09-24-2014	T. COOK	STUDY UPDATED MATERIALS FROM EXPERT BJORKLUND IN ANTICIPATION OF MEDIATION	0.8	380.00	\$304.00			
09-24-2014	T. COOK	SEND EMAIL TO MEDIATOR WITH MEDIATION BRIEF AND EXHIBITS	0.1	380.00	\$38.00			
09-24-2014	T. COOK	STUDY DEPOSITIONS OF M. COOK, M. RUZICH, FINISH DEPOSITION OF M. LUDKE	2.5	380.00	\$950.00			
09-25-2014	L. SIMONINI	RESEARCH TRIAL REPORTERS FROM 2001-2004 TO IDENTIFY VERDICTS OR SETTLEMENTS RELATING TO FMLA CLAIMS	1.2	170.00	\$204.00			
09-25-2014	L. SIMONINI	RESEARCH TRIAL REPORTERS FROM 2005-2008 TO IDENTIFY VERDICTS OR SETTLEMENTS RELATING TO FMLA CLAIMS	1.3	170.00	\$221.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-25-2014	L. SIMONINI	RESEARCH TRIAL REPORTERS FROM 2009-2014 TO IDENTIFY VERDICTS OR SETTLEMENTS RELATING TO FMLA CLAIMS	2.0	170.00	\$340.00			
09-25-2014	L. SIMONINI	RESEARCH TRIAL REPORTERS FROM 2013-2014 TO IDENTIFY VERDICTS OR SETTLEMENTS RELATING TO FMLA CLAIMS	0.7	170.00	\$119.00	Duplicative	Paralegal Simonini's .7 time entry to identify verdicts or settlements from other similar FMLA cases is not duplicative. The firm performed several analyses to attempt to determine the value of this case. This was just one of them, prior to the mediation.	
09-25-2014	L. SIMONINI	CONTINUE RESEARCH OF FEDERAL DISTRICT COURT DOCKET TO IDENTIFY CASES FILES ON FMLA CHARGES TO IDENTIFY THOSE THAT WENT TO TRIAL	1.1	170.00	\$187.00			
09-25-2014	J. BLAIR	ADDRESS FRONT PAY ISSUES, PLAN FOR MEDIATION	1.4	380.00	\$532.00			
09-25-2014	T. COOK	TELEPHONE CALL WITH MEDIATOR REGARDING CLIENT EXPECTATIONS	0.2	380.00	\$76.00			
9/25/2014	T. COOK	ANALYZE TRIAL REPORTER RESULTS, REVIEW STATUTE LANGUAGE AND ASSESS SCOPE OF DAMAGES, WHAT IS DETERMINED BY JURY AND WHAT IS DETERMINED BY COURT, WHAT ITEMS OF DAMAGE ARE REALISTIC AND CERTAIN, WHAT ITEMS ARE SUBJECT TO DEBATE AND POSSIBLE DISCOUNT, RUN CALCULATIONS FOR VALUE OF CLAIM GIVEN VARIOUS SCENARIOS ALL IN PREPARATION FOR MEDIATION	2.8	380.00	\$851.20	Block Billing	First entry (.3); second entry (2.0); third entry (.5).	Block billing; reduced by 20%.
09-25-2014	T. COOK	STUDY DEPOSITION EXHIBITS IN PREPARATION FOR MEDIATION	1.4	380.00	\$532.00			
09-25-2014	T. COOK	STUDY DEPOSITIONS OF C. ELDRIDGE AND T. DELGADO	2.0	380.00	\$760.00			
09-26-2014	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL MATERIALS FOR ATTORNEY USE AT MEDIATION	2.3	170.00	\$391.00	Vague	Paralegal Simonini's 2.3 time entry to gather additional materials for attorney use at the mediation is not vague. Such assignments are part of being a paralegal just prior to a mediation.	
09-26-2014	L. SIMONINI	RESEARCH FEDERAL DISTRICT COURT DOCKETS TO IDENTIFY ANY CASES WHEREIN DEFENDANT ATTORNEYS PARTICIPATED IN TRIAL	2.8	170.00	\$476.00			
09-26-2014	J. BLAIR	MEDIATION BEFORE A. LIEBERMAN	7.5	380.00	\$2,850.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-26-2014	J. BLAIR	REVIEW A. GRESSETT EMAILS AFTER MEDIATION [Privileged Communication]	0.2	380.00	\$76.00			
09-26-2014	T. COOK	ATTEND MEDIATION	7.5	380.00	\$2,850.00	Excessive	Attorney Cook's 7.5 time entry to attend the mediation is not excessive. Besides Plaintiff Gressett, Attorneys Blair and Cook were available for the entire mediation, attempting to analyze the positions taken by CAP and act in Plaintiff Gressett's best interests. CAP was represented by 2 outside attorneys and 2 CAP attorneys at the mediation. Fee entries are not excessive.	
09-26-2014	T. COOK	STUDY ARTICLE SHARED BY CLIENT [Privileged Communication]	0.2	380.00	\$76.00	Vague	Attorney Cook's .2 time entry to review an article from Plaintiff Gressett is not vague. Without waiving privilege, it can be said that the article related to FMLA claims.	
09-26-2014	T. COOK	STUDY SECOND EMAIL FROM CLIENT [Privileged Communication]	0.3	380.00	\$114.00			
09-28-2014	L. SIMONINI	RESEARCH TO IDENTIFY FEDERAL COURT MATTERS WHEREIN CAP'S ATTORNEYS HAVE ALLOWED FEES TO BE SOUGHT POST SETTLEMENT	3.8	170.00	\$646.00	Duplicative of 9/26/14 entry	Paralegal Simonini's 3.8 time entry to determine if CAP had settled other cases and allowed fees to be separately applied for is not duplicative of any other assignment she was given.	
09-29-2014	J. BLAIR	STUDY MATERIALS REGARDING LENGTH OF DAMAGES PERIOD AFTER LAYOFFS, IN PARTICULAR THE 5 YEAR MINIMUM MATERIALS	2.2	380.00	\$836.00			
09-30-2014	L. SIMONINI	ADDRESS ISSUES REGARDING PRETRIAL FILINGS INCLUDING MOTION IN LIMINE DEADLINE	1.2	170.00	\$204.00	Vague, excessive	Paralegal Simonini's 1.2 time entry to address what would be due next at the courthouse, including motions and the pretrial order, after the mediation failed, is neither vague nor excessive. The paralegal efforts saved attorney time.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
09-30-2014	L. SIMONINI	STUDY SUPPORT FOR FRONT PAY	1.7	170.00	\$289.00	Vague, duplicative of 9/25/14 entry	Paralegal Simonini's 1.7 time entry, to see what evidence there is in the file supporting a front pay finding for Plaintiff Gressett is neither vague nor duplicative of other assignments given to Paralegal Simonini. There are no other time entries duplicative of this entry.	
09-30-2014	J. BLAIR	RESEARCH ISSUES RAISED AT MEDIATION, SUMMARIZE FINDINGS IN EMAIL TO LITIGATION TEAM	1.2	380.00	\$456.00			
09-30-2014	J. BLAIR	STUDY GROSSING UP ISSUE IN OTHER COURTS, PULL CASES SUPPORTING THE CONCEPT	0.8	380.00	\$304.00			
09-30-2014	J. BLAIR	EMAIL TO MEDIATOR REGARDING CONTINUATION OF SETTLEMENT EFFORTS	0.1	380.00	\$38.00			
09-30-2014	T. COOK	STUDY EMAIL FROM DEFENSE COUNSEL REGARDING FINAL PRE-TRIAL MEMO	0.1	380.00	\$38.00			
09-30-2014	T. COOK	STUDY EMAIL FROM MEDIATOR REGARDING STATUS	0.1	380.00	\$38.00			
10-01-2014	L. SIMONINI	IDENTIFY 2008 PERFORMANCE REVIEW FOR ATTORNEY BLAIR'S REVIEW	0.3	170.00	\$51.00	Excessive, vague	Paralegal Simonini's .3 time entry to gather information about Plaintiff Gressett's performance evaluation in 2008 is neither excessive nor vague.	
10-01-2014	T. COOK	STUDY EMAIL FROM DEFENDANT COUNSEL REGARDING MEET AND CONFER FOR FINAL PRE TRIAL MEMORANDUM	0.1	380.00	\$38.00			
10-01-2014	J. BLAIR	REVIEW EMAIL EXCHANGES WITH CAP'S ATTORNEY AND THE MEDIATOR	0.1	380.00	\$38.00	Excessive re: entry above	Attorney Blair's .1 time entry to review email exchanges with CAP's counsel and mediator is not excessive. It was an attempt to keep the case on track after the mediation.	
10-01-2014	J. BLAIR	STUDY JUDGE TEILBORG'S MSJ RULING, PREPARE EMAILS TO LITIGATION TEAM REGARDING ISSUES TO BE RESOLVED BY PRETRIAL TIME	1.1	380.00	\$334.40	block billing, duplicative of J. Blair 8/18/14 entry	Attorney Blair's 1.1 time entry reflects his further analysis of Judge Teilborg's ruling in light of the unsuccessful mediation. Separately, this time entry produced summaries of work to be done going forward. First entry (.4); second entry (.7).	Block billing; reduced by 20%.

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-02-2014	L. SIMONINI	STUDY COURT'S ORDER ON MOTION FOR SUMMARY JUDGMENT AND IDENTIFY DOCUMENTS CITED TO IDENTIFY WAYS TO LIMIT ATTORNEY SUIT EVALUATION AS OUTLINED IN ORDER	2.3	170.00	\$391.00	vague, excessive, duplicative of J. Blair 8/18/14 and 10/1/14 entry	Paralegal Simonini's 2.3 time entry reflects her pulling materials from the court's dispositive motion orders for attorneys' review. These materials identified case law and previously filed documents.	
10-02-2014	L. SIMONINI	STUDY DEPOSITION EXHIBITS AND BEGIN TO IDENTIFY POTENTIAL TRIAL EXHIBITS	2.4	170.00	\$408.00			
10-02-2014	L. SIMONINI	PREPARE COLLECTION OF DOCUMENTS CITED IN JUDGE'S RULING ON MOTION FOR SUMMARY JUDGMENT FOR ATTORNEY USE IN PREPARING JOINT PRETRIAL ORDER	2.8	170.00	\$476.00			
10-02-2014	J. BLAIR	REVIEW CASE LAW IN THIS CIRCUIT ADDRESSING "AS SOON AS PRACTICABLE" NOTICE REQUIREMENT	2.6	380.00	\$988.00			
10-03-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR AND ATTORNEY COOK REGARDING JOINT PRETRIAL ORDER DEADLINES	1.2	170.00	\$204.00	Internal Conference	Paralegal Simonini's 1.2 time entry to discuss pretrial order deadlines with the attorneys is not an internal conference; the attorneys did not bill for this discussion with their paralegal.	
10-03-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF M. COOK TO IDENTIFY POTENTIAL DEPOSITION DESIGNATIONS TO BE INCLUDED IN JOINT PRETRIAL ORDER	2.8	170.00	\$476.00			
10-03-2014	L. SIMONINI	STUDY DEPOSITION OF T. DELGADO TO IDENTIFY POTENTIAL DEPOSITION DESIGNATIONS TO BE INCLUDED IN JOINT PRETRIAL ORDER	1.1	170.00	\$187.00			
10-03-2014	J. BLAIR	ANALYZE SETTLEMENT OPTIONS, PROPOSE MEDIATION WITH FEDERAL MAGISTRATE	1.2	380.00	\$456.00	Excessive	Attorney Blair's 1.2 time entry to address settlement options and propose a further mediation before a federal magistrate is not excessive. It is a further attempt to settle this case short of trial. (CAP's counsel rejected this proposal.)	
10-03-2014	J. BLAIR	REVIEW PRETRIAL SCHEDULE	0.2	380.00	\$76.00			
10-03-2014	J. BLAIR	RESEARCH JURY VERDICTS	0.3	380.00	\$114.00			
10-06-2014	L. SIMONINI	CONTINUED RESEARCH REGARDING AVERAGE FOR VERDICTS REGARDING FMLA	2.7	170.00	\$459.00	Excessive, duplicative of L. Simonini 4/25/14 entries	Paralegal Simonini's 2.7 time entry is a continued analysis of FMLA verdicts. As the entry notes, this is a continuation; it is neither excessive nor duplicative of prior studies in this regard.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-06-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF M. RUZICH TO IDENTIFY SUPPORT FOR MOTIONS IN LIMINE	1.1	170.00	\$187.00			
10-06-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF CLIENT TO IDENTIFY SUPPORT FOR MOTIONS IN LIMINE	2.7	170.00	\$459.00			
10-06-2014	J. BLAIR	STUDY TRIAL VERDICTS REPORTED ON WESTLAW, PREPARE SUMMARIES FOR ALL CASES AND ALL FEDERAL CASES	1.8	380.00	\$684.00	block billing, duplicative of 4 entries on 9/25/14	Attorney Blair's 1.8 time entry is to analyze Westlaw for trial verdicts for FMLA cases in state and federal courts. This was one of several analyses of case values and not duplicative of any other analysis. First entry (1.3); second entry (.5).	
10-07-2014	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS FOR CONFERENCE WITH OPPOSING COUNSEL REGARDING PRETRIAL SUBMISSIONS	1.7	170.00	\$289.00			
10-07-2014	J. BLAIR	PULL OUT JURY VERDICT CASES THAT REFLECT OUR FMLA CLAIMS	0.8	380.00	\$304.00	duplicative of above	Attorney Blair's .8 time entry is not duplicative of above. See above.	
10-08-2014	L. SIMONINI	STUDY TRIAL REPORTERS TO IDENTIFY INFORMATION REGARDING POTENTIAL VERDICTS FOR FMLA CLAIMS	1.7	170.00	\$289.00	duplicative of 4 entries on 9/25/14, excessive	Paralegal Simonini's 1.7 time entry is a further analysis of the value of FMLA claims. As noted above, there were several of these, none of which were duplicated.	
10-08-2014	J. BLAIR	STUDY JURY VERDICTS NATIONWIDE AND SUMMARIZE FOR USE IN SETTLEMENT	1.5	380.00	\$570.00	duplicative of above	Attorney Blair's 1.5 time entry is a further analysis of FMLA verdicts and settlements.	
10-09-2014	S. KING	TELECONFERENCE WITH OPPOSING COUNSEL REGARDING EXTENDING DEADLINES AND REQUEST FOR RULE 16 MAGISTRATE	0.0	170.00	\$0.00	opposing counsel did not speak to timekeeper S. King	Agreed.	
10-09-2014	S. KING	DRAFT AND REVISE UNDER ATTORNEY SUPERVISION MOTION TO EXTEND TIME FOR PARTIES TO MEET PRETRIAL DEADLINES SET IN THE COURT'S ORDER SETTING FINAL PRETRIAL CONFERENCE AND PROPOSED ORDER	0.7	170.00	\$119.00			
10-09-2014	T. COOK	ATTEND TELEPHONE CALL WITH DEFENDANT COUNSEL AS MANDATED MEET AND CONFER REGARDING MEDIATION WITH MAGISTRATE, MOVING DEADLINES	1.0	380.00	\$380.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-09-2014	T. COOK	STUDY AND APPROVE MOTION TO EXTEND DEADLINES BY 30 DAYS AND SETTING OF SETTLEMENT CONFERENCE	0.2	380.00	\$76.00			
10-09-2014	J. BLAIR	ADDRESS PRETRIAL AND SETTLEMENT ISSUES, RELATED TELEPHONE CALL WITH CAP'S ATTORNEY REGARDING EXTENSION OF PRETRIAL DATES	0.6	380.00	\$182.40	Block Billing	First entry (.4); second entry (.2).	Block billing; reduced by 20%.
10-09-2014	J. BLAIR	WORK WITH PARALEGAL TO DRAFT MOTION AND ORDER SEEKING REFERRAL TO A MAGISTRATE AND DEFERRAL OF PRETRIAL DATES	0.5	380.00	\$190.00			
10-09-2014	J. BLAIR	NOTE TO THE FILE REGARDING CONVERSATION WITH CAP'S ATTORNEY	0.2	380.00	\$76.00			
10-10-2014	J. BLAIR	REVIEW AND REVISE AND FINALIZE EXPEDITED MOTION FOR MAGISTRATE ASSIGNMENT AND REVISION OF PRETRIAL DEADLINES	0.6	380.00	\$228.00			
10-10-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-13-2014	T. COOK	TELEPHONE CALL WITH A. LIEBERMAN REGARDING MEDIATION	0.3	380.00	\$114.00			
10-13-2014	T. COOK	MEMORANDUM TO FILE REGARDING CALL WITH MEDIATOR LIEBERMAN	0.1	380.00	\$38.00			
10-13-2014	J. BLAIR	REVIEW EMAIL EXCHANGE WITH A. LIEBERMANN, CAP'S POSITION REGARDING MAGISTRATE	0.2	380.00	\$76.00			
10-15-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR REGARDING POTENTIAL MOTIONS IN LIMINE	1.4	170.00	\$238.00	Internal Conference	Paralegal Simonini's 1.4 time entry of a discussion with Attorney Blair is not an internal conference; Attorney Blair did not bill for this discussion.	
10-15-2014	L. SIMONINI	IDENTIFY PERTINENT MATERIALS AND DEPOSITION TESTIMONY TO SUPPORT MOTION IN LIMINE REGARDING DEPARTMENT OF ECONOMIC SECURITY PAPERWORK DEFENDANT CLAIMS SHOWS SUDDEN WELLNESS	2.4	170.00	\$408.00			
10-15-2014	L. SIMONINI	STUDY CAP'S STATEMENT OF FACTS SUPPORTING MOTION FOR SUMMARY JUDGMENT TO IDENTIFY POTENTIAL MOTIONS IN LIMINE	2.1	170.00	\$357.00			
10-15-2014	J. BLAIR	STUDY FILE AND OUTLINE POTENTIAL MOTIONS IN LIMINE	1.8	380.00	\$684.00			
10-16-2014	L. SIMONINI	STUDY COURT'S ORDER EXTENDING DEADLINES	0.2	170.00	\$34.00	Excessive	Paralegal Simonini's .2 time entry to review the court's order is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-16-2014	L. SIMONINI	STUDY CAP'S MOTIONS IN LIMINE	0.9	170.00	\$153.00			
10-16-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR AND ATTORNEY COOK REGARDING MOTIONS IN LIMINE	0.7	170.00	\$119.00	Internal Conference	Paralegal Simonini's .7 time entry for a discussion with Attorneys Blair and Cook concerning motions in limine is not an internal conference; the attorneys did not bill for any such discussion. [Check the T. Cook time entry below.]	
10-16-2014	L. SIMONINI	ANALYZE ISSUES AND IDENTIFY POTENTIAL MOTIONS IN LIMINE TO BE FILED	1.3	170.00	\$221.00	Duplicative of 10/15/14 entry	Paralegal Simonini's 1.3 time entry to review what motions in limine might be available is not duplicative of any prior entry. This time entry supplements the prior discussions and analysis.	
10-16-2014	L. SIMONINI	RESEARCH TO IDENTIFY PUBLICATION REGARDING DISBARMENT OF CLIENT'S FORMER ATTORNEY	0.0	170.00	\$0.00	Wrong Case - plaintiff's malpractice case	Paralegal Simonini's 1.2 time entry to find the documentation for disbarment of Plaintiff Gressett's former attorney is relevant to this case. The paralegal assignment was to determine what, if any, impact that disbarment would have on presentation of evidence at a trial of this case.	Unrelated to this case.
10-16-2014	L. SIMONINI	IDENTIFY MATERIALS TO COUNTER MOTION IN LIMINE TO STRIKE EMPLOYMENT EXPERT	0.7	170.00	\$119.00			
10-16-2014	J. BLAIR	TELEPHONE CALL WITH COURT REGARDING MAGISTRATE REQUEST	0.2	380.00	\$76.00			
10-16-2014	J. BLAIR	EMAIL EXCHANGE WITH LITIGATION TEAM REGARDING CONVERSATION WITH COURT CLERK	0.2	380.00	\$76.00	Internal Conference	Attorney Blair's .2 time entry to the litigation team explaining a recent conversation with the court clerk is not an internal conference. No one else on the team documented this time.	
10-16-2014	J. BLAIR	REVIEW COURT ORDER, DETERMINE IMPACT ON PRETRIAL SCHEDULE	0.2	380.00	\$76.00			
10-16-2014	J. BLAIR	EXTENDED TELEPHONE CALL WITH T. COOK REGARDING MOTIONS IN LIMINE AND PRETRIAL PROCEDURES	2.2	380.00	\$836.00	Internal Conference	Attorney Blair's 2.2 time entry for an extended phone call with Attorney Cook regarding pretrial procedures and proposed motions in limine is not an internal conference. Attorney Cook did not bill for this extended call. (See Attorney Cook's 1.7 entry.)	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-16-2014	J. BLAIR	TELEPHONE CALL AND EMAIL TO DEFENSE COUNSEL REGARDING MAGISTRATE REFERRAL	0.2	380.00	\$76.00			
10-16-2014	T. COOK	MEET AND CONFER TO IDENTIFY, REVIEW, EVALUATION AND PLAN FOR MOTIONS IN LIMINE	1.7	380.00	\$646.00	Internal Conference	Attorney Cook's 1.7 time entry to evaluate and plan for motions in limine is not an internal conference. This is Attorney Cook's separate analysis after her conference with Attorney Blair.	
10-16-2014	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-16-2014	T. COOK	PREPARE LIST OF MOTIONS IN LIMINE AND BASIC ARGUMENTS FOR EACH	0.7	380.00	\$266.00			
10-16-2014	T. COOK	STUDY COURT'S RULING ON MOTION FOR EXTRA TIME AND FOR MEDIATION	0.2	380.00	\$76.00			
10-16-2014	T. COOK	PREPARE EMAIL STATUS REPORT TO CLIENT [Privileged Communication]	0.8	380.00	\$304.00			
10-16-2014	T. COOK	SEND SECOND LENGTHY EMAIL STATUS REPORT TO CLIENT [Privileged Communication]	0.8	380.00	\$304.00			
10-16-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-16-2014	T. COOK	STUDY SECOND EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-17-2014	L. SIMONINI	ADDRESS ISSUES REGARDING RESPONSE TIME FOR MOTIONS IN LIMINE	0.4	170.00	\$68.00	Vague	Paralegal Simonini's .4 time entry to determine when motions in limine were due is not vague.	
10-17-2014	L. SIMONINI	BEGIN TO IDENTIFY EXHIBITS TO BE ATTACHED TO MOTIONS IN LIMINE	2.3	170.00	\$391.00			
10-17-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR REGARDING DRAFT MOTIONS IN LIMINE	0.7	170.00	\$119.00	Internal Conference	Paralegal Simonini's .7 time entry for a discussion with Attorney Blair about draft motions in limine is not an internal conference. Attorney Blair did not bill for this discussion.	
10-17-2014	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
10-17-2014	J. BLAIR	EMAIL EXCHANGES WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-17-2014	J. BLAIR	DRAFT AND REVISE OMNIBUS MOTION IN LIMINE	2.5	380.00	\$950.00	No such motion filed	Attorney Blair's 2.5 time entry for drafting and revising what he calls an omnibus motion in limine was filed. He is referring to the overarching motion, that, if granted, would have limited the presentation of evidence and the length of trial substantially.	
10-17-2014	J. BLAIR	DRAFT AND REVISE FOUR ADDITIONAL MOTIONS IN LIMINE REGARDING EMAILS, GRESSETT RELATIONSHIPS, DUTY OF CARE, AND KRUMWIEDE	2.6	380.00	\$988.00			
10-19-2014	T. COOK	EDIT MOTION IN LIMINE REGARDING PLAINTIFF'S OFFICE EMAILS NOT RELATED TO WORK	0.9	380.00	\$342.00			
10-19-2014	T. COOK	EDIT MOTION IN LIMINE REGARDING PLAINTIFF'S MORAL CHARACTER	0.9	380.00	\$342.00			
10-19-2014	T. COOK	EDIT EMAIL REGARDING DEFENDANT ATTEMPTING TO ADMIT STANDARD OF CARE EVIDENCE WITHOUT AN EXPERT	0.9	380.00	\$342.00			
10-19-2014	T. COOK	EDIT MOTION IN LIMINE REGARDING PLAINTIFF'S FORMER LAWYER AND EMPLOYER	0.6	380.00	\$228.00			
10-19-2014	T. COOK	EDIT MOTION IN LIMINE REGARDING SCOPE OF CASE NOW LIMITED TO NOTICE OF TIME OFF UNDER FMLA AND DEFENDANT'S USE OF FMLA TIME OFF TO FIRE PLAINTIFF	1.5	380.00	\$570.00			
10-19-2014	T. COOK	STUDY DEFENDANT'S RESPONSE TO REQUEST FOR EXTENSION OF TIME AND MEDIATION	0.2	380.00	\$76.00			
10-20-2014	L. SIMONINI	IDENTIFY AND PREPARE EXHIBITS TO BE ATTACHED TO MOTIONS IN LIMINE	3.7	170.00	\$629.00	Duplicative of 10/17/14 entry, excessive	Paralegal Simonini's 3.7 time entry to pull exhibits for the motions in limine, is neither duplicative nor excessive; it supplements her earlier time entry.	
10-20-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR AND ATTORNEY COOK REGARDING MOTIONS IN LIMINE	1.2	170.00	\$204.00	Internal Conference	Paralegal Simonini's 1.2 time entry for a discussion with Attorneys Blair and Cook regarding motions in limine is not an internal conference. Neither attorney reported time for this discussion.	
10-20-2014	T. COOK	FINALIZE ALL MOTIONS IN LIMINE	1.7	380.00	\$646.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-20-2014	T. COOK	ASSESS STRATEGY OPTIONS FOR TRIAL AND MOTION IN LIMINE TO LIMIT SCOPE OF TRIAL TO NOTICE REQUIREMENT	1.4	380.00	\$532.00			
10-20-2014	J. BLAIR	STUDY JOINT PRETRIAL REQUIREMENTS	0.8	380.00	\$304.00			
10-20-2014	J. BLAIR	REVIEW AND SUMMARIZE G. MCRAE OPINIONS	0.7	380.00	\$266.00			
10-20-2014	J. BLAIR	FINALIZE AND ARRANGE FILING OF 5 MOTIONS IN LIMINE, INCLUDING DISCUSSIONS WITH T. COOK AND L. SIMONINI	2.6	380.00	\$988.00	Internal Conference, duplicative of T. Cook 10/20/14 entry, clerical	Attorney Blair's 2.6 time entry to finalize all of the motions in limine is not an internal conference, does not duplicate any work by Attorney Cook, and is not clerical. No one else billed for the related discussions. This was Attorney Blair's review and finalization of the 5 motions.	
10-21-2014	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL FOR WITNESS "RORY" TO TESTIFY TRUTHFULLY IN LIGHT OF POTENTIAL PUSH BACK FROM EMPLOYER	0.4	170.00	\$68.00	Vague	Paralegal Simonini's .4 time entry represents her review of the file to determine whether CAP employee "Rory" would be a truthful witness. It is not vague.	
10-21-2014	J. BLAIR	ADDRESS WITNESS ISSUES, LOCATING AND MEETING WITH RORY	0.6	380.00	\$228.00			
10-22-2014	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL WITNESSES AT TRIAL CALLED TO SUPPORT ABSENCES ON DECEMBER 28 AND 29	0.7	170.00	\$119.00	Vague	Paralegal Simonini's .7 time entry to address which witness could testify regarding December 28 and 29 (key dates leading to Plaintiff Gressett's termination) could be called at trial. The time entry is not vague.	
10-22-2014	L. SIMONINI	STUDY DISCLOSURES AND BEGIN IDENTIFYING TRIAL WITNESSES TO BE INCORPORATED INTO JOINT PRETRIAL ORDER	2.1	170.00	\$357.00			
10-22-2014	J. BLAIR	EMAIL EXCHANGE REGARDING DEPOSITIONS OF CAP WITNESSES	0.3	380.00	\$114.00	Vague, internal conference	Attorney Blair's .3 time entry to the litigation team regarding depositions of CAP witnesses is not vague, nor is it an internal conference. No one else billed for this email.	
10-22-2014	J. BLAIR	STUDY INTERPRETATIONS OF FMLA NOTICE PROVISION, MEANING OF AS SOON AS PRACTICABLE	0.3	380.00	\$114.00			
10-22-2014	J. BLAIR	ANALYZE OPTIONS FOR ADDRESSING CAP'S MIL REGARDING RETALIATION	0.3	380.00	\$114.00			
10-22-2014	J. BLAIR	PLAN OPPOSITION TO MIL REGARDING EXPERT MCRAE	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-23-2014	L. SIMONINI	STUDY CAP'S MOTION FOR RECONSIDERATION	0.5	170.00	\$85.00			
10-23-2014	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S MOTION FOR RECONSIDERATION	0.6	170.00	\$102.00			
10-23-2014	J. BLAIR	ANALYZE OPTIONS FOR ADDRESSING CAP'S RECONSIDERATION MOTION, CONFIRM NO ACTION UNLESS COURT REQUESTS SAME UNDER LOCAL FEDERAL CIVIL RULES	0.9	380.00	\$342.00			
10-23-2014	J. BLAIR	STUDY CODE OF FEDERAL REGULATIONS REGULATION REGARDING NOTICE OF ABSENCE, 825.301, AND CASES CITED THAT ARE ILLUSTRATIVE OF OUR FACTS, NOTES TO THE FILE REGARDING SAME	2.5	380.00	\$950.00	Background research	Attorney Blair's 2.5 time entry to review all of the FMLA case law in which our facts match up in some measure with Regulation 825.301 is not background research. It is research tied directly to this case.	
10-23-2014	J. BLAIR	NOTE TO FILE REGARDING PRETRIAL ISSUES	0.2	380.00	\$76.00			
10-23-2014	J. BLAIR	NOTE TO THE FILE REGARDING CAP'S INTERFERENCE WITH GRESSETT'S FMLA RIGHTS	0.2	380.00	\$76.00			
10-23-2014	J. BLAIR	STUDY NOTICE REGULATIONS, CONFIRM LANGUAGE THAT OPERATES FOR GRESSETT CASE	0.2	380.00	\$76.00			
10-24-2014	L. SIMONINI	IDENTIFY PERTINENT PORTIONS OF CLIENT'S DEPOSITION FOR ATTORNEY BLAIR'S REVIEW	1.1	170.00	\$187.00	Vague, duplicative	Paralegal Simonini's 1.1 time entry documents an assignment from Attorney Blair to review the Gressett deposition transcript for evidence related to Attorney Blair's CFR analysis. The description of the assignment is neither vague nor duplicative.	
10-24-2014	L. SIMONINI	ADDRESS ISSUES REGARDING GRESSETT'S LIQUIDATED DAMAGES AND CASE LAW SUPPORTING SAME	1.5	170.00	\$255.00	Vague, duplicative of 1/15/14, 1/24/14 and 1/27/14 entries	Paralegal Simonini's 1.5 time entry to find support for liquidated damages for Plaintiff Gressett is neither vague nor duplicative of assignments she received in January 2014.	
10-24-2014	J. BLAIR	STUDY GRESSETT DEPOSITION, PULL REFERENCES TO KEY DECEMBER NOTICE ISSUE	0.5	380.00	\$190.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-24-2014	J. BLAIR	STUDY CASELAW REGARDING LIQUIDATED DAMAGES, SUMMARY TO THE FILE	0.7	380.00	\$266.00	Duplicative of 1/15/14, 1/24/14, 1/27/14 and 10/24/14 entries	Attorney Blair's .7 time entry to study case law relating to the liquidated damages issue and summarize his findings is not duplicative of his review of the liquidated damages issue 9 months earlier, and is separate from any other time entry this same date.	
10-24-2014	J. BLAIR	ANALYZE CASELAW ADDRESSING MITIGATION OF DAMAGES IN FMLA FACT PATTERN, NOTE TO THE FILE	0.8	380.00	\$304.00			
10-24-2014	T. COOK	STUDY DEFENDANTS MOTION FOR RECONSIDERATION	0.4	380.00	\$152.00			
10-27-2014	L. SIMONINI	STUDY COURT'S ORDER DENYING MOTION FOR RECONSIDERATION AND CONFER WITH ATTORNEY BLAIR REGARDING IMPACT ON CASE AND ON UPCOMING DEADLINES	2.2	170.00	\$374.00	Internal Conference, Block Billing, duplicative of T. Cook 10/24/14 entry	Paralegal Simonini's 2.2 time entry documents her assignment to determine the impact, if any, on upcoming deadlines when the court denied CAP's motion for reconsideration. It is not an internal conference because Attorney Blair did not bill for this analysis. First entry (.8); second entry (1.4). The paralegal review is separate from any attorney review.	
10-27-2014	L. SIMONINI	BEGIN PREPARING DRAFT OF JOINT PROPOSED PRETRIAL ORDER	1.4	170.00	\$238.00			
10-27-2014	T. COOK	STUDY COURT'S MINUTE ENTRY REGARDING DEFENDANTS MOTION FOR RECONSIDERATION	0.1	380.00	\$38.00			
10-27-2014	J. BLAIR	STUDY FEDERAL COURT DECISIONS REGARDING NOTICE OF NEED FOR FMLA LEAVE	0.6	380.00	\$228.00	Duplicative of 10/2/14 entry	Attorney Blair's .6 time entry supplements his prior analysis of federal court decisions. It is not duplicative of any prior time entry.	
10-27-2014	J. BLAIR	ANALYZE IMPACT OF COURT ORDER ON PRETRIAL REQUIREMENTS, EMAIL EXCHANGE WITH A. GRESSETT	0.4	380.00	\$121.60	Block Billing, vague	Attorney Blair's .4 time entry to analyze the impact of the court's order that date and to exchange emails with Plaintiff Gressett is not vague. First entry (.2); second entry (.2) [privileged communication].	Block billing; reduced by 20%.

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-28-2014	T. COOK	ASSESS WHY DEFENDANT IS IGNORING COMMUNICATIONS AND REQUEST TO MEDIATE; ASSESS ROLE OF CO-WORKER AS WITNESS FOR TRIAL	0.5	380.00	\$152.00	Block billing, vague	Attorney Cook's .5 time entry, her analysis of why CAP was ignoring us and our request to mediate, and to assess the role of a co-worker as a witness at trial is not vague. First entry (.2); second entry (.3).	Block billing; reduced by 20%.
10-28-2014	J. BLAIR	EMAIL TO DEFENSE COUNSEL REGARDING MAGISTRATE	0.1	380.00	\$38.00			
10-28-2014	J. BLAIR	PULL AND REVIEW AND FIRST ROUND SELECTION OF FMLA JURY INSTRUCTIONS IN FEDERAL COURT	1.0	380.00	\$380.00			
10-28-2014	J. BLAIR	STUDY NOTICE REQUIREMENT AND OTHER FMLA REGULATIONS IN REVISED FORM, CONSIDER DEFENSES CAP MAY USE	0.6	380.00	\$228.00	Vague, duplicative of 10/2/14 and 10/27/14 entries	Attorney Blair's .6 time entry to analyze the impact of the relevant revised FMLA regulation and defenses CAP may have to those regulations is neither vague nor duplicative of earlier analysis. The relevant regs have been revised from year to year and some are more attractive to the employer than others. There was no other analysis of these versions of these regulations.	
10-28-2014	J. BLAIR	READ CASES CITED IN THE EMPLOYMENT HANDBOOK PROTECTING EMPLOYERS FROM FMLA NOTICE VIOLATIONS	0.8	380.00	\$304.00	Background research	Attorney Blair's .8 time entry to study case law that CAP might use to defend against FMLA notice violations is not background research. It is application of case facts to the relevant law.	
10-29-2014	L. SIMONINI	CONFIRM REFILEING OF MOTIONS IN LIMINE TO COMPORT WITH JUDGE'S ORDER	0.3	170.00	\$51.00	Clerical	Paralegal Simonini's .3 time entry is to confirm the Judge's order was complied with. It is not clerical, but an efficient use of paralegal time.	
10-29-2014	L. SIMONINI	ADDRESS ISSUES REGARDING UPCOMING DEADLINES FOR JOINT FILINGS	1.3	170.00	\$221.00	Vague, excessive	Paralegal Simonini's 1.3 time entry to address the other joint pretrial deadlines is neither vague nor excessive.	
10-29-2014	L. SIMONINI	STUDY CAP'S MOTIONS IN LIMINE TO CONFIRM NO NEW MOTIONS ARE BEING FILED	0.4	170.00	\$68.00	Vague, excessive	Paralegal Simonini's .4 time entry to confirm the parties' refilings of motions in limine to comport with the Judge's order is not clerical. It is a confirmation that CAP did not file modified motions.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
10-29-2014	T. COOK	TELEPHONE CALL WITH CLIENT [Privileged Communication]	0.3	380.00	\$114.00			
10-29-2014	J. BLAIR	CONFIRM REILING OF MOTIONS IN LIMINE	0.2	380.00	\$76.00	Vague, clerical	Attorney Blair's .2 time entry to review the re filings by the parties is neither vague nor clerical, but what lawyers do when the court orders re filings.	
10-29-2014	J. BLAIR	REVIEW JUDGE TEILBORG'S RULING THAT NOTICE MUST SEPARATELY BE PROVEN, STUDY CASE LAW CITED IN HIS ORDER REGARDING SAME	1.1	380.00	\$418.00			
10-30-2014	J. BLAIR	REVIEW CASE VALUATION AFTER DISCUSSION WITH A. GRESSETT	0.5	380.00	\$190.00			
10-30-2014	J. BLAIR	PLAN PRETRIAL PREPARATION, STUDY SAMPLE FROM PRIOR FEDERAL COURT CASE	0.5	380.00	\$190.00			
10-30-2014	J. BLAIR	REVIEW P. BJORKLUND DAMAGES SUMMARY	0.6	380.00	\$228.00			
10-30-2014	T. COOK	EVALUATE IMPACT OF TESTIMONY OF DEFENDANT'S WITNESSES ON STRATEGY	0.9	380.00	\$342.00			
10-31-2014	L. SIMONINI	IDENTIFY DOCUMENTS THAT RELATE TO ABSENCES FOR DECEMBER 28 AND DECEMBER 29	1.8	170.00	\$306.00	Duplicative of 7/22/13m 8/20/13 and 12/17/13 entries	Paralegal Simonini's 1.8 time entry reflects an assignment to pull all materials related to Plaintiff Gressett's absences on December 28 and 29. This was an assignment related to the upcoming pretrial deadline, not duplicative of tasks she was assigned a year prior.	
10-31-2014	J. BLAIR	REVIEW RUZICH TRANSCRIPT AND DOCUMENT USEFUL PORTIONS FOR TRIAL REGARDING NOTICE ISSUE	1.4	380.00	\$532.00			
10-31-2014	J. BLAIR	BEGIN JOINT PRETRIAL FILING	1.1	380.00	\$418.00	Duplicative of L. Simonini 10/27/14 entry	Attorney Blair's 1.1 time entry to begin the joint pretrial filing is not duplicate to the task required of Paralegal Simonini. Attorney Blair was addressing legal issues and Paralegal Simonini was directed to pull supporting materials.	
10-31-2014	J. BLAIR	STUDY VERSION OF REGULATION 825.303 THAT WAS IN PLACE IN 2009	0.3	380.00	\$114.00			
11-03-2014	J. BLAIR	WORK ON JOINT PRETRIAL MATERIALS, INCLUDING DOCUMENTING KEY STIPULATED FACTS AND LAW, IDENTIFICATION OF WITNESSES	2.7	380.00	\$1,026.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-03-2014	J. BLAIR	REVIEW NINTH CIRCUIT JURY INSTRUCTIONS FOR FMLA CLAIMS	0.3	380.00	\$114.00			
11-04-2014	L. SIMONINI	CONFERENCE WITH ATTORNEYBLAIR TO CONSIDER TRIAL EXHIBITS	1.4	170.00	\$238.00	Internal Conference	Paralegal Simonini's 1.4 time entry to discuss trial exhibits with Attorney Blair is not an internal conference. Mr. Blair did not bill for this discussion.	
11-04-2014	L. SIMONINI	ADDRESS ISSUES REGARDING PRESENTING MEDICATION BOTTLES AT TRIAL	0.3	170.00	\$51.00	Vague	Paralegal Simonini's .3 time entry reflects her assignment to determine whether Plaintiff Gressett's medication bottles could be located and presented at trial. It is not vague.	
11-04-2014	L. SIMONINI	ADDRESS ISSUES REGARDING CAP'S ADMISSION REGARDING FMLA LEAVE CHART PREPARED BY ATTORNEY GROUSE	0.7	170.00	\$119.00	Vague	Paralegal Simonini's .7 time entry reflects her assignment to determine how evidence of the preparation of Attorney Grouse's leave chart was documented and could be used at trial. It is not a vague assignment.	
11-04-2014	L. SIMONINI	STUDY C. ELDRIDGE DEPOSITION TESTIMONY TO IDENTIFY TESTIMONY REGARDING PHYSICAL REACTIONS TO PRESCRIPTIONS	0.9	170.00	\$153.00			
11-04-2014	L. SIMONINI	STUDY GRESSETT'S MEDICAL FILE TO VERIFY THAT PRESCRIPTION INFORMATION PROVIDED TO M. COOK IS PART OF HER FILE	0.8	170.00	\$136.00			
11-04-2014	J. BLAIR	MAKE ADDITIONS TO JOINT PRETRIAL ORDER	0.5	380.00	\$190.00			
11-04-2014	J. BLAIR	PULL AND REVIEW EXHIBITS FOR JOINT PRETRIAL ORDER, RELATED PARALEGAL ASSIGNMENTS	2.2	380.00	\$836.00	Block billing	First entry (2.0); second entry (.2).	
11-04-2014	J. BLAIR	VALUE GRESSETT CLAIMS	0.5	380.00	\$190.00			
11-05-2014	L. SIMONINI	CONTINUE STUDY OF CAP'S VOLUMINOUS DISCOVERY RESPONSES TO IDENTIFY POTENTIAL TRIAL EXHIBITS	5.2	170.00	\$884.00			
11-05-2014	L. SIMONINI	ADDRESS ISSUES REGARDING DISCLOSURE OF CLIENT'S JOB SEARCHES	0.4	170.00	\$68.00			
11-05-2014	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING MISSING DOCUMENTS	0.1	170.00	\$17.00			
11-05-2014	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING MISSING DOCUMENTS	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 entry to review an email from CAP's counsel is not excess billing.	
11-05-2014	L. SIMONINI	STUDY E-MAIL FROM CAP PARALEGAL REGARDING MISSING DOCUMENTS	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 entry to review an email from CAP's paralegal is not excess billing.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-05-2014	J. BLAIR	MAKE ADDITIONS TO THE JOINT PRETRIAL STATEMENT	0.5	380.00	\$190.00			
11-05-2014	J. BLAIR	REVIEW DISCOVERY AND DISCLOSURE DOCUMENTS, IDENTIFY EXHIBITS	1.8	380.00	\$684.00	Duplicative of L. Simonini 11/5/14 entry	Attorney Blair's 1.8 time entry to review the file, both discovery and disclosure documents for the draft joint pretrial statement, is not a duplication of Paralegal Simonini's assignments.	
11-05-2014	J. BLAIR	DEVELOP VOIR DIRE QUESTIONS	1.2	380.00	\$456.00			
11-06-2014	L. SIMONINI	STUDY E-MAIL FROM CAP PARALEGAL REGARDING MISSING PRODUCTION DOCUMENTS	0.1	170.00	\$17.00	Duplicative of 11/5/14 entry	Paralegal Simonini's .1 time entry to review an email from CAP's paralegal is not duplicative of her email review the prior day. It is a separate email.	
11-06-2014	L. SIMONINI	DRAFT E-MAIL TO CAP PARALEGAL REGARDING MISSING PRODUCTION EXHIBITS	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email to CAP's paralegal is not excess billing.	
11-06-2014	L. SIMONINI	STUDY RECORDS ATTACHED TO SECOND SUPPLEMENT TO FIRST REQUEST FOR PRODUCTION OF DOCUMENTS	2.2	170.00	\$374.00	Vague	Paralegal Simonini's 2.2 time entry to review records that were attached to a discovery response from CAP is not vague. It was part of her joint pretrial statement responsibilities.	
11-06-2014	L. SIMONINI	CONTINUE TO IDENTIFY AND PREPARE POTENTIAL TRIAL EXHIBITS TO BE EXCHANGED WITH CAP ON 11/17/2014	5.1	170.00	\$867.00	Excessive - see 11/5/14 entry	Paralegal Simonini's 5.1 time entry to continue to prepare the trial exhibit materials for exchange with CAP is not excessive. It is a continuation of that assignment.	
11-06-2014	J. BLAIR	REVIEW CAP'S DISCLOSURE FOR EXHIBIT IDENTIFICATION	1.5	380.00	\$570.00	Vague, excessive	Attorney Blair's 1.5 time entry to study disclosures from CAP for exhibit identification (for Plaintiff Gresset) is neither vague nor excessive.	
11-06-2014	J. BLAIR	STUDY CAP'S MOTION IN LIMINE REGARDING EXPERT MCRAE, PULL CASES FOR REVIEW, STUDY CASES SUPPORTING HR EXPERTS	1.1	380.00	\$334.40	Block Billing	First time entry (.4); second time entry (.3); third time entry (.4).	Block billing; reduced by 20%.
11-06-2014	J. BLAIR	MAKE REVISIONS TO DRAFT JOINT PRETRIAL	0.2	380.00	\$76.00			
11-06-2014	J. BLAIR	ADD VOIR DIRE QUESTIONS	0.4	380.00	\$152.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-07-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR REGARDING RESPONSES TO MOTIONS IN LIMINE	1.3	170.00	\$221.00	Internal Conference	Paralegal Simonini's 1.3 time entry to discuss MIL responses with Attorney Blair is not an internal conference. Attorney Blair did not bill for this discussion.	
11-07-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR AND ATTORNEY COOK REGARDING TRIAL EXHIBITS	0.6	170.00	\$102.00	Internal Conference	Paralegal Simonini's .6 time entry to discuss trial exhibits with Attorneys Blair and Cook is not an internal conference; neither attorney billed for this discussion.	
11-07-2014	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING MOTION IN LIMINE	0.1	170.00	\$17.00			
11-07-2014	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING MOTION IN LIMINE	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry an email from expert McRae is not excess billing.	
11-07-2014	L. SIMONINI	DRAFT SECOND E-MAIL TO EXPERT MCRAE REGARDING MOTION IN LIMINE	0.1	170.00	\$17.00			
11-07-2014	L. SIMONINI	IDENTIFY AND PREPARE EXHIBITS TO BE FORWARDED TO EXPERT MCRAE REGARDING PENDING MOTIONS IN LIMINE	0.5	170.00	\$85.00			
11-07-2014	L. SIMONINI	STUDY LETTER FROM CAP PARALEGAL REGARDING MISSING PRODUCTION DOCUMENTS	0.2	170.00	\$34.00			
11-07-2014	L. SIMONINI	STUDY GRESSETT'S INITIAL DISCLOSURE STATEMENT TO IDENTIFY AND ASSEMBLE TRIAL EXHIBITS TO BE EXCHANGED WITH DEFENDANT	2.8	170.00	\$476.00	Block billing	Paralegal Simonini's 2.8 time entry to study Plaintiff's Disclosure Statement and identify and assemble trial exhibits for exchange with CAP is not block billing. It is one task.	
11-07-2014	L. SIMONINI	BEGIN DRAFTING TRIAL EXHIBIT LIST	1.2	170.00	\$204.00			
11-07-2014	J. BLAIR	WORK ON G. MCRAE RESPONSE TO MOTION IN LIMINE SEEKING HER DISQUALIFICATION	1.6	380.00	\$608.00			
11-07-2014	J. BLAIR	STUDY CASES CITED BY CAP REGARDING DISQUALIFICATION OF MCRAE	0.8	380.00	\$304.00			
11-07-2014	J. BLAIR	STUDY RECORDS DISCLOSED BY CAP, MARK KEY ONES FOR JOINT PRETRIAL	1.0	380.00	\$380.00			
11-07-2014	J. BLAIR	MEETING WITH T. COOK REGARDING DOCUMENT REVIEW, DISCUSSIONS WITH G. MCRAE, MOTIONS IN LIMINE DRAFTS	0.7	380.00	\$266.00	Internal Conference	Attorney Blair's .7 time entry to discuss document review and discussions with Expert McRae and draft MILs responses is not an internal conference. Attorney Cook did not bill for these discussions.	
11-07-2014	J. BLAIR	EMAIL TO EXPERT MCRAE REGARDING MOTION IN LIMINE	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-07-2014	T. COOK	BEGIN STUDY OF ALL DISCLOSURES AND DISCOVERY TO SELECT TRIAL EXHIBITS	2.0	380.00	\$760.00			
11-07-2014	T. COOK	STUDY AND PLAN FOR STRATEGY AND RESPONSES TO DEFENDANTS MOTIONS IN LIMINE	1.0	380.00	\$380.00			
11-07-2014	J. BLAIR	STUDY DEFENDANT'S LISTED TRIAL EXHIBITS	0.8	380.00	\$304.00			
11-09-2014	T. COOK	COMPLETE STUDY OF ALL DISCLOSURES AND DISCOVERY RESPONSES AND SELECTION OF TRIAL EXHIBITS	4.0	380.00	\$1,520.00			
11-10-2014	L. SIMONINI	STUDY CAP DISCLOSURE DOCUMENTS TO IDENTIFY POTENTIAL TRIAL EXHIBITS	3.7	170.00	\$629.00	Duplicative of T. Cook entry on 11/9/14	Paralegal Simonini's 3.7 time entry to identify potential trial exhibits from CAP's disclosure documents is not duplicative of Attorney's Cook's efforts related to trial exhibits. Attorney Cook would review the product of Paralegal Simonini's assignments.	
11-10-2014	L. SIMONINI	ADDRESS ISSUES REGARDING MOTIONS IN LIMINE TO BE FILED	1.3	170.00	\$221.00	Vague, excessive - already filed per 10/20/14 entry	Paralegal Simonini's 1.3 time entry addresses issues regarding MIL responses. (Incorrectly referencing Motions to be filed) It was her responsibility to organize any evidentiary support for the responses. The time entry is neither vague or excessive.	
11-10-2014	L. SIMONINI	STUDY CAP DISCOVERY DOCUMENTS TO IDENTIFY POTENTIAL TRIAL EXHIBITS	3.6	170.00	\$612.00	Duplicative of T. Cook entry on 11/9/14	Paralegal Simonini's 3.6 time entry to review CAP discovery documents and identify potential trial exhibits is not duplicative of Attorney Cook's review. As noted above, Attorney Cook relied on Paralegal Simonini's initial efforts.	
11-10-2014	J. BLAIR	TELEPHONE CALL WITH G. MCRAE REGARDING RESPONSE TO CAP'S MOTION IN LIMINE	0.5	380.00	\$190.00			
11-10-2014	J. BLAIR	REVIEW RECORDS FOR JOINT PRETRIAL PURPOSES	0.6	380.00	\$228.00			
11-10-2014	J. BLAIR	DRAFT RESPONSES TO CAP MOTIONS IN LIMINE	1.6	380.00	\$608.00			
11-10-2014	J. BLAIR	TELEPHONE CALL WITH T. COOK REGARDING PRETRIAL ISSUES	0.2	380.00	\$76.00	Internal Conference	Attorney Blair's .2 time entry to discuss pretrial issues with Attorney Cook is not an internal conference. Attorney Cook did not bill for this discussion.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-11-2014	L. SIMONINI	ADDRESS ISSUES REGARDING JOINT PRETRIAL ORDER	1.3	170.00	\$221.00	Vague	Paralegal Simonini's 1.3 time entry to address the joint pretrial order components is not vague. It was her responsibility to coordinate the various components into a final product.	
11-11-2014	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL TRIAL EXHIBITS	2.8	170.00	\$476.00	Vague	Paralegal Simonini's 2.8 time entry to address issues related to potential trial exhibits is not vague. See above.	
11-11-2014	L. SIMONINI	STUDY GRESSETT DOCUMENTS TO IDENTIFY POTENTIAL TRIAL EXHIBITS	2.9	170.00	\$493.00	Vague	Paralegal Simonini's 2.9 time entry to review Gressett materials for potential trial exhibits is not vague. See comments above.	
11-11-2014	J. BLAIR	STUDY SUPPORT MATERIALS RE EXPERT MCRAE	1.2	380.00	\$456.00			
11-11-2014	J. BLAIR	DRAFT RESPONSE RE MOTION TO DISQUALIFY G. MCRAE	1.8	380.00	\$684.00	Duplicative of 11/10/14 entry	Attorney Blair's 1.8 time entry to draft a response re Motion to Disqualify Expert McRae is not duplicative of any other entry. This draft response was only possible after Attorney Blair's discussions with Expert McRae.	
11-11-2014	J. BLAIR	MAKE REVISIONS AND ADDITIONS TO DRAFT RESPONSE BRIEF	1.1	380.00	\$418.00			
11-11-2014	J. BLAIR	MAKE REVISIONS TO REMAINING TWO MOTIONS IN LIMINE	0.3	380.00	\$114.00	Excessive - already filed per 10/20/14 entry	Attorney Blair's .3 time entry relates to responses to MIL, not the initial motions. It is a typographical error, not a reference to prior filed motions.	
11-12-2014	L. SIMONINI	CONFIRM THAT FMLA ELEMENTS ARE INCORPORATED INTO JOINT PRETRIAL ORDER	0.8	170.00	\$136.00			
11-12-2014	L. SIMONINI	STUDY CAP'S MOTIONS IN LIMINE	2.3	170.00	\$391.00	Excessive, duplicative of 10/16/14 and 11/6/14 entries	Paralegal Simonini's 2.3 time entry documents further analysis of the motions per instruction from Attorney Cook.	
11-12-2014	L. SIMONINI	IDENTIFY EVIDENCE TO SUPPORT RESPONSE TO CAP'S MOTIONS IN LIMINE	2.7	170.00	\$459.00	Excessive, duplicative of 10/15/14, 10/16/14 and 11/6/14 entries	Paralegal Simonini's 2.7 time entry documents her responsibility to pull the evidence support Plaintiff Gressett's responses to CAP's MILs. This was a continuing responsibility as the response deadline approached.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-12-2014	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING EXCHANGE OF TRIAL EXHIBITS	0.1	170.00	\$17.00			
11-12-2014	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING TRIAL EXHIBIT EXCHANGE	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from CAP's counsel is not excess billing.	
11-12-2014	L. SIMONINI	RESEARCH TO CONFIRM ACCURACY OF CASE CITATIONS IN MOTIONS IN LIMINE	1.2	170.00	\$204.00			
11-12-2014	T. COOK	EDIT AND FINALIZE RESPONSES TO MOTIONS IN LIMINE (x3) FILED BY DEFENDANT	3.0	380.00	\$1,140.00			
11-12-2014	J. BLAIR	REVISE AND FINALIZE MOTIONS IN LIMINE, RELATED EMAIL COMMUNICATIONS WITH T. COOK	1.6	380.00	\$608.00	Internal Conference, Block Billing, duplicative of above entry	Attorney Blair's 1.6 time entry to revise and finalize responses to CAP's MILs, then discuss those responses in an email to Attorney Cook is not an internal conference nor is it duplicative of the earlier entry. This was Attorney Blair's separate review of the response motions he had prepared. First time entry (1.4); second time entry (.2).	
11-13-2014	L. SIMONINI	ASSIST WITH PREPARATION OF MOTIONS IN LIMINE	2.4	170.00	\$408.00	Vague	Paralegal Simonini's 2.4 time entry to assist with the preparation of response briefs is not vague. It is a paralegal's responsibility to do just that.	
11-13-2014	L. SIMONINI	IDENTIFY EXHIBITS TO BE ATTACHED TO MOTIONS IN LIMINE	2.7	170.00	\$459.00			
11-13-2014	J. BLAIR	MEET WITH T. COOK REGARDING PRETRIAL REQUIREMENTS	0.5	380.00	\$190.00	Internal Conference	Attorney Blair's .5 time entry to discuss all Pretrial requirements with Attorney Cook is not an internal conference. Attorney Cook did not bill for this discussion.	
11-13-2014	J. BLAIR	STUDY MOTION IN LIMINE RESPONSES FROM CAP	0.6	380.00	\$228.00			
11-13-2014	J. BLAIR	REVISE PRETRIAL ORDER TO INCLUDE CONTENTIONS REGARDING GRESSETT'S NOTICE TO CAP OF HER FMLA PROTECTED ABSENCES	0.6	380.00	\$228.00			
11-13-2014	J. BLAIR	REVIEW EMAIL FROM A. GRESSETT [Privileged Communication]	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-14-2014	L. SIMONINI	ASSIST WITH PREPARATION AND FINALIZATION OF DRAFT JOINT PRETRIAL ORDER TO BE SENT TO CAP	2.7	170.00	\$459.00	Duplicative of L. Simonini 11/13/14 entry	Paralegal Simonini's 2.7 time entry documents her responsibilities to assist in the preparation/finalization of the draft joint pretrial order before it was sent to CAP's attorney. This time entry is not duplicative of those continuing responsibilities from prior days.	
11-14-2014	L. SIMONINI	ASSIST WITH PREPARATION AND FINALIZATION OF MOTIONS IN LIMINE	2.4	170.00	\$408.00	Duplicative of above, excessive	Paralegal Simonini's 2.4 time entry to assist in the prep and finalization of the MIL response briefs is neither duplicative or excessive. It was her responsibility to participate in the finalization of these materials before filing.	
11-14-2014	L. SIMONINI	IDENTIFY EXHIBITS TO BE ATTACHED TO MOTIONS IN LIMINE	1.6	170.00	\$272.00	Duplicative of L. Simonini 11/13/14 entry	Paralegal Simonini's 1.6 time entry to pull the exhibits for the responses to MIL is not duplicative of any earlier time entry related to this task. She saw that these exhibits were pulled just prior to filing.	
11-14-2014	T. COOK	DETAILED STUDY OF DEFENDANT'S RESPONSE TO MOTION IN LIMINE ON STANDARD OF CARE	1.8	380.00	\$684.00			
11-14-2014	T. COOK	IDENTIFY AND ISSUE INSTRUCTIONS FOR FOLLOW UP FOR ORAL ARGUMENT AND DESIGNATION OF EXHIBITS IN RESPONSE TO ALL OF DEFENDANT'S RESPONSES TO MOTIONS IN LIMINE	0.8	380.00	\$304.00			
11-14-2014	T. COOK	DETAILED STUDY AND NOTATIONS TO DEFENDANT'S RESPONSE TO MOTION IN LIMINE REGARDING MARITAL STATUS AND CHILDREN	1.3	380.00	\$494.00	Excessive	Attorney Cook's 1.3 time entry to review and make notes about this particular MIL response from CAP is not excessive. It is the trial lawyer's responsibility to know these motions in detail, not merely for presentation of the motions, but for trial.	
11-14-2014	T. COOK	DETAILED STUDY AND NOTATE FOLLOW-UP NEEDED FROM DEFENDANT'S RESPONSE TO MOTION IN LIMINE REGARDING NON-WORK RELATED EMAILS	0.9	380.00	\$342.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-14-2014	T. COOK	STUDY AND NOTATE RESPONSE FROM DEFENDANT TO MOTION IN LIMINE REGARDING ATTORNEY KRUMWEIDE	0.7	380.00	\$266.00			
11-14-2014	J. BLAIR	STUDY MOTION IN LIMINE RESPONSES FROM CAP	1.2	380.00	\$456.00	Duplicative of T. Cook 11/14/14 entries	Attorney Blair's 1.2 time entry to review the CAP MIL responses is not duplicative of effort by trial Attorney Cook. Attorney Blair reviewed all the MIL responses so as to be certain how those issues would be defended by CAP at trial.	
11-14-2014	J. BLAIR	REVISIONS TO DRAFT JOINT PRETRIAL ORDER	0.3	380.00	\$114.00			
11-14-2014	J. BLAIR	EMAIL FROM A. GRESSETT [Privileged Communication]	0.1	380.00	\$38.00			
11-16-2014	L. SIMONINI	IDENTIFY ALL DOCUMENTS TO BE FILED WITH COURT ON 12/01/14 AND CONFIRM PROCESS IS IN PLACE FOR EXCHANGING SAME	0.5	170.00	\$85.00			
11-17-2014	L. SIMONINI	DRAFT SUPPLEMENTAL DISCLOSURE STATEMENT REGARDING GRESSETT'S ANTICIPATED TESTIMONY	0.4	170.00	\$68.00			
11-17-2014	L. SIMONINI	STUDY CAP'S DISCLOSURE DOCUMENTS TO IDENTIFY AND PREPARE TRIAL EXHIBITS TO BE EXCHANGED WITH CAP	2.8	170.00	\$476.00			
11-17-2014	L. SIMONINI	STUDY CAP'S DEPOSITION EXHIBITS TO IDENTIFY AND PREPARE TRIAL EXHIBITS TO BE EXCHANGED WITH CAP	2.4	170.00	\$408.00			
11-17-2014	L. SIMONINI	CONFER WITH ATTORNEY BLAIR REGARDING DRAFT JOINT PRETRIAL ORDER TO BE EXCHANGED WITH CAP COUNSEL	0.7	170.00	\$119.00	Internal Conference	Paralegal Simonini's .7 time entry for a discussion with Attorney Blair exchanging Pretrial materials with CAP is not an internal conference. Attorney Blair did not bill for this discussion.	
11-17-2014	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING GRESSETT'S PORTION OF JOINT PRETRIAL ORDER	0.1	170.00	\$17.00			
11-17-2014	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY AND ATTACHED DEFENDANT'S PORTION OF JOINT PRETRIAL ORDER	1.2	170.00	\$204.00			
11-17-2014	J. BLAIR	REVISE JOINT PRETRIAL, ARRANGE DRAFT TO CAP'S ATTORNEY	0.8	380.00	\$304.00			
11-17-2014	T. COOK	STUDY AND EDIT FIRST ROUND DRAFT OF JOINT PRE-TRIAL STATEMENT	0.8	380.00	\$304.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-18-2014	L. SIMONINI	DRAFT NOTICE OF SERVICE OF SUPPLEMENTAL DISCLOSURE STATEMENT	0.1	170.00	\$17.00			
11-18-2014	L. SIMONINI	DRAFT E-MAIL TO GRESSETT [Privileged Communication]	0.1	170.00	\$17.00			
11-18-2014	L. SIMONINI	STUDY E-MAIL FROM GRESSETT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Plaintiff Gressett is not excessive billing.	
11-18-2014	L. SIMONINI	STUDY CAP'S DISCOVERY RESPONSES TO IDENTIFY AND PREPARE TRIAL EXHIBITS TO BE EXCHANGED WITH CAP	3.6	170.00	\$612.00			
11-18-2014	J. BLAIR	STUDY DRAFT JOINT PRETRIAL FROM CAP, IDENTIFY ISSUES THAT CAN BE RESOLVED	1.2	380.00	\$456.00	Duplicative of L. Simonini 11/17/14 entry	Attorney Blair's 1.2 time entry to study CAP's draft joint pretrial materials and identify issues that can be resolved between the parties is not duplicative with Paralegal Simonini's review of the draft joint pretrial materials. Paralegal Simonini's responsibilities were structural and procedural; Attorney Blair's responsibilities involved the legality of the joint pretrial statement as well as the presentation of Plaintiff Gressett's evidence at trial.	
11-18-2014	T. COOK	PRELIMINARY REVIEW OF COMBINED FINAL PRE TRIAL STATEMENT	0.3	380.00	\$114.00			
11-19-2014	L. SIMONINI	MEET WITH CAP PARALEGAL TO IDENTIFY AND EXCHANGE TRIAL EXHIBITS	1.0	170.00	\$170.00			
11-19-2014	L. SIMONINI	CONFERENCE CALL ATTORNEY BLAIR AND ATTORNEY COOK REGARDING JOINT PRETRIAL ORDER	0.6	170.00	\$102.00	Internal Conference	Paralegal Simonini's .6 time entry for a discussion with Attorneys Blair and Cook about the joint pretrial order is not an internal conference. Neither attorney billed for this discussion.	
11-19-2014	L. SIMONINI	EXCHANGE MESSAGES WITH CAP ATTORNEY REGARDING TRIAL EXHIBIT EXCHANGE	0.1	170.00	\$17.00			
11-19-2014	L. SIMONINI	PREPARE SET OF TRIAL EXHIBITS TO BE EXCHANGED WITH CAP PER JUDGE'S PRETRIAL ORDER	1.3	170.00	\$221.00			
11-19-2014	L. SIMONINI	RETRIEVE SAMPLE JURY INSTRUCTIONS FROM FMLA MATTER FOR ATTORNEY CONSIDERATION	1.1	170.00	\$187.00			
11-19-2014	J. BLAIR	WORK ON JOINT PRETRIAL STATEMENT, ANALYZE PORTIONS ADDED BY CAP	1.4	380.00	\$532.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-19-2014	J. BLAIR	CONFIRM EXCHANGE OF EXHIBITS, REVIEW CAP'S DRAFT	0.2	380.00	\$76.00			
11-20-2014	L. SIMONINI	PREPARE COLLECTION OF GRESSETT'S TRIAL EXHIBITS FOR ATTORNEY USE IN PREPARING JOINT PRETRIAL ORDER	1.3	170.00	\$221.00			
11-20-2014	L. SIMONINI	PREPARE COLLECTION OF GRESSETT'S TRIAL EXHIBITS FOR ATTORNEY USE IN PREPARING JOINT PRETRIAL ORDER	2.3	170.00	\$391.00	Duplicative of above	Paralegal Simonini's 2.3 time entry describes her responsibility to prepare a subset of all Gressett trial exhibits for trial Attorney Cook's use. This assignment is not duplicative of her efforts related to the joint pretrial order.	
11-20-2014	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT BJORKLUND'S TRIAL EXHIBITS	1.3	170.00	\$221.00	Vague	Paralegal Simonini's 1.3 time entry to separate Expert Bjorklund's trial exhibits is not vague. It was an assignment from Attorney Blair, who was to take testimony from Expert Bjorklund.	
11-20-2014	T. COOK	STUDY EMAIL FROM DEFENDANT COUNSEL REGARDING EDIT WORK ON FINAL PRETRIAL STATEMENT	0.2	380.00	\$76.00			
11-20-2014	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING JOINT FINAL PRETRIAL STATEMENT	0.2	380.00	\$76.00			
11-20-2014	J. BLAIR	PREPARE REVISIONS TO COMBINED JOINT PRETRIAL ORDER	1.7	380.00	\$646.00			
11-20-2014	J. BLAIR	STUDY CAP'S MARKED EXHIBITS, MAKE NOTES REGARDING SAME	1.6	380.00	\$608.00			
11-20-2014	J. BLAIR	STUDY EMAIL EXCHANGE WITH CAP'S ATTORNEY	0.2	380.00	\$76.00	Duplicative of T. Cook 11/20/14 entry	Attorney Blair's .2 time entry to review the exchange between this office and CAP's attorney is not duplicative of Attorney Cook's communication with CAP's counsel. It is Attorney Blair's separate review on how the joint pretrial is progressing.	
11-21-2014	L. SIMONINI	STUDY TRIAL EXHIBITS TO IDENTIFY DUPLICATES TO BE REMOVED AND OBJECTIONS TO BE MADE	4.7	170.00	\$799.00			
11-21-2014	L. SIMONINI	STUDY DRAFT JOINT PRETRIAL ORDER TO IDENTIFY ADDITIONAL OBJECTIONS TO BE MADE REGARDING STIPULATED FACTS, WITNESSES	1.1	170.00	\$187.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-21-2014	L. SIMONINI	STUDY CAP DISCLOSURE STATEMENTS TO CONFIRM WITNESSES LISTED IN JOINT PRETRIAL ORDER HAVE BEEN APPROPRIATELY DISCLOSED	1.3	170.00	\$221.00			
11-21-2014	T. COOK	CONFER WITH ATTORNEY BLAIR REGARDING TRIAL PLANNING, FINAL STATEMENT, SELECTION OF EXHIBITS, ARGUMENTS RELATING TO VARIOUS DOCUMENTS, JURY INSTRUCTIONS, VERDICT FORM	2.0	380.00	\$760.00	Internal Conference	Attorney Cook's 2.0 time entry to assess the case going forward is not an internal conference. Attorney Blair did not bill for this discussion with Attorney Cook.	
11-21-2014	J. BLAIR	WORK ON JOINT PRETRIAL, STUDY EXHIBITS IDENTIFIED BY GRESSETT AND CAP	0.4	380.00	\$152.00	Duplicative of 11/20/14 entry	Attorney Blair's .4 time entry to continue work on the joint pretrial, after input from CAP, is not duplicative of his efforts one week earlier.	
11-21-2014	J. BLAIR	WORK WITH T. COOK ON PRETRIAL STRATEGY, TALK THROUGH EXHIBITS AND WITNESSES	2.0	380.00	\$760.00	Internal Conference	Attorney Blair's 2.0 time entry to strategize with Attorney Cook about the trial exhibits and witnesses is an internal conference, but it is one of the key times in a litigation process when a conference is permitted, for billing purposes, because it insures both attorneys are on the same page.	
11-24-2014	L. SIMONINI	RESEARCH TO IDENTIFY FINAL JURY INSTRUCTIONS APPROVED BY JUDGE TEILBORG OR RELATING TO FMLA MATTERS	3.3	170.00	\$561.00	Vague, excessive	Paralegal Simonini's 3.3 time entry, to document her assignment to identify FMLA jury instructions approved by Judge Teilborg's other trials is neither vague or excessive. It is what paralegals should be doing when assigned similar responsibilities by the trial attorney.	
11-24-2014	L. SIMONINI	STUDY E-MAIL FROM CAP PARALEGAL REGARDING DUPLICATE TRIAL EXHIBITS	0.1	170.00	\$17.00			
11-24-2014	L. SIMONINI	STUDY SECOND E-MAIL FROM CAP PARALEGAL REGARDING DUPLICATE TRIAL EXHIBITS	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review an email from CAP's paralegal is not excessive billing.	
11-24-2014	L. SIMONINI	CONTINUED RESEARCH TO IDENTIFY TRIALS THAT CAP ATTORNEYS HAVE CHAIRED	2.7	170.00	\$459.00	Excessive	Paralegal Simonini's 2.7 time entry to attempt to determine the trial experience of CAP's attorneys is not excessive. It is good legal preparation.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-24-2014	J. BLAIR	REVIEW AND DICTATE OBJECTIONS TO EXHIBITS	1.3	380.00	\$494.00	Duplicative of L. Simonini entry on 11/21/14	Attorney Blair's 1.3 time entry to dictate objections to CAP's proposed exhibits is not duplicative of Paralegal Simonini's responsibilities associated with gathering and documenting those exhibits.	
11-24-2014	J. BLAIR	REVIEW JURY INSTRUCTIONS, PREPARE INSTRUCTION PACKAGE AND RELATED PARALEGAL ASSIGNMENT REGARDING JUDGE TEILBORG'S INSTRUCTIONS	1.5	380.00	\$570.00			
11-24-2014	J. BLAIR	MAKE REVISIONS TO JOINT PRETRIAL STATEMENT	0.5	380.00	\$190.00			
11-25-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF T. DELGADO TO IDENTIFY POTENTIAL DEPOSITION DESIGNATIONS	1.7	170.00	\$289.00	Excessive, unnecessary because no designations were made	Paralegal Simonini's 1.7 time entry was necessary if Delgado did not testify. The work was performed for that eventuality. It was not excessive.	
11-25-2014	L. SIMONINI	STUDY CLIENT'S DEPOSITION TO IDENTIFY POTENTIAL DEPOSITION DESIGNATIONS	3.7	170.00	\$629.00	Excessive, unnecessary because no designations were made	Paralegal Simonini's 3.7 time entry to identify deposition designations by review plaintiff Gressett's deposition was not excessive. The work was completed in anticipation of witnesses who would not testify.	
11-25-2014	J. BLAIR	REVIEW NINTH CIRCUIT JURY INSTRUCTIONS AND DRAFT INSTRUCTIONS FOR FMLA CLAIM	2.1	380.00	\$798.00			
11-26-2014	L. SIMONINI	ADDRESS ISSUES REGARDING JOINT PROPOSED JURY INSTRUCTIONS	2.2	170.00	\$374.00			
11-26-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR REGARDING JOINT PRETRIAL ORDER AND ASSOCIATED FILINGS	0.5	170.00	\$85.00	Internal Conference	Paralegal Simonini's .5 time entry to review pretrial materials with Attorney Blair was not an internal conference. No one else billed for this time.	
11-26-2014	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING JOINT PRETRIAL ORDER	0.1	170.00	\$17.00			
11-26-2014	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING DRAFT JURY INSTRUCTIONS	0.1	170.00	\$17.00			
11-26-2014	L. SIMONINI	STUDY DEPOSITION TRANSCRIPT OF M. RUZICH TO IDENTIFY DEPOSITION DESIGNATIONS	2.1	170.00	\$357.00	Excessive, unnecessary because no designations were made	Paralegal Simonini's 2.1 time entry to study the Ruzich transcript and identify deposition designations was not excessive. It was necessary because at the pretrial time it was unclear whether Ruzich would testify.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-26-2014	L. SIMONINI	STUDY DEPOSITION OF M. LUDKE TO IDENTIFY POTENTIAL DEPOSITION DESIGNATIONS	1.3	170.00	\$221.00	Excessive, unnecessary because no designations were made	Paralegal Simonini's 1.3 time entry to identify potential designations for Ludke was not excessive. It was unknown at that time whether Ludke would testify.	
11-26-2014	T. COOK	STUDY MODEL JURY INSTRUCTIONS, EDIT DRAFT JURY INSTRUCTIONS, SEND TO DEFENDANT FOR EDITS	1.8	380.00	\$684.00			
11-26-2014	J. BLAIR	REVISE JURY INSTRUCTIONS	1.1	380.00	\$418.00	Duplicative of T. Cook entry on 11/26/14	Attorney Blair's 1.1 time entry to revise jury instructions is supplemental to Attorney Cook's work in this area. It is not duplicative.	
11-26-2014	J. BLAIR	PREPARE STATEMENT OF THE CASE	0.5	380.00	\$190.00			
11-26-2014	J. BLAIR	ARRANGE PRETRIAL PACKAGE TO T. COOK FOR REVIEW AND TRANSMISSION TO CAP'S ATTORNEY	0.0	380.00	\$0.00	Clerical	Attorney Blair's .2 time entry to arrange for Attorney Cook's review of the draft pretrial package was not clerical. Attorney Blair reviewed the package to his satisfaction and had it transmitted to Attorney Cook.	Clerical
11-26-2014	J. BLAIR	PLAN FOR FILING OF JOINT PRETRIAL, AND RELATED EMAIL COMMUNICATIONS WITH T.COOK	0.4	380.00	\$152.00	Internal Conference	Attorney Blair's .4 time entry to plan for the joint pretrial and send a related email to Attorney Cook was not an internal conference. Attorney Cook did not bill for this time entry.	
11-26-2014	T. COOK	WORK ON VOIR DIRE	1.0	380.00	\$380.00			
11-28-2014	L. SIMONINI	STUDY DRAFT JOINT PRETRIAL ORDER TO IDENTIFY ADDITIONS IN ADVANCE OF FILING SAME	1.1	170.00	\$187.00	Excessive, duplicative of 10/18/12, 1/14/14, 10/2/14, 10/3/14, 10/20/14, 10/22/14, 10/31/14, 11/3/14, 11/4/14, 11/5/14, 11/6/14, 11/7/14, 11/10/14, 11/11/14, 11/12/14, 11/14/14, 11/17/14, 11/18/14, 11/19/14, 11/20/14, 11/21/14, and 11/26/14 entries	Paralegal Simonini's 1.1 time entry to review the draft pretrial order and suggest additions before filing is not excessive. It is supplemental to the prior work and critical at this stage of the pretrial preparation.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
11-28-2014	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION REGARDING M. COOK TO IDENTIFY DEPOSITION DESIGNATIONS	2.3	170.00	\$391.00	Excessive, unnecessary because no designations were made	Paralegal Simonini's 2.3 time entry to identify deposition designations for Mike Cook is not excessive. At this point of the case it was unclear whether Mike Cook would testify in person.	
11-28-2014	T. COOK	EDIT VOIR DIRE	1.0	380.00	\$380.00			
11-28-2014	T. COOK	EDIT AND DIRECT CORRECTIONS FOR VERDICT FORMS	0.2	380.00	\$76.00			
11-28-2014	J. BLAIR	EMAIL COMMUNICATIONS WITH T. COOK AND CAP'S ATTORNEY REGARDING JOINT PRETRIAL MATERIALS	0.3	380.00	\$114.00			
11-29-2014	T. COOK	STUDY DEFENDANT'S SIXTH SUPPLEMENTAL DISCLOSURE STATEMENT WITH ATTACHMENTS	0.3	380.00	\$114.00			
11-29-2014	J. BLAIR	REVIEW EMAIL COMMUNICATIONS REGARDING PRETRIAL MATERIALS	0.2	380.00	\$76.00	Duplicative of 11/28/14 entry	Attorney Blair's .2 time entry to study email communications relating to the pretrial materials is not duplicative of any other entry. It is supplemental.	
11-30-2014	J. BLAIR	REVIEW EMAIL EXCHANGE REGARDING JOINT PRETRIAL FILINGS	0.2	380.00	\$76.00	Duplicative of above	Attorney Blair's .2 time entry to study a separate email exchange between the parties relating to the joint pretrial statement is not duplicative of any other time entry.	
12-01-2014	L. SIMONINI	CONFERENCE CALL ATTORNEYS COOK, BLAIR AND CAP ATTORNEYS REGARDING JOINT PRETRIAL FILINGS	1.8	170.00	\$306.00	Excessive	Paralegal Simonini's 1.8 time entry for an extended conference call with Attorneys Cook and Blair and the CAP attorneys regarding the joint pretrial filing is not excessive. Paralegal Simonini was instrumental in the joint pretrial effort and critical to the discussion with opposing counsel.	
12-01-2014	L. SIMONINI	ASSIST WITH PREPARATION AND FINALIZATION OF JOINT PRETRIAL STATEMENT	2.2	170.00	\$374.00			
12-01-2014	L. SIMONINI	ASSIST WITH PREPARATION AND FINALIZATION OF JOINT PROPOSED JURY INSTRUCTIONS	1.6	170.00	\$272.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-01-2014	L. SIMONINI	DRAFT VERDICT FORMS	0.6	170.00	\$102.00	Duplicative of T. Cook entry on 11/28/14	Paralegal Simonini's .6 time entry to draft a verdict form is not duplicative, but supplemental to a time entry by Attorney Cook. Paralegal Simonini's instruction was to prepare a verdict form in light of the discussions with opposing counsel.	
12-01-2014	L. SIMONINI	ASSIST WITH PREPARATION AND FINALIZATION OF STIPULATED-TO DESCRIPTION OF CASE	0.4	170.00	\$68.00			
12-01-2014	L. SIMONINI	ASSIST WITH PREPARATION AND FINALIZATION OF JOINT PROPOSED VOIR DIRE	1.2	170.00	\$204.00			
12-01-2014	L. SIMONINI	DRAFT THREE E-MAILS TO CAP ATTORNEY REGARDING JOINT PRETRIAL STATEMENT AND ASSOCIATED FILINGS	0.3	170.00	\$51.00	Excessive billing for email exchange	Paralegal Simonini's .3 time entry to draft 3 emails to CAP's counsel is not excessive billing. This is .1 per email.	
12-01-2014	L. SIMONINI	STUDY NINE E-MAILS FROM CAP ATTORNEY REGARDING JOINT PRETRIAL STATEMENT AND ASSOCIATED FILINGS	0.6	170.00	\$102.00	Excess billing for email exchange	Paralegal Simonini's .6 time entry to review 9 emails from CAP's counsel is not excessive billing. That is less than .1 billing per email reviewed.	
12-01-2014	L. SIMONINI	CONTINUE DRAFTING CONTENTIONS TO BE INCLUDED IN JOINT PRETRIAL STATEMENT	1.2	170.00	\$204.00			
12-01-2014	J. BLAIR	MAKE REVISIONS TO JOINT PRETRIAL STATEMENT, INSTRUCTIONS	2.8	380.00	\$1,064.00	Duplicative of T. Cook entry on 12/1/14	Attorney Blair's 2.8 time entry to revise the joint pretrial statement and related instructions is not duplicative of any time entry by Attorney Cook. It is a split of effort by Plaintiff Gressett's attorneys.	
12-01-2014	T. COOK	WORK ON EDITS AND FINAL OF ALL PRE-TRIAL FILES DUE TO THE COURT	8.6	380.00	\$3,268.00			
12-02-2014	L. SIMONINI	STUDY FINAL JOINT PRE TRIAL ORDER TO IDENTIFY ISSUES TO BE ADDRESSED AT PRETRIAL CONFERENCE	1.2	170.00	\$204.00	Excessive	Paralegal Simonini's 1.2 time entry to review the final joint pretrial order to identify issues to be addressed at the pretrial conference is not excessive. It is what the paralegal was assigned to do in light of the communications between counsel and the upcoming pretrial conference.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-02-2014	L. SIMONINI	INTERNET RESEARCH REGARDING CLIENT TO IDENTIFY POTENTIAL CROSS EXAMINATION MATERIALS	2.3	170.00	\$391.00	Vague, excessive	Paralegal Simonini's 2.3 time entry describes an assignment sheet given to identify potential cross-examination materials that CAP's counsel could use against Plaintiff Gressett. It is neither vague nor excessive, but critical for trial presentation.	
12-02-2014	J. BLAIR	STUDY CAP'S VERDICT FORM AND ARGUMENTS MADE IN JOINT PRETRIAL STATEMENT	1.1	380.00	\$418.00			
12-03-2014	L. SIMONINI	PREPARE COLLECTION OF CAP TRIAL EXHIBITS FOR ATTORNEY USE AT PRETRIAL CONFERENCE	1.7	170.00	\$289.00			
12-03-2014	L. SIMONINI	PREPARE COLLECTION OF CLIENT'S TRIAL EXHIBITS FOR ATTORNEY USE AT PRETRIAL CONFERENCE	1.8	170.00	\$306.00			
12-03-2014	L. SIMONINI	UPDATE DEPOSITION NOTEBOOKS FOR ATTORNEY USE IN PREPARING FOR PRETRIAL CONFERENCE	2.7	170.00	\$459.00			
12-03-2014	J. BLAIR	ANALYZE ISSUES RAISED BY CAP'S CONTENTIONS IN THE JOINT PRETRIAL STATEMENT	0.3	380.00	\$114.00			
12-04-2014	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
12-04-2014	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Plaintiff Gressett is not excessive billing.	
12-04-2014	L. SIMONINI	ADDRESS ISSUES REGARDING PRETRIAL CONFERENCE	1.3	170.00	\$221.00	Vague	Paralegal Simonini's 1.3 time entry to review issues in anticipation of the pretrial conference is not vague. It is an assignment paralegals would routinely be given at this stage of litigation.	
12-04-2014	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS FOR ATTORNEY USE AT FINAL PRETRIAL CONFERENCE	3.6	170.00	\$612.00	Duplicative of L. Simonini 12/3/14 entries, excessive	Paralegal Simonini's 3.6 time entry to pull and prepare materials for attorneys at the final pretrial conference is not duplicative of any other work by Paralegal Simonini. It is a continuation of that work. It is also not excessive, but necessary.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-04-2014	L. SIMONINI	INTERNET RESEARCH TO IDENTIFY INFORMATION REGARDING WITNESS CRANE	0.5	170.00	\$85.00			
12-05-2014	L. SIMONINI	STUDY LUDKE AND RUZICH DEPOSITIONS TO IDENTIFY TESTIMONY REGARDING TERMINATION COMMITTEE	3.4	170.00	\$578.00	Excessive, duplicative	Paralegal Simonini's 3.4 time entry to review the Ludke and Ruzich depositions for their testimony relating to the termination committee is neither excessive nor duplicative. This was an assignment for Paralegal Simonini to pull together CAP's human resource testimony relating to plaintiff Gressett's termination, which was critical to the case.	
12-05-2014	J. BLAIR	STUDY JOINT PRETRIAL MATERIALS AND PREPARE SUMMARY FOR MONDAY CONFERENCE	2.1	380.00	\$798.00			
12-08-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY BLAIR, ATTORNEY COOK AND CLIENT [Privileged Communication]	3.6	170.00	\$612.00	Duplicative of T. Cook 12/8/14 entry	Paralegal Simonini's 3.6 time entry for a conference with attorneys Blair and Cook and plaintiff Gressett is not duplicative of a time entry by Attorney Cook. This was another stage in the proceeding, just prior to the pretrial conference where the attorneys and plaintiff Gressett reviewed their case and the presentation of that case.	
12-08-2014	L. SIMONINI	STUDY DEPOSITIONS OF MODEER, COOK AND DELGADO TO IDENTIFY TESTIMONY WHEREIN CAP INSTRUCTED WITNESSES NOT TO RESPOND REGARDING TERMINATION COMMITTEE	3.9	170.00	\$663.00			
12-08-2014	T. COOK	MEET AND CONFER WITH CLIENT AND TRIAL TEAM [Privileged Communication]	3.6	380.00	\$1,368.00			
12-08-2014	J. BLAIR	REVIEW PRETRIAL NOTES FOR TELEPHONE CALL WITH A. GRESSETT TODAY	0.2	380.00	\$76.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-08-2014	J. BLAIR	PORTION OF EXTENDED TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	2.9	380.00	\$1,102.00	Excessive, duplicative of T. Cook 12/8/14 entry	Attorney Blair's 2.9 time entry for the pretrial phone conference between attorneys and plaintiff Gressett prior to the hearing before the judge is not excessive or duplicative, but critically necessary at this stage of the proceeding. Attorney Blair billed for his portion of that extended conference.	
12-09-2014	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS TO SUPPORT MOTIONS IN LIMINE FOR ATTORNEY USE AT FINAL PRETRIAL CONFERENCE	2.1	170.00	\$357.00	Duplicative of 12/4/14 entry	Paralegal Simonini's 2.1 time entry to pull materials supporting the motions in limine for use at the final pretrial conference is not duplicative of any earlier effort by Paralegal Simonini. It is what she did just prior to the conference.	
12-09-2014	L. SIMONINI	ADDRESS ISSUES REGARDING DOCUMENTS SUPPORTING PURPORTED FAILURE TO MITIGATE	2.7	170.00	\$459.00	Vague	Paralegal Simonini's 2.7 time entry to pull materials relating to CAP's defense that plaintiff Gressett failed to mitigate her damages for review prior to the joint pretrial statement is not vague.	
12-09-2014	L. SIMONINI	STUDY CLIENT'S DEPOSITION TO ADDRESS TESTIMONY REGARDING MITIGATION	3.1	170.00	\$527.00	Excessive, duplicative	Paralegal Simonini's 3.1 time entry to review plaintiff Gressett's deposition transcript on the mitigation issue is neither excessive nor duplicative. It was anticipated this would be CAP's key defense against plaintiff Gressett.	
12-09-2014	J. KLECAN	STRATEGY CONFERENCE WITH ATTORNEY COOK REGARDING JURY VS NON-JURY	1.0	380.00	\$380.00	Internal Conference	Attorney Klecan's 1.0 time entry to discuss with Attorney Cook whether the case should be heard by a jury or not is not an internal conference. No one else billed for that time.	
12-09-2014	T. COOK	ASSESS STRENGTH OF CASE BEFORE JURY VS JUDGE TO AID WITH DECISION ON HOW BEST TO PROCEED	1.6	380.00	\$608.00	Internal Conference	Attorney Cook's 1.6 time entry to analyze whether the case was better presented to a jury or a judge is not an internal conference. It is an analysis separate from her discussion with attorney Klecan.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-09-2014	J. BLAIR	STUDY CASES CITED BY CAP FOR MITIGATION ISSUE	1.1	380.00	\$418.00			
12-09-2014	J. BLAIR	RESEARCH MITIGATION ISSUE IN NINTH CIRCUIT, PULL AND REVIEW PORTION OF KEY CASES	1.3	380.00	\$494.00			
12-10-2014	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL MATERIALS FOR ATTORNEY USE AT FINAL PRETRIAL CONFERENCE	3.1	170.00	\$527.00	Excessive, duplicative of L. Simonini 12/9/14 entry	Paralegal Simonini's 3.1 time entry to identify and pull additional materials for use at the final pretrial conference is neither excessive nor duplicative. It was an assignment given to her just prior to the conference.	
12-10-2014	L. SIMONINI	ADDRESS ISSUES REGARDING WITNESS RORY CRANE AND POTENTIAL ISSUES WITH HIS TESTIMONY	0.3	170.00	\$51.00	Vague	Paralegal Simonini's .3 time entry to aid in the decision whether Rory Crane would testify is not vague.	
12-10-2014	L. SIMONINI	ADDRESS ISSUES REGARDING TRIAL WITNESSES THAT HAVE NOT BEEN DISCLOSED	0.3	170.00	\$51.00	Vague	Paralegal Simonini's .3 time entry to identify for the trial attorneys whether all potential witnesses were disclosed by the parties is not vague.	
12-10-2014	L. SIMONINI	STUDY DISCLOSURE DOCUMENTS TO IDENTIFY RECORDS NEEDED FOR DAMAGES ANALYSIS	1.3	170.00	\$221.00			
12-10-2014	L. SIMONINI	STUDY TRIAL EXHIBITS TO IDENTIFY DOCUMENTS WHICH MAY SUPPORT RUSS HERD TESTIMONY REGARDING CLIENT'S PERFORMANCE	1.0	170.00	\$170.00	Excessive	Paralegal Simonini's 1.0 time entry to pull and identify documents which would be used if Russ Herd testified is not excessive. Mr. Herd was a potential witness for the December 28 and December 29 Gressett absences.	
12-10-2014	T. COOK	NOTES TO FILE ON THEORY TO EXPLORE BEHIND FINAL CHOICE OF BENCH VS JURY	0.3	380.00	\$114.00	Internal Conference	Attorney Cook's .3 time entry to prepare a note regarding whether this matter should be a bench or jury trial is not an internal conference. No one else billed for that time.	
12-10-2014	J. KLECAN	CONFERENCE WITH ATTORNEY BLAIR REGARDING TRIAL, JURY, STRATEGY, CLIENT INVOLVEMENT	1.5	380.00	\$570.00	Internal Conference	Attorney Klecan's 1.5 time entry to strategize with Attorney Blair about the trial presentation and Plaintiff Gressett's involvement in that presentation is not an internal conference. No one else billed for this time.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-10-2014	J. BLAIR	STUDY CASE LAW ADDRESSING MITIGATION OF DAMAGES, EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	1.5	380.00	\$456.00	Block Billing	First time entry (1.3); second time entry (.2).	Block billing; reduced by 20%.
12-10-2014	J. BLAIR	STUDY GRESSETT'S DEPOSITION TESTIMONY REGARDING MITIGATION	0.7	380.00	\$266.00			
12-11-2014	L. SIMONINI	ADDRESS ISSUES REGARDING DEFENDANT'S REQUIREMENT TO PROVE FAILURE TO MITIGATE DAMAGES	3.2	170.00	\$544.00	Vague, excessive	Paralegal Simonini's 3.2 time entry to determine whether, and to what extent, CAP had the burden to establish plaintiff Gressett's failure to mitigate is neither vague nor excessive.	
12-11-2014	L. SIMONINI	BEGIN STUDY OF DISCLOSURE RECORDS TO IDENTIFY THOSE THAT DEFENDANT MAY USE TO PROVE FAILURE TO MITIGATE DAMAGES	2.9	170.00	\$493.00	Excessive, duplicative of J. Blair on 12/11/14	Paralegal Simonini's 2.9 time entry to review the disclosed records to identify those that CAP could use to establish failure to mitigate is neither excessive nor duplicative of any effort by Attorney Blair on that score. See time entry below.	
12-11-2014	L. SIMONINI	STUDY CAP DOCUMENTS TO IDENTIFY THOSE THAT MAY BE USED FOR CROSS-EXAMINATION	1.7	170.00	\$289.00			
12-11-2014	J. BLAIR	REVIEW CAP'S EXHIBITS, CLIP THOSE HELPFUL TO THE MITIGATION ISSUE	1.2	380.00	\$456.00			
12-12-2014	L. SIMONINI	IDENTIFY MOTION IN LIMINE MATERIALS FOR ATTORNEY USE AT FINAL PRETRIAL CONFERENCE	1.1	170.00	\$187.00	Duplicative of entry on 12/9/14	Paralegal Simonini's 1.1 time entry to segregate motion in limine materials for attorney use at the final pretrial conference is not duplicative of any prior time entry. This effort was specifically for the conference.	
12-12-2014	L. SIMONINI	WESTLAW RESEARCH TO IDENTIFY ALL CASELAW CITED IN MOTIONS IN LIMINE FOR ATTORNEY USE IN PREPARING FOR FINAL PRETRIAL CONFERENCE	2.3	170.00	\$391.00	Excessive, duplicative of 10/16/14, 10/17/14, 10/20/14, 11/10/14, 11/12/14, 11/13/14 and 12/9/14 entries	Paralegal Simonini's 2.3 time entry to pull research related to the motions in limine is neither excessive nor duplicative. This was an assignment specifically given to Paralegal Simonini for the final pretrial conference, and is not duplicative of the earlier assignment months prior.	
12-15-2014	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL DOCUMENTS FOR USE AT FINAL PRETRIAL CONFERENCE	0.6	170.00	\$102.00			
12-15-2014	J. BLAIR	STUDY JOINT PRETRIAL AND MOTIONS IN LIMINE	1.1	380.00	\$418.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-16-2014	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL MATERIALS FOR ATTORNEY USE AT FINAL PRETRIAL CONFERENCE	1.2	170.00	\$204.00	Duplicative of L. Simonini 12/15/14 entry	Paralegal Simonini's 1.2 time entry to assist the attorney by identifying and pulling additional material for the final pretrial conference is not duplicative of efforts, but a continuation of those efforts.	
12-16-2014	L. SIMONINI	STUDY CAP'S TRIAL EXHIBITS TO IDENTIFY DOCUMENTS THEY MAY USE REGARDING MITIGATION OF DAMAGES	5.7	170.00	\$969.00	Duplicative of J. Blair entry on 12/11/14, Excessive	Paralegal Simonini's 5.7 time entry to identify CAP's trial exhibits on the mitigation issue is not duplicative of Attorney Blair's entry five days earlier, but supplemental to those efforts. It is also not excessive, but critical to this case.	
12-16-2014	J. BLAIR	REVIEW JOINT PRETRIAL ORDER AND FILINGS IN ADVANCE OF HEARING IN THE MORNING BEFORE JUDGE TEILBORG	1.2	380.00	\$456.00			
12-16-2014	T. COOK	BEGIN STUDY OF MOTIONS IN LIMINE, REPLIES AND SUPPORTING CASE LAW IN PREPARATION FOR FINAL PRE-TRIAL CONFERENCE	1.5	380.00	\$570.00			
12-17-2014	L. SIMONINI	ATTEND FINAL PRETRIAL CONFERENCE	1.0	170.00	\$170.00	Duplicative of attorney's attendance	Paralegal Simonini's 1.0 time entry to attend the final pretrial conference is not duplicative. The paralegal role is critical to the pretrial and subsequent trial.	
12-17-2014	L. SIMONINI	CONFERENCE WITH ATTORNEY COOK AND ATTORNEY BLAIR REGARDING FINAL PRETRIAL CONFERENCE AND ISSUES TO BE PRESENTED AT TRIAL	1.6	170.00	\$272.00	Internal Conference	Paralegal Simonini's 1.6 time entry to meet with Attorneys Cook and Blair to review what needed to be presented at trial after the final pretrial conference is not an internal conference. It is a key opportunity to get the litigation team on one page, immediately after the pretrial conference. This conference, like the others involving members of the litigation team was approved by Plaintiff Gressett.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-17-2014	L. SIMONINI	BEGIN STUDY OF TRIAL EXHIBITS TO IDENTIFY DOCUMENTS SUPPORTING TIMELINE IN LIGHT OF JUDGE OPENING CASE FACTS	4.8	170.00	\$816.00	Excessive, vague	Paralegal Simonini's 4.8 time entry to identify exhibits key to the litigation timeline is neither excessive nor vague. This assignment came directly from Judge Tielborg's statements during the final pretrial conference.	
12-17-2014	T. COOK	FINAL PREPARATIONS FOR FINAL PRETRIAL CONFERENCE	3.0	380.00	\$1,140.00			
12-17-2014	T. COOK	ATTEND FINAL PRETRIAL CONFERENCE	1.0	380.00	\$380.00			
12-17-2014	T. COOK	STUDY COURT'S MINUTE ENTRY REGARDING FINAL PRETRIAL CONFERENCE	0.2	380.00	\$76.00			
12-17-2014	J. BLAIR	REVIEW JOINT PRETRIAL NOTEBOOK BEFORE HEARING	0.2	380.00	\$76.00			
12-17-2014	J. BLAIR	HEARING BEFORE JUDGE TEILBORG REGARDING PENDING MOTIONS AND SETTING TRIAL DATE FOR 3/23/15	1.0	380.00	\$380.00	Duplicative of attorney's attendance	Attorney Blair's 1.0 time entry to attend the pretrial conference. It is not duplicative of Attorney Cook's time entry for that conference. It is critical that the trial attorneys and their paralegal, i.e., the litigation team, be present and understand the final pretrial conference rulings. Plaintiff Gressett approved the separate billings for this 1.0 time entry.	
12-17-2014	J. BLAIR	PLAN LITIGATION GOING FORWARD, WITH T. COOK AND L. SIMONINI	0.8	380.00	\$304.00	Internal Conference	Attorney Blair's .8 time entry to plan the litigation going forward after the final pretrial conference with Attorney Cook and Paralegal Simonini is not an internal conference. As noted above, this is one of the key moments in trial preparation when the entire litigation team should be present and aware of the rulings.	
12-17-2014	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.1	380.00	\$38.00			
12-17-2014	J. BLAIR	REVIEW COURT ORDERS FROM HEARING THIS AM	0.1	380.00	\$38.00	Duplicative of T. Cook 12/17/14 entry	Attorney Blair's .1 time entry to review Court rulings from earlier in the day is not duplicative of Attorney Cook's review. Both attorneys needed to understand the Court's rulings.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-17-2014	J. BLAIR	CONFIRM OFFER OF JUDGMENT NOT AVAILABLE TO PLAINTIFF IN FEDERAL COURT	0.3	380.00	\$114.00	Vague	Attorney Blair's .3 time entry to review whether an offer of judgment would be appropriate from a plaintiff in a federal court proceeding is not vague. (It is not available).	
12-18-2014	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE ADVISING OF TRIAL DATE	0.1	170.00	\$17.00	Duplicative of J. Blair entry on 12/18/14	Paralegal Simonini's .1 time entry to prepare an email to Expert McRae is not duplicative of any time entry by Attorney Blair. The email was separately sent, whereas Attorney Blair contacted the experts himself.	
12-18-2014	L. SIMONINI	DRAFT E-MAIL TO EXPERT BJORKLUND ADVISING OF TRIAL DATE	0.1	170.00	\$17.00	Duplicative of J. Blair entry on 12/18/14	Paralegal Simonini's .1 time entry to send an email to Expert Bjorklund is not duplicative of any other time entry. See above.	
12-18-2014	L. SIMONINI	STUDY TRIAL EXHIBITS TO IDENTIFY DOCUMENTS SUPPORTING TIMELINE IN LIGHT OF JUDGE OPENING CASE FACTS	4.1	170.00	\$697.00	Duplicative of 12/17/14 entry, excessive, vague	Paralegal Simonini's 4.1 time entry to review the trial exhibits and update the litigation timeline after Judge Tielborg's rulings at the final pretrial is not duplicative of Paralegal Simonini's earlier efforts, but supplements them. The litigation team was aware after the final pretrial conference that the case presentation would be substantially greater than the team anticipated before the conference.	
12-18-2014	J. BLAIR	NOTIFY EXPERTS OF TRIAL DATES, CONFIRM AVAILABILITY	0.2	380.00	\$76.00			
12-18-2014	J. BLAIR	CONSIDER PRETRIAL OPTIONS FOR ADVISING THE COURT OF THE LIMITED ISSUES TO BE TRIED	0.4	380.00	\$152.00	Vague	Attorney Blair's .4 time entry to investigate options for filings with the court to revisit the idea of a limited trial presentation is not vague. As noted above, this was a key matter for trial after Plaintiff Gressett's position that only a limited case should be tried was rejected by the Court.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-19-2014	L. SIMONINI	CONTINUE STUDY OF TRIAL EXHIBITS TO IDENTIFY PERTINENT TIMELINE DOCUMENTS	2.8	170.00	\$476.00	Duplicative of 12/14/17 entry, excessive	Paralegal Simonini's 2.8 time entry to identify pertinent timeline documents is not duplicative of earlier time entries or excessive, it is a continuation of the tasks assigned to her after the final pretrial conference.	
12-19-2014	J. BLAIR	PULL AND REVIEW CASELAW REGARDING DAMAGES, PRETEXT	0.5	380.00	\$190.00	Duplicative of T. Cook entry on 12/19/14	Attorney Blair's .5 time entry to review case law relating to the issues of damages and pretext is not duplicative of any time entry by Attorney Cook, but supplements any such time entries.	
12-19-2014	T. COOK	STUDY CASE LAW AND STATUTES REGARDING FMLA CLAIMS, DAMAGES, DEFENSES, REBUTTALS	3.1	380.00	\$1,178.00	Duplicative of 6/10/13, 6/28/13, 8/8/13, 8/30/13, 1/27/14, 10/2/14, 10/24/14, 12/10/14, and 12/16/14 entries	Attorney Cook's 3.1 time entry to review case law and statutes relating to FMLA claims, damages, defenses and rebuttals is not duplicative of her earlier efforts. There was now a clarity as to how the case would be presented after the final pretrial conference.	
12-22-2014	L. SIMONINI	STUDY DELGADO TRANSCRIPT TO IDENTIFY ISSUES REGARDING MITIGATION	2.6	170.00	\$442.00	Excessive	Paralegal Simonini's 2.6 time entry to study the Delgado transcript relating to mitigation issues is not excessive. It is a logical paralegal task, and this was the time necessary to perform that task.	
12-22-2014	L. SIMONINI	STUDY CAP'S JURY INSTRUCTIONS TO IDENTIFY ISSUES WITH SAME REGARDING MITIGATION	1.3	170.00	\$221.00	Excessive, only 1 instruction on mitigation	Paralegal Simonini's 1.3 time entry to address CAP's jury instruction regarding mitigation is not excessive. While there was a single mitigation instruction, it was not a form instruction and Paralegal Simonini was tasked to see what, if any, support there was for CAP's proposed instruction.	
12-22-2014	J. BLAIR	STUDY CASELAW REGARDING LIQUIDATED DAMAGES, BURDEN AND PROOF REQUIREMENTS	0.8	380.00	\$304.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
12-23-2014	L. SIMONINI	STUDY DEPOSITION OF LUDKE TO ADDRESS ISSUES REGARDING CLIENT'S MITIGATION DAMAGES	2.7	170.00	\$459.00	Excessive	Paralegal Simonini's 2.7 time entry to review the Ludke deposition as it relates to mitigation, is not excessive. Mitigation became a key issue at trial.	
12-23-2014	L. SIMONINI	STUDY DEPOSITION OF CLIENT TO IDENTIFY ISSUES REGARDING CLIENT'S MITIGATION DAMAGES	3.1	170.00	\$527.00	Excessive	Paralegal Simonini's 3.1 time entry to review the Gressett deposition as it relates to the mitigation issue is not excessive, but key to an issue in the case.	
12-28-2014	T. COOK	STUDY AND HIGHLIGHT KEY PROVISIONS FROM COURT'S FINAL PRE-TRIAL MINUTE ENTRY	0.1	380.00	\$38.00			
01-05-2015	L. SIMONINI	PULL CASE LAW REQUESTED BY ATTORNEYS BLAIR AND COOK FOR USE IN TRIAL MEMORANDUM	1.3	170.00	\$221.00	Vague, excessive - no trial memorandum submitted or required	Paralegal Simonini's 1.3 time entry to pull particular cases sought by Attorneys Blair and Cook for use in a trial memorandum is neither vague nor excessive. Plaintiff Gressett's litigation team prepared a trial memorandum in anticipation of seeking a directed verdict at the end of trial. It was argued by Attorney Blair at the end of trial.	
01-05-2015	L. SIMONINI	STUDY CAP'S VOLUMINOUS DISCOVERY RESPONSES TO IDENTIFY ITEMS TO BE INCLUDED IN TIMELINE	5.8	170.00	\$986.00	Excessive, Duplicative of entries on 7/23/13, 12/4/13, 12/17/14, and 12/19/14	Paralegal Simonini's 5.8 time entry to update the timeline by reviewing CAP's discovery responses is neither excessive nor duplicative, but supplemental.	
01-06-2015	L. SIMONINI	CONTINUE STUDY OF CAP'S VOLUMINOUS DISCOVERY RESPONSES TO IDENTIFY ITEMS TO BE INCLUDED IN TIMELINE	5.2	170.00	\$884.00	Excessive, Duplicative of entries on 7/23/13, 12/4/13, 12/17/14, and 12/19/14	Paralegal Simonini's 5.2 time entry to continue to review CAP's discovery responses to update the litigation timeline is, as she says, supplemental, neither excessive nor duplicative.	
01-06-2015	J. BLAIR	STUDY FMLA PUBLICATION SENT OVER THROUGH A. GRESSETT	0.5	380.00	\$190.00	Background research, duplicative of 10/16/14 entry	Attorney Blair's .5 time entry to review FMLA materials from Plaintiff Gressett is not background research or duplicative of any other time entry. When Plaintiff Gressett provided materials to her attorneys, they reviewed them for use at trial.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-07-2015	L. SIMONINI	STUDY M. COOK DEPOSITION TRANSCRIPT TO IDENTIFY TESTIMONY TO BE INCORPORATED INTO TIMELINE	1.7	170.00	\$289.00			
01-07-2015	L. SIMONINI	DRAFT SUMMARY OF M. COOK DEPOSITION	1.4	170.00	\$238.00			
01-07-2015	J. BLAIR	STUDY RECENT CASES ADDRESSING NOTICE OF FMLA LEAVE	0.5	380.00	\$190.00	Background research	Attorney Blair's .5 time entry to review recent cases relating to the notice issue is not background research, but key to issues in this case.	
01-08-2015	L. SIMONINI	STUDY PLAINTIFF TRIAL EXHIBITS TO IDENTIFY DOCUMENTS TO BE INCORPORATED INTO TIME LINE	3.1	170.00	\$527.00	Excessive	Paralegal Simonini's 3.1 time entry to identify trial exhibits to be included in the litigation timeline is not excessive, but supplemental as noted above.	
01-08-2015	L. SIMONINI	STUDY CAP'S TRIAL EXHIBITS TO IDENTIFY DOCUMENTS TO BE INCORPORATED INTO TIMELINE	2.7	170.00	\$459.00	Duplicative of 1/5/15 entry	Paralegal Simonini's 2.7 time entry to review CAP's trial exhibits for inclusion in a litigation timeline is not duplicative of any other time entry, but supplemental.	
01-08-2015	L. SIMONINI	STUDY DEPOSITION EXHIBITS TO IDENTIFY RECORDS TO BE INCORPORATED INTO TIMELINE	2.4	170.00	\$408.00	Duplicative of 12/19/13 entry	Paralegal Simonini's 2.4 time entry to review deposition exhibits for materials to be incorporated into the litigation timeline is not duplicative of any other time entry, but supplemental.	
01-08-2015	J. BLAIR	STUDY RECENT DECISION REGARDING ATTORNEYS FEES IN CIVIL RIGHTS ACTION	0.6	380.00	\$228.00	Unnecessary - this matter was not a civil rights action.	Attorney Blair's .6 time entry to review a recent decision regarding the availability of attorney's fees was relevant to this case. The reference to a civil rights action is a misstatement by Attorney Blair. He was reviewing cases arising out of the FMLA.	
01-09-2015	L. SIMONINI	STUDY GRESSETT'S DEPOSITION TO IDENTIFY TESTIMONY TO BE INCLUDED IN TIME LINE	3.7	170.00	\$629.00	Excessive, duplicative of 7/25/13, 1/8/14, 1/10/14, 1/17/14, 2/28/14, 10/24/14, and 1/8/15 entries	Paralegal Simonini's 3.7 time entry to review plaintiff Gressett's deposition for testimony to be included in the litigation timeline is not excessive or duplicative of prior efforts, but supplemental.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-09-2015	L. SIMONINI	CONTINUE STUDY OF TRIAL EXHIBITS TO IDENTIFY DOCUMENTS TO BE INCORPORATED INTO TIME LINE	2.3	170.00	\$391.00	Excessive, duplicative of 1/8/15 entry	Paralegal Simonini's 2.3 time entry to "continue" her review of trial exhibits for inclusion in the litigation timeline is neither excessive nor duplicative, but supplemental.	
01-10-2015	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF C. ELDRIDGE AND NOTE TESTIMONY TO BE INCLUDED IN TIME LINE	1.9	170.00	\$323.00			
01-12-2015	L. SIMONINI	STUDY GRESSETT'S ASU RECORDS DISCLOSED BY CAP	2.3	170.00	\$391.00	Excessive - records consist of only 51 pages	Paralegal Simonini's 2.3 time entry to review the ASU records related to plaintiff Gressett's degree is not excessive. It was the time necessary for Paralegal Simonini to review those materials and report them to the attorneys she worked with.	
01-12-2015	L. SIMONINI	RESEARCH TO IDENTIFY AND CRIMINAL CASES OR CIVIL LITIGATION FOR WITNESS D. MODEER	1.3	170.00	\$221.00	Excessive	Paralegal Simonini's 1.3 time entry to identify any litigation associated with witness Modeer is not excessive. It was key to the preparation for trial.	
01-12-2015	L. SIMONINI	RESEARCH TO IDENTIFY AND CRIMINAL CASES OR CIVIL LITIGATION FOR WITNESS M. COOK	1.7	170.00	\$289.00	Excessive	Paralegal Simonini's 1.7 time entry to identify any litigation associated with witness Mike Cook is not excessive, but key to the preparation for trial.	
01-12-2015	L. SIMONINI	RESEARCH TO IDENTIFY AND CRIMINAL CASES OR CIVIL LITIGATION FOR WITNESS T. DELGADO	0.8	170.00	\$136.00			
01-12-2015	L. SIMONINI	RESEARCH TO IDENTIFY CRIMINAL CASES OR CIVIL LITIGATION FOR WITNESS K. GROUSE	1.7	170.00	\$289.00	Excessive	Paralegal Simonini's 1.7 time entry to determine whether Attorney Grouse is identified in other litigation was not excessive. It was not known at that point whether Attorney Grouse would testify.	
01-13-2015	L. SIMONINI	STUDY GRESSETT'S PAY RECORDS FROM CAP'S PAYROLL SYSTEM TO IDENTIFY ITEMS TO BE INCLUDED IN TIME LINE	2.7	170.00	\$459.00	Excessive	Paralegal Simonini's 2.7 time entry to review Gressett pay records and update the litigation timeline is not excessive, but supplemental.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-14-2015	L. SIMONINI	STUDY GRESSETT'S E-MAIL FILE DISCLOSED BY CAP TO IDENTIFY CROSS EXAMINATION MATERIALS TO BE USED FOR WITNESS PREPARATION	2.7	170.00	\$459.00	Duplicative of 8/5/13, 11/15/13, and 1/22/14 entries	Paralegal Simonini's 2.7 time entry to review the Gressett email file in advance of Gressett witness preparation is not duplicative of other efforts. Paralegal Simonini's assignment was to determine what, if any, cross-examination materials might be in those files (the motion in limine relating to this issue had been denied.)	
01-14-2015	L. SIMONINI	STUDY RECORDS FROM GRESSETT'S FORMER EMPLOYERS FOR ITEMS TO BE INCLUDED IN TIME LINE	2.1	170.00	\$357.00			
01-15-2015	L. SIMONINI	STUDY GRESSETT'S DEPARTMENT OF LABOR FILE DISCLOSED BY CAP TO IDENTIFY RECORDS TO BE CITED IN TIME LINE	1.4	170.00	\$238.00	Duplicative of 5/22/13, 7/22/13, 12/18/13, 1/22/14 and 3/25/14 entries	Paralegal Simonini's 1.4 time entry to review the DOL file for use in the litigation timeline is not duplicative of any other time entry, but supplemental.	
01-15-2015	L. SIMONINI	STUDY GRESSETT'S PERSONNEL FILE TO IDENTIFY ITEMS TO BE CITED IN TIME LIME	3.6	170.00	\$612.00	Duplicative of 7/25/13 entry	Paralegal Simonini's 3.6 time entry to incorporate the Gressett personnel file into the litigation timeline is not duplicative of any other time entry, but supplemental.	
01-15-2015	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
01-15-2015	J. BLAIR	OUTLINE TRIAL BRIEF TO ADVISE JUDGE TEILBORG OF REMAINING ISSUES	0.3	380.00	\$114.00			
01-16-2015	L. SIMONINI	STUDY DEPARTMENT OF ECONOMIC SECURITY FILE DISCLOSED BY CAP TO IDENTIFY RECORDS TO BE INCLUDED IN TIME LINE	1.7	170.00	\$289.00	Duplicative - repeatedly "studied" file throughout case	Paralegal Simonini's 1.7 time entry to incorporate the DES file materials into the litigation timeline is not duplicative. (The word "study" is not key to this analysis, but the assignment itself.)	
01-16-2015	J. BLAIR	ADDRESS HOW TO PREPARE FOR TRIAL GIVEN THE DENIAL OF MOTION TO RESET OTHER MATTER	0.3	380.00	\$114.00	Excessive, internal conference	Attorney Blair's .3 time entry represents his analysis of whether the trial can be efficiently prepared given the other matter involving Attorney Cook remaining on calendar. It is neither excessive nor an internal conference. No one else billed for this evaluation.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-16-2015	J. BLAIR	STUDY FMLA NOTICE REGULATIONS, COMPARE CHANGES OVER THE PAST 5 YEARS	1.2	380.00	\$456.00			
01-20-2015	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF T. DELGADO TO IDENTIFY TESTIMONY TO BE INCLUDED IN TIMELINE	2.3	170.00	\$391.00	Excessive, duplicative of 8/16/13, 8/19/13, 8/21/13, 9/3/13, 2/26/14, 3/6/14, 3/27/14, 9/14/14, 9/25/14, 10/3/14, 11/25/14, 12/8/14, 12/22/14, and 1/12/15 entries	Paralegal Simonini's 2.3 time entry to review the Delgado deposition for inclusion of testimony in the litigation timeline is neither excessive, nor duplicative, but supplemental.	
01-20-2015	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF D. SIGMON TO IDENTIFY TESTIMONY FOR TIMELINE	1.5	170.00	\$255.00			
01-20-2015	L. SIMONINI	STUDY TRANSCRIPT OF DEPOSITION OF D. MODEER TO IDENTIFY ISSUES FOR TIMELINE	2.4	170.00	\$408.00	Excessive, duplicative of 9/23/14 and 12/8/14 entries	Paralegal Simonini's 2.4 time entry to review the Modeer deposition for inclusion of issues in the litigation timeline is neither excessive nor duplicative, but supplemental.	
01-20-2015	L. SIMONINI	CONTINUE DRAFTING TIME LINE TO SUPPORT TRIAL PREPARATION	1.0	170.00	\$170.00			
01-21-2015	T. COOK	STUDY EMAIL FROM DEFENDANT ATTORNEY REGARDING TRIAL STATUS	0.1	380.00	\$38.00			
01-23-2015	J. BLAIR	REVIEW EMAIL EXCHANGE WITH CAP'S ATTORNEY REGARDING PROBLEMS WITH TRIAL DATE	0.2	380.00	\$76.00			
01-26-2015	L. SIMONINI	CONTINUE STUDY OF CAP TRIAL EXHIBITS TO IDENTIFY EXHIBITS TO BE USED TO CONTRADICT MITIGATION OF DAMAGES	3.9	170.00	\$663.00	Excessive, duplicative - "studied" several times during case	Paralegal Simonini's 3.9 time entry to continue pulling CAP trial exhibits to contradict CAP's mitigation defense is neither excessive, nor duplicative, but supplemental.	
01-26-2015	L. SIMONINI	STUDY CLIENT'S TRIAL EXHIBITS TO IDENTIFY DOCUMENTS SUPPORTING MITIGATION OF DAMAGES	4.1	170.00	\$697.00	Excessive, duplicative - "studied" several times during case	Paralegal Simonini's 4.1 time entry to review plaintiff Gressett's trial exhibits to counter the mitigation defense is not excessive nor duplicative, but supplemental.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
01-27-2015	L. SIMONINI	STUDY REPORT AND SUPPLEMENTAL REPORT OF EXPERT MCRAE TO IDENTIFY TRIAL EXHIBITS TO SUPPORT TESTIMONY	1.2	170.00	\$204.00	Excessive, duplicative - "studied" several times during case	Paralegal Simonini's 1.2 time entry to review Expert McRae's report and identify trial exhibits to support her opinions is not excessive nor duplicative, but a new task (the term "study" is not key to this analysis).	
01-29-2015	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
01-30-2015	L. SIMONINI	STUDY DEPOSITION OF CLIENT AND CONTINUE PREPARATION OF TIMELINE FOR USE IN TRIAL PREP	2.7	170.00	\$459.00	Excessive, duplicative - "studied" several times during case	Paralegal Simonini's 2.7 time entry to review the Gressett deposition for updating of the litigation timeline is not excessive or duplicative, but supplemental. ("Study" is not key to this analysis.)	
01-30-2015	L. SIMONINI	STUDY CLIENT EMPLOYEE FILE FORM CAP TO IDENTIFY PERTINENT RECORDS TO BE INCORPORATED INTO TIMELINE	4.9	170.00	\$833.00	Excessive, duplicative of 7/25/13, 9/17/14 and 1/15/15 entries	Paralegal Simonini's 4.9 time entry to study CAP's Gressett employment file for inclusion in the litigation timeline is neither excessive nor duplicative of other time entries, but supplemental.	
01-30-2015	J. BLAIR	EMAIL COMMUNICATIONS WITH CAP'S ATTORNEY AND MS. GRESSETT [Privileged Communication]	0.3	380.00	\$114.00	Block Billing	Time Entry 1 (.2); Time Entry 2 (.1).	
02-02-2015	L. SIMONINI	STUDY M. COOK'S DEPOSITION TO IDENTIFY PERTINENT TESTIMONY TO BE RAISED DURING TRIAL TESTIMONY	2.8	170.00	\$476.00			
02-03-2015	L. SIMONINI	BEGIN PREPARING KEY DOCUMENTS COLLECTION FOR ATTORNEY USE AT TRIAL	3.7	170.00	\$629.00	Duplicative of 6/5/13 and 11/12/13 entries	Paralegal Simonini's 3.7 time entry to collect key documents for trial presentation is not duplicative of any other time entry, particularly those more than a year prior. The earlier time entries relate to identifying records for disclosure and pretrial, not for use at trial.	
02-03-2015	L. SIMONINI	STUDY CLIENT'S DEPOSITION TO IDENTIFY PERTINENT ISSUES TO BE DISCUSSED DURING TRIAL PREPARATION SESSIONS	2.7	170.00	\$459.00	Duplicative of entry on 1/30/15	Paralegal Simonini's 2.7 time entry to review the Gressett transcript in advance of a trial prep session with plaintiff Gressett is not duplicative of any other entry. This assignment supplements the 1/30 task.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-03-2015	J. BLAIR	CONFIRM STATUS OF TRIAL SETTING STIPULATION	0.2	380.00	\$76.00	Vague, clerical	Attorney Blair's .2 time entry to determine whether the parties were going to attempt to move the trial date is neither vague nor clerical.	
02-04-2015	L. SIMONINI	STUDY E-MAIL FROM ATTORNEY KREIGSFELD REGARDING STIPULATION	0.1	170.00	\$17.00			
02-04-2015	L. SIMONINI	DRAFT STIPULATION AND ORDER TO EXTEND TRIAL DATE	0.5	170.00	\$85.00			
02-04-2015	L. SIMONINI	DRAFT E-MAIL TO ATTORNEY KREIGSFELD REGARDING STIPULATION	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email to CAP's attorney is not excessive billing.	
02-04-2015	L. SIMONINI	STUDY SECOND E-MAIL FROM ATTORNEY KREIGSFELD REGARDING STIPULATION	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review an email from CAP's attorney is not excessive billing.	
02-04-2015	L. SIMONINI	BEGIN PREPARING FOR ELECTRONIC PRESENTATION OF TRIAL EXHIBITS	5.3	170.00	\$901.00			
02-04-2015	J. BLAIR	EMAIL EXCHANGE REGARDING STIPULATION TO EXTEND TRIAL DATES	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry reflecting an exchange of emails with CAP's attorneys regarding whether to move to extend trial dates is not excessive.	
02-04-2015	J. BLAIR	REVIEW AND APPROVE DRAFT STIPULATION	0.1	380.00	\$38.00			
02-05-2015	L. SIMONINI	PREPARE CLIENT'S TRIAL EXHIBITS WITH TRIAL BATES NUMBERS IN ADVANCE OF LOADING SAME INTO TRIAL PRESENTATION SOFTWARE	3.4	170.00	\$578.00	Duplicative of L. Simonini 2/4/15 entry	Paralegal Simonini's 3.4 time entry to prepare trial exhibits for loading into trial presentation software is not duplicative of any other time entry, but supplemental.	
02-05-2015	L. SIMONINI	STUDY E-MAIL FROM ATTORNEY KREIGSFELD REGARDING STIPULATION	0.1	170.00	\$17.00			
02-05-2015	L. SIMONINI	DRAFT E-MAIL TO ATTORNEY KREIGSFELD REGARDING STIPULATION	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email to CAP's attorney is not excessive billing.	
02-05-2015	L. SIMONINI	BEGIN PREPARING DEPOSITION TRANSCRIPTS FOR ELECTRONIC TRIAL PRESENTATION	4.3	170.00	\$731.00	Excessive	Paralegal Simonini's 4.3 time entry to load deposition transcripts for electronic presentation is not excessive but supplemental.	
02-05-2015	J. BLAIR	STUDY EMAIL EXCHANGE REGARDING TRIAL EXTENSION	0.2	380.00	\$76.00	Excessive, duplicative of L. Simonini 2/5/15 entry	Attorney Blair's .2 time entry to review emails relating to the extension of trial dates is neither excessive nor duplicative, but Attorney Blair's review of the case status.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-06-2015	L. SIMONINI	IDENTIFY DOCUMENTS TO SUPPORT CONTENTION THAT CAP VIOLATED CLIENT'S RIGHT TO HIPPA PROTECTION	1.7	170.00	\$289.00	Excessive - not an issue presented in this case	Paralegal Simonini's 1.7 time entry to pool materials supporting CAP's possible violation of plaintiff Gressett's HIPPA protections is not excessive. It is an assignment she received in preparation for trial.	
02-06-2015	L. SIMONINI	BEGIN TO PREPARE DEFENDANT'S TRIAL EXHIBITS WITH TRIAL BATES NUMBERS	3.7	170.00	\$629.00			
02-06-2015	J. BLAIR	STUDY EMAIL EXCHANGE REGARDING AVAILABLE TRIAL DATES	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to review emails between the parties concerning other trial dates is not excessive, but an attorney's review of the trial status.	
02-09-2015	L. SIMONINI	IDENTIFY AND PREPARE DEPOSITION EXHIBITS FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.3	170.00	\$391.00			
02-09-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR EXPERT BJORKLUND FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.1	170.00	\$357.00			
02-09-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR EXPERT CAMERON FOR ATTORNEY USE IN PREPARING FOR TRIAL	1.7	170.00	\$289.00			
02-09-2015	L. SIMONINI	STUDY DISCLOSURE DOCUMENTS TO IDENTIFY RECORDS REGARDING EXPERT BJORKLUND TO BE INCORPORATED INTO WITNESS NOTEBOOK	1.3	170.00	\$221.00	Excessive	Paralegal Simonini's 1.3 time entry to pool disclosure materials for the Bjorklund witness notebook is not excessive. It was a separate assignment related to the Bjorklund testimony.	
02-09-2015	L. SIMONINI	STUDY DISCLOSURE DOCUMENTS TO IDENTIFY RECORDS REGARDING EXPERT CAMERON TO BE INCORPORATED INTO WITNESS NOTEBOOK	1.1	170.00	\$187.00			
02-09-2015	J. BLAIR	CONFIRM STIPULATION TO MOVE TRIAL DATE	0.0	380.00	\$0.00	Clerical	Agreed.	
02-09-2015	J. BLAIR	REVIEW COURT ORDER SETTING TELEPHONE HEARING FOR THURSDAY	0.1	380.00	\$38.00			
02-09-2015	J. BLAIR	CONFIRM BACHELDER DECISION SUPPORTS DIRECT EVIDENCE OF CAP'S BREACH	0.2	380.00	\$76.00			
02-10-2015	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS FOR ATTORNEY USE AT TELEPHONIC HEARING REGARDING TRIAL	0.6	170.00	\$102.00			
02-10-2015	L. SIMONINI	BEGIN REVIEW OF DISCLOSURE AND DISCOVERY DOCUMENTS TO IDENTIFY RECORDS REGARDING M. COOK TO BE INCORPORATED INTO WITNESS NOTEBOOK	2.8	170.00	\$476.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-10-2015	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS TO IDENTIFY RECORDS RELATING TO RORY TO BE INCORPORATED INTO WITNESS NOTEBOOK	2.3	170.00	\$391.00	Excessive - no records regarding this witness, witness not called by plaintiff	Paralegal Simonini's 2.3 time entry to review discovery & disclosure materials for incorporation into witness notebooks is not excessive. At this stage, it was unclear whether this witness would testify for either party.	
02-11-2015	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING TRIAL	0.1	170.00	\$17.00			
02-11-2015	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING TRIAL	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Expert McRae is not excessive billing.	
02-11-2015	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL RESOLUTION VIA MEDIATION AND CONFIRM MEDIATOR'S AVAILABILITY	1.2	170.00	\$204.00	Vague, block billing, excessive	Paralegal Simonini's 1.2 time entry to determine whether the matter might be resolved by Mediator Toone is neither vague, nor block billing, nor excessive. She was given the assignment to see if a late mediation might work.	
02-11-2015	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
02-11-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR C. ELDRIDGE FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.7	170.00	\$459.00			
02-11-2015	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS AND IDENTIFY RECORDS TO BE INCLUDED IN C. ELDRIDGE WITNESS FOLDER	3.3	170.00	\$561.00	Excessive	Paralegal Simonini's 3.3 time entry to pull materials for the Eldrige witness folder is not excessive, but critically necessary.	
02-11-2015	T. COOK	TELEPHONE CALL WITH DEFENSE COUNSEL REGARDING TRIAL DATE AND MEDIATION	0.4	380.00	\$152.00			
02-11-2015	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
02-11-2015	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00	Excess billing for email exchange	Attorney Cook's .1 time entry to review an email from Plaintiff Gressett is not excessive.	
02-11-2015	T. COOK	SEND EMAIL TO DEFENDANT REGARDING MEDIATION WITH T. TOONE	0.2	380.00	\$76.00	Excessive	Attorney Cook's .2 time entry to prepare an email to CAP's attorney regarding a mediation with T. Toone is not excessive.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-11-2015	J. BLAIR	TELEPHONE CALL WITH CAP'S ATTORNEY REGARDING HEARING TOMORROW, CONSIDER MEDIATION OPTIONS	0.8	380.00	\$304.00	Excessive - T. Cook billed only .4 for same	Attorney Blair's .8 time entry is not excessive. A phone call was .4 and Attorney Blair's separate review of mediation options after the phone call was also .4	
02-11-2015	J. BLAIR	REVIEW EMAIL COMMUNICATIONS WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
02-12-2015	L. SIMONINI	RESEARCH TO IDENTIFY SETTLEMENT RANGES FOR FMLA CASES	2.3	170.00	\$391.00	Duplicative of 7/30/13, 1/28/14, 1/30/14, and 9/24/14 entries	Paralegal Simonini's 2.3 time entry to attempt to learn settlement ranges from FMLA cases is not duplicative, but supplemental of earlier efforts by Paralegal Simonini and Attorney Blair.	
02-12-2015	L. SIMONINI	ADDRESS ISSUES REGARDING ITEMS TO BE PROVEN AT TRIAL TO SUCCEED ON FMLA CLAIMS	1.3	170.00	\$221.00	Vague	Paralegal Simonini's 1.3 time entry reflects her assignment to identify the strongest aspects of Plaintiff Gressett's FMLA claims. It is not vague.	
02-12-2015	L. SIMONINI	ADDRESS ISSUES REGARDING JUDGE'S RULING CONFIRMING TRIAL	1.3	170.00	\$221.00	Excessive, vague	Paralegal Simonini's 1.3 time entry reflects her assignment to see how to accelerate trial preparation in light of Judge Teilborg's ruling. It is neither excessive or vague.	
02-12-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR EXPERT MCRAE FOR ATTORNEY USE IN PREPARING FOR TRIAL	1.9	170.00	\$323.00			
02-12-2015	J. BLAIR	HEARING BEFORE JUDGE TEILBORG CONFIRMING TRIAL DATE, DISCUSS PREPARATION FOR SAME WITH T. COOK	0.8	380.00	\$304.00	Internal Conference, Block Billing	Attorney Blair's .8 time entry to accept Judge Teilborg' ruling and review work to be done with Attorney Cook is not an internal conference. No one else billed for this time entry. First time entry (.3); second time entry (.5).	
02-12-2015	J. BLAIR	ANALYZE TRIAL PRESENTATION ISSUES GIVEN JUDGE TEILBORG'S LIMITATION ON TIME TO TRY THIS MATTER	0.5	380.00	\$190.00			
02-12-2015	J. BLAIR	PREPARE SUMMARY OF TRIAL MEMO TO BE PUT BEFORE THE JUDGE, CIRCULATE SAME	0.5	380.00	\$190.00	Excessive - no trial memorandum filed with Court	Attorney Blair's .5 time entry to finalize and circulate a copy of the draft trial memo to the litigation team is not excessive. Plaintiff Gressett moved for a "directed verdict" after trial.	
02-12-2015	J. BLAIR	PREPARE JURY VERDICTS SUMMARY FROM ANALYSIS OF SAME FOR FEDERAL CASES NATIONWIDE FOR FMLA CASES	1.1	380.00	\$418.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-13-2015	J. BLAIR	EXTENDED TELEPHONE CALLS WITH A. GRESSETT AND P. BJORKLUND	1.5	380.00	\$456.00	Block Billing	Time entry one (.9); time entry two (.6).	Block billing; reduced by 20%.
02-17-2015	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS TO IDENTIFY RECORDS REGARDING D. SIGMON TO BE INCORPORATED INTO WITNESS FOLDER	2.1	170.00	\$357.00			
02-17-2015	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS TO IDENTIFY RECORDS REGARDING EXPERT MCRAE TO BE INCORPORATED INTO WITNESS FOLDER	1.0	170.00	\$170.00	Excessive, duplicative of L. Simonini 2/12/15 entry	Paralegal Simonini's 1.0 time entry to prepare materials for the McRae expert witness folder is neither excessive nor duplicative, but supplemental.	
02-18-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR T. DELGADO FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.3	170.00	\$391.00			
02-18-2015	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS TO IDENTIFY RECORDS TO BE INCLUDED IN DELGADO WITNESS FOLDER	2.7	170.00	\$459.00			
02-18-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR D. SIGMON FOR ATTORNEY USE IN PREPARING FOR TRIAL	1.3	170.00	\$221.00			
02-18-2015	J. BLAIR	CONFIRM AVAILABILITY OF A STRUCTURED SETTLEMENT BROKER FOR MEDIATION	0.2	380.00	\$76.00	Clerical	Attorney Blair's .2 time entry to insure a structured settlement broker was available for the Toone mediation is not clerical.	
02-18-2015	J. BLAIR	SEND EMAIL TO CAP WITH DEMAND TO SETTLE	0.2	380.00	\$76.00			
02-19-2015	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS AND IDENTIFY RECORDS RELATING FOR ATTORNEY GROUSE TO BE INCLUDED IN WITNESS FOLDER	2.6	170.00	\$442.00	Excessive - few records existed re: Grouse	Paralegal Simonini's 2.6 time entry to pull disclosure and discovery records for a Grouse witness folder is not excessive. The complete review was necessary whether or not Attorney Grouse sponsored documents.	
02-19-2015	L. SIMONINI	STUDY DISCLOSURE AND DISCOVERY DOCUMENTS AND IDENTIFY DOCUMENTS REGARDING M. COOK TO BE INCORPORATED INTO WITNESS FOLDERS	3.6	170.00	\$612.00			
02-20-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR ATTORNEY K. GROUSE FOR ATTORNEY USE IN PREPARING FOR TRIAL	0.5	170.00	\$85.00	Duplicative of 2/19/15 entry	Paralegal Simonini's .5 time entry to update the Grouse witness folder for trial is not duplicative of any other time entry, but supplemental.	
02-20-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR M. LUDKE FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.3	170.00	\$391.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
02-20-2015	T. COOK	SEND EMAIL TO DEFENDANT REGARDING STATUS OF OFFER	0.1	380.00	\$38.00			
02-20-2015	T. COOK	BEGIN DETAILED OUTLINE OF PLAN OF ACTION TO PREPARE FOR TRIAL	0.8	380.00	\$304.00			
02-23-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR D. MODEER FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.4	170.00	\$408.00			
02-23-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR M. RUZICH FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.7	170.00	\$459.00			
02-23-2015	T. COOK	BEGIN DETAILED STUDY AND NOTATIONS OF DEPOSITIONS IN PREPARATION FOR TRIAL	7.6	380.00	\$2,888.00			
02-23-2015	J. BLAIR	REVIEW LATEST SETTLEMENT OFFER FROM CAP	0.2	380.00	\$76.00	Excessive	Attorney Blair's .2 time entry to assess CAP's latest settlement offer is not excessive.	
02-24-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR CLIENT FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.1	170.00	\$357.00			
02-24-2015	L. SIMONINI	ADDRESS ISSUES REGARDING HIPPA AND EXPERT MCRAE'S TESTIMONY REGARDING SAME	0.7	170.00	\$119.00	Vague, excessive - HIPPA not at issue in this case	Paralegal Simonini's .7 time entry to determine if HIPPA might be an issue in this case and gather Expert McRae's testimony about that issue is not vague or excessive. It was appropriate trial preparation.	
02-24-2015	L. SIMONINI	BEGIN PREPARING UPDATED WITNESS FOLDER FOR M. COOK FOR ATTORNEY USE IN PREPARING FOR TRIAL	2.3	170.00	\$391.00	Duplicative of 8/1/13, 12/9/13, 12/11/13, 12/12/13, 1/7/15 and 1/12/15 entries	Paralegal Simonini's 2.3 time entry to prepare the Mike Cook witness folder is not duplicative of any prior time entries, but supplemental.	
02-24-2015	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
02-24-2015	J. BLAIR	EMAIL EXCHANGE WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
02-25-2015	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING TRIAL	0.1	170.00	\$17.00			
02-25-2015	L. SIMONINI	TELEPHONE CALL EXPERT BJORKLUND REGARDING UPCOMING TRIAL	0.4	170.00	\$68.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
2/25/2015	T. COOK	MEET AND CONFER WITH J. BLAIR REGARDING CASE VALUE, SETTLEMENT TALKS, NEXT STEPS, CALL TO CLIENT [Privileged Communication] , CALL TO DEFENDANT COUNSEL WITH COUNTER DEMAND AND PROPOSAL FOR HOW TO PROCEED NEXT, REQUEST UPDATED ACCOUNTING OF CASE FOR USE WITH CLIENT REGARDING VALUATION PROCESS	1.0	380.00	\$304.00	Internal Conference, Block Billing	Attorney Cook's 1.0 time entry to discuss case value with Attorney Blair and call to defense counsel with a counter demand, and request updated accounting information about the case is not an internal conference because the Attorney Blair time entry (below) is acknowledged as duplicative. First time entry (.2); second time entry (.2); third time entry (.6).	Block billing; reduced by 20%.
02-25-2015	J. BLAIR	STUDY EMAIL FROM A. GRESSETT [Privileged Communication]	0.3	380.00	\$114.00			
02-25-2015	J. BLAIR	REVIEW CASE STRATEGY WITH T. COOK, TELEPHONE CALL TO A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00	Internal Conference, Block Billing	Attorney Blair's .4 time entry is in part, duplicative and should be deleted. First time entry (.2); second time entry (.2).	
02-25-2015	J. BLAIR	TELEPHONE CALL WITH A. GRESSETT [Privileged Communication]	0.2	380.00	\$76.00			
02-25-2015	J. BLAIR	TELEPHONE CALL WITH CAP'S ATTORNEY REGARDING SETTLEMENT NEGOTIATIONS	0.3	380.00	\$114.00			
02-27-2015	L. SIMONINI	DRAFT E-MAIL TO CLIENT [Privileged Communication]	0.1	170.00	\$17.00			
02-27-2015	L. SIMONINI	STUDY E-MAIL FROM CLIENT [Privileged Communication]	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Plaintiff Gressett is not excessive billing.	
03-02-2015	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING TRIAL	0.1	170.00	\$17.00			
03-02-2015	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING TRIAL	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Expert McRae is not excessive billing.	
03-02-2015	L. SIMONINI	DRAFT SECOND E-MAIL TO EXPERT MCRAE REGARDING TRIAL	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to prepare a second email to Expert McRae is not excessive billing.	
03-02-2015	T. COOK	STUDY EMAIL FROM DEFENDANT COUNSEL REGARDING SUBPOENAS FOR TRIAL	0.1	380.00	\$38.00			
03-02-2015	J. BLAIR	ADDRESS G. MCRAE'S AVAILABILITY AT TRIAL	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to confirm Expert McRae, an out-of-town witness, would be available for trial, is not vague.	
03-03-2015	T. COOK	STUDY AND OUTLINE DEPOSITIONS FOR TRIAL, CHART ISSUES TO BE RESOLVED REGARDING DISCLOSURE OF EVIDENCE, THEORIES FOR TRIAL, PLAN OF ACTION GOING FORWARD	9.0	380.00	\$2,736.00	Block billing	First time entry (3.5); second time entry (5.5).	Block billing; reduced by 20%.

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-04-2015	L. SIMONINI	ADDRESS ISSUES REGARDING ROADBLOCKS TO TESTIMONY OF EXPERT MCRAE AND CAP'S HR TESTIMONY THAT SUPPORTS NEED FOR EXPERT TESTIMONY	1.2	170.00	\$204.00	Vague	Paralegal Simonini's 1.2 time entry is to identify the issues that support the need for Expert McRae's testimony. It is not vague.	
03-04-2015	J. BLAIR	STUDY T. COOK'S TRIAL OUTLINE OF ISSUES, RESPOND TO SAME	0.8	380.00	\$304.00	Duplicative of T. Cook entry on 3/3/15	Attorney Blair's .8 time entry to review and supplement Attorney Cook's issues outline is not duplicative of Attorney Cook's efforts.	
03-04-2015	J. BLAIR	ANALYZE TRIAL PREPARATION ISSUES WITH T. COOK, RELATED TELEPHONE CALL TO EXPERT MCRAE REGARDING HER TESTIMONY	0.0	380.00	\$0.00	Internal Conference, Block Billing	<b>Accept.</b>	
03-04-2015	T. COOK	STUDY AND NOTATE DEPOSITIONS, TELEPHONE CALL WITH EXPERT G. MCRAE REGARDING TRIAL TESTIMONY AND PLAN OF ACTION, CONFER WITH TRIAL TEAM AND CO-COUNSEL REGARDING THEORY OF THE CASE AND HOW BEST TO PROCEED WITH CASE IN CHIEF	10.0	380.00	\$3,040.00	Internal Conference, Block Billing	Attorney Cook's 10.0 time entry is not an internal conference because all of Attorney Blair's time (above) is duplicative and should be struck. First time entry (6.8); second time entry (.9); third time entry (2.3).	Block billing; reduced by 20%.
03-05-2015	L. SIMONINI	STUDY E-MAIL EXCHANGES REGARDING POTENTIAL SETTLEMENT	0.4	170.00	\$68.00	Excessive, duplicative of T. Cook 2/20/15 and J. Blair 2/23/15 entries	Paralegal Simonini's .4 time entry to review the email exchanges between the parties discussing a possible settlement is neither excessive nor duplicative, but necessary for a paralegal that is preparing for trial.	
03-05-2015	L. SIMONINI	ADDRESS ISSUES REGARDING WITNESSES TO BE CALLED DURING CASE IN CHIEF	1.2	170.00	\$204.00	Vague	Paralegal Simonini's 1.2 time entry to propose what Plaintiff's witnesses will be able to say to prove Plaintiff's case is not vague.	
03-05-2015	L. SIMONINI	TELEPHONE CALL ATTORNEYS COOK AND KREIGSFELD REGARDING UPCOMING TRIAL	0.3	170.00	\$51.00			
03-05-2015	L. SIMONINI	STUDY TRANSCRIPT FROM FINAL PRE TRIAL CONFERENCE AND NOTE PERTINENT COMMENTS MADE BY JUDGE	0.8	170.00	\$136.00			
03-05-2015	L. SIMONINI	CONFER WITH ATTORNEY BLAIR REGARDING COMMENTS MADE BY JUDGE AT FINAL PRETRIAL CONFERENCE	0.4	170.00	\$68.00	Internal Conference	Paralegal Simonini's .4 time entry to discuss Judge Teilborg's ruling at the final pretrial conference is not an internal conference. Attorney Blair did not bill for this time.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-05-2015	T. COOK	WORK ON DETAILED NOTES OF DEPOSITION TESTIMONY FROM WHICH TO CRAFT EXAMINATION OF WITNESSES; TELEPHONE CALL WITH DEFENSE COUNSEL REGARDING STATUS OF COUNTER OFFER; ANALYSIS OF ISSUES WITH CO-COUNSEL; EMAILS TO POSSIBLE MEDIATOR, TO DEFENSE COUNSEL AND TO CLIENT REGARDING POSSIBLE SETTLEMENT MEDIATION	5.0	380.00	\$1,520.00	Block Billing	First time entry (2.0); second time entry (.2); third time entry (2.5); fourth time entry (.3).	Block billing; reduced by 20%.
03-05-2015	J. BLAIR	DISCUSS SETTLEMENT STRATEGY WITH T. COOK, CONFIRM T. TOONE'S AVAILABILITY NEXT WEEK	1.1	380.00	\$418.00	Internal Conference	Attorney Blair's 1.1 time entry to develop a settlement strategy with Attorney Cook prior to the Toone mediation is not an internal conference, but a billable strategy session which Plaintiff Gressett approved.	
03-05-2015	J. BLAIR	ADDRESS TRIAL ISSUES WITH T. COOK	1.4	380.00	\$532.00	Internal Conference	Attorney Blair's 1.4 time entry to review trial issues with Attorney Cook likewise is not a prohibited internal conference but a key strategy session that Plaintiff Gressett approved.	
03-06-2015	L. SIMONINI	GATHER INFORMATION FOR POTENTIAL SETTLEMENT PURPOSES	0.4	170.00	\$68.00			
03-06-2015	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS REGARDING EXPERTS BJORKLUND AND CAMERON FOR ATTORNEY BLAIR'S USE IN PREPARING FOR TRIAL	1.3	170.00	\$221.00			
03-06-2015	L. SIMONINI	DETERMINE WHETHER MATERIALS PROMISED DURING T. DELGADO DEPOSITION HAVE BEEN PRODUCED	2.7	170.00	\$459.00	Excessive	Paralegal Simonini's 2.7 time entry to determine whether materials promised by CAP during the Delgado deposition were ever produced is not excessive. It was a key paralegal assignment.	
03-06-2015	L. SIMONINI	STUDY CAP'S DISCOVERY RECORDS TO LOCATE PAYROLL SUPPORT TO PROVE FAILURE OF CAP TO TRACK CLIENT'S FMLA LEAVE	1.4	170.00	\$238.00	Duplicative of 12/19/13 and 1/13/15 entries	Paralegal Simonini's 1.4 time entry to find support that CAP never tracked Plaintiff Gressett's FMLA leave is not duplicative of earlier efforts but supplemental.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-06-2015	J. BLAIR	STUDY DEPOSITION OF T. DELGADO, EMAILS TO TRIAL PREP TEAM REGARDING SAME	2.5	380.00	\$950.00	Internal Conference, Block Billing	Attorney Blair's 2.5 time entry to study the Delgado deposition and prepare an email summary to the litigation team is not an internal conference. No one else billed for this email. First time entry (2.2); second time entry (.3).	
03-06-2015	J. BLAIR	CONFIRM STATUS OF SETTLEMENT NEGOTIATIONS	0.2	380.00	\$76.00	Vague	Attorney Blair's .2 time entry to confirm the status of settlement negotiations between Plaintiff Gressett and CAP is not vague.	
03-07-2015	L. SIMONINI	STUDY DEPARTMENT OF ECONOMIC SECURITY RECORDS TO IDENTIFY ITEMS TO BE ADDRESSED WITH CLIENT IN ADVANCE OF TRIAL	4.1	170.00	\$697.00	Excessive, duplicative of 7/11/13, 7/18/13, 8/6/13, 10/15/14, and 1/16/15 entries	Paralegal Simonini's 4.1 time entry to pull DES materials for review with Plaintiff Gressett is neither excessive nor duplicative of any other time entries. This was pretrial preparation for a session with Plaintiff Gressett.	
03-08-2015	J. BLAIR	STUDY PORTION OF EXPERT CAMERON'S DEPOSITION, NOTES REGARDING SAME	1.1	380.00	\$418.00			
03-09-2015	S. KING	STUDY DEPOSITION AND EXPERT FILE OF CATHERINE CAMERON FOR ARTICLE IN PREPARATION FOR TRIAL	0.3	170.00	\$51.00	Excessive, S. King did not appear at trial as counsel	Paralegal King's .3 time entry to pull an article authored by Expert Cameron is not excessive. This was a separate paralegal assignment to prepare for cross-examination of Expert Cameron at trial.	
03-09-2015	S. KING	STUDY CASE FILE FOR 2014 TAX RETURNS AND DEPOSITION TRANSCRIPT OF GRESSETT AND FORWARD TO EXPERT PAUL BJORKLUND	0.3	170.00	\$51.00			
03-09-2015	S. KING	DRAFT FOURTH SUPPLEMENTAL DISCLOSURE STATEMENT ADDING 2013 AND 2014 GRESSETT TAX RETURNS	0.2	170.00	\$34.00			
03-09-2015	S. KING	TELECONFERENCE WITH A. GRESSETT [Privileged Communication]	0.2	170.00	\$34.00			
03-09-2015	S. KING	EMAIL WITH PLAINTIFF EXPERT PAUL BJORKLUND IN PREPARATION FOR CLIENT CONSULTATION IN PREPARATION FOR TRIAL	0.2	170.00	\$34.00			
03-09-2015	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING MEDIATION	0.1	380.00	\$38.00			
03-09-2015	T. COOK	SEND EMAIL TO T. TOONE REGARDING MEDIATION	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-09-2015	J. BLAIR	STUDY REMAINDER OF CAMERON DEPOSITION, MAKE NOTES REGARDING TRIAL PREPARATION	1.5	380.00	\$570.00			
03-09-2015	J. BLAIR	EXTENDED TELEPHONE CALL WITH P. BJORKLUND REGARDING TRIAL PREPARATION	0.8	380.00	\$304.00			
03-09-2015	J. BLAIR	STUDY MATERIALS FROM MR. BJORKLUND, CONSIDER MOTION TO STRIKE CAMERON FOR LACK OF VOCATIONAL TRAINING	1.4	380.00	\$425.60	Block billing	Time entry one (1.1); second time entry (.3).	Block billing; reduced by 20%.
03-09-2015	J. BLAIR	REVIEW EMAIL EXCHANGES REGARDING MEDIATION LATER THIS WEEK	0.3	380.00	\$114.00			
03-09-2015	J. BLAIR	STUDY ARTICLE AUTHORED BY EXPERT CAMERON	0.2	380.00	\$76.00			
03-09-2015	T. COOK	WORK ON COMPREHENSIVE REPORT OF EVENTS TO TRACK TIME OFF	4.8	380.00	\$1,824.00			
03-10-2015	S. KING	EMAILS TO P. BJORKLUND AND CLIENT [Privileged Communication]	0.2	170.00	\$34.00			
03-10-2015	L. SIMONINI	DRAFT MEDIATION MEMO TO BE SUBMITTED TO MEDIATOR TOONE	1.3	170.00	\$221.00			
03-10-2015	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT BJORKLUND AND UPDATE TO DAMAGES ANALYSIS AND IMPACT OF EARNINGS ON DAMAGES	1.2	170.00	\$204.00			
03-10-2015	L. SIMONINI	IDENTIFY AND PREPARE SUPPORTING DOCUMENTS TO BE SUBMITTED TO MEDIATOR TOONE	0.9	170.00	\$153.00			
03-10-2015	T. COOK	CONFER WITH CO-COUNSEL BLAIR REGARDING TRIAL STRATEGY AND MEDIATION PLANNING	1.0	380.00	\$380.00	Internal Conference	Attorney Cook's 1.0 time entry to discuss trial strategy and mediation with Attorney Blair is not an internal conference because the Blair time entry (below) should be struck.	
03-10-2015	T. COOK	STUDY EMAIL FROM DEFENDANT REGARDING MEDIATION	0.1	380.00	\$38.00			
03-10-2015	T. COOK	SEND EMAIL TO CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
03-10-2015	T. COOK	CONTINUE WORK ON TIME OFF CHART	1.8	380.00	\$684.00			
<b>03-10-2015</b>	<b>J. BLAIR</b>	<b>PLAN MEDIATION PROCESS WITH T. COOK</b>	<b>0.0</b>	<b>380.00</b>	<b>\$0.00</b>	<b>Internal Conference</b>	<b>Criticism accepted.</b>	
03-10-2015	J. BLAIR	ANALYZE A. GRESSETT'S DAMAGES IN LIGHT OF VARIOUS JOBS TAKEN	0.8	380.00	\$304.00			
03-10-2015	J. BLAIR	REVIEW PORTION OF P. BJORKLUND'S DEPOSITION, RELATED EMAILS FOR TRIAL PREPARATION	1.5	380.00	\$570.00			
03-10-2015	J. BLAIR	PREPARE PORTION OF P. BJORKLUND'S DIRECT TESTIMONY	0.6	380.00	\$228.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-10-2015	J. BLAIR	STUDY ABSENCES CHART, DISCUSS SAME WITH T. COOK	0.2	380.00	\$76.00	Internal Conference, Block Billing	Attorney Blair's .2 time entry to review the absences chart and discuss it with Attorney Cook is not an internal conference. No one else billed for this discussion. First time entry (.1); second time entry (.1).	
03-10-2015	J. BLAIR	ANALYZE MATERIALS FROM P. BJORKLUND REGARDING VOCATIONAL EXPERTS, REVIEW CAMERON TRANSCRIPT, PREPARE EMAIL SUMMARIZING CAMERON'S MISSTEPS	1.5	380.00	\$456.00	Block billing	First time entry (.3); second time entry (1.); third time entry (.2).	Block billing; reduced by 20%.
03-11-2015	L. SIMONINI	STUDY DEPOSITIONS OF M. RUZICH AND D. SIGMON AND IDENTIFY TESTIMONY REGARDING CHART PURPORTING TO TRACK FMLA LEAVE	2.1	170.00	\$357.00			
03-11-2015	L. SIMONINI	STUDY E-MAIL EXCHANGES AND REQUEST CAP'S PRODUCTION RECORDS TO IDENTIFY SUPPORT FOR ADMISSIBILITY FOR "LEAVE TIME TAKEN" CHART	1.9	170.00	\$323.00	Block billing, excessive - previously "studied" one page chart	Paralegal Simonini's 1.9 time entry to review the file for support for Plaintiff Gressett's position that the "leave time taken chart" should be admissible is not block billing or excessive. This is a specific assignment relating to a key issue. (The use of the word "study" is not key to this issue).	
03-11-2015	J. BLAIR	EXTENDED TELEPHONE CALL WITH P. BJORKLUND RE UPDATING HIS CHARTS, PREPARE FOR MEDIATION	1.0	380.00	\$304.00	Block billing	First time entry (.6); second time entry (.4).	Block billing; reduced by 20%.
03-11-2015	J. BLAIR	STUDY A. GRESSETT'S EMAIL [Privileged Communication]	0.2	380.00	\$76.00			
03-11-2015	J. BLAIR	CONFIRM FILING OF MEDIATION STATEMENT	0.0	380.00	\$0.00	Clerical	Attorney Blair's .2 time entry to approve the mediation statement for filing is not clerical.	Clerical
03-12-2015	L. SIMONINI	STUDY CAP'S TRIAL SUBPOENAS	0.7	170.00	\$119.00	Excessive	Paralegal Simonini's .7 time entry to review the CAP trial subpoenas is not excessive.	
03-12-2015	L. SIMONINI	IDENTIFY AND PREPARE TRIAL FILINGS TO BE INCORPORATED INTO TRIAL NOTEBOOK	1.7	170.00	\$289.00			
03-12-2015	L. SIMONINI	PREPARE TRIAL NOTEBOOK FOR ATTORNEY COOK	1.1	170.00	\$187.00			
03-12-2015	L. SIMONINI	PREPARE TRIAL NOTEBOOK FOR ATTORNEY BLAIR	1.1	170.00	\$187.00			
03-12-2015	J. BLAIR	REVIEW POSITION STATEMENT IN ADVANCE OF MEDIATION WITH T. TOONE	0.5	380.00	\$190.00			
03-12-2015	J. BLAIR	MEET WITH A. GRESSETT [Privileged Communication]	0.7	380.00	\$266.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-12-2015	J. BLAIR	MEDIATION WITH T. TOONE	5.0	380.00	\$1,900.00	Excessive, mediation was only 4 hours	Attorney Blair's 5.0 time entry for the mediation with Tom Toone is not excessive. Plaintiff Gressett's attorneys were there for 5 hours.	
03-12-2015	T. COOK	MEET WITH CLIENT PRE-MEDIATION [Privileged Communication]	0.5	380.00	\$190.00			
03-12-2015	T. COOK	ATTEND MEDIATION	5.0	380.00	\$1,900.00	Excessive attorney attendance	Attorney Cook's 5.0 time entry to attend the mediation is not excessive. The mediation lasted 5 hours and it was critical that both Ms. Gressett and her attorneys be present. It became even more critical as negotiations continued.	
03-12-2015	T. COOK	MEET POST-MEDIATION WITH CLIENT [Privileged Communication]	0.5	380.00	\$190.00			
03-13-2015	L. SIMONINI	DRAFT TRIAL SUBPOENA TO C. RUZICH	0.2	170.00	\$34.00			
03-13-2015	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING ACCEPTANCE OF SERVICE OF RUZICH TRIAL SUBPOENA	0.1	170.00	\$17.00			
03-13-2015	L. SIMONINI	ADDRESS ISSUES REGARDING EXPERT MCRAE'S TRIAL TESTIMONY	0.7	170.00	\$119.00	Vague	Paralegal Simonini's .7 time entry to support the trial attorneys as to issues about Expert McRae's ability to testify is not vague.	
03-13-2015	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING SERVICE OF TRIAL SUBPOENA	0.1	170.00	\$17.00	Excessive billing for email exchange	Paralegal Simonini's .1 time entry to review an email from CAP's attorney regarding trial subpoenas is not excessive.	
03-13-2015	L. SIMONINI	ADDRESS ISSUES REGARDING POTENTIAL SETTLEMENT	1.2	170.00	\$204.00	Vague, excessive	Paralegal Simonini's 1.2 time entry to work with the trial attorneys in an attempt to settle this case after the formal mediation is neither vague or excessive.	
03-13-2015	J. BLAIR	EMAIL COMMUNICATIONS WITH A. GRESSETT [Privileged Communication] AND CAP'S ATTORNEY	0.4	380.00	\$152.00			
03-13-2015	T. COOK	STUDY EMAIL FROM CLIENT [Privileged Communication]	0.1	380.00	\$38.00			
03-13-2015	T. COOK	SEND EMAIL TO T. TOONE REGARDING CLIENT'S NEW OFFER	0.1	380.00	\$38.00			
03-13-2015	T. COOK	SEND EMAIL TO DEFENDANT COUNSEL REGARDING CONTACT ON CASE POST MEDIATION	0.1	380.00	\$38.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-13-2015	T. COOK	STUDY EMAIL FROM T. TOONE REGARDING RESPONSE TO HIS CONTACT WITH DEFENDANT COUNSEL ON CLIENT'S OFFER WITH NO PROSPECTS OF RESOLUTION	0.1	380.00	\$38.00			
03-13-2015	T. COOK	SEND EMAIL TO MEDIATOR TO OFFER THOUGHTS ON HOW TO ENCOURAGE DEFENDANT TO SEEK ADDITIONAL FUNDS	0.1	380.00	\$38.00			
03-13-2015	T. COOK	BEGIN WORK ON OPENING STATEMENT	2.0	380.00	\$760.00			
03-15-2015	T. COOK	COMPREHENSIVE STUDY AND NOTATION OF ALL TRIAL EXHIBITS, FMLA LAW, FMLA REGULATIONS, DEFENDANT'S CLAIMS/DEFENSES, OUTLINE REBUTTAL TO SAME, FORMULATE THEME FOR TRIAL AND OUTLINE CHALLENGE TO ALL PLAUSIBLE DEFENSES	5.9	380.00	\$2,242.00			
03-16-2015	L. SIMONINI	DRAFT SUPPLEMENTAL DISCLOSURE STATEMENT REGARDING EXPERT BJORKLUND'S SUPPLEMENTAL REPORT	0.3	170.00	\$51.00			
03-16-2015	L. SIMONINI	PREPARE EXHIBITS TO BE ATTACHED TO SUPPLEMENTAL DISCLOSURE STATEMENT	0.9	170.00	\$153.00	Excessive	Paralegal Simonini's .9 time entry to pull together materials for a supplemental disclosure statement is not excessive.	
03-16-2015	L. SIMONINI	STUDY CAP AND CLIENT'S TRIAL EXHIBITS TO IDENTIFY AND REMOVE DUPLICATE EXHIBITS	2.3	170.00	\$391.00	Duplicative of entry on 11/21/14	Paralegal Simonini's 2.3 time entry to study, then remove duplicative exhibits is not duplicative of any other time entry but supplemental.	
03-16-2015	D. BARNES	RESEARCH FAMILY MEDICAL LEAVE ACT STATUTES RELATED TO RECOVERY OF ATTORNEYS' FEES, COSTS AND EXPERT FEES	0.4	360.00	\$144.00	Background research, duplicative	Attorney Barnes .4 time entry to research Plaintiff Gressett's entitlement to fees, costs and expert fees is not background research and was not duplicative, but supplemental.	
03-16-2015	J. BLAIR	EMAIL EXCHANGES WITH MEDIATOR AND A. GRESSETT [Privileged Communication]	0.5	380.00	\$190.00			
03-16-2015	J. BLAIR	TELEPHONE CALL WITH P. BJORKLUND REGARDING SUPPLEMENTAL REPORT	0.5	380.00	\$190.00			
03-16-2015	J. BLAIR	STUDY BJORKLUND'S SUPPLEMENTAL REPORT, CONFIRM DISCLOSURE OF SAME	0.5	380.00	\$190.00			
03-16-2015	J. BLAIR	ASSIST IN TRIAL PREPARATION	0.8	380.00	\$304.00	Vague	Attorney Blair's .8 time entry to assist in trial preparation is vague, but represents Attorney Blair's assistance with Trial Attorney Cook and Paralegal Simonini in smoothing out the trial presentation.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-16-2015	T. COOK	STUDY AND NOTATE DEPOSITION AND DEPOSITION EXHIBITS, DISCOVERY, AND DISCLOSURES OF CLIENT FOR TRIAL; BEGIN OUTLINE OF DIRECT EXAMINATION	10.2	380.00	\$3,876.00			
03-17-2015	S. KING	STUDY DEPARTMENT OF ECONOMIC SECURITY FILE DOCUMENTS AND PREPARE ANALYSIS OF DOCUMENTS IN PREPARATION FOR TRIAL	2.1	170.00	\$357.00	Duplicative of L. Simonini entry on 3/7/15	Paralegal King's 2.1 time entry to review DES records as part of trial preparation is not duplicative any other time entry, but supplemental to Paralegal Simonini's .	
03-17-2015	L. SIMONINI	CONTINUE PREPARING EXHIBITS FOR ELECTRONIC PRESENTATION AT TRIAL	1.7	170.00	\$289.00			
03-17-2015	L. SIMONINI	ADDRESS ISSUES REGARDING WITNESSES TO BE CALLED AT TRIAL; EXPERT TESTIMONY	1.3	170.00	\$221.00	Vague	Paralegal Simonini's 1.3 time entry to assist the attorneys in identifying who would testify when, both fact witness and expert witness, is not vague.	
03-17-2015	L. SIMONINI	PREPARE COURT'S COPY OF TRIAL EXHIBIT LIST	0.7	170.00	\$119.00			
03-17-2015	J. BLAIR	WORK ON DIRECT TESTIMONY FOR P. BJORKLUND	1.6	380.00	\$608.00			
03-17-2015	J. BLAIR	ADDRESS TRIAL ISSUES, REVIEW EMAILS TO AND FROM A. GRESSETT	0.6	380.00	\$182.40	Vague, block billing	Attorney Blair's .6 time entry to address trial issues and review correspondence from and to Plaintiff Gressett is not vague. It is what attorneys do right before trial. First time entry (.4); second time entry (.2).	Block billing; reduced by 20%.
03-17-2015	J. BLAIR	TELEPHONE CALL WITH P. BJORKLUND REGARDING DIRECT TESTIMONY	0.7	380.00	\$266.00			
03-17-2015	T. COOK	NOTATE AND STUDY EXHIBITS FROM DEPOSITION OF EXPERT BJORKLUND	4.1	380.00	\$1,558.00			
03-17-2015	T. COOK	STUDY DEPOSITION OF DEFENDANT EXPERT CAMERON AND DEPOSITION EXHIBITS	4.3	380.00	\$1,634.00			
03-18-2015	L. SIMONINI	PREPARE CAP'S TRIAL EXHIBITS FOR CLIENT REVIEW	2.2	170.00	\$374.00	Excessive - CAP exhibits already prepared	Paralegal Simonini's 2.2 time entry to organize CAP's trial exhibits for review by Plaintiff Gressett is not excessive. Plaintiff Gressett to review all of them before her prep session.	
03-18-2015	L. SIMONINI	PREPARE CLIENT'S SET OF EXHIBITS IN ADVANCE OF TRIAL PREPARATION SESSION	2.0	170.00	\$340.00			
03-18-2015	L. SIMONINI	EXCHANGE E-MAILS WITH CLIENT [Privileged Communication]	0.4	170.00	\$68.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-18-2015	L. SIMONINI	ATTEND TRIAL STRATEGY SESSION WITH ATTORNEYS COOK, BLAIR AND KLECAN	0.5	170.00	\$85.00	Internal Conference	Paralegal Simonini's .5 time entry to attend a strategy session with Attorneys Cook, Blair and Klecan is not an internal conference. It was the single pretrial session when the trial plan was analyzed for presentation. Plaintiff Gressett approved this separate pretrial session.	
03-18-2015	L. SIMONINI	EXCHANGE E-MAILS WITH CAP ATTORNEYS REGARDING TRIAL	0.3	170.00	\$51.00	Internal Conference	Paralegal Simonini's .3 time entry to exchange emails with CAP attorneys regard trial issues is not an internal conference.	
03-18-2015	L. SIMONINI	CONTINUE ATTEMPTS TO SET UP TRIAL PREPARATION SESSION WITH C. ELDRIDGE	0.3	170.00	\$51.00			
03-18-2015	L. SIMONINI	ADDRESS ISSUES REGARDING TRIAL WITNESSES TO BE CALLED AND POTENTIAL TESTIMONY	1.3	170.00	\$221.00	Vague	Paralegal Simonini's 1.3 time entry to propose which witness could say what as part of Plaintiff Gressett's direct case is not vague. It was an assignment from the Renaud Cook Drury Mesaros, P.A. attorneys.	
03-18-2015	J. KLECAN	TRIAL STRATEGY MEETING WITH TAMARA COOK	1.5	380.00	\$570.00	Internal Conference	Attorney Klecan's 1.5 time entry for a strategy session with Attorney Cook is not an internal conference. (See above).	
03-18-2015	J. BLAIR	ADDRESS SETTLEMENT OPTIONS AFTER CAP OFFERS TO PAY MEDIATION FEE	0.5	380.00	\$190.00			
03-18-2015	J. BLAIR	PLAN TRIAL WITH ATTORNEY KLECAN AND ATTORNEY COOK	0.5	380.00	\$190.00	Internal Conference, vague	Attorney Blair's .5 time entry for discussing trial strategy with Attorneys Klecan and Cook is not an internal conference, nor is it vague. (See above).	
03-18-2015	T. COOK	STUDY DEPOSITION AND EXHIBITS AND NOTATE SAME REGARDING WITNESS SIGMON; BEGIN OUTLINE OF EXAMINATION	3.2	380.00	\$1,216.00			
03-18-2015	T. COOK	STUDY DEPOSITION OF D. MOREER, DEPOSITION EXHIBITS, NOTATE SAME	3.7	380.00	\$1,406.00			
03-18-2015	T. COOK	STUDY, OUTLINE AND NOTATE DEPOSITION AND EXHIBITS FROM DEPOSITION OF M. RUZICH; BEGIN OUTLINE OF EXAMINATION	3.7	380.00	\$1,406.00			
03-19-2015	L. SIMONINI	DRAFT TRIAL SUBPOENA AND LETTER TO D. MODEER	0.2	170.00	\$34.00			
03-19-2015	L. SIMONINI	DRAFT TRIAL SUBPOENA AND COVER LETTER TO ATTORNEY GROUSE	0.2	170.00	\$34.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-19-2015	L. SIMONINI	DRAFT TRIAL SUBPOENA AND LETTER TO R. CRANE	0.2	170.00	\$34.00			
03-19-2015	L. SIMONINI	DRAFT TRIAL SUBPOENA AND LETTER TO C. ELDRIDGE	0.3	170.00	\$51.00			
03-19-2015	L. SIMONINI	TELEPHONE CALL C. ELDRIDGE REGARDING TRIAL TESTIMONY	0.3	170.00	\$51.00			
03-19-2015	L. SIMONINI	TWO TELEPHONE CALLS CLIENT [Privileged Communication]	0.2	170.00	\$34.00			
03-19-2015	L. SIMONINI	ADDRESS ISSUES REGARDING WITNESSES TO BE CALLED AT TRIAL	1.5	170.00	\$255.00	Vague	Paralegal Simonini's 1.5 time entry to address issues relating to witnesses called to trial is not vague. It is the assignment referenced above by Renaud Cook Drury Mesaros, P.A. attorneys to propose how all of the direct case witness testimony would be presented without being duplicated.	
03-19-2015	L. SIMONINI	CONTINUE PREPARING ELECTRONIC PRESENTATION OF EXHIBITS AND DEPOSITION TRANSCRIPTS AT TRIAL	3.1	170.00	\$527.00			
03-19-2015	L. SIMONINI	STUDY GROUSE CHART AND DEPARTMENT OF LABOR DOCUMENTS TO DETERMINE WHETHER THERE IS ANY SUPPORTING EVIDENCE FOR THE CHART	2.6	170.00	\$442.00	Excessive, duplicative of 5/22/13, 7/22/13, 12/18/13, 1/16/14, 3/19/14, 3/25/14 and 1/15/15 entries	Paralegal Simonini's 2.6 time entry is neither excessive nor duplicative of her earlier attempts to identify any supporting evidence for the Grouse "leave taken" chart. Plaintiff Gressett's team was trying to determine and confirm it could get the chart into evidence independent of what CAP chose to do about the contents of the chart.	
03-19-2015	L. SIMONINI	STUDY E-MAIL FROM CAP ATTORNEY REGARDING WITNESS TESTIMONY	0.1	170.00	\$17.00			
03-19-2015	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING TRIAL SUBPOENAS	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to prepare an email to CAP's counsel is not excessive billing.	
03-19-2015	L. SIMONINI	DRAFT SECOND E-MAIL TO CAP ATTORNEY REGARDING TRIAL SUBPOENAS	0.1	170.00	\$17.00			
03-19-2015	L. SIMONINI	DRAFT GRESSETT PORTION OF WITNESS LIST	0.4	170.00	\$68.00			
03-19-2015	L. SIMONINI	EXCHANGE E-MAIL WITH CAP PARALEGAL REGARDING JOINT WITNESS LIST	0.3	170.00	\$51.00			
03-19-2015	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS FOR TRIAL TEAM MEETING	0.7	170.00	\$119.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-19-2015	D. BARNES	RESEARCH AND ANALYZE NOTICE REQUIREMENTS UNDER THE FAMILY MEDICAL LEAVE ACT	1.3	360.00	\$468.00	Background research, duplicative	Attorney Barnes' 1.3 time entry to analyze the FMLA Notice Requirements is supplemental to prior research, not duplicative of that earlier research. It is also not background research because it is specifically tied to Plaintiff Gressett's testimony.	
03-19-2015	D. BARNES	PREPARE OUTLINE OF FAMILY MEDICAL LEAVE ACT NOTICE REQUIREMENTS	0.7	360.00	\$252.00	Duplicative of 10/2/14, 10/19/14, 10/20/14, 10/22/14, 10/23/14, 10/27/14, 10/28/14, 10/29/14, 10/31/14, 11/13/14, 1/7/15, and 1/16/15 entries	Attorney Barnes' .7 time entry to outline FMLA Notice Requirements is not duplicative of earlier research efforts, but supplemental.	
03-19-2015	D. BARNES	RESEARCH AND ANALYZE THE LAW OF THE CASE DOCTRINE RELATED TO ADMISSIBLE TESTIMONY	1.3	360.00	\$468.00			
03-19-2015	J. KLECAN	MEETINGS (2) WITH TRIAL TEAM TO DISCUSS STRATEGY, THEME, SIMPLIFICATION, COMPARISON OF DEPARTMENT OF LABOR TABLE TO TERMINATION LETTER	4.5	380.00	\$1,710.00	Internal Conference	Attorney Klecan's 4.5 time entry to plan the trial presentation is not an internal conference. Attorney Klecan is an experienced trial attorney brought in for this single purpose. These trial team meetings were requested and approved by Plaintiff Gressett.	
03-19-2015	J. BLAIR	DRAFT TRIAL BRIEFS REGARDING GROUSE CHART, CAP'S RELIANCE ON ATTENDANCE POLICIES, DIRECTED VERDICT	2.2	380.00	\$836.00	Excessive - no trial brief filed or required by Court	Attorney Blair's 2.2 time entry to draft trial briefs relating to the Grouse chart and the attendance policies became the basis for Plaintiff Gressett's argument for "directed verdict" immediately after witness testimony. It is not excessive.	
03-19-2015	J. BLAIR	ADDRESS GRESSETT RESEARCH ISSUES, REVIEW SUPPORTING CASE LAW	0.8	380.00	\$304.00	Vague	Attorney Blair's .8 time entry to review the issues researched by Attorney Barnes as well as supporting case law is not vague.	
03-19-2015	J. BLAIR	STUDY EXPERT BJORKLUND'S SUPPLEMENTAL NUMBERS, PLAN DIRECT TESTIMONY	1.8	380.00	\$684.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-19-2015	J. BLAIR	TRIAL PREPARATION	1.5	380.00	\$570.00	Vague	Attorney Blair's 1.5 time entry for trial preparation is not vague. It represents his attendance at some of the trial strategy meetings involving Attorney Klecan (above) and requested and approved by Plaintiff Gressett.	
03-19-2015	T. COOK	STUDY, NOTATE AND ANALYZE EXHIBITS TO DEPOSITION OF T. DELGADO	5.2	380.00	\$1,976.00			
03-19-2015	T. COOK	STUDY MOTIONS IN LIMINE, CASE LAW CITED BY DEFENDANT AND FORMULATE PLAN OF ACTION TO CHALLENGE EACH DURING TRIAL	3.9	380.00	\$1,482.00			
03-20-2015	L. SIMONINI	CONFERENCE CALL WITH CAP ATTORNEYS AND TRIAL TEAM REGARDING TRIAL WITNESSES AND TRIAL EXHIBITS TO BE ADMITTED	1.4	170.00	\$238.00			
03-20-2015	L. SIMONINI	TRIAL TEAM MEETING REGARDING WITNESSES, TRIAL EXHIBITS AND WITNESS TESTIMONY	1.5	170.00	\$255.00	Internal Conference	Paralegal Simonini's 1.5 time entry for a trial team meeting regarding witnesses and exhibits is not an internal conference. No one else billed for this time.	
03-20-2015	L. SIMONINI	MEET WITH JUDGE TEILBORG'S STAFF AND MARK TRIAL EXHIBITS, WITNESS LIST AND CONFIRM FUNCTIONALITY OF ELECTRONIC TRIAL EXHIBIT PRESENTATION	1.7	170.00	\$289.00			
03-20-2015	L. SIMONINI	ATTEND TRIAL TEAM MEETING REGARDING ITEMS TO BE ADDRESSED BEFORE START OF TRIAL	1.0	170.00	\$170.00	Internal Conference	Paralegal Simonini's 1.0 time entry to attend a trial team meeting is not an internal conference. Plaintiff Gressett requested that Paralegal Simonini and the trial attorneys meet just before trial to get everyone on the same page. She approved this and other billings by the trial attorneys on these two days before trial.	
03-20-2015	L. SIMONINI	CONFIRM T. DELGADO EXHIBITS HAVE BEEN MARKED	0.2	170.00	\$34.00			
03-20-2015	L. SIMONINI	STUDY E-MAIL FROM CAP PARALEGAL REGARDING WITNESS LIST	0.1	170.00	\$17.00			
03-20-2015	L. SIMONINI	STUDY E-MAIL FROM COURT CLERK REGARDING LENGTH OF TRIAL DAYS AND WITNESS LIST	0.1	170.00	\$17.00			
03-20-2015	L. SIMONINI	PREPARE BACK UP ELECTRONIC PRESENTATION IN CASE LAPTOP FAILS DURING TRIAL	0.6	170.00	\$102.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-20-2015	L. SIMONINI	UPDATE TRIAL TEAM NOTEBOOKS CONTAINING PERTINENT COURT FILINGS	0.8	170.00	\$136.00			
03-20-2015	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING TRIAL	0.1	170.00	\$17.00			
03-20-2015	L. SIMONINI	STUDY E-MAIL FROM EXPERT MCRAE REGARDING TRIAL	0.1	170.00	\$17.00	Excess billing for email exchange	Paralegal Simonini's .1 time entry to review an email from Expert McRae is not excessive billing.	
03-20-2015	L. SIMONINI	IDENTIFY AND PREPARE EXHIBITS REQUESTED BY EXPERT MCRAE	1.3	170.00	\$221.00			
03-20-2015	D. BARNES	RESEARCH AND ANALYZE CASE LAW RELATED TO APPLICATION OF ATTORNEY CLIENT PRIVILEGE AS BOTH SWORD AND SHIELD	1.6	360.00	\$576.00			
03-20-2015	D. BARNES	PREPARE OUTLINE OF CASE LAW TO SUPPORT THE ARGUMENT THAT DEFENDANT MAY NOT RELY ON TESTIMONY AT TRIAL THAT WAS PREVIOUSLY DEEMED TO BE ATTORNEY CLIENT PRIVILEGED	0.6	360.00	\$216.00			
03-20-2015	D. BARNES	PREPARE OUTLINE OF CASE LAW RELATED TO THE LAW OF THE CASE DOCTRINE AND ITS APPLICABILITY TO TESTIMONY AT TRIAL	0.3	360.00	\$108.00			
03-20-2015	J. KLECAN	MEET WITH TRIAL TEAM REGARDING STRATEGY AND WITH T. COOK AND CLIENT TO GO OVER HER TESTIMONY [Privileged Communication]	3.2	380.00	\$1,216.00	Internal Conference, Block Billing	Attorney Klecan's 3.2 time entry to meet with the trial team this date and with Attorney Cook and Plaintiff Gressett to discuss her testimony is not an internal conference and was specifically requested by Plaintiff Gressett. First time entry (1.5); second time entry (1.7).	
03-20-2015	J. KLECAN	RESEARCH ON PROOF OF FACTS FOR FMLA TRIAL AND ON PROOF OF BAD FAITH INCLUDING ARIZONA DECISION THAT FAILING TO FOLLOW PERSONNEL POLICY IS BAD FAITH	2.7	380.00	\$1,026.00			
03-20-2015	J. BLAIR	TELEPHONE CALLS WITH P. BJORKLUND REGARDING TESTIMONY	0.4	380.00	\$152.00			
03-20-2015	J. BLAIR	ATTEND PORTION OF PREPARATION MEETING WITH A. GRESSETT [Privileged Communication]	1.2	380.00	\$456.00	Excessive - no briefing filed	Attorney Blair's 1.2 time entry to attend a portion of the Gressett prep session was critically important and appropriate. (See above). The briefing criticism is misplaced.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-20-2015	J. BLAIR	TELEPHONE CALL WITH CAP'S COUNSEL REGARDING EXHIBITS, WITNESSES	2.2	380.00	\$836.00			
03-20-2015	J. BLAIR	REVIEW BRIEFING FOR TRIAL, MAKE REVISIONS TO SAME	1.2	380.00	\$456.00			
03-20-2015	J. BLAIR	PLAN EXPERT BJORKLUND'S TESTIMONY, REVIEW EXHIBITS	1.4	380.00	\$532.00			
03-20-2015	J. BLAIR	TRIAL TEAM STATUS MEETING	1.5	380.00	\$570.00	Internal Conference	Attorney Blair's 1.5 time entry to attend a portion of the trial team status meeting is not an internal conference. (See above).	
03-20-2015	T. COOK	STUDY DEPOSITION AND EXHIBITS AND NOTATE DEPOSITION OF M. COOK; BEGIN OUTLINE OF EXAMINATION	5.5	380.00	\$2,090.00			
03-20-2015	T. COOK	STUDY DEPOSITION AND EXHIBITS AND NOTATE SPECIFIC TESTIMONY REGARDING LUDKE; BEGIN OUTLINE OF EXAMINATION	4.6	380.00	\$1,748.00			
03-20-2015	T. COOK	STUDY AND NOTATE MEDICAL RECORDS FOR USE DURING EXAMINATION OF ELDRIDGE	2.3	380.00	\$874.00			
03-21-2015	L. SIMONINI	STUDY GRESSETT'S JOB SEARCH DATA AND CREATE DEMONSTRATIVE EXHIBIT SUMMARIZING SAME	2.8	170.00	\$476.00	Unnecessary (demonstrative exhibit not used)	Paralegal Simonini's 2.8 time entry to summarize Plaintiff Gressett's job search data and develop a demonstrative exhibit illustrating same was necessary. The exhibit became an outline for taking direct testimony from Plaintiff Gressett.	
03-21-2015	L. SIMONINI	STUDY CAP'S TERMINATION POLICY AND IDENTIFY ITEMS TO CHALLENGE FOR CAP'S FAILURE TO FOLLOW POLICY	0.8	170.00	\$136.00			
03-21-2015	L. SIMONINI	CONTINUE PREPARING ELECTRONIC PRESENTATION OF TRIAL EXHIBITS, INCLUDING EXPERT BJORKLUND'S DEMONSTRATIVE EXHIBITS	1.9	170.00	\$323.00			
03-21-2015	L. SIMONINI	CONFIRM CAP DID NOT REQUEST GRESSETT'S IMPEACHMENT EVIDENCE	0.3	170.00	\$51.00			
03-21-2015	L. SIMONINI	STUDY STATE BAR'S JUDGMENT AGAINST ATTORNEY KRUMWEIDE TO IDENTIFY ITEMS REFERENCED IN SAME TO CHALLENGE CAP'S TRIAL EXHIBITS REGARDING KRUMWEIDE	0.6	170.00	\$102.00			
03-21-2015	J. KLECAN	STUDY M. COOK'S NOTES TO ASSIST WITH CROSS X	1.5	380.00	\$570.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-21-2015	J. BLAIR	PREPARE FOR TRIAL, REVIEW PRETRIAL MATERIALS	3.2	380.00	\$1,216.00	Block billing, vague	Attorney Blair's 3.2 time entry to prepare for trial by reviewing all of the pretrial materials is not block billing nor vague.	
03-21-2015	T. COOK	STUDY AND NOTATE DEPOSITION OF C. ELDRIDGE	6.5	380.00	\$2,470.00			
03-21-2015	T. COOK	BASED UPON FULL CASE REVIEW, PREPARE PRELIMINARY OUTLINES FOR OPENING, CLOSING, EXAMINATIONS OF ALL PLAUSIBLE WITNESSES AT TRIAL	5.0	380.00	\$1,900.00			
03-21-2015	T. COOK	MEET AND CONFER AND PREPARE CLIENT FOR TESTIMONY AT TRIAL [Privileged Communication]	3.0	380.00	\$1,140.00			
03-22-2015	S. KING	STUDY DEFENDANT CAP'S RESPONSES TO GRESSETT'S REQUEST FOR PRODUCTION OF DOCUMENTS SET THREE AND FOUR AND ATTACHED DOCUMENT PRODUCTION FOR INFORMATION REGARDING HR TRACKING OF FMLA HOURS IN PREPARATION FOR TRIAL	1.0	170.00	\$170.00			
03-22-2015	S. KING	PREPARE ANALYSIS OF PLAINTIFF GRESSETT'S JOB SEARCH AS OUTLINED IN TRIAL EXHIBITS 14 THROUGH 16 IN PREPARATION FOR DEMONSTRATIVE FOR TRIAL	1.5	170.00	\$255.00	Unnecessary (demonstrative exhibit not used)	Paralegal King's 1.5 time entry to assist in the preparation of the Gressett job search material was necessary. See above.	
03-22-2015	L. SIMONINI	ASSIST ATTORNEY COOK IN PREPARING CLIENT FOR DIRECT AND CROSS EXAMINATION	4.2	170.00	\$714.00			
03-22-2015	L. SIMONINI	ADDRESS ISSUES WITH ATTORNEY BLAIR REGARDING DIRECT EXAMINATION OF EXPERT BJORKLUND	1.2	170.00	\$204.00	Internal Conference	Paralegal Simonini's 1.2 time entry to assist Attorney Blair with the examination of Expert Bjorklund is not an internal conference. No one else billed for this time.	
03-22-2015	L. SIMONINI	STUDY TWO E-MAILS FROM EXPERT MCRAE REGARDING MATERIALS SUPPORTING OPINION	0.2	170.00	\$34.00	Excessive billing for email exchange	Paralegal Simonini's .2 time entry to review two emails from Expert McRae is not excessive billing. (.1) per email.	
03-22-2015	L. SIMONINI	IDENTIFY ADDITIONAL MATERIALS TO BE FORWARDED TO EXPERT MCRAE	0.6	170.00	\$102.00			
03-22-2015	L. SIMONINI	DRAFT E-MAIL TO EXPERT MCRAE REGARDING MATERIALS SUPPORTING OPINION	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-22-2015	L. SIMONINI	REVISE POTENTIAL DEMONSTRATIVE EXHIBIT REGARDING GRESSETT'S JOB SEARCHES	0.8	170.00	\$136.00	Unnecessary (demonstrative exhibit not used)	Paralegal Simonini's .8 time entry to prepare the job search presentation at trial was necessary. See above.	
03-22-2015	L. SIMONINI	IDENTIFY AND PREPARE ADDITIONAL MATERIALS TO BE USED AS TRIAL EXHIBITS	0.8	170.00	\$136.00			
03-22-2015	L. SIMONINI	EXCHANGE E-MAIL WITH CAP ATTORNEY REGARDING TRIAL EXHIBIT ONE	0.1	170.00	\$17.00			
03-22-2015	J. KLECAN	ASSIST WITH TRIAL PREPARATION	2.0	380.00	\$760.00	Vague	Attorney Klecan's 2.0 time entry to assist with trial prep reflects his work with the trial attorney team each day based on what occurred that day and what was anticipated the next day. It is not vague.	
03-22-2015	J. KLECAN	ASSIST WITH TRIAL PREPARATION	2.0	380.00	\$760.00	Vague	Attorney Klecan's 2.0 time entry to assist with trial prep reflects his work with the trial attorney team each day based on what occurred that day and what was anticipated the next day. It is not vague. This was the second conference that day.	
03-22-2015	J. BLAIR	TELEPHONE CALL WITH P. BJORKLUND REGARDING TESTIMONY	1.0	380.00	\$380.00			
03-22-2015	J. BLAIR	PREPARE FOR TRIAL, STUDY EXPERT REPORTS	2.5	380.00	\$950.00	Vague, block billing	Attorney Blair's 2.5 time entry documents his review of Expert Bjorklund and Expert Cameron's reports and his assistance to trial Attorney Cook that trial day. It is not vague. (1.3); time entry two (1.2)	
03-22-2015	T. COOK	FINAL PREPARATIONS FOR TRIAL: COMPLETE OPENING, DIRECT OF CLIENT, STUDY OF FMLA LAW AND REGULATIONS, REVIEW FINAL PRE-TRIAL STATEMENT, DIRECT OF MODEER	10.0	380.00	\$3,800.00			
03-22-2015	T. COOK	STUDY EMAIL FROM G. MCRAE REGARDING SCOPE OF TESTIMONY	0.1	380.00	\$38.00			
03-22-2015	T. COOK	MEET, CONFER WITH, AND PREPARE CLIENT FOR TRIAL [Privileged Communication]	6.4	380.00	\$2,432.00			
03-23-2015	S. KING	EMAIL TO EXPERT GINGER MCRAE REGARDING POTENTIAL TRIAL TESTIMONY	0.2	170.00	\$34.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-23-2015	S. KING	REVIEW TRIAL EXHIBITS 14 AND 15 REGARDING GINGER MCRAE'S EXPERT REPORT AND CREATE BULLET POINT ANALYSIS IN PREPARATION FOR MEETING WITH ATTORNEYS AND EXPERT MCRAE	2.5	170.00	\$425.00			
03-23-2015	S. KING	STUDY AND PREPARE ANALYSIS OF SUPPLEMENTAL REPORT OF EXPERT MCCRAE IN PREPARATION FOR EXPERT PREPARATION FOR TRIAL	0.4	170.00	\$68.00			
03-23-2015	L. SIMONINI	ATTEND DAY ONE OF TRIAL; ASSIST WITH SELECTION OF JURY, ELECTRONIC PRESENTATION OF EXHIBITS DURING OPENING, DIRECT EXAMINATION OF GRESSETT AND EXAMINATION OF D. MODEER	8.5	170.00	\$1,445.00			
03-23-2015	L. SIMONINI	ADDRESS ISSUES WITH ATTORNEYS COOK, BLAIR, KLECAN AND EXPERT MCRAE REGARDING NEXT DAY OF TRIAL	1.4	170.00	\$238.00			
03-23-2015	L. SIMONINI	IDENTIFY AND PREPARE MATERIALS FOR TRIAL	1.3	170.00	\$221.00			
03-23-2015	L. SIMONINI	PREPARE TRIAL EXHIBIT REGARDING EXPERT BJORKLUND	0.3	170.00	\$51.00			
03-23-2015	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY REGARDING EXPERT BJORKLUND EXHIBIT	0.1	170.00	\$17.00			
03-23-2015	L. SIMONINI	TELEPHONE CALL C. ELDRIDGE REGARDING TRIAL TESTIMONY	0.3	170.00	\$51.00			
03-23-2015	J. BLAIR	FIRST DAY OF TRIAL, REVIEW TRIAL DAY 1 AND PREPARE FOR DAY 2	11.5	380.00	\$4,370.00			
03-23-2015	T. COOK	TRIAL DAY ONE: ORAL ARGUMENTS ON JURY INSTRUCTIONS, ISSUES RELATED TO PERMISSION TO CALL EXPERT MCRAE, OPENING STATEMENTS, GRESSETT, MODEER	8.5	380.00	\$3,230.00			
03-23-2015	T. COOK	PRE-TRIAL PREPARATIONS: COMPLETE OUTLINE AND PRACTICE OPENING STATEMENT	1.5	380.00	\$570.00			
03-23-2015	T. COOK	PRE-TRIAL PREPARATIONS: OUTLINE ISSUES TO RAISE WITH COURT BEFORE START OF TRIAL	0.6	380.00	\$228.00			
03-23-2015	T. COOK	POST-TRIAL PREPARATIONS: STUDY TRIAL TRANSCRIPTS FROM DAY ONE	1.5	380.00	\$570.00			
03-23-2015	T. COOK	POST-TRIAL PREPARATIONS: MEET AND CONFER WITH G. MCRAE	1.0	380.00	\$380.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-24-2015	S. KING	STUDY AND SEND EXPERT PAUL BJORKLUND HIS DEPOSITION AND EXHIBITS PER EMAIL FROM ATTORNEY COOK IN PREPARATION OF HIS TRIAL TESTIMONY	0.2	170.00	\$34.00	Clerical	Paralegal King's .2 time entry to pull and send Expert Bjorklund materials in advance of his trial testimony is not clerical. Only a paralegal could locate these materials in a timely fashion.	
03-24-2015	S. KING	PREPARE DEPOSITION SUMMARY OF DEFENDANT'S EXPERT CATHERINE CAMERON FOR TRIAL TEAM	2.4	170.00	\$408.00			
03-24-2015	L. SIMONINI	ATTEND DAY TWO OF TRIAL; ASSIST WITH ELECTRONIC PRESENTATION OF EXHIBITS DURING CONTINUED DIRECT EXAMINATION OF GRESSETT AND EXPERT BJORKLUND	8.5	170.00	\$1,445.00			
03-24-2015	L. SIMONINI	EXCHANGE E-MAIL WITH COURT REPORTER REGARDING DAILY EXHIBITS	0.2	170.00	\$34.00			
03-24-2015	L. SIMONINI	STUDY EXPERT DOCUMENTS TO IDENTIFY ADDITIONAL EXHIBITS TO BE SHOWN TO EXPERT BJORKLUND	0.6	170.00	\$102.00			
03-24-2015	L. SIMONINI	STRATEGY SESSION WITH ATTORNEYS COOK, KLECAN AND BLAIR AND EXPERT MCRAE REGARDING EXAMINATION OF M. RUZICH AND EXPERT MCRAE'S DIRECT EXAMINATION	1.4	170.00	\$238.00			
03-24-2015	L. SIMONINI	IDENTIFY AND PREPARE EXHIBITS AND MATERIALS FOR SECOND DAY OF TRIAL	1.1	170.00	\$187.00			
03-24-2015	J. KLECAN	PROPOSED CROSS EXAMINATION QUESTIONS ON LACK OF PROOF THAT FMLA TIME WAS GRANTED	0.4	380.00	\$152.00			
03-24-2015	J. KLECAN	MEET WITH TRIAL TEAM AT END OF DAY TO DISCUSS STRATEGY	0.8	380.00	\$304.00	Internal Conference	Attorney Klecan's .8 time entry to meet with the trial team and strategize is not an internal conference. See above.	
03-24-2015	J. BLAIR	TRIAL DAY 2, PREPARE FOR EXPERT BJORKLUND TESTIMONY, PREPARE FOR DAY 3	11.8	380.00	\$4,484.00			
03-24-2015	T. COOK	TRIAL DAY TWO: CLIENT, BJORKLUND	8.5	380.00	\$3,230.00			
03-24-2015	T. COOK	PRE-TRIAL PREPARATIONS: FINALIZE PREPARATIONS FOR COMPLETING DIRECT OF CLIENT, BEGIN OUTLINE OF DIRECT OF MCRAE, SELECTION OF TRIAL EXHIBITS	3.0	380.00	\$1,140.00			
03-24-2015	T. COOK	POST-TRIAL STUDY OF TESTIMONY AND TRIAL TRANSCRIPTS	1.8	380.00	\$684.00			
03-25-2015	L. SIMONINI	DRAFT TRANSCRIPT REQUEST FORM FOR M. COOK TESTIMONY	0.1	170.00	\$17.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-25-2015	L. SIMONINI	ATTEND THIRD DAY OF TRIAL; ASSIST DURING CROSS EXAMINATION OF M. COOK AND C. ELDRIDGE AND REDIRECT OF EXPERT BJORKLUND	8.5	170.00	\$1,445.00			
03-25-2015	L. SIMONINI	ATTEND STRATEGY SESSION WITH ATTORNEYS COOK, BLAIR AND KLECAN REGARDING DAY FOUR OF TRIAL	0.5	170.00	\$85.00	Internal Conference	Paralegal Simonini's .5 time entry to attend that particular strategy session with the trial attorneys and Attorney Klecan is not an internal conference. See above.	
03-25-2015	J. KLECAN	DIRECT EXAM OF EXPERT	0.5	380.00	\$190.00			
03-25-2015	J. KLECAN	RESEARCH ON ESTOPPEL REGARDING CHART AND PROPOSED NEW COLUMN	0.5	380.00	\$190.00			
03-25-2015	J. KLECAN	ATTEND TRIAL TO DISCUSS POSSIBLE OBJECTIONS TO CHART	1.0	380.00	\$380.00	Did not participate in trial, vague	Attorney Klecan's 1.0 time entry to review testimony from the courtroom as it was presented is not vague. While not making an appearance at trial, he participated behind the scenes to assist at trial presentation. He was present in the courtroom for a portion of the Mike Cook testimony.	
03-25-2015	S. KING	PREPARE COPIES OF DAILY COURT TRANSCRIPTS OF TRIAL TESTIMONY FOR CASE TEAM	0.3	170.00	\$51.00	Clerical	Paralegal King's .3 time entry to organize the daily transcripts for use by the trial attorneys is not clerical. Only someone familiar with the case could do this efficiently.	
03-25-2015	S. KING	RESEARCH FEBRUARY 2010 VERSION OF 29CFR 825 FOR TRIAL TEAM	0.5	170.00	\$85.00			
03-25-2015	D. BARNES	RESEARCH AND ANALYZE DEFENSES TO AFTER ACQUIRED EVIDENCE DOCTRINE	2.0	360.00	\$720.00			
03-25-2015	J. BLAIR	TRIAL DAY 3; REVIEW DAY 3 AND PREPARE FOR DAY 4, PREPARE FOR JURY INSTRUCTIONS AND MOTIONS	11.6	380.00	\$4,408.00			
03-25-2015	T. COOK	TRIAL DAY THREE: BJORKLUND, COOK, ELDRIDGE	8.5	380.00	\$3,230.00			
03-25-2015	T. COOK	PRE-TRIAL PREPARATIONS: COMPLETE CROSS OF COOK AND ELDRIDGE, STUDY AND SELECT TRIAL EXHIBITS	3.0	380.00	\$1,140.00			
03-25-2015	T. COOK	POST-TRIAL PREPARATIONS: MEET AND CONFER WITH G. MCRAE	1.0	380.00	\$380.00			
03-25-2015	T. COOK	POST-TRIAL REVIEW OF TESTIMONY AND TRIAL TRANSCRIPTS	1.3	380.00	\$494.00			
03-26-2015	L. SIMONINI	PREPARE MATERIALS FOR DAY FOUR OF TRIAL	0.6	170.00	\$102.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-26-2015	L. SIMONINI	ATTEND DAY FOUR OF TRIAL; ASSIST DURING EXAMINATION OF EXPERT MCRAE, WITNESSES M. LUDKE AND T. DELGADO	8.5	170.00	\$1,445.00			
03-26-2015	L. SIMONINI	ATTEND STRATEGY SESSION WITH ATTORNEYS COOK AND BLAIR AND CLIENT [Privileged Communication]	1.7	170.00	\$289.00			
03-26-2015	S. KING	PERFORM LEGAL RESEARCH AND PREPARE COPY OF ACTIVE FMLA 29CFR 825 FOR TRIAL TEAM	0.4	170.00	\$68.00			
03-26-2015	D. BARNES	RESEARCH AND ANALYZE CASE LAW AND STATUTES RELATED TO LIQUIDATED DAMAGES AND EQUITABLE RELIEF (FRONT PAY) UNDER THE FAMILY MEDICAL LEAVE ACT	1.5	360.00	\$540.00	Duplicative of 9/25/14 and 9/30/14 entries	Attorney Barnes' 1.5 time entry to research liquidated damages and front pay issues is not duplicative of any other time entries. As the trial wound down, and the Court requested a memo on these issues, this research effort became critical.	
03-26-2015	D. BARNES	RESEARCH AND ANALYZE CASE LAW AND STATUTES RELATED TO WHEN LIABILITY ATTACHES IN CLAIMS UNDER THE FAMILY MEDICAL LEAVE ACT	0.7	360.00	\$252.00			
03-26-2015	D. BARNES	REVIEW STANDARD LANGUAGE FOR JURY INSTRUCTION ON AFTER ACQUIRED EVIDENCE AND DEFENDANT'S PROPOSED JURY INSTRUCTION REGARDING AFTER ACQUIRED EVIDENCE	0.5	360.00	\$180.00			
03-26-2015	D. BARNES	DRAFT JURY INSTRUCTION FOR AFTER-ACQUIRED EVIDENCE	0.5	360.00	\$180.00			
03-26-2015	D. BARNES	REVIEW AND ANALYSIS OF AFTER-ACQUIRED EVIDENCE	0.7	360.00	\$252.00			
03-26-2015	J. KLECAN	PREPARE CROSS EXAMINATION OF CAMERON	0.8	380.00	\$304.00			
03-26-2015	J. BLAIR	TRIAL DAY 4, REVIEW DAY 4 AND PREPARE FOR DAY 5, DIRECTED VERDICT ARGUMENT	11.5	380.00	\$4,370.00			
03-26-2015	T. COOK	STUDY TESTIMONY ELICITED FROM DEFENDANT REGARDING AFTER ACQUIRED EVIDENCE, STUDY CASE LAW REGARDING SAME, EVALUATE AND PLAN DIRECT EXAMINATION OF CLIENT TO CLOSE REMAINING LOOPS ON DEFENSE	2.4	380.00	\$912.00			
03-26-2015	T. COOK	DRAFT CLOSING ARGUMENT, STUDY TRIAL TRANSCRIPTS FOR TESTIMONY REFERENCES, REVIEW TRIAL EXHIBITS FOR USE IN CLOSING	2.0	380.00	\$760.00			
03-26-2015	T. COOK	TRIAL DAY FOUR: MCRAE, LUDKE, DELGADO	8.5	380.00	\$3,230.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-26-2015	T. COOK	PRETRIAL PREPARATIONS: FINALIZE EXAMINATIONS OF LUDKE, MCRAE, DELGADO, RUZICH	1.8	380.00	\$684.00			
03-27-2015	L. SIMONINI	STUDY TRANSCRIPT OF LUDKE TESTIMONY TO IDENTIFY ITEMS FOR CLOSING ARGUMENTS	1.7	170.00	\$289.00			
03-27-2015	L. SIMONINI	PREPARE SUMMARY OF EXHIBIT 35 FOR ATTORNEY COOK'S USE IN CLOSING ARGUMENT	0.6	170.00	\$102.00			
03-27-2015	L. SIMONINI	ATTEND LAST DAY OF TRIAL; ASSIST DURING EXAMINATION OF M. RUZICH AND CLOSING ARGUMENTS	8.5	170.00	\$1,445.00			
03-27-2015	S. KING	PREPARE BILL OF COSTS TO INCLUDE TRIAL TRANSCRIPTS	0.5	170.00	\$85.00			
03-27-2015	S. KING	REVIEW ATTORNEYS FEES FROM CUMULATIVE BILL AND SPLIT BY TIME KEEPER IN PREPARATION FOR APPLICATION FOR ATTORNEYS FEES	0.5	170.00	\$85.00			
03-27-2015	J. BLAIR	TRIAL DAY 5, DIRECTED VERDICT ARGUMENT	8.5	380.00	\$3,230.00			
03-27-2015	T. COOK	ATTEND TRIAL: JURY INSTRUCTIONS, RUZICH, GRESSETT, RULE 50 MOTIONS, CLOSING ARGUMENTS, VERDICT	8.5	380.00	\$3,230.00			
03-27-2015	T. COOK	PRETRIAL PREPARATIONS: FINALIZE DIRECT EXAMINATION OF RUZICH, EVALUATE TIME LIMITATIONS IMPOSED BY COURT AND AREAS WHERE CUTS CAN BE MADE WITHOUT UNDULY COMPROMISING CASE IN CHIEF, FINALIZE CLOSING ARGUMENT	4.0	380.00	\$1,520.00			
03-28-2015	J. BLAIR	STUDY CASE LAW SUPPORTING LIQUIDATED DAMAGES AND FRONT PAY, EMAIL TO LITIGATION TEAM	1.2	380.00	\$456.00	Internal conference, duplicative of 1/24/14, 1/27/14, 9/25/14, 9/30/14, 10/24/14, 12/22/14, and 3/26/15 entries	Attorney Blair's 1.2 time entry to review the liquidated damages and front pay case law and summarize same in an email is not an internal conference and not duplicative of any other efforts. He needed this info to prepare the post-trial brief requested by Judge Teilborg.	
03-30-2015	L. SIMONINI	STUDY TRIAL TRANSCRIPTS TO IDENTIFY TESTIMONY SUPPORTING BRIEF FOR FRONT PAY AND LIQUIDATED DAMAGES	3.7	170.00	\$629.00			
03-30-2015	L. SIMONINI	IDENTIFY PERTINENT TRIAL EXHIBITS TO SUPPORT BRIEF SEEKING FRONT PAY AND LIQUIDATED DAMAGES	1.1	170.00	\$187.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-30-2015	L. SIMONINI	CONFIRM ACCURACY OF CASE CITATIONS IN BRIEF SEEKING FRONT PAY AND LIQUIDATED DAMAGES	1.2	170.00	\$204.00			
03-30-2015	L. SIMONINI	STUDY CAP'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW AND IDENTIFY TRIAL TESTIMONY AND EXHIBITS COUNTERING ASSERTIONS IN SAME	1.6	170.00	\$272.00			
03-30-2015	L. SIMONINI	STUDY CAP'S BRIEF REGARDING FRONT PAY AND IDENTIFY TRIAL TESTIMONY AND EXPERTS COUNTERING ASSERTIONS MADE IN SAME	1.2	170.00	\$204.00			
03-30-2015	S. KING	PREPARE ANALYSIS OF NONTAXABLE AND TAXABLE COSTS	0.5	170.00	\$85.00			
03-30-2015	D. BARNES	REVIEW AND ANALYZE ANY SIGNIFICANT UPDATES IN CASE LAW RELATED TO EQUITABLE DAMAGES AND LIQUIDATED DAMAGES IN FAMILY MEDICAL LEAVE ACT CASES	1.4	360.00	\$504.00	Excessive, duplicative of J. Blair 3/28/15 entry	Attorney Barnes 1.4 time entry is to update any earlier research on liquidated damages and front pay. It is not excessive, nor duplicative of any work by Attorney Blair. Her efforts fed his efforts.	
03-30-2015	J. BLAIR	DRAFT BRIEF SEEKING LIQUIDATED DAMAGES AND FRONT PAY, REVISE SAME, FINALIZE SAME, WORK WITH PARALEGAL SIMONINI TO COORDINATE SUPPORTING EVIDENCE, WORK WITH ATTORNEY COOK TO ORGANIZE SAME, AND OVERVIEW FILINGS BY CAP	8.2	380.00	\$2,492.80	Internal Conference, Block Billing	Attorney Blair's 8.2 time entry, to prepare the post-trial brief seeking Plaintiff Gressett's liquidated damages and front pay is not block billing or an internal conference, but a description in some detail of the work done that day to complete that task. Attorney Cook did not bill for any time to support this effort.	Block billing; reduced by 20%.
03-31-2015	L. SIMONINI	IDENTIFY AND PREPARE TRIAL TESTIMONY, TRIAL EXHIBITS AND CASE LAW FOR ORAL ARGUMENT ON LIQUIDATED DAMAGES AND FRONT PAY	3.1	170.00	\$527.00			
03-31-2015	L. SIMONINI	ATTEND ORAL ARGUMENT ON LIQUIDATED DAMAGES AND FRONT PAY	1.5	170.00	\$255.00			
03-31-2015	J. BLAIR	REVIEW MATERIALS FILED BY CAP, HELP ATTORNEY COOK PREPARE FOR ARGUMENT	2.1	380.00	\$798.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
03-31-2015	J. BLAIR	HEARING BEFORE JUDGE TEILBORG REGARDING LIQUIDATED DAMAGES AND FRONT PAY	1.5	380.00	\$570.00	Duplicative attorney attendance - did not present at hearing	Attorney Blair's 1.5 time entry to attend the hearing before Judge Teilborg re liquidated damages and front pay is not duplicative. While Attorney Cook presented these materials, Attorney Blair was there to assist. He prepared the brief. All three of CAP's attorneys were present.	
03-31-2015	J. BLAIR	EVALUATE ARGUMENT WITH T. COOK	0.5	380.00	\$190.00	Internal Conference	Attorney Blair's .5 time entry to evaluate the argument with Attorney Cook is not an internal conference. Attorney Cook did not bill for this evaluation/ discussion.	
03-31-2015	J. BLAIR	PLAN FEES/COSTS APPLICATION	0.2	380.00	\$76.00	Clerical	Attorney Blair's .2 time entry to plan the fees/costs application is just that, i.e., an overview analysis of what would be needed in short order. It is not clerical.	
03-31-2015	T. COOK	APPEAR AND PRESENT AT HEARING TO COURT REGARDING LIQUIDATED DAMAGES AND FRONT PAY	1.5	380.00	\$570.00			
03-31-2015	T. COOK	STUDY BRIEFS FILED ON FRONT PAY AND LIQUIDATED DAMAGES, STUDY CASE LAW CITED AND MARK FOR USE WITH COURT AT HEARING	2.4	380.00	\$912.00			
04-01-2015	J. BLAIR	STUDY COURT ORDER AWARDING LIQUIDATED DAMAGES AND FRONT PAY	0.5	380.00	\$190.00			
04-01-2015	J. BLAIR	BEGIN ANALYSIS OF REQUIREMENTS FOR FEE/COSTS APPLICATION, REVIEWING LOCAL RULE AND PRIOR FEES REQUESTS IN FEDERAL COURT	2.3	380.00	\$874.00	Excessive	Attorney Blair's 2.3 time entry to begin his analysis of the requirement for a fees/costs application, including studying the local rule and other fee requests is not excessive. The fees/costs application is a significant undertaking and requires organization and analysis.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-01-2015	T. COOK	STUDY COURT'S JUDGMENT, AWARD OF LIQUIDATED DAMAGES AND FRONT PAY, RULING ON LIQUIDATED DAMAGES AND FRONT PAY AND FORWARD TO CLIENT	0.3	380.00	\$114.00	Duplicative of J. Blair 4/1/15 entry	Attorney Cook's .3 time entry to review the Court's order awarding liquidated damages and front pay is not duplicative. Trial Attorney Cook was critical in the presentation of oral argument leading to that award and just as critical in the preparation of the liquidated damages/front pay memorandum.	
04-02-2015	J. BLAIR	REVIEW LOCAL RULES AND PREPARE INITIAL DRAFT MOTION FOR FEES AND SUPPORTING AFFIDAVIT	2.7	380.00	\$1,026.00	Block billing, duplicative of 4/1/15 entry	Attorney Blair's 2.7 time entry to begin drafting the motion for fees/costs and the supporting affidavit is not block billing, nor is it duplicative of any other time entry. This is a continuation of this task.	
04-02-2015	L. SIMONINI	BEGIN PREPARATION OF ITEMIZED FEE BILL TO BE SUBMITTED TO COURT	2.3	170.00	\$391.00			
04-08-2015	J. BLAIR	REVIEW DRAFT INVOICE FOR LEGAL SERVICES, REMOVE DUPLICATION AND INEFFICIENCIES	2.2	380.00	\$836.00			
04-10-2015	D. BARNES	PREPARE SUMMARY OUTLINE OF COURT OF APPEALS CASE LAW RELATED TO AWARD OF ATTORNEYS' FEES IN FAMILY MEDICAL LEAVE ACT ACTIONS	0.3	360.00	\$108.00			
04-10-2015	J. BLAIR	STUDY COSTS RULE LRCIV 54.1, MODIFY FILINGS ACCORDINGLY	0.5	380.00	\$190.00	Duplicative of 4/1/15 entry	Attorney Blair's .5 time entry to review the costs reporting under LRCIV 54.1 is not duplicative of any other time entry. It is a continuation of this task.	
04-10-2015	J. BLAIR	MAKE REVISIONS TO DRAFT AFFIDAVIT, FEES MEMORANDUM, ENCLOSURES	2.1	380.00	\$798.00			
04-10-2015	J. BLAIR	REVIEW FILINGS WITH T. COOK, CALL S. BIDDLE REGARDING MEET AND CONFER	0.8	380.00	\$243.20	Block billing	Attorney Blair's task one (.7); task two (.1).	Block billing; reduced by 20%.
04-10-2015	J. BLAIR	PREPARE MEET AND CONFER ATTACHMENT TO FEES APPLICATION	0.3	380.00	\$114.00			
04-10-2015	J. BLAIR	ADDRESS BILLS FROM OUTSIDE ATTORNEYS, RELATED EMAIL COMMUNICATIONS WITH A. GRESSETT [Privileged Communication]	0.5	380.00	\$190.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-13-2015	J. BLAIR	STUDY LOCAL RULE RE TAXABLE COSTS, DRAFT COVER MEMO	0.8	380.00	\$304.00	Duplicative of 4/10/15 entry, block billing	Attorney Blair's .8 time entry is not duplicative of any other time entry nor is it block billing. It is Attorney Blair's drafting of the costs/fees memorandum based on the local rules.	
04-13-2015	J. BLAIR	WORK ON FEES APPLICATION/MEMORANDUM	0.5	380.00	\$190.00			
04-13-2015	J. BLAIR	WORK ON SUPPORTING AFFIDAVIT	1.2	380.00	\$456.00			
04-13-2015	J. BLAIR	ADDRESS ISSUE OF FEES OWED TO PRIOR COUNSEL, MODIFY FILINGS ACCORDINGLY	0.6	380.00	\$228.00			
04-13-2015	J. BLAIR	ADDRESS NON-TAXABLE COSTS ISSUES	0.5	380.00	\$190.00	Vague	Attorney Blair's .5 time entry to review work by others regarding the non-taxable costs summary and issues presented by that summary is not vague.	
04-13-2015	L. SIMONINI	CONFERENCE WITH ATTORNEYS BLAIR AND COOK REGARDING FEE APPLICATION	0.4	170.00	\$68.00	Internal Conference	Paralegal Simonini's .4 time entry to discuss the fees application with attorneys Blair/Cook is not an internal conference. No one else billed for that discussion.	
04-13-2015	L. SIMONINI	TELEPHONE CALL CAP ATTORNEY BIDDLE REGARDING EXTENSION FOR FILING FEE APPLICATION	0.1	170.00	\$17.00	Excessive - it was plaintiff's counsel's request for extension	Paralegal Simonini's .1 time entry to perform a phone call to CAP's Attorney Biddle is not excessive. Paralegal Simonini's had difficulty getting any response from Attorney Biddle so she documented each communication.	
04-13-2015	L. SIMONINI	TELEPHONE CALL JUDGE TEILBORG'S CHAMBERS REGARDING EXTENSION FOR FILING FEE APPLICATION	0.2	170.00	\$34.00	Excessive - it was plaintiff's counsel's request for extension	Paralegal Simonini's .2 time entry to complete a phone call to Judge Teilborg's chambers is not excessive. Paralegal Simonini had difficulty getting any response from Attorney Biddle so she documented each communication.	
04-13-2015	L. SIMONINI	STUDY DRAFT MEMORANDUM SEEKING ATTORNEYS FEES AND IDENTIFY DOCUMENTATION SUPPORTING SAME	1.2	170.00	\$204.00			
04-13-2015	L. SIMONINI	STUDY ATTORNEY BLAIR'S DRAFT AFFIDAVIT AND IDENTIFY AND PREPARE DOCUMENTATION SUPPORTING SAME	1.3	170.00	\$221.00			
04-13-2015	L. SIMONINI	TELEPHONE CALL CLIENT REGARDING [Privileged Communication]	0.2	170.00	\$34.00			
04-13-2015	L. SIMONINI	BEGIN PREPARING ITEMIZATION OF EXPENSES SEEKING COSTS UNDER LRCIV 54.2	1.3	170.00	\$221.00			

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-13-2015	L. SIMONINI	IDENTIFY AND PREPARE SUPPORT FOR EXPENSES UNDER LRCIV 54.2	0.9	170.00	\$153.00			
04-14-2015	T. COOK	CONFER WITH TEAM REGARDING DRAFTING OF FINAL MATERIALS FOR COURT CONSIDERATION	0.5	380.00	\$190.00	Internal Conference	Attorney Cook's .5 time entry to determine the progress of the materials being filed with the Court is not an internal conference. No one else billed for this attorney time entry.	
04-14-2015	T. COOK	EMAIL EXCHANGE WITH COUNSEL FOR CAP REGARDING EXTENSION TO COMPLETE DOCUMENTS REGARDING COSTS AND FEES	0.1	380.00	\$38.00	Excessive - it was plaintiff's counsel's request for extension	Attorney Cook's .1 time entry to exchange emails with CAP's counsel is not excessive. This office was having difficulty getting any response from Attorney Biddle.	
04-14-2015	J. BLAIR	MAKE SERIES OF UPDATES TO FEE APPLICATION AND COST SUMMARIES IN LIGHT OF ADDITIONAL INFORMATION	0.7	380.00	\$266.00			
04-14-2015	J. BLAIR	ADDRESS TAXABLE/NON-TAXABLE COSTS ISSUES	0.5	380.00	\$190.00	Vague	Attorney Blair's .5 time entry to address issues related to taxable/non-taxable costs is not vague. The rules and case law are specific on this point and Attorney Blair was following the rules correctly.	
04-14-2015	L. SIMONINI	DRAFT E-MAIL TO CAP ATTORNEY KRIEGSFELD REGARDING EXTENSION OF TIME FOR FEE APPLICATION	0.1	170.00	\$17.00	Excessive - it was plaintiff's counsel's request for extension	Paralegal Simonini's .1 time entry to perform a phone call to CAP's Attorney Kriegsfeld is not excessive. Paralegal Simonini had difficulty getting any response from Attorney Biddle so she documented each communication.	
04-14-2015	L. SIMONINI	DRAFT NOTICE OF CAP'S NON-OPPOSITION OF EXTENSION REGARDING FEE APPLICATION	0.1	170.00	\$17.00	Excessive - it was plaintiff's counsel's request for extension	Paralegal Simonini's .1 time entry is not excessive. Paralegal Simonini had difficulty getting any response from Attorney Biddle so she documented each communication.	
04-14-2015	L. SIMONINI	TELEPHONE CALL ATTORNEY BIDDLE'S OFFICE REGARDING MOTION FOR EXTENSION	0.1	170.00	\$17.00	Excessive - it was plaintiff's counsel's request for extension	Paralegal Simonini's .1 time entry is not excessive. Paralegal Simonini had difficulty getting any response from Attorney Biddle so she documented each communication.	

Date	Attorney	Description	Hours	Rate	Amount	CAP Objections	Gressett Reply	Court's Ruling (Blank entry indicates that objection was overruled)
04-14-2015	L. SIMONINI	STUDY E-MAIL FROM ATTORNEY BIDDLE REGARDING MOTION FOR EXTENSION	0.1	170.00	\$17.00	Excessive - it was plaintiff's counsel's request for extension	Paralegal Simonini's .1 time entry is not excessive. Paralegal Simonini had difficulty getting any response from Attorney Biddle so she documented each communication.	
04-14-2015	L. SIMONINI	DRAFT E-MAIL TO ATTORNEY BIDDLE CONFIRMING MESSAGE WAS LEFT WITH HIS ASSISTANT	0.1	170.00	\$17.00	Excessive - it was plaintiff's counsel's request for extension	Paralegal Simonini's .1 time entry is not excessive. Paralegal Simonini had difficulty getting any response from Attorney Biddle so she documented each communication.	
04-14-2015	L. SIMONINI	DRAFT BILL OF COSTS AND ITEMIZATION UNDER LRCIV 54.2	1.2	170.00	\$204.00	Duplicative of L. Simonini 4/13/15 entry	Paralegal Simonini's 1.2 time entry to prepare the bill of costs and itemization materials as requires under LRCIV 54.2 is not duplicative of other time entries. This is a continuation of that assignment.	
04-14-2015	L. SIMONINI	IDENTIFY AND PREPARE SUPPORTING RECORDS FOR BILL OF COSTS	1.3	170.00	\$221.00			
04-15-2015	J. BLAIR	MAKE MODIFICATIONS TO THE MEMORANDUM AND AFFIDAVIT TO REFLECT REQUIREMENTS UNDER LRCIV 54.2	2.3	380.00	\$874.00			
04-15-2015	J. BLAIR	STUDY FEE BILLS AND COST BILLS, CORRECT ERRORS	1.1	380.00	\$418.00			
04-15-2015	L. SIMONINI	IDENTIFY ARGUMENT TO BE ADDED TO FEE MEMORANDUM RELATING TO JUDGE'S FINAL ORDER AND CAP'S CONDUCT DURING CASE	0.4	170.00	\$68.00			
04-15-2015	L. SIMONINI	IDENTIFY MOST RECENT NUMBERS EXCHANGED AMONG PARTIES DURING MEDIATION	0.6	170.00	\$102.00			
04-15-2015	L. SIMONINI	CONTINUE PREPARING ITEMIZATION OF EXPENSES PURSUANT LRCIV 54.2 AND IDENTIFYING SUPPORTING DOCUMENTATION	1.3	170.00	\$221.00			
04-15-2015	L. SIMONINI	CONTINUE PREPARING ITEMIZATION OF EXPENSES PURSUANT LRCIV 54.1 AND IDENTIFYING SUPPORTING DOCUMENTATION	1.7	170.00	\$289.00			
04-15-2015	L. SIMONINI	STUDY DRAFT AFFIDAVIT AND INCORPORATE ADDITIONAL SUPPORTING INFORMATION AND DOCUMENTATION	0.7	170.00	\$119.00			
<b>Totals</b>			2542.2		<b>\$688,626.00</b>			