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6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF ARIZONA**

8
9 Advanced Reimbursement Solutions LLC,
10 Plaintiff,

No. CV-17-01688-PHX-DWL

11 v.

ORDER

12 Spring Excellence Surgical Hospital LLC, et
13 al.,

14 Defendants.

15 Pending before the Court is a motion for attorneys' fees and costs filed by Plaintiff
16 Advanced Reimbursement Solutions LLC ("ARS"). (Doc. 236.) For the following
17 reasons, the motion will be granted in part and denied in part.

18 **BACKGROUND**

19 ARS is a billing service that contracts with medical providers to process and bill
20 out-of-network insurance claims. Defendant Spring Excellence Surgical Hospital LLC
21 ("SESH") owns and operates a hospital in Texas.

22 On May 31, 2017, ARS filed a complaint. (Doc. 1.) At the time, ARS was
23 represented by the law firm of Schian Walker PLC ("Schian Walker"). The complaint
24 asserted, among other things, a breach-of-contract claim against SESH.

25 On June 8, 2018, ARS filed a motion for partial summary judgment, limited to the
26 issue of liability on its breach-of-contract claim. (Doc. 97.)

27 On June 29, 2018, SESH filed a motion under Rule 56(d) of the Federal Rules of
28 Civil Procedure for authorization to conduct additional discovery before responding to the

1 partial summary judgment motion. (Doc. 121.)

2 On July 12, 2018, the Court granted the Rule 56(d) motion. (Doc. 135.)

3 On August 10, 2018, SESH filed a motion to transfer the case to Texas. (Doc. 149.)

4 In December 2018—after about a year and a half of litigation—ARS switched to
5 new counsel, the law firm of Thorpe Shwer, P.C. (“Thorpe Shwer”). (Docs. 180, 181.)

6 On January 11, 2019, SESH’s motion to transfer was denied. (Doc. 186.)

7 On April 3, 2019, the Court imposed a \$8,230.95 sanction award against SESH.
8 (Doc. 210.) The award stemmed from SESH’s counsel’s failure to attend a deposition in
9 Texas, which was one of the depositions that SESH had sought and obtained authorization
10 to pursue under Rule 56(d). (Doc. 206.)

11 On May 10, 2019, the Court granted ARS’s motion for partial summary judgment
12 on liability. (Doc. 215.)

13 On February 6, 2020, the Court granted ARS’s motion for partial summary
14 judgment on damages, awarding \$734,934.03 plus fees and interest. (Doc. 234.)

15 On February 20, 2020, ARS filed a motion for attorneys’ fees and costs. (Doc. 236.)
16 The same day, ARS filed a bill of costs. (Doc. 237.)

17 On March 9, 2020, SESH filed a response. (Doc. 243.)

18 On March 18, 2020, ARS filed a reply. (Doc. 246.)

19 On April 28, 2020, the parties filed a notice stating that they had reached a
20 settlement concerning attorneys’ fees. (Doc. 247.)

21 On May 27, 2020, ARS informed the Court that the parties had not, in fact, settled
22 and thus requested a ruling on its fee motion. (Doc. 251.)

23 **DISCUSSION**

24 **I. Parties’ Arguments**

25 In its motion, ARS seeks \$522,588.60 in fees—composed of \$234,179.10 in fees
26 incurred by attorneys from Schian Walker and \$288,409.50 in fees incurred by attorneys
27 from Thorpe Shwer—and \$3,178.85 in costs. (Doc. 236 at 1.) In support of its motion,
28 ARS provided a Microsoft Excel spreadsheet containing an itemized statement of legal

1 services, as well as declarations from Tyler Grim (a former Schian Walker associate, see
2 Doc. 236-3 at 2-4) and Sara Witthoft (a Thorpe Shwer partner, see Doc. 236-1 at 2-5)
3 attesting to the reasonableness of each firm’s fees.

4 In its response, SESH does not dispute that ARS, as the prevailing party in this
5 action, is contractually entitled to an award of reasonable attorneys’ fees. (Doc. 243 at 2.)¹
6 Additionally, SESH does not dispute ARS’s bill of costs. (Id.) SESH does, however, raise
7 several objections to ARS’s fee request, arguing that: (1) the Grim declaration is
8 insufficient to validate the request for \$234,179.10 in fees paid to Schian Walker because
9 Grim was a junior associate who only worked on the case for five weeks and has no
10 personal knowledge as to whether other Schian Walker attorneys actually performed the
11 work in question or exercised reasonable billing judgment when doing so (id. at 2-4);
12 (2) ARS is seeking reimbursement of \$6,717.50 for time spent preparing and litigating a
13 motion for sanctions related to a missed deposition in Texas, but the Court already granted
14 the sanctions motion and SESH already paid the resulting award, so the time entries in
15 question amount to impermissible double-billing (id. at 5-6); (3) because ARS made a
16 voluntary “decision to change law firms during the course of the litigation,” the request for
17 \$288,409.50 in fees paid to Thorpe Shwer attorneys should be reduced to eliminate “the
18 inherent duplication caused by a change in counsel [coupled with] no indication in either
19 [Thorpe Shwer’s] supporting affidavit or [Thorpe Shwer’s] billing summary that any
20 ‘billing judgment’ was exercised in connection with such transition and duplication” (id.
21 at 6-7); (4) both firms’ timesheets contain entries marred by impermissible “block-billing”
22 (id. at 7-8); (5) due to extensive redaction based on the attorney-client privilege, many
23 entries fail to provide an adequate description of the service being rendered, in violation of
24 Local Rule of Civil Procedure 54.2(e)(2)(A) (id. at 8-9); (6) some of the entries from Schian
25 Walker appear to concern legal advice rendered in unrelated matters (id. at 9-10); and (7)

26
27 ¹ Specifically, section 12(e) of the parties’ contract provides that “[i]f any legal action
28 . . . is brought in connection with this Agreement, the prevailing Party shall be entitled to
recover reasonable attorneys’ fees, accounting fees, and other costs incurred in that action
. . . .” (Doc. 98-4 at 9.)

1 although SESH generally doesn't challenge the reasonableness of the hourly rates charged
2 by the Schian Walker and Thorpe Shwer attorneys, it does dispute the \$595 hourly rate of
3 one attorney who is identified only by the attorney's initials (id. at 10).

4 In reply, ARS concedes that (1) SESH has already paid the sanction award, so the
5 related charges should have been omitted from its fee request, and (2) the time entries
6 SESH identified as pertaining to unrelated matters should be excluded. (Doc. 246 at 2, 5.)
7 Additionally, ARS attached to its reply a declaration from Cody Jess, a former partner at
8 Schian Walker who worked extensively on this matter, in an attempt to address SESH's
9 foundation-related objections to the Grim declaration. (Doc. 246-1.)

10 II. Analysis

11 The parties agree that Arizona law governs ARS's fee request. (Doc. 236 at 3; Doc.
12 243 at 2.) The parties further agree that ARS's entitlement to fees arises from an express
13 provision within the parties' contract. (Id.)

14 "Unlike fees awarded under A.R.S. § 12-341.01(A), the court lacks discretion to
15 refuse to award fees under [a] contractual provision." McDowell Mountain Ranch
16 *Community Ass'n v. Simons*, 165 P.3d 667, 670 (Ariz. Ct. App. 2007) (quotation omitted).
17 However, "[n]otwithstanding the general rule that attorneys' fees are enforced in
18 accordance with the terms of a contract, a contractual provision providing for an award of
19 unreasonable attorneys' fees will not be enforced." Id. at 671. "Assuming that the fees
20 requested [are] facially reasonable," the party opposing the fee request has "the burden to
21 show that they were clearly excessive." Id. at 672.

22 The District of Arizona's local rules identify some of the factors that may "bear[]"
23 on the reasonableness of the requested attorneys' fee award." See LRCiv 54.2(c)(3). Those
24 factors include, but are not limited to, the time and labor required of counsel; the novelty
25 and difficulty of the questions presented; the skill required to perform the legal service
26 properly; the preclusion of other employment by counsel because of the acceptance of the
27 action; the customary fee charged in matters of the type involved; whether the fee
28 contracted between the attorney and the client is fixed or contingent; any time limitations

1 imposed by the client or the circumstances; the amount of money, or the value of the rights,
2 involved, and the results obtained; the experience, reputation, and ability of counsel; the
3 “undesirability” of the case; the nature and length of the professional relationship between
4 the attorney and the client; awards in similar actions; and any other matters deemed
5 appropriate under the circumstances. *Id.*

6 **A. Hourly Rate**

7 As an initial matter, SESH does not—with one exception—dispute the
8 reasonableness of the hourly rates charged by the attorneys from Schian Walker and Thorpe
9 Shwer. The exception is a Schian Walker attorney identified in ARS’s supporting materials
10 only as “PS,” who charged an hourly rate of \$595.² SESH argues that “[n]o information
11 is provided as to the identity of ‘PS,’ or his or her qualifications, or qualifications that
12 would render his or her hourly rate of \$595.00 reasonable. In addition, [Schian Walker’s]
13 engagement agreement provides the upper limit of the hourly rates as \$560” (Doc.
14 243 at 10.) ARS does not respond to these points in its reply. However, the Jess declaration
15 clarifies that “[t]he individual identified in time entries as ‘PS’ is Peter Sorensen, an
16 attorney Schian had hired at the time to consult with Schian Walker on complex
17 commercial litigation matters” and that Sorensen was once a partner at Greenberg Traurig,
18 LLP. (Doc. 246-1 ¶ 7.)

19 This explanation satisfies the Court as to the identity of “PS.” However, it fails to
20 explain why Sorensen’s rate exceeded the upper limit provided in Schian Walker’s
21 engagement agreement. Additionally, the rate charged is at the high end of rates considered
22 reasonable for complex, high-dollar commercial litigation in the Phoenix legal market.
23 *Orman v. Central Loan Admin. & Reporting*, 2020 WL 919302, *2 (D. Ariz. 2020)
24 (declining to award \$665 per hour and noting that other Arizona courts have generally
25 upheld rates only as high as \$500 or \$550 per hour in complex, high-stakes cases). This
26 case was not particularly complex (ARS described it in the parties’ Rule 26(f) report as “a
27 simple payment dispute,” see Doc. 187 at 3) and didn’t involve particularly high stakes

28 ² The entries attributed to PS are Nos. 254 and 463.

1 (ARS sought less than \$750,000 in breach-of-contract damages). Accordingly, the Court
2 will reduce the rate charged to Sorenson to \$430 per hour, which is the maximum rate
3 charged by the other Schian Walker attorneys in this case. This reduction results in an
4 overall reduction of ARS’s fee request of \$792.

5 **B. Duplicative Hours**

6 SESH argues that “entries that appear on their face to be related to ARS’[s]
7 transition to new counsel and new counsels’ efforts to ‘get up to speed’” must be eliminated
8 as duplicative. (Doc. 243 at 6.) ARS responds that SESH has failed to explain how the
9 disputed entries constitute duplicative work. (Doc. 246 at 2-3.)

10 “In determining a reasonable number of hours, the Court must review detailed time
11 records to determine whether the hours claimed by the applicant were unnecessary,
12 duplicative or excessive.” *Moshir v. Automobili Lamborghini Am. LLC*, 927 F. Supp. 2d
13 789, 799-800 (D. Ariz. 2013) (citation omitted). Although “[a] litigant has the right to
14 counsel of his choice in many circumstances,” there is “no legal authority . . . that would
15 require [a losing party] to pay for the hours [opposing counsel] expended to become
16 ‘caught-up’ after a change of counsel entirely within [the prevailing party’s] discretion.”
17 *Id.* at 800. See also *Quint v. A.E. Staley Mfg. Co.*, 245 F. Supp. 2d 162, 181 (D. Me. 2003)
18 (“It is unreasonable to charge a losing party with significant duplication of effort resulting
19 from the prevailing party’s decision to change counsel.”); *Hamilton v. Bradford*, 502 F.
20 Supp. 822, 838 (S.D. Miss. 1980) (reducing a fee award in part because “much of the time
21 consumed by plaintiff’s counsel in this action constituted a duplication of effort resulting
22 from a change of law firms”). However, a “blanket assertion that the bill represents
23 duplicative work is insufficient [because] it does not explain why the items billed on the
24 first bill could have been avoided but for defendants’ decision to switch counsel.” *Internet*
25 *Brands Inc. v. Ultimatecoupons.com, LLC*, 2013 WL 5575042, *4 (C.D. Cal. 2013).

26 Here, some of the entries challenged by SESH are, on their face, attributable to
27 ARS’s decision to switch counsel.³ For example, an early entry from Thorpe Shwer reflects

28 ³ These entries are Nos. 502, 510-16, 518, 519, and 522.

1 that attorneys spent time “[r]eview[ing] and analyz[ing] . . . ARS’[s] motion for partial
2 summary judgment regarding liability in district court case against SESH [and] ARS’[s]
3 third amended complaint filed in district court.” (Doc. 243-1 at 69.) Because Schian
4 Walker attorneys drafted those documents, it’s hard to imagine why, but for ARS’s
5 decision to switch counsel, review and analysis of those documents would have been
6 necessary. For the same reason, Thorpe Shwer’s review of Schian Walker’s case file
7 pertaining to this matter is activity that would not have been necessary but for the decision
8 to change counsel. Finally, time spent drafting motions to withdraw and substitute counsel
9 would not have been necessary but for the decision to change firms. These hours are not
10 chargeable to SESH, and the Court will reduce the fee award by \$5,192.50.

11 On the other hand, SESH has not demonstrated that the remaining challenged entries
12 qualify as duplicative “getting up to speed” hours. SESH objects to all hours Thorpe Shwer
13 paralegals spent between December 14, 2018 and February 8, 2019 reviewing and
14 analyzing documents produced by SESH.⁴ Although Schian Walker attorneys and
15 paralegals also spent time conducting document review, SESH has not demonstrated that
16 these particular entries involved the duplicative review of documents already reviewed by
17 others. Of course, ARS hasn’t done the opposite—it hasn’t affirmatively shown that the
18 challenged entries involved the initial review of documents never reviewed by its former
19 counsel—but the burden ultimately falls onto SESH to show that the challenged entries
20 “were clearly excessive.” *Simons*, 165 P.3d at 672. SESH hasn’t met that burden here, so
21 the Court will not eliminate those hours from the fee request.

22 **C. Compliance With Local Rule 54.2**

23 The bulk of SESH’s objections concern whether ARS complied with various
24 requirements imposed by Local Rule 54.2.

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26 ...

27 _____
28 ⁴ The entries SESH flags as duplicative but fails to explain why are Nos. 523, 545,
548, 549, 552, 556, 559, 561, 565, 568, 570, 571, 579, 584, 586, 588, 594, 600, 619, 625,
652, 665, 672, 675, and 680.

1 1. Affidavit Of Reasonableness, Necessity, And Billing Judgment

2 Local Rule 54.2(d)(4)(C) requires a party seeking fees to submit “an affidavit of
3 moving counsel” that, among other things, “state[s] that the affiant has reviewed and has
4 approved the time and charges set forth in the task-based itemized statement and that the
5 time spent and expenses incurred were reasonable and necessary under the circumstances.
6 This section also must demonstrate that the affiant exercised ‘billing judgment.’” Id.

7 SESH argues that the Grim declaration is insufficient to satisfy these requirements
8 as to the \$234,179.10 in Schian Walker fees because Grim barely worked on the case and
9 lacks foundation to testify about whether the fees incurred by other Schian Walker
10 attorneys were reasonable, necessary, and reflect billing judgment. (Doc. 243 at 2-4.) In
11 its reply, ARS does not defend Grim’s qualifications. Instead, it attaches a new declaration
12 from Cody Jess, a former partner at Schian Walker who was present throughout the
13 engagement with ARS. (Doc. 246 at 1; Doc. 246-1.)

14 In general, when “new evidence is presented in a reply . . . the district court should
15 not consider the new evidence without giving the [non-]movant an opportunity to respond.”
16 *Provenz v. Miller*, 102 F.3d 1478, 1483 (9th Cir. 1996) (quotation omitted). However,
17 “[w]hile a party may not file ‘new’ evidence with a reply, it may file ‘rebuttal’ evidence to
18 contravene arguments first raised by the non-moving party in its opposition.” *TSI Inc. v.*
19 *Azbil BioVigilant Inc.*, 2014 WL 880408, *1 (D. Ariz. 2014). See also *E.E.O.C. v. Creative*
20 *Networks, LLC & Res-Care, Inc.*, 2008 WL 5225807, *2 (D. Ariz. 2008) (acknowledging
21 that “a party may not file ‘new’ evidence with a reply and then deprive the opposing party
22 of an opportunity to respond to the new evidence” but holding that evidence attached to
23 defendant’s reply was “proper” because it merely “rebut[ted] arguments first raised by
24 Plaintiff in its opposition to” the motion).

25 Here, the Jess declaration arguably qualifies as rebuttal evidence because it responds
26 to arguments raised in SESH’s response. Additionally, SESH has not moved for
27 permission to file a sur-reply and it appears to the Court that further briefing would be
28 futile—the new declaration cures the concerns SESH raised in its response. Jess avers that

1 he made his declaration “based on matters within [his] own personal knowledge” and that
2 Schian Walker attorneys “exercised sound billing judgment,” and Jess’s declaration does
3 not contain “understandings” that could support a hearsay objection. (Doc. 246-1 at 1-2.)
4 The Court thus declines to categorically reject ARS’s request for fees paid to Schian
5 Walker.

6 2. Adequacy Of Time Entries After Redaction

7 Local Rule 54.2(e)(2) provides that “[t]he party seeking an award of fees must
8 adequately describe the services rendered so that the reasonableness of the charge can be
9 evaluated. In describing such services, however, counsel should be sensitive to matters
10 giving rise to issues associated with the attorney-client privilege and attorney work-product
11 doctrine, but must nevertheless furnish an adequate nonprivileged description of the
12 services in question. If the time descriptions are incomplete, or if such descriptions fail to
13 adequately describe the service rendered, the court may reduce the award accordingly.” Id.

14 SESH argues that many entries⁵ from which ARS has redacted information (in the
15 interest of maintaining the attorney-client privilege) are now too generic to conduct a
16 reasonableness review. (Doc. 243 at 8-9.) ARS replies that the redaction of privileged
17 information is permissible under Local Rule 54.2(e)(2) and that, even after the redactions,
18 the entries provide enough information to assess whether the expenditures of time were
19 reasonable. (Doc. 246 at 4-5.)

20 Although the Court does not fault ARS for seeking to zealously protect the attorney-
21 client privilege, some of the redactions in this case make it impossible to assess whether
22 the time entries constituted reasonable expenditures of time and/or were related to the case.
23

24 ⁵ These entries are Nos. 2, 3, 5, 8, 9, 13-16, 22, 23, 25, 27, 43, 52, 68-70, 74, 77, 79,
25 92, 96, 98, 107, 110, 113, 119, 123, 128, 129, 131, 138, 151, 154, 156, 163, 165, 170, 177,
26 183, 184, 186, 191, 193, 195, 196, 202, 210, 225, 228-30, 243, 251, 256, 267, 268, 271,
27 293, 294, 297, 303-05, 308, 316, 330, 333, 347, 363, 369, 376, 377, 383, 387, 391, 394,
28 395, 397, 398, 400-02, 404, 406, 408, 409, 414, 418, 419, 421, 422, 426-29, 438, 441, 443,
444, 450, 458, 462, 466, 474, 478, 479, 483, 484, 494, 509, 512, 514, 524, 527, 536, 540-
42, 553, 555, 566, 567, 576, 577, 580, 581, 620, 621, 653, 674, 691, 692, 697, 709, 710,
721, 725, 728, 736, 744, 747, 751-53, 757, 760, 762, 766, 773, 774, 777, 781, 782, 786,
787, 790, 794, 798, 801, 803, 804, 813, 814, 817, 833, 849, 855, 857, 859, 870, 874, 883,
897, 906, 918, 922, 933, 937, 940, 942, 945, 946, 957, 963, 966, 967, 969, 972, and 973.

1 To provide one example, the entry at line 210 seeks to bill 1.0 hours for “Corresponded
2 with clients re: [redacted for privilege].” This is insufficient under Local Rule 54.2(e).
3 *Oskowis v. Sedona Oak-Creek Unified Sch. Dist. #9*, 2019 WL 5066821, *8 (D. Ariz. 2019)
4 (“Although the local rules don’t provide an explanatory example for how emails or letters
5 should be documented in an attorneys’ fee motion, the closest parallel is telephone
6 conferences. Thus, the Court will not grant attorneys’ fees for email/letter time entries that
7 don’t identify to whom the email/letter was sent or the subject matter of the email/letter.”).

8 Accordingly, the Court will not grant fees for entries in which ARS has redacted the
9 subject matter of the communication.⁶

10 3. Block-Billing

11 SESH argues that ARS’s attorneys engaged in impermissible block-billing, which
12 makes it impossible to assess whether certain time expenditures were reasonable.⁷ (Doc.
13 243 at 6-7.) ARS replies that (1) many of the entries SESH flags as block-billed are not
14 block-billed, and (2) the block-billed entries are, in any event, sufficiently descriptive for
15 the Court to assess whether the time expenditures were reasonable. (Doc. 246 at 3-4.)

16 “‘Block billing’ is the time-keeping method by which each lawyer and legal
17 assistant enters the total daily time spent working on a case, rather than itemizing the time
18 expended on specific tasks.” *Welch v. Metro. Life Ins. Co.*, 480 F.3d 942, 945 n.2 (9th Cir.
19 2007) (citation omitted). “While not forbidden by case law, block-billing makes it nearly
20 impossible for the Court to determine the reasonableness of the hours spent on each task.
21 Where the Court cannot distinguish between the time claimed for the various tasks, the
22 Court will reduce the award accordingly.” *Moshir*, 927 F. Supp. at 799. Nevertheless, the
23 fundamental question is “whether time entries meet the basic requirements of listing
24 [attorneys’] hours and identifying the general subject matter of [their] time expenditures.”

25 _____
26 ⁶ The Court notes that entry No. 859, to which SESH objected on the basis of
27 inappropriate redaction, contains no redactions and provides a sufficient description for the
28 Court to conclude the fee was reasonable.

⁷ In the interest of reducing the administrative burden posed by this order, the Court
will enumerate only those entries where the block-billing causes a need for wholesale
elimination of fees associated with a time entry.

1 Maki v. N. Sky Partners II LP, 2018 WL 4042455, *2 (D. Ariz. 2018) (internal quotation
2 omitted). See also Oskowis, 2019 WL 5066821 at *9 (“[B]ecause the entries provided
3 sufficient detail regarding the various tasks that were performed, the fact that the tasks are
4 included in a single entry does not render the entries deficient”). Courts tend to award fees
5 despite the presence of block-billing where the billing is for “closely related tasks, each
6 covering no more than a few hours.” Maki, 2018 WL 4042455 at *3. See also Sunstone
7 Behavioral Health, Inc. v. Alameda Cty. Med. Ctr., 646 F. Supp. 2d 1206, 1217 (E.D. Cal.
8 2009) (“[E]ven where hours are block-billed, a district court should refrain from reducing
9 fees until it first determines whether sufficient detail has been provided so that [the Court]
10 can evaluate what the lawyers were doing and the reasonableness of the number of hours
11 spent on those tasks.”) (internal quotation omitted).

12 Here, ARS is correct that some of the disputed entries aren’t actually block-billed.⁸
13 Where the attorneys specified how much time they spent on a given task, the mere fact that
14 the tasks were presented in a series (rather than a separate row) allows the Court to
15 distinguish between the time claimed for various tasks.

16 Many other instances fall into the category of block-billed entries that still provide
17 sufficient detail for the Court to assess the reasonableness of a time expenditure, involve
18 closely related tasks, and do not last more than a few hours. These entries are not deficient.

19 Nevertheless, some difficulty persists in light of ARS’s extensive redactions for
20 privilege. The block-billed nature of partially redacted entries makes it impossible for the
21 Court to separate out time that should fall within the scope of the fee award and time not
22 properly chargeable to SESH. Consequently, the Court will not grant fees for block-billed
23 entries where part of the block-billed entry is otherwise redacted in a manner that prevents
24 reasonableness review.⁹

25 ⁸ Specifically, entries Nos. 401 and 450 are not block-billed.

26 ⁹ The block-billed entries with such redactions are Nos. 2, 5, 15, 23, 27, 43, 52, 68-
27 70, 74, 77, 79, 92, 96, 98, 110, 113, 119, 123, 128, 129, 131, 138, 151, 154, 156, 163, 170,
28 177, 183, 184, 186, 191, 193, 195, 196, 202, 225, 228-30, 243, 251, 256, 267, 268, 271,
293, 294, 297, 303-05, 308, 316, 330, 333, 347, 363, 369, 377, 383, and 391. The Court
has reduced these entries by the full amount billed because it was unable to separate the

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D. Other Disputed Entries

As noted, ARS has conceded that it inadvertently included some entries unrelated to this litigation and entries related to sanctions already paid by SESH. Accordingly, the Court will strike these entries, which reduces the fee award by \$9,627.45. (Doc. 246 at 5.)

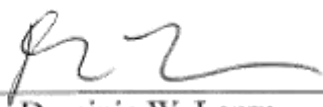
E. Conclusion

After the reductions discussed above, ARS’s fee request of \$522,588.60 will be reduced to \$444,799.70. Although this sum may, at first blush, seem high relative to the overall amount at stake in this action (as noted, ARS’s total recovery was less than \$750,000), the Court finds it to be “facially reasonable.” Simons, 165 P.3d at 672. SESH has not argued that the overall amount sought is disproportionate and SESH helped contribute to the expenditures in this case through its motions practice.

Accordingly, **IT IS ORDERED** that:

- (1) ARS’s motion for attorneys’ fees and costs (Doc. 236) is **granted in part and denied in part.**
- (2) SESH is ordered to pay ARS attorneys’ fees in the amount of \$444,799.70 and costs in the amount of \$3,178.85.

Dated this 28th day of May, 2020.



Dominic W. Lanza
United States District Judge

_____ properly recorded activities from the activities with redactions.

Entry	Date	Name	Rev Hrs	Rev Amt	Narrative	Objections	Ruling	Final Charge
2	5/10/2017	Tyler Grim	0.50	125.00	Reviewed draft complaint provided by client and correspondence with Spring Excellence Surgical Hospital; e-mail to Mr. Lowden [redacted for privilege]	Lack of Substance of Communication under LR 54.2(e)(2) and/or LR 54.2(e)(2)(C) - hereinafter "LR 54.2(e)(2)"	Sustained	0.00
3	5/11/2017	Tyler Grim	1.20	300.00	Prepared for and attend conference call with client re: [redacted for privilege]	LR 54.2(e)(2) (minus 1.2)	Sustained	0.00
4	5/12/2017	Nathan T. Mitchler	1.20	516.00	Review draft complaint and analyze contracts with Spring Excellence Surgical Hospital			516.00
5	5/15/2017	Nathan T. Mitchler	1.60	688.00	Research potential additional claims against Spring Excellence Surgical Hospital and Joanna Davis; telephone call with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); Block-Billing/Lumping - hereinafter "LR 54.2(e)(1)(B) "	Sustained; sustained	0.00
6	5/15/2017	Tyler Grim	0.30	75.00	Reviewed and analyzed additional correspondence between client and Spring Excellence Surgical Hospital and non-disclosure agreement provided by client			75.00
7	5/16/2017	Tyler Grim	0.30	75.00	Reviewed and analyzed litigation hold letter and additional documents provided by client			75.00
8	5/17/2017	Nathan T. Mitchler	1.50	645.00	Telephone call with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2) (minus 1.5)	Sustained	0.00
9	5/17/2017	Tyler Grim	0.80	200.00	Prepared for and attend conference call with client	LR 54.2(e)(2) (minus 0.8)	Sustained	0.00
10	5/18/2017	Tyler Grim	0.30	75.00	Revised draft complaint			75.00
11	5/19/2017	Tyler Grim	0.50	125.00	Continued drafting complaint			125.00
12	5/22/2017	Tyler Grim	0.40	100.00	Continued drafting complaint			100.00
13	5/23/2017	Nathan T. Mitchler	1.90	817.00	Strategy call with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2) (minus 1.9)	Sustained	0.00
14	5/23/2017	Tyler Grim	0.30	75.00	Meeting with Mr. Mitchler re: [redacted for privilege]	LR 54.2(e)(2) (minus 0.3)	Sustained	0.00
15	5/24/2017	Nathan T. Mitchler	1.20	516.00	Review BAA; telephone call with client re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
16	5/24/2017	Tyler Grim	1.20	300.00	Telephone call with client; meeting with Mr. Mitchler re: [redacted for privilege]	LR 54.2(e)(2) (minus 1.2)	Sustained	0.00
17	5/25/2017	Nathan T. Mitchler	2.30	989.00	Research re: corporate disclosures; finalize demand letter			989.00
18	5/25/2017	Tyler Grim	2.00	500.00	Revised complaint; reviewed and revised demand letter to Spring Excellence Surgical Hospital	LR 54(e)(1)(B)	Overruled	500.00
19	5/31/2017	Nathan T. Mitchler	1.20	518.00	Review complaint and filing requirements; review demand letter revisions	LR 54(e)(1)(B)	Overruled	518.00
20	5/31/2017	Tyler Grim	0.20	50.00	Reviewed and revised complaint			50.00
21	6/1/2017	Nathan T. Mitchler	2.10	903.00	Draft and revise demand letter; review new procedures and requirements for District Court pilot program	LR 54(e)(1)(B)	Overruled	903.00
22	6/8/2017	Tyler Grim	0.40	100.00	Call with client re: [redacted for privilege]	LR 54.2(e)(2) (minus 0.4)	Sustained	0.00
23	6/12/2017	Nathan T. Mitchler	1.00	430.00	Review and finalize District Judge election; review final service of summons and materials for service; research regarding assigned judge and report to client re [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
24	6/21/2017	Nathan T. Mitchler	1.00	430.00	Call with opposing counsel to discuss complaint; report on call and analysis of information provided by opposing counsel	LR 54(e)(1)(B)	Overruled	430.00
25	6/21/2017	Tyler Grim	0.20	50.00	Prepared e-mail to client re: [redacted for privilege]	LR 54.2(e)(2) (minus 0.2)	Sustained	0.00

26	6/29/2017	Julie S. Larsen	0.30	64.50	Prepared request and affidavit of default re: both defendants			64.50
27	7/6/2017	Nathan T. Mitchler	0.90	387.00	Telephone call with Ms. Keppler to discuss payment of amount due and plan for moving case forward; report to client re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
28	7/8/2017	Nathan T. Mitchler	0.40	172.00	Research background of new opposing counsel; communicate re: extensions request	LR 54(e)(1)(B)	Overruled	172.00
29	7/10/2017	Nathan T. Mitchler	0.90	387.00	Telephone conference with opposing counsel re: complaint, potential extension, and settlement; report to client re: same	LR 54(e)(1)(B)	Overruled	387.00
30	7/11/2017	Nathan T. Mitchler	0.40	172.00	Further telephone call with opposing counsel and email to client re: extension request	LR 54(e)(1)(B)		172.00
31	7/13/2017	Nathan T. Mitchler	1.00	430.00	Research for application for default judgment			430.00
32	7/17/2017	Nathan T. Mitchler	0.70	301.00	Prepare and review form of judgment for extension; telephone call with opposing counsel re: same	LR 54(e)(1)(B)	Overruled	301.00
33	7/18/2017	Nathan T. Mitchler	0.20	86.00	Review filed form of judgment			86.00
34	7/26/2017	Nathan T. Mitchler	1.20		Revise and prepare first amended complaint; confer with opposing counsel re: stipulation to amend complaint and draft and finalize stipulation			
35	7/27/2017	Nathan T. Mitchler	0.70		Finalize first amended complaint and review filing; research status of parties citizenship			
36	8/3/2017	Nathan T. Mitchler	1.10	473.00	Draft and finalize cease and desist letter			473.00
37	8/7/2017	Nathan T. Mitchler	2.90		Research re: diversity jurisdiction pleading; prepare and finalize second amended complaint and stipulation			
38	8/8/2017	Nathan T. Mitchler	0.90		Revise second amended complaint and communicate with client re: same			
39	8/10/2017	Nathan T. Mitchler	0.40	172.00	Telephone call with Mr. Crane re: cease and desist letter			172.00
40	8/17/2017	Nathan T. Mitchler	1.20	516.00	Research and begin draft for motion to extend time to serve and substitute service for Joanna Davis			516.00
41	8/18/2017	Nathan T. Mitchler	1.70	731.00	Review SESH answer and analyze motion to dismiss			731.00
42	8/21/2017	Nathan T. Mitchler	3.80	1,634.00	Research for opposition to motion to dismiss; research and draft motion for extension of time to serve and substitute service	LR 54(e)(1)(B)	Overruled	1634.00
43	8/23/2017	Nathan T. Mitchler	2.30	989.00	Finalize motion for time extension and alternative service; communicate with client re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
44	8/25/2017	Nathan T. Mitchler	3.90	1,677.00	Research and analysis for opposition to motion to dismiss; continue draft of opposition to motion to dismiss	LR 54(e)(1)(B)	Overruled	1677.00
45	8/28/2017	Nathan T. Mitchler	2.20	946.00	Continue draft of opposition to motion to dismiss			946.00
46	8/29/2017	Nathan T. Mitchler	1.70	731.00	Continue draft of opposition to motion to dismiss			731.00
47	8/30/2017	Nathan T. Mitchler	3.70	1,591.00	Continue draft of opposition to motion to dismiss; insert items for draft affidavits in support of opposition	LR 54(e)(1)(B)	Overruled	1591.00
48	8/31/2017	Nathan T. Mitchler	4.40	1,892.00	Draft and revise opposition to motion to dismiss; review and incorporate affidavits	LR 54(e)(1)(B)	Overruled	1892.00
49	9/1/2017	Nathan T. Mitchler	1.60	688.00	Reviewed and finalized opposition to motion to dismiss			688.00

50	9/5/2017	Nathan T. Mitchler	1.30	559.00	Analyzed service of process; reviewed and analyzed required disclosures; researched failure to submit affidavits with motion	LR 54(e)(1)(B)	Overruled	559.00
51	9/6/2017	Nathan T. Mitchler	2.30	989.00	Prepared draft mandatory initial disclosure; researched options to amend complaint with pending motion to dismiss	LR 54(e)(1)(B)	Overruled	989.00
52	9/7/2017	Nathan T. Mitchler	1.00	430.00	Reviewed and summarized information required for mandatory initial disclosure statement and communicate with client re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
53	9/12/2017	Nathan T. Mitchler	1.20	516.00	Reviewed, drafted, and revised mandatory initial disclosures; researched management status of Spring Excellence	LR 54(e)(1)(B)	Overruled	516.00
54	9/13/2017	Nathan T. Mitchler	1.20	516.00	Review documents for inclusion in disclosure statement			516.00
55	9/14/2017	Nathan T. Mitchler	1.50	645.00	Reviewed and revised draft disclosure statement			645.00
56	9/15/2017	Nathan T. Mitchler	2.10	903.00	Finalize draft and review of materials for initial disclosure statement			903.00
57	9/18/2017	Julie S. Larsen	0.20	43.00	Prepared notice of service of responses to mandatory initial discovery requests			43.00
58	9/18/2017	Nathan T. Mitchler	1.30	559.00	Finalized mandatory initial disclosure statement; reviewed SESH disclosure statement	LR 54(e)(1)(B)	Overruled	559.00
59	9/20/2017	Nathan T. Mitchler	1.40	602.00	Drafted and finalized case update and litigation strategy plan			602.00
60	9/21/2017	Nathan T. Mitchler	0.30	129.00	Conferred with process server re: service of Ms. Davis			129.00
61	9/22/2017	Nathan T. Mitchler	1.60	688.00	Finalized letter to opposing counsel re: disclosure deficiencies; reviewed and analyzed SESH reply in support of motion to dismiss	LR 54(e)(1)(B)	Overruled	688.00
62	9/26/2017	Kristine L. Berry	1.00	200.00	Drafted second motion for extension of time to serve Joanna Davis and affidavit of Mr. Mitchler			200.00
63	9/28/2017	Nathan T. Mitchler	1.20	516.00	Drafted opposition to request for extension			516.00
64	9/29/2017	Kristine L. Berry	1.00	200.00	Drafted response to defendants' motion for extension of time to file reply in support of motion to dismiss			200.00
65	9/29/2017	Nathan T. Mitchler	1.00	430.00	Finalized opposition to request for extension			430.00
66	10/12/2017	Cody J. Jess	1.40	532.00	Corresponded with Mr. Hirsch re scheduling deadlines; correspondence with Mr. Mitchler re same; telephone call with Mr. Hirsch and Mr. Crane re Rule 26 (f) meeting; settlement prospects	LR 54(e)(1)(B)	Overruled	532.00
67	10/12/2017	Julie S. Larsen	0.40		Prepared stipulation to continue Rule 16 scheduling conference and order re: same			0.00
68	10/13/2017	Cody J. Jess	0.50	190.00	Reviewed draft of affidavit of service on Ms. Davis for filing; reviewed order denying SESH motion to dismiss; corresponded with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
69	10/17/2017	Cody J. Jess	0.80	304.00	Corresponded with Mr. Lowden re: [redacted for privilege]; prepared for and attended conference call with Mr. Hirsch re: scheduling and related matters	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
70	10/18/2017	Cody J. Jess	0.60	228.00	Telephone call with Mr. Lowden and Mr. Allen re: [redacted for privilege]; corresponded with Mr. Hirsch and Mr. Crane re motion to extend deadlines	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00

71	10/19/2017	Cody J. Jess	1.10	418.00	Prepared joint motion to continue deadlines and proposed order; sent to Mr. Hirsch and Mr. Crane for review; reviewed Mr. Crane's proposed changes; sent same to client	LR 54(e)(1)(B)	Overruled	418.00
72	10/24/2017	Cody J. Jess	0.20		Reviewed order granting joint motion to continue; sent same to Mr. Lowden and Mr. Allen			
73	10/30/2017	Cody J. Jess	0.30	114.00	Telephone call with Mr. Schube re: Davis answer extension; corresponded with client contacts and Mr. Schube re: same	LR 54(e)(1)(B)	Overruled	114.00
74	10/31/2017	Cody J. Jess	0.50	190.00	Corresponded with client re: [redacted for privilege]; telephone call with Mr. Schube re: same and settlement proposal	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
75	10/31/2017	Kristine L. Berry	0.50	100.00	Drafted application for entry of default re: Joanna Davis			100.00
76	11/1/2017	Cody J. Jess	0.20		Corresponded with Mr. Schube re: default; prepared default pleadings			0.00
77	11/2/2017	Cody J. Jess	1.60	608.00	Telephone call with Mr. Schube re: Davis default; calls and emails with Mr. Lowden re: [redacted for privilege]; prepared judgment and related pleadings re: Davis judgment; calculated interest and fees to be applied to judgment	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
78	11/2/2017	Julie S. Larsen	1.50	322.50	Revised request for default judgment and prepared accompanying affidavit and proposed judgment			322.50
79	11/3/2017	Cody J. Jess	1.90	722.00	Corresponded with Mr. Lowden and Mr. Allen re: [redacted for privilege]; emails with Mr. Lowden re: [redacted for privilege]; reviewed documents from Mr. Lowden re: same; Westlaw research re: effect of untimely response under Rule 55	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
80	11/6/2017	Cody J. Jess	0.50	190.00	Telephone call with Mr. Schube re: standstill agreement; follow-up with client contacts re: same	LR 54(e)(1)(B)	Overruled	190.00
81	11/7/2017	Cody J. Jess	1.10	418.00	Corresponded with Mr. Schube re: standstill agreement; reviewed pleadings re: Excellence bankruptcy; reviewed documents from Mr. Lowden re: SESH v. Davis litigation	LR 54(e)(1)(B)	Overruled	418.00
82	11/9/2017	Brittany M. Neel	0.20		Conferred with Mr. Jess re: case status and unresolved issues			
83	11/9/2017	Cody J. Jess	0.50	190.00	Meeting with Ms. Neel re: veil piercing claims; reviewed ANMM binder re: trade secret issue	LR 54(e)(1)(B)	Overruled	190.00
84	11/10/2017	Brittany M. Neel	1.80	450.00	Reviewed second amended complaint, defendants' answers to same, Davis's motion to dismiss, miscellaneous corporate documents, and Texas litigation filings	LR 54(e)(1)(B)	Overruled	450.00
85	11/13/2017	Brittany M. Neel	3.90	975.00	Continued reviewing case documents and research case law re: piercing the corporate veil; drafted memorandum re: case status and potential claims against Dr. Baig	LR 54(e)(1)(B)	Overruled	975.00
86	11/13/2017	Cody J. Jess	0.70	266.00	Reviewed memorandum from Ms. Neel re: amendment to add corporate veil piercing remedy; corresponded with client re: same	LR 54(e)(1)(B)	Overruled	266.00

87	11/14/2017	Cody J. Jess	0.90	342.00	Corresponded with Mr. Schube re: response to motion to dismiss extension and related matters; prepared stipulation re: same	LR 54(e)(1)(B)	Overruled	342.00
88	11/14/2017	Kristine L. Berry	1.00	200.00	Drafted stipulation to extend deadline for ARS to respond to motion to dismiss and proposed order			200.00
89	11/15/2017	Cody J. Jess	1.00	380.00	Corresponded with Mr. Schube re: revisions to stipulation to extend time for response to Davis motion to dismiss; follow-up with clients re: case status and strategy re: Davis claims	LR 54(e)(1)(B)	Overruled	380.00
90	11/16/2017	Cody J. Jess	0.40	152.00	Corresponded with client and Mr. Schube re: Davis and related claims; finalized and filed Davis extension stipulation	LR 54(e)(1)(B)	Overruled	152.00
91	11/17/2017	Brittany M. Neel	0.80	200.00	Researched proper venue to depose party witnesses residing out of state; reviewed documents and prepared list of additional documents needed from Ms. Davis	LR 54(e)(1)(B)	Overruled	200.00
92	11/17/2017	Cody J. Jess	1.20	456.00	Prepared for and attended call with Mr. Allen re: [redacted for privilege]; prepared notice of Davis deposition; meeting with Ms. Neel re: Dr. Baig claims; corresponded with Mr. Schube re: additional documents from Ms. Davis	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
93	11/17/2017	Julie S. Larsen	0.20		Prepared notice of deposition of Ms. Davis			0.00
94	11/20/2017	Cody J. Jess	0.20	76.00	Corresponded with Mr. Schube re: telephone call to discuss document request from Ms. Davis			76.00
95	11/21/2017	Brittany M. Neel	3.40	850.00	Drafted letter to Spring Excellence Surgical Hospital re: lack of authority defense; telephone call with Mr. Shube and Mr. Jess re: request for additional documents; revised letter	LR 54(e)(1)(B)	Overruled	850.00
96	11/21/2017	Cody J. Jess	3.60	1,368.00	Corresponded with Mr. Lowden re: [redacted for privilege]; telephone call with Mr. Schube re: additional Davis document production; prepared letter to Mr. Hirsch re: disclaimer of authority defense; reviewed documents from Ms. Davis re: SESH authority defense; meeting with Ms. Neel re: same	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
97	11/22/2017	Brittany M. Neel	0.50	125.00	Revised letter to Spring Excellence Surgical Hospital			125.00
98	11/22/2017	Cody J. Jess	2.70	1,026.00	Continued reviewing Davis documents; prepared final revisions to SESH demand; corresponded with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
99	11/27/2017	Brittany M. Neel	0.20		Reviewed email from Mr. Jess re: telephone call with SESH's counsel re: amending complaint and waiving lack of authority defense; conferred with Mr. Jess re: same			0.00
100	11/27/2017	Cody J. Jess	2.70	1,026.00	Prepared for and attended telephone call with Mr. Hirsch and Mr. Crane re: authority defense; lengthy email to client summarizing same; corresponded with Mr. Schube re: response to Davis motion to dismiss; reviewed motion to dismiss; research re: effect of ratification vis-a-vis damages	LR 54(e)(1)(B)	Overruled	1026.00

101	11/28/2017	Cody J. Jess	0.30	114.00	Call to Mr. Schube re: extension to respond to Davis motion to dismiss; corresponded with client re: SESH demand response	LR 54(e)(1)(B)	Overruled	114.00
102	11/29/2017	Brittany M. Neel	0.40		Reviewed letter from Mr. Hirsch, SESH company agreement, and second amended petition filed in Texas litigation			0.00
103	11/29/2017	Cody J. Jess	1.80	684.00	Reviewed letter from Mr. Hirsch and enclosed documents; corresponded with Mr. Schube re: extension to respond to David motion to dismiss; lengthy follow-up email with Mr. Allen re: [redacted for privilege]	LR 54(e)(1)(B)	Overruled	684.00
104	11/30/2017	Brittany M. Neel	6.00	1,500.00	Reviewed various emails between Mr. Jess, Mr. Schube, and Mr. Allen; compared revisions in second amended Texas petition to first amended Texas petition; drafted response to Davis motion to dismiss; reviewed and revised same	LR 54(e)(1)(B)	Overruled	1500.00
105	11/30/2017	Cody J. Jess	5.10	1,938.00	Prepared response to Davis motion to dismiss; meeting with Ms. Neel re: same; conference call with client re: case status and strategy; prepared notice of depositions on deposition subpoenas	LR 54(e)(1)(B)	Overruled	1938.00
106	11/30/2017	Julie S. Larsen	0.50	107.50	Prepared notices of deposition for Dr. Baig, Ms. Davis, Ms. Russell, and Mr. Francis and accompanying subpoenas			107.50
107	12/3/2017	Cody J. Jess	0.20	76.00	Corresponded with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2) (minus 0.2)	Sustained	0.00
108	12/5/2017	Brittany M. Neel	0.90	225.00	Began preparing agenda for Rule 26(f) conference			225.00
109	12/5/2017	Cody J. Jess	0.30	114.00	Corresponded with Mr. Schube and Mr. Hirsch re: joint discovery plan meeting			114.00
110	12/6/2017	Brittany M. Neel	2.40	600.00	Prepared agenda for Rule 26(f) conference; telephone call with Mr. Lowden re: [redacted for privilege] and email to Mr. Jess re: telephone call and agenda; met with Mr. Jess to prepare for Rule 26(f) conference; participate in telephonic Rule 26(f) conference with Mr. Crane and Mr. Schube regarding discovery plan	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
111	12/6/2017	Cody J. Jess	2.00	760.00	Meeting with Ms. Neel re: joint discovery plan meeting; call with Mr. Crane and Mr. Schube re: same; final revisions to notice of depositions and deposition subpoenas; finalized letter to Mr. Hirsch re: invoices and payment demand	LR 54(e)(1)(B)	Overruled	760.00
112	12/7/2017	Brittany M. Neel	1.20	300.00	Searched for ARS documents re: potential amended claims; drafted discovery plan and proposed scheduling order; revised same; reviewed Davis's reply in support of motion to dismiss	LR 54(e)(1)(B)	Overruled	300.00
113	12/7/2017	Cody J. Jess	1.30	494.00	Corresponded with Mr. Lowden re: [redacted for privilege]; prepared joint discovery plan; finalized notices and deposition subpoenas	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
114	12/7/2017	Julie S. Larsen	0.60	129.00	Prepared joint discovery plan; prepared correspondence to accompany deposition subpoenas	LR 54(e)(1)(B)	Overruled	129.00
115	12/8/2017	Brittany M. Neel	0.30		Reviewed non-disclosure agreement between ARS and SESH			0.00

116	12/8/2017	Cody J. Jess	0.20		Reviewed contract for deposition accommodations in Texas			0.00
117	12/11/2017	Cody J. Jess	0.50	190.00	Corresponded with Mr. Schube re: revisions to proposed scheduling order			190.00
118	12/12/2017	Brittany M. Neel	3.30	825.00	Revised discovery plan and proposed scheduling order and exchange emails with Mr. Schube and Mr. Crane re: same; reviewed documents from client and emailed Mr. Jess re: analysis of potential amended claims	LR 54(e)(1)(B)	Overruled	825.00
119	12/12/2017	Cody J. Jess	1.80	684.00	Corresponded with Mr. Crane and Mr. Schube re: to same; reviewed court's order re: particulars of same; corresponded with Marriott re: reservations for deposition rooms in Texas	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
120	12/13/2017	Brittany M. Neel	0.30		Exchanged emails with Mr. Lowden re: [redacted for privilege]; reviewed emails from Mr. Schube re: confidentiality agreement			0.00
121	12/13/2017	Cody J. Jess	1.00	380.00	Meeting with Ms. Neel re: motion for summary judgment; amended complaint re: trade secret theft; reviewed and revised Davis proposed confidentiality agreement	LR 54(e)(1)(B)	Overruled	380.00
122	12/14/2017	Cody J. Jess	0.80	304.00	Revised Davis proposed confidentiality agreement			304.00
123	12/15/2017	Cody J. Jess	0.90	342.00	Corresponded with Mr. Schube re: additional changes to proposed confidentiality agreement; reviewed Davis reply to response to motion to dismiss; corresponded with Mr. Lowden re [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
124	12/18/2017	Brittany M. Neel	1.20	300.00	Prepared motion for summary judgment; exchanged emails with Mr. Crane and Mr. Schube re: confidentiality agreement and Rule 16 conference; prepared for Rule 16 conference	LR 54(e)(1)(B)	Overruled	300.00
125	12/18/2017	Cody J. Jess	1.30	494.00	Corresponded with clients and Mr. Barbarena re: service upon Ms. Russell; reviewed Texas Secretary of State filings for Ms. Russell address; corresponded with Mr. Maxon re: same; reviewed Mr. Schube's changes to confidentiality agreement; corresponded with Ms. Neel re: same; hearing on joint discovery plan	LR 54(e)(1)(B)	Overruled	494.00
126	12/19/2017	Brittany M. Neel	1.70	425.00	Attended scheduling conference; conferred with Mr. Jess re: same; reviewed scheduling order; emailed same to Mr. Lowden; read emails from Mr. Lowden and Mr. Jess re: SESH's admission in February 2017 letter	LR 54(e)(1)(B)	Overruled	425.00
127	12/19/2017	Cody J. Jess	0.60	228.00	Meeting with Ms. Neel re: joint discovery plan; reviewed Court's order re: same and sent to client; Westlaw research re: statements by party opponent	LR 54(e)(1)(B)	Overruled	228.00

128	12/20/2017	Brittany M. Neel	2.80	700.00	Prepared agenda for phone call with client representatives; prepared for and participated in telephone call with client representatives and Mr. Jess; responded to email from Mr. Lowden re: [redacted for privilege]; drafted internal memorandum summarizing [redacted for privilege]; searched file for SESH's response to cease and desist letter; emailed Mr. Crane and Mr. Hirsch re: SESH's failure to respond to same	LR 54.2(e)(2); LR 54(e)(1)(B)		0.00
							Sustained; sustained	
129	12/20/2017	Cody J. Jess	1.90	722.00	Prepared for and attended call with client re: [redacted for privilege]; meeting with Mr. Sorensen re: Rule 11 sanctions against Bryan Cave and SESH; prepared litigation strategy outline; meeting with Ms. Neel re: same	LR 54.2(e)(2); LR 54(e)(1)(B)		0.00
							Sustained; sustained	
130	12/21/2017	Brittany M. Neel	4.20	1,050.00	Researched agency law and review Texas limited liability act; began drafting motion for partial summary judgment	LR 54(e)(1)(B)		1050.00
							Overruled	
131	12/27/2017	Brittany M. Neel	2.00	500.00	Continued preparing motion for partial summary judgment; reviewed and responded to email from Mr. Lowden re: [redacted for privilege]; reviewed and responded to email from Mr. Hirsch re: deadline to schedule settlement conference	LR 54.2(e)(2); LR 54(e)(1)(B)		0.00
							Sustained; sustained	
132	12/27/2017	Cody J. Jess	0.20		Corresponded with Mr. Hirsch re: scheduling settlement conference			0.00
133	12/28/2017	Brittany M. Neel	1.40	350.00	Continued preparing motion for partial summary judgment; contacted Judge Boyle's chambers re: availability for settlement conference and email opposing counsels re: same	LR 54(e)(1)(B)		350.00
							Overruled	
134	1/2/2018	Brittany M. Neel	2.60	650.00	Continued drafting motion for partial summary judgment			650.00
135	1/3/2018	Cody J. Jess	0.20		Corresponded with Ms. Larsen re: service on Russell			
136	1/4/2018	Brittany M. Neel	2.50	625.00	Continued drafting motion for partial summary judgment; telephone call with Judge Boyle's assistant and email Mr. Shube and Mr. Crane re: same	LR 54(e)(1)(B)		625.00
							Overruled	
137	1/5/2018	Brittany M. Neel	1.50	375.00	Continued drafting motion for partial summary judgment; telephone call with client representatives re: SESH additional breaches of contract and status of documents; conferred with Mr. Jess re: case status	LR 54(e)(1)(B)		375.00
							Overruled	
138	1/5/2018	Cody J. Jess	0.90	355.50	Telephone call with Mr. Lowden and Mr. Allen re: [redacted for privilege]; meeting with Ms. Neel re: same	LR 54.2(e)(2); LR 54(e)(1)(B)		0.00
							Sustained; sustained	
139	1/8/2018	Brittany M. Neel	1.80	450.00	Continued drafting motion for partial summary judgment			450.00
140	1/8/2018	Cody J. Jess	0.20	79.00	Reviewed additional litigation matter re: defamation; memorandum from Ms. Neel re: same	Services unrelated to 2:17-cv-01688-DWL	Sustained	0.00
141	1/9/2018	Brittany M. Neel	0.30		Researched re: serving deposition subpoena on non-party witness			0.00

142	1/9/2018	Cody J. Jess	0.60	237.00	Corresponded with Ms. Larsen re: service on Russell; corresponded with Mr. Schube re: confidentiality agreement and Davis deposition and third-party depositions	LR 54(e)(1)(B)	Overruled	237.00
143	1/10/2018	Brittany M. Neel	0.20		Researched alternative service of deposition subpoenas			0.00
144	1/11/2018	Brittany M. Neel	0.20	50.00	Emailed Mr. Schube re: confidentiality agreement and attempts to serve Ms. Russell			50.00
145	1/11/2018	Cody J. Jess	0.20	79.00	Meeting with Ms. Neel and Ms. Larsen re: Texas depositions; continuing Davis deposition			79.00
146	1/12/2018	Brittany M. Neel	0.30	75.00	Telephone call with Mr. Crane re: issue of ARS's confidential documents and potential settlement offer			75.00
147	1/15/2018	Brittany M. Neel	0.20		Telephone call with client representatives re: case status and potential settlement offer from SESH			0.00
148	1/16/2018	Brittany M. Neel	0.40	100.00	Emailed opposing counsels to follow up re: availability for settlement conference and rescheduled depositions, attempted to contact Dr. Francis re: rescheduled deposition; read and respond to email from Mr. Crane re: settlement conference schedule	LR 54(e)(1)(B)	Overruled	100.00
149	1/17/2018	Brittany M. Neel	2.50	625.00	Emailed Mr. Schube re: his failure to respond to multiple emails, conferred with Ms. Berry re: notice to Dr. Francis re: rescheduled depositions; reviewed letter to Dr. Francis re: same; drafted statement of facts in support of motion for partial summary judgment	LR 54(e)(1)(B)	Overruled	625.00
150	1/17/2018	Cody J. Jess	0.50	197.50	Corresponded with Ms. Neel re: status of deposition rescheduling; demands to defendants re: same; reviewed and revised letter to Dr. Francis re: continuation; corresponded with Mr. Mack re: Mr. Schube's absence and attorney representing Davis in ARS litigation	LR 54(e)(1)(B)	Overruled	197.50
151	1/18/2018	Brittany M. Neel	2.80	700.00	Searched and located SESH property address; emailed Mr. Lowden re: [redacted for privilege]; revised motion for partial summary judgment and statement of facts in support of same	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
152	1/18/2018	Cody J. Jess	3.60	1,422.00	Reviewed and revised motion for summary judgment; statement of facts; prepared settlement letter to Mr. Hirsch; corresponded with Judge Boyle's chambers re: settlement conference	LR 54(e)(1)(B)	Overruled	1422.00
153	1/19/2018	Brittany M. Neel	2.20	550.00	Reviewed and finalized motion for partial summary judgment, statement of facts, and exhibits to same; conferred with Mr. Jess re: same and settlement offer letter	LR 54(e)(1)(B)	Overruled	550.00
154	1/19/2018	Cody J. Jess	1.60	632.00	Corresponded with Mr. Lowden re: [redacted for privilege]; reviewed and revised final drafts of same and exhibits attached thereto	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
155	1/19/2018	Julie S. Larsen	2.30	517.50	Reviewed and revised Webb and Lowden affidavits, motion for partial summary judgment, and the accompanying statement of facts			517.50

156	1/22/2018	Brittany M. Neel	2.60	650.00	Reviewed emails from Mr. Lowden re: [redacted for privilege]; drafted email to Mr. Mack re: status of Davis's representation; reviewed case law and correspondence re: potential theft of trade secret claims; telephone calls with Mr. Mack and Mr. Schube re: status of Ms. Davis's representation; responded to email from Mr. Lowden re: questions about motion for partial summary judgment; exchanged emails with Mr. Lowden re: Deb Sofia's affidavit	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
157	1/22/2018	Cody J. Jess	1.20	474.00	Reviewed Manning Kass motion to withdraw; calls with Mr. Schube and Mr. Mack re: Davis representation; corresponded with Mr. Mack and Ms. Davis re: same; meeting with Ms. Neel re: revisions to draft motion for summary judgment	LR 54(e)(1)(B)	Overruled	474.00
158	1/24/2018	Brittany M. Neel	0.60		Conferred with Mr. Jess re: case status; emailed Mr. Lowden [redacted for privilege]; emailed Magistrate Judge Boyle's assistant, Ms. Brown, re: status of scheduling settlement conference; emailed Mr. Crane re: rescheduling depositions; conferred with Ms. Larsen re: preparing settlement letter and motion to be sent to Mr. Crane			0.00
159	1/24/2018	Cody J. Jess	0.20		Meeting with Ms. Neel re: finalization of motion for summary judgment and settlement documents			0.00
160	1/25/2018	Cody J. Jess	1.60	632.00	Reviewed final drafts of motion for summary judgment, statement of facts and settlement offer; sent same to Mr. Hirsch; corresponded with Mr. Mack re: Davis representation; meeting with Ms. Neel re: depositions schedule	LR 54(e)(1)(B)	Overruled	632.00
161	1/26/2018	Brittany M. Neel	0.20		Reviewed and responded to email from Mr. Lowden re: Joanna Davis's representation status and potential willingness to cooperate			0.00
162	1/26/2018	Cody J. Jess	0.30	118.50	Corresponded with client re: third-party witness depositions			118.50
163	1/28/2018	Cody J. Jess	0.30	118.50	Corresponded with Mr. Allen re: [redacted for privilege]; exchanged emails with Mr. Kimbell re: Francis deposition	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
164	2/10/2018	Cody J. Jess	0.40	158.00	Corresponded with Mr. Crane re: ARS settlement offer; reviewed emails from Mr. Crane re: intellectual property claims	LR 54(e)(1)(B)	Overruled	158.00
165	2/12/2018	Cody J. Jess	0.20		Corresponded with Mr. Allen re: [redacted for privilege]	LR 54.2(e)(2) (minus 0.2)	Sustained	0.00
166	2/13/2018	Cody J. Jess	0.20	79.00	Corresponded with Mr. Allen re: SESH litigation strategy; reviewed order granting Davis's counsel's withdrawal	LR 54(e)(1)(B)	Overruled	79.00

167	2/15/2018	Brittany M. Neel	1.50	375.00	Reviewed letter from Mr. Hirsch re: SESH's settlement counter offer; conferred with Mr. Jess re: same; email to Ms. Davis re: scheduling telephone call; email to Ms. Brown re: settlement conference; drafted email to Mr. Crane re: SESH's theft of ARS's proprietary patient forms	LR 54(e)(1)(B)	Overruled	375.00
168	2/15/2018	Cody J. Jess	0.40	158.00	Meeting with Ms. Neel re: case status and strategy; corresponded with Ms. Davis re: settlement and mediation meeting	LR 54(e)(1)(B)	Overruled	158.00
169	2/16/2018	Cody J. Jess	0.50	197.50	Corresponded with Mr. Crane re: theft of ARS intellectual property issue; meeting with Ms. Neel re: same	LR 54(e)(1)(B)	Overruled	197.50
170	2/19/2018	Brittany M. Neel	1.80	450.00	Prepared agenda outline for phone call with Ms. Davis; telephone call with Ms. Davis; prepared summary of same; reviewed emails exchanged between Mr. Jess, Mr. Lowden, and Mr. Allen re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
171	2/19/2018	Cody J. Jess	1.80	711.00	Prepared for and attended call with Ms. Davis re: mediation; SESH claims; reviewed settlement . counteroffer from Mr. Hirsch; sent same to clients together with case strategy; corresponded with clients re: same	LR 54(e)(1)(B)	Overruled	711.00
172	2/20/2018	Brittany M. Neel	0.20		Reviewed emails from Ms. Davis with attached documents			0.00
173	2/20/2018	Cody J. Jess	0.20	79.00	Corresponded with Ms. Davis re: documents illustrating corporate authority			79.00
174	2/22/2018	Cody J. Jess	0.20	79.00	Corresponded with Mr. Crane re: agreement to amend complaint			79.00
175	2/23/2018	Cody J. Jess	0.20		Meeting with Ms. Neel re: telephone call with Mr. Crane re: stipulation to amend complaint			0.00
176	2/27/2018	Brittany M. Neel	0.80	0.80	Telephone call with Mr. Jess and Mr. Crane re: stipulation to amend complaint and status of settlement negotiations; email to Mr. Lowden re: exhibits to mutual non-disclosure agreement addendum 1	LR 54(e)(1)(B)	Overruled	0.80
177	2/27/2018	Cody J. Jess	1.40	1.40	Meeting with Ms. Neel re: case status and strategy; corresponded with Mr. Lowden and Mr. Maxon re: [redacted for privilege] prepared for and attended call with Mr. Crane re: amendment to complaint to add theft of trade secrets claim; reviewed order denying Davis motion to dismiss	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
178	2/28/2018	Cody J. Jess	0.40	0.40	Corresponded with Ms. Davis re: additional contracts; follow-up with court re: settlement conference scheduling	LR 54(e)(1)(B)	Overruled	0.40
179	3/2/2018	Cody J. Jess	0.20		Reviewed order setting settlement conference; corresponded with client re: [redacted for privilege]			0.00
180	3/5/2018	Cody J. Jess	0.60	237.00	Prepared agenda for strategy meeting; corresponded with Ms. Davis re: narrative and document review	LR 54(e)(1)(B)	Overruled	237.00

181	3/6/2018	Cody J. Jess	6.40	2,528.00	Prepared for and attended meeting with clients re: case status and strategy; call with Mr. Hirsch re: SESH request for damages information per settlement letter; prepared follow up emails to Mr. Hirsch and clients re: same; prepared case narrative and sent same to Brandon Maldonado; Westlaw research re: misappropriation claims under the AUTSA; call with Ms. Davis re: affidavit	LR 54(e)(1)(B)	Overruled	2528.00
182	3/6/2018	Kristine L. Berry	1.00	200.00	Began drafting first request for production of documents to SESH			200.00
183	3/7/2018	Cody J. Jess	0.30	118.50	Corresponded with Mr. Lowden re: [redacted for privilege] call to Ms. Davis re: affidavits; corresponded with Mr. Hirsch and Mr. Crane re: amended complaint	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
184	3/8/2018	Cody J. Jess	0.60	237.00	Lengthy call with Ms. Davis re: case status and background; follow up with client re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
185	3/9/2018	Cody J. Jess	0.20		Reviewed status of Texas litigation; follow up with client re: same			0.00
186	3/13/2018	Brittany M. Neel	3.80	950.00	Reviewed caselaw; researched misappropriation of trade secrets and/or confidential information and copyright infringement; emailed Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
187	3/17/2018	Cody J. Jess	0.70	276.50	Corresponded with Mr. Allen re: SESH collections issue; research re: potential discoverable information re: SESH financials	LR 54(e)(1)(B)	Overruled	276.50
188	3/19/2018	Cody J. Jess	0.20		Corresponded with Mr. Maxon and Mr. Allen re: [redacted for privilege]			0.00
189	3/20/2018	Brittany M. Neel	1.50	375.00	Conferred with Mr. Jess re: discovery strategy and amended complaint; researched remedies available for misappropriation of trade secrets claims; revised third amended complaint	LR 54(e)(1)(B)	Overruled	375.00
190	3/20/2018	Cody J. Jess	2.20	869.00	Meeting with Ms. Neel to discuss case status and strategy; third amended complaint review and revisions; reviewed Davis narrative to incorporate into Davis and Russell declarations; began preparing same	LR 54(e)(1)(B)	Overruled	869.00
191	3/21/2018	Brittany M. Neel	6.40	1,600.00	Researched damages and remedies available for breach of non-disclosure agreements, misappropriation of trade secrets, and copyright infringement; drafted letter to Mr. Lowden re: [redacted for privilege] re: same; conferred with Mr. Jess and Mr. Sorensen re: same; revise letter; begin drafting requests for production to SESH; review and revise affidavit of Ms. Davis; prepare flow chart of SESH entities	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00

201	3/29/2018	Brittany M. Neel	4.50	1,125.00	Emailed Mr. Crane and Mr. Hirsch to follow up re: the status of the stipulated motion to extend the scheduling order deadline; emailed Ms. Davis re: same; drafted requests for production and non-uniform interrogatories to Ms. Davis; revised requests for production, nonuniform interrogatories, and requests for admissions to SESH; drafted ARS's first supplemental response to mandatory initial disclosure; reviewed documents to be produced in connection with same	LR 54(e)(1)(B)		1125.00
							Overruled	
202	3/29/2018	Cody J. Jess	3.20	1,264.00	Corresponded with clients re: [redacted for privilege]; prepared written discovery to propound on SESH and Davis; corresponded with Ms. Davis re: revisions to her and Janell Russell affidavits	LR 54.2(e)(2); LR 54(e)(1)(B)		0.00
							Sustained; sustained	
203	3/29/2018	Julie S. Larsen	1.20		Reviewed and finalized discovery requests to SESH; prepared accompanying notice of service for filing			0.00
204	3/30/2018	Brittany M. Neel	1.30	325.00	Drafted first supplemental response to mandatory initial disclosure; reviewed documents received from Ms. Davis; emailed Ms. Davis to follow-up re: stipulation to extend scheduling order deadline; prepared SESH ownership flowchart	LR 54(e)(1)(B)		325.00
							Overruled	
205	4/2/2018	Cody J. Jess	1.20	474.00	Reviewed Ms. Davis documents re: SESH assets; reviewed and revised draft discovery propounded upon Ms. Davis; revisions to supplemental MIDP; reviewed SESH asset search	LR 54(e)(1)(B)		474.00
							Overruled	
206	4/2/2018	Julie S. Larsen	0.80	180.00	Revised and finalized requests for production of documents and interrogatories to Ms. Davis; prepared notice of service re: same; reviewed and revised supplemental response to mandatory initial discovery	LR 54(e)(1)(B)		180.00
							Overruled	
207	4/2/2018	Brittany M. Neel	0.70	175.00	Revised SESH ownership flowchart; emailed Ms. Davis re: subscription agreement; reviewed additional documents emailed from Ms. Davis; revised first supplemental response to mandatory initial discovery; reviewed Mr. Jess's revisions to non-uniform interrogatories to Davis	LR 54(e)(1)(B)		175.00
							Overruled	
208	4/3/2018	Brittany M. Neel	1.10	275.00	Conferred with Mr. Jess re: case status; revised first supplemental response to mandatory initial discovery and emailed same to Mr. Lowden; conferred with Mr. Jess re: 30(b)(6) deposition topics	LR 54(e)(1)(B)		275.00
							Overruled	
209	4/3/2018	Cody J. Jess	1.00	395.00	Corresponded with Ms. Davis re: discovery requests; emails with third parties re: depositions; meeting with Ms. Neel re: case status and strategy	LR 54(e)(1)(B)		395.00
							Overruled	
210	4/4/2018	Cody J. Jess	1.00	395.00	Corresponded with clients re: [redacted for privilege]	LR 54.2(e)(2) (minus 1.0)		0.00
211	4/4/2018	Brittany M. Neel	0.20		Reviewed email from Mr. Lowden re: [redacted for privilege]; reviewed emails exchanged re: status of SESH asset investigation			0.00
212	4/5/2018	Cody J. Jess	0.30		Corresponded with Ms. Neel re: SESH representations re: contract; corresponded with Mr. Crane and Mr. Hirsch re: status of settlement proposal re: additional claims			

213	4/5/2018	Brittany M. Neel	1.20	300.00	Reviewed documents from client uploaded to ShareFile; emailed Inertia Solutions representative re: uploading voluminous document set to Relativity platform; drafted email to Mr. Crane and Mr. Hirsch re: follow up on settlement proposal and availability for depositions; emailed Ms. Janell Russell re: availability for phone call	LR 54(e)(1)(B)	Overruled	300.00
214	4/9/2018	Brittany M. Neel	2.40	600.00	Exchanged emails with Ms. Russell re: phone call; exchanged emails with Mr. Crane and Mr. Hirsch re: settlement proposal and depositions; phone call with Mr. Fritz re: uploading documents to document review database; emailed Mr. Lowden re: business associates agreement for Inertia; emailed Mr. Fritz re: same; conferred with Mr. Jess re: potential amended complaints and strategy	LR 54(e)(1)(B)	Overruled	600.00
215	4/9/2018	Cody J. Jess	1.50	592.50	Reviewed correspondences from Ms. Russell re: meeting to discuss affidavit; meeting with Ms. Neel and Inertia re: document search; corresponded with Mr. Hirsch and Mr. Crane re: settlement proposal re: additional claims; scheduling depositions; meeting with Ms. Neel re: case strategy in light of Hirsch e-mail re: amended claims	LR 54(e)(1)(B)	Overruled	592.50
216	4/10/2018	Brittany M. Neel	4.40	1,100.00	Drafted motion to amend complaint; revised third amended complaint; phone call with Ms. Russell re: affidavit and testimony re: facts of the case	LR 54(e)(1)(B)	Overruled	1100.00
217	4/10/2018	Cody J. Jess	0.90	355.50	Prepared for and attended conference call with Ms. Russell re: Davis authority issue; emails with Mr. Lowden re: case status and strategy	LR 54(e)(1)(B)	Overruled	355.50
218	4/11/2018	Brittany M. Neel	1.20	300.00	Drafted Janell Russell's affidavit; conferred with Mr. Jess re: motion to amend complaint to add amended claims	LR 54(e)(1)(B)	Overruled	300.00
219	4/11/2018	Cody J. Jess	0.50	197.50	Meeting with Ms. Neel re: case status and strategy re: amended claims and discovery			197.50
220	4/12/2018	Brittany M. Neel	2.90	725.00	Prepared agenda for phone call with clients; phone call with clients re: amended claims, case status, and strategy; revised motion to amend complaint and third amended complaint; emailed same to Mr. Lowden and Mr. Allen to review	LR 54(e)(1)(B)	Overruled	725.00
221	4/12/2018	Cody J. Jess	3.60	1,422.00	Reviewed and revised Russell affidavit; reviewed and revised motion to file amended complaint; reviewed and revised amended complaint; prepared for and attended meeting with clients re: strategy in amending complaint; corresponded with Ms. Russell and Ms. Davis re final affidavits; reviewed Davis responses to discovery	LR 54(e)(1)(B)	Overruled	1422.00
222	4/13/2018	Julie S. Larsen	0.60		Reviewed and revised motion for leave to amend complaint and amended complaint			

223	4/13/2018	Brittany M. Neel	1.20	300.00	Revised motion to amend complaint and third amended complaint; drafted second set of non-uniform interrogatories and requests for production to SESH	LR 54(e)(1)(B)	Overruled	300.00
224	4/13/2018	Cody J. Jess	1.10	434.50	Westlaw research re: pleading standard re: affirmative defenses in District of Arizona; reviewed and revised final drafts of motion for leave to amend and amended complaint; reviewed and revised second set of discovery propounded on SESH; reviewed Mr. Lowden's changes to draft complaint and motion; incorporated same	LR 54(e)(1)(B)	Overruled	434.50
225	4/16/2018	Cody J. Jess	0.20	79.00	Reviewed and revised proposed order re: third amended complaint; corresponded with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
226	4/16/2018	Brittany M. Neel	0.90	225.00	Reviewed final revisions to motion to amend complaint and third amended complaint; reviewed exhibits to same; emailed Mr. Jess to follow up re: second set of discovery to SESH	LR 54(e)(1)(B)	Overruled	225.00
227	4/17/2018	Brittany M. Neel	0.20		Reviewed second set of discovery to SESH and notice of service of same			0.00
228	4/18/2018	Cody J. Jess	0.60	237.00	Corresponded with Mr. Hirsch and clients re: ARS financials proposal; emails with Mr. Lowden re: [redacted for privilege] Davis and Russell affidavits	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
229	4/19/2018	Brittany M. Neel	1.80	450.00	Drafted notice of SESH's 30(b)(6) witness deposition; phone call with Mr. Lowden re: [redacted for privilege]; researched whether ARS may be subject to an attorneys' fee award upon voluntary dismissal of Davis	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
230	4/19/2018	Cody J. Jess	0.80	316.00	Prepared for and attended meeting with Mr. Lowden re: [redacted for privilege] corresponded with Mr. Kimbell re: Dr. Francis deposition	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
231	4/20/2018	Brittany M. Neel	0.20		Exchanged emails with Mr. Fritz re: document review			
232	4/23/2018	Brittany M. Neel	2.00	500.00	Read several emails from Mr. Jess re: EMG bankruptcy filing; reviewed EMG bankruptcy claims; conferred with Mr. Jess re: discovery schedule; phone call with Messrs. Hirsch and Crane re: disclosure of SESH's financial information; drafted notices of deposition; drafted email to Ms. Davis re: status of affidavit	LR 54(e)(1)(B)	Overruled	500.00
233	4/23/2018	Cody J. Jess	1.70	671.50	Reviewed response from Mr. Hirsch re: SESH financials; corresponded with Mr. Hirsch and clients re: same; reviewed EMG bankruptcy schedules and statements	LR 54(e)(1)(B)	Overruled	671.50
234	4/24/2018	Cody J. Jess	1.70	671.50	Prepared for and attended meeting with Inertia re: document review; prepared correspondence with Ms. David for production to SESH in response to request for production; reviewed memorandum from Ms. Neel re: attorneys' fee issue	LR 54(e)(1)(B)	Overruled	671.50
235	4/24/2018	Brittany M. Neel	7.00	1,750.00	Researched attorneys fee awards on voluntary dismissal; drafted memorandum re: same; reviewed documents provided by ARS	LR 54(e)(1)(B)	Overruled	1750.00

236	4/25/2018	Cody J. Jess	0.20		Finalized review of memorandum on attorneys' fees issue; meeting with Ms. Neel re: same			
237	4/25/2018	Brittany M. Neel	6.50	1,625.00	Reviewed documents from ARS; revised memorandum re: attorneys fees ordered upon voluntary dismissal and emailed same to Mr. Lowden	LR 54(e)(1)(B)	Overruled	1625.00
238	4/26/2018	Cody J. Jess	0.50	197.50	Meeting with Ms. Neel re: discovery responses; lengthy correspondence with Mr. Hirsch re: discovery extension	LR 54(e)(1)(B)	Overruled	197.50
239	4/26/2018	Brittany M. Neel	7.20	1,800.00	Reviewed documents from ARS; exchanged emails with Mr. Hirsch re: extension to respond to discovery	LR 54(e)(1)(B)	Overruled	1800.00
240	4/27/2018	Cody J. Jess	0.70	276.50	Corresponded with Mr. Hirsch re: extension to respond to discovery; amended scheduling order; calls with Mr. Hirsch re: settlement proposal	LR 54(e)(1)(B)	Overruled	276.50
241	4/27/2018	Brittany M. Neel	1.20	300.00	Reviewed documents from ARS			300.00
242	4/29/2018	Brittany M. Neel	1.10	275.00	Reviewed documents from ARS			275.00
243	4/30/2018	Cody J. Jess	0.50	197.50	Corresponded with Mr. Lowden re: [redacted for privilege] corresponded with Davis, Russell, Francis, and Mr. Hirsch re: deposition schedules	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
244	4/30/2018	Brittany M. Neel	8.50	2,125.00	Reviewed documents from ARS; read SESH's response to the motion to amend second amended complaint; conferred with Mr. Jess re: discovery deadlines and deposition schedule	LR 54(e)(1)(B)	Overruled	2125.00
245	5/1/2018	Brittany M. Neel	0.80		Emailed Mr. Fritz re: preparing documents for production; emailed Mr. Lowden re: SESH's [redacted for privilege]; reviewed SESH's responses to requests for admission and non-uniform interrogatories			0.00
246	5/1/2018	Cody J. Jess	0.60	237.00	Meeting with Ms. Neel re: document production to SESH; corresponded with Mr. Kimbell re: Dr. Francis deposition; corresponded with Mr. Crane re: discovery responses	LR 54(e)(1)(B)	Overruled	237.00
247	5/2/2018	Brittany M. Neel	7.90	1,975.00	Reviewed SESH's response to the motion for leave to file third amended complaint; read cases cited in same; drafted reply in support of motion for leave to file third amended complaint; telephone call with Mr. Fritz re: preparing ARS documents for disclosure; reviewed SESH's responses to requests for admission and nonuniform interrogatories; emailed Mr. Hirsch and Mr. Crane re: deficiencies in same	LR 54(e)(1)(B)	Overruled	1975.00
248	5/2/2018	Cody J. Jess	1.00	395.00	Corresponded with Mr. Lowden re: discovery responses; reviewed and revised correspondence to SESH attorneys re: meet and confer; meeting with Ms. Neel re: reply to response to motion for leave to amend; deposition schedules	LR 54(e)(1)(B)	Overruled	395.00
249	5/3/2018	Brittany M. Neel	6.90	1,725.00	Reviewed document production; revised notices of deposition; telephone call with Mr. Fritz re: same; telephone call with Mr. Hirsch and Mr. Crane re: discovery dispute; drafted reply in support of motion for leave to file third amended complaint	LR 54(e)(1)(B)	Overruled	1725.00

250	5/3/2018	Cody J. Jess	2.80	1,106.00	Prepared for and attended meet and confer re: SESH discovery responses; emails to Ms. Davis, Ms. Russell and Mr. Kimbell re: deposition schedules; prepared lengthy e-mail to Mr. Hirsch re: discovery objections; meeting with Ms. Neel re: depositions	LR 54(e)(1)(B)	Overruled	1106.00
251	5/4/2018	Brittany M. Neel	5.10	1,275.00	Prepared production log; drafted response to SESH's first set of requests for production to ARS; read Mr. Hirsch's email re: discovery dispute; drafted response to same; reviewed and revised reply in support of motion for leave to file third amended complaint; conferred with Mr. Sorenson re: case strategy; drafted email to Mr. Lowden and Mr. Allen re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
252	5/4/2018	Cody J. Jess	3.30	1,303.50	Reviewed and revised reply to response to motion to amend complaint; meeting with Ms. Neel re: same; meeting with Mr. Sorensen re: Rule 11 sanctions motion; prepared lengthy e-mail to clients re discovery schedule; corresponded with Mr. Hirsch re discovery dispute re: SESH deficient discovery responses; follow up with ARS re: status of depositions	LR 54(e)(1)(B)	Overruled	1303.50
253	5/4/2018	Julie S. Larsen	0.40		Finalized and filed reply in support of motion for leave to file amended complaint			0.00
254	5/4/2018	PS	1.50	892.50	Meeting with Mr. Jess and Ms. Neel re: strategy	No identity, no qualifications, billing rate exceeds upper limit of hourly rates set forth in SW engagement agreement, no evidence that SW's rates increased beyond rates set forth in SW engagement agreement	Sustained; fee reduced to \$430/hour	645.00
255	5/7/2018	Brittany M. Neel	3.10	775.00	Reviewed emails between ARS's counsel and Davis; telephone call with Mr. Fritz re: document production and privilege documents; drafted second supplemental response to mandatory initial discovery requests; revised response to SESH first set of requests for production; read email from Mr. Hirsch re: discovery dispute resolution; conferred with Mr. Jess re: same; emailed Msrs. Hirsch and Dan re: document production	LR 54(e)(1)(B)	Overruled	775.00
256	5/7/2018	Cody J. Jess	2.10	829.50	Reviewed and revised discovery responses; corresponded with Mr. Lowden re: [redacted for privilege]; call with Davis re: affidavit; corresponded with Mr. Hirsch re: discovery dispute; meeting with Ms. Neel re: discovery responses and Dr. Baig deposition schedule; reviewed SESH discovery responses to requests for production	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
257	5/7/2018	Julie S. Larsen	0.30		Prepared and filed notice of errata re: reply in support of motion for leave			0.00

258	5/8/2018	Brittany M. Neel	3.80	950.00	Reviewed SESH's response to ARS's first set of requests for production of documents; drafted email to SESH's counsel re: deficiencies in same; telephone call with Mr. Kimbell re: Dr. Francis's affidavit and deposition; drafted Dr. Francis's affidavit; drafted email to Mr. Kimbell re: same; telephone call with Mr. Lowden re: settlement conference and depositions; revised notice of deposition	LR 54(e)(1)(B)	Overruled	950.00
259	5/8/2018	Cody J. Jess	2.20	869.00	Corresponded with Mr. Kimbell re: Dr. Francis affidavit; call with Mr. Kimbell re: same; revised notice of service of discovery responses; reviewed and revised notice of Baig deposition; reviewed and revised Dr. Francis affidavit; sent same to Mr. Kimbell	LR 54(e)(1)(B)	Overruled	869.00
260	5/9/2018	Brittany M. Neel	1.50	375.00	Telephone call with Mr. Hirsch re: discovery disputes; drafted email to Mr. Hirsch summarizing same	LR 54(e)(1)(B)	Overruled	375.00
261	5/9/2018	Cody J. Jess	1.60	632.00	Prepared for and attended meet and confer with Mr. Hirsch re: deficient discovery responses; depositions schedules; follow up email to Mr. Hirsch re: same	LR 54(e)(1)(B)	Overruled	632.00
262	5/10/2018	Brittany M. Neel	0.20		Revised notice of SESH's 30(b)(6) deposition			
263	5/11/2018	Cody J. Jess	0.20	79.00	Reviewed and revised SESH notice of 30(b)(6) deposition			79.00
264	5/11/2018	Julie S. Larsen	0.20		Reviewed and revised notice of deposition of SESH 30(b)(6) witness			
265	5/14/2018	Brittany M. Neel	1.00	250.00	Reviewed email from Doug re: subpoenas to third-party medical billing companies; drafted email in response to same; conferred with Mr. Jess re: same	LR 54(e)(1)(B)	Overruled	250.00
266	5/14/2018	Cody J. Jess	0.50	197.50	Corresponded with Mr. Hirsch re: Dr. Baig deposition; responded to eDiscovery request for information; corresponded with Mr. Kimbell re: Dr. Francis affidavit; corresponded with Mr. Lowden re: additional subpoena	LR 54(e)(1)(B)	Overruled	197.50
267	5/15/2018	Brittany M. Neel	0.80	200.00	Revised email to Mr. Lowden re: [redacted for privilege]; emailed Mr. Hirsch re: discovery dispute	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
268	5/15/2018	Cody J. Jess	0.30	118.50	Reviewed and revised e-mail to Mr. Lowden re: [redacted for privilege]; corresponded with Mr. Hirsch re: discovery issues	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
269	5/16/2018	Brittany M. Neel	0.60		Telephone call with Mr. Hirsch re: discovery dispute			0.00
270	5/16/2018	Cody J. Jess	0.50	197.50	Telephone call with Mr. Hirsch re: discovery dispute; corresponded with Mr. Lowden re: SESH financials	LR 54(e)(1)(B)	Overruled	197.50
271	5/17/2018	Brittany M. Neel	6.50	1,625.00	Reviewed settlement conference order; exchanged emails with Mr. Lowden re: [redacted for privilege]; calculated ARS's damages re: unpaid invoices; drafted letter to SESH re: settlement offer; telephone call with Mr. Lowden re: [redacted for privilege] drafted settlement conference mediation memorandum	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
272	5/17/2018	Cody J. Jess	1.20	474.00	Meeting with Ms. Neel re: SESH settlement offer; reviewed and revised draft of same; corresponded with clients re: same	LR 54(e)(1)(B)	Overruled	474.00
273	5/18/2018	Brittany M. Neel	1.00	250.00	Reviewed SESH's supplemental responses to discovery			250.00

274	5/18/2018	Cody J. Jess	0.20		Corresponded with Mr. Kimbell re: Francis deposition and affidavit			0.00
275	5/21/2018	Brittany M. Neel	2.60	650.00	Drafted confidential settlement conference memorandum; reviewed SES H's amended responses to first set of discovery requests and responses to second set of discovery requests; correspond with Mr. Jess re: deficiencies in same	LR 54(e)(1)(B)	Overruled	650.00
276	5/21/2018	Cody J. Jess	1.50	592.50	Meeting with Ms. Neel re: case status and strategy; prepared for and attended call with Mr. Kimbell re: Dr. Francis deposition and affidavit; reviewed and revised settlement conference memorandum	LR 54(e)(1)(B)	Overruled	592.50
277	5/22/2018	Brittany M. Neel	2.40	600.00	Revised confidential settlement conference memorandum; read email from Mr. Hirsch re: request to extend discovery deadlines	LR 54(e)(1)(B)	Overruled	600.00
278	5/22/2018	Cody J. Jess	1.10	434.50	Final revisions to settlement conference memorandum; corresponded with Mr. Hirsch re: extension of discovery deadlines	LR 54(e)(1)(B)	Overruled	434.50
279	5/23/2018	Brittany M. Neel	5.70	1,425.00	Emailed Ms. Davis re: availability for phone call; telephone call with Ms. Davis re: case status and discovery; reviewed supplementary document production from SESH; reviewed revised settlement conference memorandum; drafted email to SESH's counsel re: delinquent document production; prepared table summarizing contracts executed on behalf of SESH	LR 54(e)(1)(B)	Overruled	1425.00
280	5/23/2018	Cody J. Jess	1.80	711.00	Meeting with Ms. Neel re: Baig deposition; corresponded with Mr. Allen re: comments to mediation memorandum; call with Ms. Davis re: SESH discovery dispute and pending deadlines	LR 54(e)(1)(B)	Overruled	711.00
281	5/24/2018	Brittany M. Neel	8.60	2,150.00	Reviewed additional supplemental document production from SESH; updated table summarizing contracts executed on behalf of SESH; researched responding party's obligations to conduct reasonable inquiry when responding to requests for admission; drafted letter to SESH's counsel detailing continuing deficient discovery responses	LR 54(e)(1)(B)	Overruled	2150.00
282	5/24/2018	Cody J. Jess	0.60	237.00	Corresponded with Mr. Allen and other SESH representatives re: case status and strategy; corresponded with Mr. Hirsch re: settlement offer; meeting with Ms. Neel re: discovery demand letter	LR 54(e)(1)(B)	Overruled	237.00

283	5/25/2018	Brittany M. Neel	5.10	1,275.00	Drafted letter to Mr. Hirsch and Mr. Crane re: SESH's deficient discovery responses; revised motion for partial summary judgment; read emails from Mr. Hirsch re: proposed deposition dates; reviewed Harris County District Court docket re: SESH's litigation against EMG, et al. re: electronic documents disclosed in connection with same; read SESH's motion to extend discovery deadlines; conferred with Mr. Jess re: same; read email from SESH's counsel to Judge Boyle re: motion to extend scheduling order deadlines; read emails from Ms. Davis re: same	LR 54(e)(1)(B)	Overruled	1275.00
284	5/25/2018	Cody J. Jess	3.00	1,185.00	Reviewed and revised discovery dispute demand letter to Mr. Hirsch; prepared for and attended call re: same; reviewed documentation re: ex parte communications by SESH to Judge Boyle; corresponded with Ms. Davis and Mr. Hirsch re: same; meeting with Ms. Neel re: Davis affidavit re: discovery dispute	LR 54(e)(1)(B)	Overruled	1185.00
285	5/25/2018	Julie S. Larsen	1.20	270.00	Reviewed and revised letter to Mr. Hirsch and Mr. Crane re: discovery dispute; reviewed and revised third supplemental response to mandatory initial discovery; prepared notice of service re: same	LR 54(e)(1)(B)	Overruled	270.00
286	5/26/2018	Brittany M. Neel	0.40		Read draft email from Mr. Jess re: response to Mr. Hirsch and Mr. Crane's ex parte communications with Judge Boyle; exchanged correspondence with Mr. Jess re: same and strategy			0.00
287	5/28/2018	Brittany M. Neel	1.60	400.00	Read email from Mr. Hirsch to Ms. Davis re: discovery responses; reviewed past emails to determine when SESH's counsel was first aware of Ms. Davis's current email addresses; reviewed Harris County District Court filings re: Texas litigation between SESH, et al. and EMG, et al. re: SESH's copying of EMG's server and Ms. Davis's electronic devices; emailed Mr. Jess re: same.	LR 54(e)(1)(B)	Overruled	400.00
288	5/29/2018	Brittany M. Neel	4.80	1,200.00	Emailed Judge Boyle re: discovery dispute; drafted Ms. Davis's affidavit regarding discovery dispute issues; revised motion for partial summary judgment and statement of facts in support of same	LR 54(e)(1)(B)	Overruled	1200.00
289	5/29/2018	Cody J. Jess	0.80	316.00	Reviewed settlement conference order; emailed client re: same; corresponded with Ms. Davis re: settlement conference; multiple emails with Mr. Hirsch re: Davis discovery meeting; conference call with Judge Reyes; call with Ms. Davis re: deposition schedule	LR 54(e)(1)(B)	Overruled	316.00
290	5/30/2018	Brittany M. Neel	5.30	1,325.00	Telephone conference with Ms. Davis, Mr. Crane, Mr. Hirsch, and Mr. Jess re: Ms. Davis's responses to SESH's discovery; conferred with Mr. Sorenson re: potential requests for sanctions against SESH and counsel; drafted motion to extend scheduling order deposition deadline; prepared for settlement conference	LR 54(e)(1)(B)	Overruled	1325.00

291	5/30/2018	Cody J. Jess	3.30	1,303.50	Prepared for and attended telephone calls with Ms. Davis and Mr. Hirsch re: outstanding discovery disputes; Davis supplemental production; meeting with Ms. Neel re: settlement conference strategy; meeting with Mr. Sorensen re: sanctions motion; reviewed letter from Mr. Hirsch to Ms. Davis re: discovery dispute; reviewed SESH motion to extend discovery deadline; prepared for settlement conference	LR 54(e)(1)(B)		1303.50
							Overruled	
292	5/31/2018	Brittany M. Neel	6.30	1,575.00	Reviewed second amended petition filed in Texas litigation; met with Msrs. Lowden, Allen, and Maldonado to prepare for settlement conference; attended settlement conference with same and Mr. Jess	LR 54(e)(1)(B)		1575.00
							Overruled	
293	5/31/2018	Cody J. Jess	6.00	2,370.00	Attended settlement conference; corresponded with Mr. Lowden and Mr. Allen re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
294	6/22/2018	Cody J. Jess	0.50	197.50	Reviewed email from Mr. Lowden re: [redacted for privilege]; follow-up re: same; Westlaw research re: improper interference	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
295	6/25/2018	Cody J. Jess	0.20		Meeting with Mr. Goldberg re: acquiring counterclaims in ABCD litigation			0.00
296	6/26/2018	Cody J. Jess	0.30	118.50	Meeting with Mr. Goldberg re: bankruptcy claims acquisition; corresponded with Mr. Allen re: same	LR 54(e)(1)(B)	Overruled	118.50
297	6/27/2018	Brittany M. Neel	2.40	600.00	Reviewed case law re: successor liability and piercing the corporate veil; prepared agenda for telephone call with Mr. Lowden re: [redacted for privilege] with Mr. Duffy and issue re: successor liability	LR 54.2(e)(2); LR 54(e)(1)(B); Services unrelated to 2:17-cv-01688-DWL	Sustained; sustained; sustained	0.00
298	6/27/2018	Cody J. Jess	1.50	592.50	Prepared for and attended meeting with clients re: Duffy matter and corporate veil piercing	Services unrelated to 2:17-cv-01688-DWL	Sustained	0.00
299	6/28/2018	Brittany M. Neel	0.50	125.00	Prepared summary of matters discussed during telephone call on June 27	Services unrelated to 2:17-cv-01688-DWL	Sustained	0.00
300	6/29/2018	Cody J. Jess	0.20		Reviewed email from Mr. Lowden re: [redacted for privilege]			0.00
301	6/1/2018	Brittany M. Neel	6.00	1,500.00	Contacted Judge Rayes's assistant re: status of order re: motion to extend scheduling order deadlines; reviewed order re: same; drafted motion to reconsider order re: same; read and responded to Mr. Lowden's email re: subpoenas to other billing companies	LR 54(e)(1)(B)	Overruled	1500.00
302	6/4/2018	Brittany M. Neel	5.30	1,325.00	Revised motion for reconsideration of order; prepared agenda for phone call with clients; conferred with Mr. Jess re: same; conferred with Mr. Jess re: Ms. Davis's affidavit; telephone call with Ms. Davis re: best method of communication; revised motion to extend deadline to commence SESH's 30(b)(6) witness deposition	LR 54(e)(1)(B)	Overruled	1325.00

303	6/4/2018	Cody J. Jess	2.10	829.50	Corresponded with Mr. Lowden re: [redacted for privilege]; follow up with Mr. Allen re: [redacted for privilege]; reviewed and revised motion for reconsideration re: order extending discovery deadlines; motion to extend discovery deadline; strategy meeting agenda; revisions to Ms. Davis's affidavit re: discovery dispute; corresponded with Mr. Kimbell re: Dr. Francis affidavit	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
304	6/5/2018	Brittany M. Neel	3.60	900.00	Telephone conference with clients re: [redacted for privilege]; revised motion to reconsider and motion to extend deadline to commence deposition; prepared exhibits for same; drafted proposed form of orders for same	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
305	6/5/2018	Cody J. Jess	2.00	790.00	Corresponded with Mr. Kimbell re: status of Dr. Francis affidavit; prepared for and attended status conference telephone call with clients; reviewed and revised motion for reconsideration and motion to amend scheduling order; corresponded with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
306	6/5/2018	Julie S. Larsen	1.30	292.50	Reviewed, finalized, and filed motion to reconsider order granting motion to extend scheduling order deadlines and motion to extend deadline to commence Rule 20(b) deposition; assembled exhibits re: same	LR 54(e)(1)(B)	Overruled	292.50
307	6/6/2018	Brittany M. Neel	2.00	500.00	Emailed Msrs. Hirsch and Crane re: telephonic conference re: discovery dispute; prepare summary meet and confers re: discovery dispute; drafted good faith consultation certificate; several telephone calls to Judge Rayes's assistant to schedule telephonic conference re: discovery dispute; exchange emails with Mr. Hirsch re: same; reviewed and revised settlement letter	LR 54(e)(1)(B)	Overruled	500.00
308	6/6/2018	Cody J. Jess	2.40	948.00	Reviewed and revised good faith consultation certification; prepared for and attended call with Judge Rayes's court re: discovery dispute; corresponded with Mr. Allen and Mr. Lowden re: [redacted for privilege]; finalized motion for partial summary judgment	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
309	6/6/2018	Julie S. Larsen	0.20		Reviewed and revised settlement offer correspondence to Mr. Hirsch and Mr. Crane			0.00
310	6/6/2018	Julie S. Larsen	0.20		Finalized and filed good faith certificate re: discovery dispute			0.00
311	6/7/2018	Brittany M. Neel	3.90	975.00	Revised motion for partial summary judgment and statement of facts; reviewed exhibits to same; emailed Mr. Kimbell re: status of Dr. Francis's affidavit	LR 54(e)(1)(B)	Overruled	975.00
312	6/7/2018	Cody J. Jess	0.90	355.50	Final revisions to motion for partial summary judgment			355.50

313	6/8/2018	Brittany M. Neel	2.90	725.00	Prepare for telephonic conference with Judge Rayes re: discovery dispute and pending motions; telephonic conference with Judge Rayes re: same; final review of motion for partial summary judgment and statement of facts; review Texas litigation and EMG's bankruptcy docket	LR 54(e)(1)(B)	Overruled	725.00
314	6/8/2018	Cody J. Jess	2.00	790.00	Prepared for and attended conference call with Judge Rayes re: discovery dispute; meeting with Ms. Neel re: same; reviewed pleadings filed in Texas litigation for claims acquisition in EMG bankruptcy; corresponded with clients re: status of discovery dispute	LR 54(e)(1)(B)	Overruled	790.00
315	6/8/2018	Julie S. Larsen	3.00	675.00	Assembled exhibits for statement of facts in support of motion for summary judgment; reviewed and finalized statement of facts and motion for summary judgment; filed same	LR 54(e)(1)(B)	Overruled	675.00
316	6/11/2018	Brittany M. Neel	0.50	125.00	Read and responded to email from Mr. Lowden re: [redacted for privilege]; reviewed Ms. Russell's bankruptcy filings	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
317	6/12/2018	Brittany M. Neel	0.20		Read and responded to email from Mr. Allen re: [redacted for privilege].; reviewed email from Mr. Lowden re: [redacted for privilege]			0.00
318	6/13/2018	Brittany M. Neel	0.20	50.00	Conferred with Mr. Goldberg re: purchase of EMG's claim against Dr. Baig			50.00
319	6/15/2018	Brittany M. Neel	0.20		Read emails from Mr. Crane and Mr. Hirsch re: document production			
320	6/18/2018	Brittany M. Neel	1.10	275.00	Read various emails from Mr. Hirsch and Mr. Crane re: depositions and document production; prepared outline for response to same; reviewed documents	LR 54(e)(1)(B)	Overruled	275.00
321	6/20/2018	Cody J. Jess	0.80	316.00	Reviewed documents from opposing counsel re: additional discovery; deposition dates; corresponded with Ms. Neel re: same; reviewed Texas law re: third party deposition subpoenas	LR 54(e)(1)(B)	Overruled	316.00
322	6/21/2018	Brittany M. Neel	6.30	1,575.00	Drafted email to Mr. Hirsch and Mr. Crane re: proposed deposition schedule and proposal to stay discovery; researched standard applicable to motions to stay discovery; drafted motion to stay discovery; revised same; drafted joint report on settlement talks and emailed same to Messrs. Hirsch and Crane; telephone call with Mr. Kimbell re: status of Dr. Francis's affidavit; emailed Mr. Lowden re: status of text messages and Perry's steakhouse receipt	LR 54(e)(1)(B)	Overruled	1575.00
323	6/21/2018	Cody J. Jess	2.40	948.00	Meeting with Ms. Neel re: motion to stay discovery; prepared lengthy e-mail to Mr. Hirsch re: same; follow up with client re: same; call to Mr. Kimbell re: Francis affidavit; corresponded with Mr. Allen re: offer of judgment	LR 54(e)(1)(B)	Overruled	948.00
324	6/21/2018	Julie S. Larsen	0.20		Reviewed and revised joint report on settlement talks			

325	6/21/2018	Julie S. Larsen	0.50	112.50	Revised and filed motion to stay discovery; prepared and filed proposed order staying discovery			112.50
326	6/22/2018	Brittany M. Neel	0.40		Drafted motion for expedited consideration and proposed form of order			
327	6/22/2018	Cody J. Jess	1.00	395.00	Reviewed and revised motion and order setting expedited briefing schedule on motion to stay discovery; call with Mr. Hirsch re: same; follow up with Mr. Allen re: settlement; reviewed settlement letter and sent same to client; reviewed notices of depositions	LR 54(e)(1)(B)	Overruled	395.00
328	6/22/2018	Julie S. Larsen	0.20	45.00	Finalized and filed joint report on settlement talks			45.00
329	6/22/2018	Julie S. Larsen	0.60	135.00	Reviewed and revised motion and order for expedited consideration of motion to stay discovery; prepared and filed stipulation and order expediting briefing schedule re: motion to stay discovery			135.00
330	6/25/2018	Brittany M. Neel	1.30	325.00	Read and responded to email from Mr. Lowden re: [redacted for privilege]; reviewed notices of deposition and subpoenas for deposition and documents; outlined strategy for responding to same; conferred with Mr. Jess re: same	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
331	6/25/2018	Cody J. Jess	1.20	474.00	Reviewed SESH subpoenas to third parties; meeting with Ms. Neel re: motion for protective order; summarized caselaw on third party subpoenas for email to Mr. Hirsch re: meet and confer prior to filing motion for protective order; emailed Mr. Hirsch re: same	LR 54(e)(1)(B)	Overruled	474.00
332	6/26/2018	Brittany M. Neel	2.10	525.00	Prepared agenda for telephone call with Msrs. Hirsch and Crane re: scope of depositions and protective order; telephone call with Msrs. Hirsch and Crane re: same; reviewed case law re: discovery fishing expeditions; responded to email from Mr. Lowden re: documents related to SESH's other third-party billing agencies	LR 54(e)(1)(B)	Overruled	525.00
333	6/26/2018	Cody J. Jess	1.90	750.50	Corresponded with clients and discovery dispute; call with Mr. Lowden re: [redacted for privilege] prepared for and attended call with Mr. Hirsch and Mr. Cane re: same; corresponded with Mr. Kimbell re: deposition of Dr. Francis; Westlaw research re: discovery dispute	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
334	6/27/2018	Cody J. Jess	0.50	197.50	Reviewed SESH disclosures re: contract issue; corresponded with Mr. Lowden re: same			197.50
335	6/28/2018	Brittany M. Neel	2.20	550.00	Researched case law re: grounds for protective order barring depositions; conferred with Mr. Jess re: discovery dispute procedures; contacted Ms. Farmer to schedule telephonic conference re: discovery dispute; emailed Messrs. Hirsch and Crane re: same	LR 54(e)(1)(B)	Overruled	550.00
336	6/28/2018	Cody J. Jess	0.70	276.50	Meeting with Ms. Neel re: protective order re: SESH discovery; reviewed Judge Rayes procedures; reviewed and revised draft e-mail to Mr. Hirsch re: same	LR 54(e)(1)(B)	Overruled	276.50
337	6/28/2018	Julie S. Larsen	0.20		Revised and filed Rule 37(a)(1) good faith consultation			

338	6/29/2018	Brittany M. Neel	3.10	775.00	Drafted joint statement re: request for protective order; emailed Ms. Farmer to confirm date for telephonic conference; read SESH's motion for Rule 56(d) relief	LR 54(e)(1)(B)	Overruled	775.00
339	6/29/2018	Cody J. Jess	0.30		Reviewed and revised joint statement for protective order; meeting with Ms. Neel re: same			
340	7/2/2018	Brittany M. Neel	3.30	825.00	Outlined and drafted response to SESH's Rule 56(d) motion			825.00
341	7/2/2018	Brittany M. Neel	1.60	400.00	Researched Rule 56(d) standard for deferring resolution on motion for summary judgment			400.00
342	7/2/2018	Cody J. Jess	0.40	158.00	Reviewed motion for access to EMG server; response to motion to stay discovery; meeting with Ms. Neel re: same	LR 54(e)(1)(B)	Overruled	158.00
343	7/2/2018	Julie S. Larsen	0.20		Reviewed and revised joint statement re: request for protective order			
344	7/3/2018	Brittany M. Neel	6.20	1,550.00	Researched case law re: grounds for seeking to defer consideration of motion for summary judgment (3); drafted response to rule 56(d) motion (3.2)			1550.00
345	7/3/2018	Cody J. Jess	0.50	197.50	Meeting with Ms. Neel re: response to SESH Rule 56 motion			197.50
346	7/5/2018	Brittany M. Neel	9.10	2,275.00	Drafted response to motion for rule 56(d) relief [6.1]; drafted reply in support of motion to stay discovery [3]			2275.00
347	7/5/2018	Cody J. Jess	4.00	1,580.00	Reviewed and revised reply to response to motion to stay discovery; response to Rule 56(d) motion; corresponded with Mr. Lowden re: [redacted for privilege] reviewed and revised reply to response to motion to stay discovery	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
348	7/5/2018	Cody J. Jess	0.20	79.00	Corresponded with Mr. Kimbell re: Dr. Francis affidavit			79.00
349	7/6/2018	Brittany M. Neel	1.40	350.00	Revised response to rule 56(d) motion and reply in support of motion to stay	LR 54(e)(1)(B)	Overruled	350.00
350	7/6/2018	Cody J. Jess	1.20	474.00	Final revisions to response to motion for Rule 56(d) relief; meeting with Ms. Neel re: same	LR 54(e)(1)(B)	Overruled	474.00
351	7/6/2018	Julie S. Larsen	1.10	247.50	Finalized and filed response to SESH Rule 56(d) Motion; assembled exhibits for filing re: same			247.50
352	7/6/2018	Julie S. Larsen	0.30	67.50	Finalized and filed reply in support of motion to stay discovery			67.50
353	7/9/2018	Brittany M. Neel	1.00	250.00	Emailed Mr. Crane re: status of joint statement re: ARS's request for protective order; reviewed and revised same			250.00
354	7/9/2018	Cody J. Jess	0.20		Corresponded with Mr. Hirsch re: status of Texas depositions			0.00
355	7/9/2018	Julie S. Larsen	0.40	90.00	Reviewed and revised joint statement re: request for protective order			90.00
356	7/10/2018	Cody J. Jess	0.30	118.50	Reviewed and revised joint statement of position re: discovery dispute; meeting with Ms. Neel re: same; corresponded with Mr. Hirsch re: Texas deposition schedules	LR 54(e)(1)(B)	Overruled	118.50
357	7/10/2018	Julie S. Larsen	0.20		Finalized and filed joint statement; email to Ms. Davis re: same			0.00
358	7/11/2018	Brittany M. Neel	2.20	550.00	Prepared outline for telephonic hearing re: discovery disputes			550.00

359	7/11/2018	Cody J. Jess	1.20	474.00	Meeting with Ms. Neel re: hearing on discovery dispute; prepared for same			474.00
360	7/12/2018	Brittany M. Neel	0.30	75.00	Telephone call with Ms. Davis re: status of motion for partial summary judgment and depositions			75.00
361	7/12/2018	Brittany M. Neel	0.90	225.00	Appeared for telephonic hearing re: discovery dispute			225.00
362	7/12/2018	Brittany M. Neel	0.70	175.00	Prepared for telephonic hearing re: discovery dispute			175.00
363	7/12/2018	Brittany M. Neel	1.40	350.00	Drafted disclosure re: citizenship of ARS's members; emailed Mr. Lowden re: [redacted for privilege] reviewed and revised third amended complaint	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
364	7/12/2018	Cody J. Jess	0.30	118.50	Reviewed corporate disclosure statement; reviewed final draft of third amended complaint; corresponded with Mr. Hirsch re: same	LR 54(e)(1)(B)	Overruled	118.50
365	7/12/2018	Cody J. Jess	2.40	948.00	Prepared for and attended hearing on discovery dispute; emails with Mr. Lowden re: same	LR 54(e)(1)(B)	Overruled	948.00
366	7/12/2018	Julie S. Larsen	0.20		Reviewed and revised disclosure re: citizenship of members			0.00
367	7/15/2018	Cody J. Jess	0.20		Reviewed outstanding checklist of to do items and updated			0.00
368	7/16/2018	Brittany M. Neel	1.20	300.00	Exchanged emails with Mr. Lowden re: membership of ARS [.3]; prepared case status and strategy memorandum [.9]			300.00
369	7/16/2018	Cody J. Jess	0.30	118.50	Reviewed and revised corporate disclosure statement; call with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
370	7/17/2018	Brittany M. Neel	0.20		Revised disclosure re: citizenship of ARS's members			0.00
371	7/17/2018	Cody J. Jess	0.20	79.00	Corresponded with Mr. Hirsch re: scheduling of Texas and Arizona depositions			79.00
372	7/17/2018	Julie S. Larsen	0.30		Filed third amended complaint; filed disclosure re: citizenship of membership; emails to Ms. Davis and client re: same			0.00
373	7/18/2018	Brittany M. Neel	3.80	950.00	Drafted third set of requests for production and non-uniform interrogatories and second set of requests for admissions to SESH [3]; drafted fourth supplemental responses to mandatory initial discovery requests and first supplemental responses to requests for production of documents [.5]; drafted email to Messrs. Hirsch and Crane re: SESH's ongoing failure to produce documents in native form [.3]			950.00
374	7/18/2018	Cody J. Jess	0.20	79.00	Reviewed draft supplemental discovery responses			79.00
375	7/19/2018	Julie S. Larsen	0.50	112.50	Finalized and served first supplemental response to SESH's first set of requests for production of documents and fourth supplemental responses to mandatory initial discovery requests; email to opposing counsel and client re: same; prepared notices of service re: same			112.50
376	7/20/2018	Cody J. Jess	0.20	79.00	Corresponded with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2) (minus 0.2)	Sustained	0.00

377	7/20/2018	Julie S. Larsen	0.20		Filed notices of service of fourth supplemental responses to mandatory initial discovery requests and first supplemental responses to SESH's first set of requests for production of documents; email to Ms. Davis and clients re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
378	7/21/2018	Cody J. Jess	0.80	316.00	Reviewed additional discovery requests to SESH re: amended claims; e-mail to Mr. Hirsch re: status of EMG server access request in Texas litigation	LR 54(e)(1)(B)	Overruled	316.00
379	7/23/2018	Julie S. Larsen	0.30	67.50	Prepared second amended notice of deposition of Dr. Baig and accompanying subpoena			67.50
380	7/25/2018	Brittany M. Neel	0.30	75.00	Read email from Mr. Hirsch re: request for extension to answer third amended complaint; conferred with Mr. Jess re: same			75.00
381	7/25/2018	Cody J. Jess	0.90	355.50	Corresponded with Mr. Lowden and Mr. Hirsch re: extension to respond to amended complaint			355.50
382	7/26/2018	Brittany M. Neel	1.20	300.00	Reviewed emails exchanged between Mr. Jess and Mr. Hirsch re: depositions, request for extension to answer complaint; and status of document production [.2]; prepared agenda for case status meeting [1]			300.00
383	7/26/2018	Cody J. Jess	0.50	197.50	Corresponded with clients re: depositions and status of EMG server document disclosure; reviewed SESH amended notice of ARS 30(b)(6) deposition; corresponded with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
384	7/27/2018	Brittany M. Neel	2.00	500.00	Conferred with Mr. Jess re: discovery requests (.8); revised requests for production, non-uniform interrogatories, and requests for admissions [1.2]	LR 54(e)(1)(B)	Overruled	500.00
385	7/27/2018	Cody J. Jess	1.80	711.00	Corresponded with Mr. Hirsch re: discovery issue re: ARS 30(b)(6) witness; meeting with Ms. Neel re: case status and strategy re: outstanding discovery and upcoming discovery; reviewed draft supplement discovery on third amended complaint			711.00
386	7/29/2018	Cody J. Jess	0.20		Corresponded with Ms. Neel re: amended notices of depositions and topics for SESH 30(b)(6) witness			0.00
387	7/30/2018	Brittany M. Neel	4.40	1,100.00	Reviewed and revised notice of SESH's 30(b)(6) witness deposition and emailed Ms. Larsen re: preparing subpoena for deposition of Dr. Mirza Baig [.4]; prepared for and participated in telephonic conference with Messrs. Hirsch and Crane re: discovery issues [1.3]; reviewed correspondence between counsels re: deposition dates [.5]; telephone call with Mr. Lowden re: [redacted for privilege] [.6]; read and responded to email from Mr. Lowden re: [redacted for privilege] [.4]; conferred with Mr. Jess re: deposition strategy and revised subpoena for deposition of Dr. Baig and notice of SESH's 30(b)(6) witness deposition [.8]; revised written discovery to SESH [.4]	LR 54.2(e)(2) (minus 1.0)	Sustained	850.00

388	7/30/2018	Cody J. Jess	3.00	1,185.00	Finalized notices of SESH 30(b)(6) and Dr . Baig; prepared for and attended meet and confer re: objectionable SESH topics of 30(b)(6); call with Mr. Lowden re: final SESH discovery	LR 54(e)(1)(B)	Overruled	1185.00
389	7/30/2018	Julie S. Larsen	0.20		Prepared notice of service of second set of requests for admissions, third set of requests for production, and third set of non-uniform interrogatories			0.00
390	7/31/2018	Brittany M. Neel	2.00	500.00	Reviewed documents to prepare for Mr. Webb's deposition [.7]; telephone call to Mr. Fritz re: Webb email export [.1]; reviewed and revised notice of SESH's 30(b)(6) witness deposition (.4); conferred with Mr. Jess to prepare for meeting with Mr. Webb (.8)			500.00
391	7/31/2018	Cody J. Jess	1.90	750.50	Finalized Baig deposition subpoena and SESH 30(b)(6) notice of deposition; corresponded with Mr. Lowden re: [redacted for privilege]; prepared for Webb deposition preparation meeting; reviewed Davis bankruptcy docket	LR 54.2(e)(2); LR 54(e)(1)(B)	Sustained; sustained	0.00
392	7/31/2018	Julie S. Larsen	0.20		Filed notice of service of discovery requests; emails to opposing counsel and client re: same			0.00
393	7/31/2018	Julie S. Larsen	0.60	135.00	Finalized and filed notice of deposition of SESH 30(b) (6) witness; finalized deposition subpoena for Dr. Baig; prepared and filed accompanying notice of deposition for Dr. Baig			135.00
394	8/1/2018	Brittany M. Neel	5.60	1,400.00	Consulted with Mr. Fritz re: access to Webb emails [.2]; researched information about Terry Fokas [.3]; read SESH's answer to thi rd amended complaint [.6]; reviewed emails re: Mr. Webb (.6); attended meeting with Messrs. Webb and Lowden to prepare for Mr. Webb's deposition (3.2); exchanged emails with Mr. Jess re: case strategy and deadlines (.3); emailed Messrs. Lowden and Allen re: [redacted for privilege] (.4)	LR 54.2(e)(2) (minus 0.4)	Sustained	1300.00
395	8/1/2018	Cody J. Jess	3.60	1,422.00	Reviewed and revised draft acceptance of service [.2]; prepared for and attended deposition preparation of Mr. Webb (3.2); corresponded with Mr. Lowden and Mr. Allen re: [redacted for privilege] (.2)	LR 54.2(e)(2) (minus 0.2)	Sustained	1343.00
396	8/1/2018	Julie S. Larsen	0.20	45.00	Prepared acceptance of service re: Baig notice of deposition and subpoena [.1]; email to Mr. Hirsch re: same (.1)			45.00
397	8/2/2018	Brittany M. Neel	0.70	175.00	Reviewed SESH's discovery requests [.3]; read email from Mr. Crane re: count 5 damages and conferred with Mr. Jess re: same (.2); reviewed emails from Mr. Lowden re: [redacted for privilege] (.2)	LR 54.2(e)(2) (minus 0.2)	Sustained	125.00
398	8/2/2018	Cody J. Jess	0.50	197.50	Corresponded with Mr. Crane re: SESH's second request for production of documents [.3]; corresponded with Mr. Lowden re: [redacted for privilege] (.2)	LR 54.2(e)(2) (minus 0.2)	Sustained	118.50

399	8/3/2018	Brittany M. Neel	2.10	525.00	Reviewed case file and compiled documents to prepare for ARS's 30(b)(6) witness deposition (1.2); read email from Mr. Hirsch re: documents produced by SESH responsive to ARS's RFP No. 5; reviewed same documents; emailed Mr. Hirsch re: SESH's ongoing failure to provide complete responses [.8]; emailed SESH's answer to third amended complaint and requests for production to Messrs. Allen and Lowden [.1]			525.00
400	8/3/2018	Cody J. Jess	0.40	158.00	Prepared for and attended call with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2) (minus 0.4)	Sustained	0.00
401	8/4/2018	Cody J. Jess	0.40	158.00	Corresponded with Mr. Lowden re: [redacted for privilege]; emails with Mr. Hirsch re: SESH deficient discovery responses (.1); reviewed SESH answer to third amended complaint, compared same to answer to second amended complaint, follow-up with client re: same (.3)	LR 54.2(e)(2); LR 54.2(e)(1)(B)	Overruled	158.00
402	8/6/2018	Brittany M. Neel	3.20	800.00	Reviewed emails exchanged between counsels and calendar follow up tasks [.5]; conferred with Mr. Jess re: potential settlement offer [.4]; exchanged emails with Ms. Hood re: request copy of Dr. Baig's deposition transcript [.4]; reviewed Mr. Lowden's summary of Mr. Webb's text messages [.3]; reviewed Dr. Baig's deposition transcript and related attachments (1.5); emailed Mr. Crane re: email attachments [.4]; telephone call with Mr. Lowden re: [redacted for privilege] [.5]; emailed Messrs. Lowden and Allen re: Dr. Baig's deposition transcript [.2]	LR 54.2(e)(2) (minus 0.5)	Sustained	675.00
403	8/6/2018	Cody J. Jess	1.90	750.50	Corresponded with Mr. Hirsch re: continuing Webb and 30(b)(6) depositions; call with Mr. Sorensen re: same (.4); reviewed draft email to Ms. Hood re: Baig deposition transcript [.2]; meeting with Ms. Neel re: discovery schedule and strategy [.6]; reviewed additional disclosure by ARS [.7]			750.50
404	8/7/2018	Brittany M. Neel	7.30	1,825.00	Drafted email to Mr. Hirsch re: SESH's failure to respond to RFP No. 5 [.8]; prepared response to SESH's second set of requests for production [2.9]; reviewed documents to prepare outline for SESH's 30 (b)(6) deposition [3.3]; conferred with Mr. Jess to prepare for meeting with Mr. Lowden re: [redacted for privilege] [.3]	LR 54.2(e)(2) (minus 0.3)	Sustained	1750.00
405	8/7/2018	Cody J. Jess	1.90	750.50	Lengthy emails to Mr. Hirsch re: Webb and ARS 30(b)(6) depositions; outstanding discovery; reviewed and revised draft response to SESH second set of requests for production; prepared for deposition preparation of Mr. Lowden	LR 54.2(e)(1)(B)	Overruled	750.50
406	8/8/2018	Brittany M. Neel	4.30	1,075.00	Continued preparing outline for SESH's 30(b)(6) witness deposition [4]; exchanged emails with Mr. Lowden re: [redacted for privilege] [.3]	LR 54.2(e)(2) (minus 0.3)	Sustained	1000.00

407	8/8/2018	Cody J. Jess	0.60	237.00	Corresponded with Mr. Lowden re: deposition preparation [.2]; response to SESH second set of requests for production [.2]; meeting with Ms. Neel re: ShareFile information to provide to Mr. Lowden [.2]			237.00
408	8/9/2018	Brittany M. Neel	3.10	775.00	Reviewed additional documents produced by SESH responsive to RFP No. 5 [.5]; read email from Mr. Hirsch re: status of depositions and intent to file motion to transfer; reviewed briefing and order on SESH's previous request to transfer; conferred with Mr. Jess re: same [.8]; received email from Mr. Lowden re: [redacted for privilege] [1.8]	LR 54.2(e)(2) (minus 1.8)	Sustained	325.00
409	8/9/2018	Cody J. Jess	0.80	316.00	Lengthy correspondence with Mr. Hirsch re: discovery dispute [.3]; corresponded with Mr. Lowden re: [redacted for privilege] [.2]; SESH document production [.3]	LR 54.2(e)(2) (minus 0.2)	Sustained	237.00
410	8/10/2018	Cody J. Jess	0.30	118.50	Corresponded with Mr. Lowden and Mr. Hirsch re: responses to SESH's second set of requests for production of documents			118.50
411	8/12/2018	Cody J. Jess	0.20	79.00	Corresponded with Mr. Hirsch re: outstanding discovery requests [.1]; status of in and out of state depositions [.1]			79.00
412	8/13/2018	Cody J. Jess	0.90	355.50	Corresponded with Mr. Englander re: Webb text messages [.3]; corresponded with Mr. Hirsch re: discovery dispute [.3]; corresponded with Mr. Lowden re: same [.3]			355.50
413	8/14/2018	Brittany M. Neel	1.30	325.00	Reviewed various emails exchanged between Mr. Jess and Mr. Hirsch re: status of depositions and documents to be produced ; reviewed text messages exchanged between Mr. Webb and Ms. Davis [.3]; reviewed various documents and prepared task list [.6]; read SESH's motion to stay proceedings [.4]			325.00
414	8/15/2018	Brittany M. Neel	6.30	1,575.00	Reviewed motion to transfer venue and motion to stay deadlines and prepared outline for responding to same [1]; exchanged emails with Mr. Kimbell re: phone call and Dr. Francis affidavit [.2]; telephone call with Ms. Davis re: case status and communications with SESH [.4]; telephone call with Mr. Kimbell re: availability for deposition, Dr. Francis affidavit, and communications with SESH [.6]; continued summarizing invoice backup to confirm contract damages [1.5]; revised Dr. Francis affidavit and emailed same to Mr. Kimbell [.5]; prepared agenda for telephone conference with Messrs. Hirsch and Crane re: discovery dispute [.3]; telephone conference with Hirsch and Crane re: deposition dates [.3]; conferred with Mr. Jess and Mr. Sorenson re: case strategy [1]; prepared email to Mr. Lowden and Mr. Allen re: [redacted for privilege] [.5]; prepared email to Mr. Hirsch re: Francis deposition [.2]	LR 54.2(e)(2) (minus 0.5)	Sustained	1450.00

415	8/15/2018	Cody J. Jess	2.40	948.00	Corresponded with Mr. Hirsch re: discovery dispute call [.1]; corresponded with Mr. Lowden re: Texas depositions [.1]; reviewed Ms. Davis's bankruptcy docket [.2]; prepared for and attended call with Ms. Davis re: case status [.4]; call with Mr Kimbell re: Francis affidavit [.6]; meeting with Mr. Sorenson re: case strategy [1.0]			948.00
416	8/15/2018	Brittany M. Neel	8.70	2,175.00	Review emails exchanged between Mr. Jess and Mr. Hirsch re: Francis's deposition [.2]; researched case law cited by SESH in support of its motion to suspend deadlines [2]; began drafting objection to motion to suspend deadlines [3.5]; prepared second supplemental response to SESH's first set of requests for production and fifth supplemental responses to mandatory initial discovery requests [.6]; met with Mr. Jess and Mr. Lowden to prepare for ARS's 30(b)(6) witness deposition [2.4]			2175.00
417	8/16/2018	Cody J. Jess	2.90	1,145.50	Corresponded with Mr. Kimbell re: SESH discovery [.5]; prepared for and attended deposition preparation with Mr. Lowden [2.4]			1145.50
418	8/16/2018	Brittany M. Neel	6.10	1,525.00	Drafted objection to SESH's motion to suspend deadlines and emailed same to Mr. Jess to review [4.1]; drafted Mr. Lowden affidavit in support of same [.3]; revised objection [1]; prepared exhibits to same [.5]; exchanged emails with Mr. Lowden re: [redacted for privilege] [.2]	LR 54.2(e)(2) (minus 0.2)	Sustained	1475.00
419	8/17/2018	Cody J. Jess	3.30	1,303.00	Prepared analysis of offering in-house counsel as 30(b)(6) witness [.7]; corresponded with Mr. Lowden re: [redacted for privilege] [.2] ; prepared subpoena to SESH lessee [.7]; reviewed documents for same [.5]; reviewed SESH motion to stay pending deadlines pending ruling on venue transfer motion [.4]; reviewed and revised objection to same [.8]	LR 54.2(e)(2) (minus 0.2)	Sustained	1224.00
420	8/17/2018	Julie S. Larsen	2.10	472.50	Finalized second supplemental response to SESH discovery and fifth supplemental responses to mandatory initial discovery requests [0.2]; prepared and filed notices re: same [0.2]; email to Ms. Davis and clients re: same [0.1]; prepared amended notices of deposition of SESH and Dr. Baig [0.2]; prepared subpoena to Spring Surgical Hospital Partners, LLC and accompanying letter [0.4]; prepared and filed notice of intent to serve subpoena and emails to opposing counsel and clients re: same [0.3]; revised and filed response to motion to suspend deadline and accompanying affidavit and emails to Ms. Davis and client re: same [0.9]			472.50

421	8/20/2018	Brittany M. Neel	6.30	1,575.00	Reviewed SESH's reply in support of motion to suspend deadlines [.4]; prepared outline for telephonic hearing re: same [1.2]; prepared for and participated in telephonic status hearing [1.5]; telephone call with Mr. Lowden and Mr. Allen re: [redacted for privilege] [.6]; telephone call with Mr. Hirsch re: brief re: scope of automatic stay [.3]; researched case law re: same and drafted brief re: scope of automatic stay [2.1]; reviewed Mr. Jess's revisions to same [.2]	LR 54.2(e)(2) (minus 0.6)	Sustained	1425.00
422	8/20/2018	Cody J. Jess	3.60	1,422.00	Prepared for and attended hearing on emergency motion to stay [1.5]; meeting with Ms. Neel re: same [.4]; call with Mr. Allen and Mr. Lowden re: [redacted for privilege] [.6]; prepared brief on scope of automatic stay (1.1)	LR 54.2(e)(2) (minus 0.6)	Sustained	1185.00
423	8/21/2018	Brittany M. Neel	4.60	1,150.00	Researched case law re: (1) enforceability of choice of venue provisions, (2) impact of choice of venue provision on venue transfer analysis, and (3) venue transfer analysis under section 1412 versus section 1404 and read case law cited by SESH in motion to transfer venue [3.8]; prepared outline of response to motion to transfer venue [.5]; reviewed motion to quash subpoena filed by Dr. Francis [.3]			1150.00
424	8/21/2018	Cody J. Jess	1.20	474.00	Meeting with Ms. Neel re: SESH depositions and non-party discovery post-hearing on motion to extend [.3]; follow-up with Mr. Kimbell re: Francis deposition [.2]; finalized position statement re: automatic stay and sent same to client for review [.3]; reviewed motion to quash filed by Dr. Francis [.4]			474.00
425	8/21/2018	Julie S. Larsen	0.40	90.00	Reviewed and filed position statement re: scope of automatic stay [0.3]; emails to Ms. Davis and client re: same [0.1]			90.00
426	8/22/2018	Brittany M. Neel	6.70	1,675.00	Began drafting response to motion to transfer venue [3.6]; read SESH's response to brief re: scope of automatic stay, researched case law re: same, conferred with Mr. Jess re: same [1.7]; telephone call with Mr. Lowden re: [redacted for privilege] [.4]; prepared outline for telephonic hearing re: scope of automatic stay [.5]; attended hearing re: same [.5]	LR 54.2(e)(2) (minus 0.4)	Sustained	1575.00
427	8/22/2018	Cody J. Jess	2.90	1,145.50	Reviewed brief re: scope of automatic stay [.6]; prepared for hearing on same [1.6]; corresponded with Mr. Bonds re: stay relief [.4]; corresponded with Mr. Allen re: Mr .. Lowden [redacted for privilege] [.3]	LR 54.2(e)(2) (minus 0.3)	Sustained	1027.00
428	8/23/2018	Cody J. Jess	0.50	197.50	Corresponded with Mr. Bonds re: lift-stay matter [.2]; exchanged emails with Mr. Lowden re: [redacted for privilege] [.3]	LR 54.2(e)(2) (minus 0.3)	Sustained	79.00
429	8/24/2018	Cody J. Jess	0.40	158.00	Reviewed Bonds Ellis engagement agreement and sent same to client for review [.2]; corresponded with Mr. Tittle re: lift-stay stipulation [.1]; corresponded with Mr. Lowden re: [redacted for privilege] [.1]	LR 54.2(e)(2) (minus 0.1)	Sustained	118.50

430	8/27/2018	Brittany M. Neel	4.60	1,150.00	Continued drafting response to motion to transfer venue and emailed same to Mr. Jess to review [3.1]; researched case law re: right to attorneys' fees [1.5]			1150.00
431	8/27/2018	Cody J. Jess	0.50	197.50	Call with Ms. Walter re: Spring Surgical subpoena [.3]; call with Mr. Tittle re: conference call with Ms. Tran [.2]			197.50
432	8/28/2018	Brittany M. Neel	0.60	150.00	Telephone call with Ms. Tran and Mr. Tittle re: stipulation to lift automatic stay			150.00
433	8/28/2018	Cody J. Jess	2.70	1,066.50	Emails with Ms. Walter and Mr. Crane re: pendency of stay re: Spring Hospital Surgical Partners' obligation to respond to ARS subpoena [.4]; prepared for and attended call with Ms. Tran and Mr. Tittle re: stay relief stipulation [2.3]			1066.50
434	8/29/2018	Brittany M. Neel	6.00	1,500.00	Reviewed and revised letter to Mr. Hirsch re: SESH's perjury accusation [2.8]; drafted memorandum re: attorneys' fees provision and fee-shifting statute [3.2]			1500.00
435	8/29/2018	Cody J. Jess	1.10	434.50	Corresponded with Mr. Tittle re: motion for approval of lift-stay (.2); corresponded with clients re: status of the same [.2]; finalized letter to Mr .. Hirsch re: representations in reply to motion to stay deadlines [.7]			434.50
436	8/29/2018	Julie S. Larsen	0.20	45.00	Reviewed and revised letter to Mr. Hirsch re: demand to correct record			45.00
437	8/30/2018	Brittany M. Neel	2.90	725.00	Reviewed motion to stay and drafted factual background section [1.2]; revised memorandum re: recovery of attorneys' fees (1.7)			725.00
438	8/30/2018	Cody J. Jess	2.40	948.00	Corresponded with Mr. Lowden re: [redacted for privilege] [.2]; reviewed and revised memorandum to client re: attorneys' fees recovery (2.2)	LR 54.2(e)(2) (minus 0.2)	Sustained	869.00
439	8/31/2018	Cody J. Jess	1.40	553.00	Reviewed and revised draft stay relief motions and orders (1.2); corresponded with Mr. Tittle re: same [.2]			553.00
440	9/4/2018	Cody J. Jess	1.70	671.50	Reviewed Ms. Tran's changes to stay relief orders [.2]; corresponded with Mr. Tittle re: same [.3]; reviewed SESH motion to transfer venue [.4]; reviewed and revised response to same [.6]; reviewed Russell and Davis dockets and sent same to client [.2]			671.50
441	9/5/2018	Cody J. Jess	2.70	1,066.50	Continued revising response to venue transfer motion [.8]; corresponded with Ms. Neel re: same [.3]; reviewed Davis and Russell responses to SESH lift stay motions [.3]; corresponded with client re: [redacted for privilege] [.3]	LR 54.2(e)(2) (minus 0.3)	Sustained	948.00
442	9/6/2018	Cody J. Jess	0.60	237.00	Corresponded with Ms. Tran re: form of stay relief order [.3]; exchanged emails with co-counsel and opposing counsel re: same [.3]			237.00

443	9/7/2018	Brittany M. Neel	1.80	450.00	Reviewed email from Mr. Hirsch re: SESH's perjury accusation, agreement to lift stay in Ms. Davis's bankruptcy case, and proposal for in-person meeting, reviewed ARS's recent document disclosures and emailed Mr. Jess re: same [.7]; reviewed revised draft of response to motion to transfer venue [.5]; telephone call with Mr. Lowden re: [redacted for privilege] [.6]	LR 54.2(e)(2) (minus 0.6)	Sustained	300.00
444	9/7/2018	Cody J. Jess	0.80	316.00	Corresponded with Mr. Lowden re: [redacted for privilege] [.2]; prepared for and attended telephone call with Mr. Lowden re: [redacted for privilege] [.5]; corresponded with Mr. Hirsch, co-counsel and Ms. Tran re: lift-stay and discovery procedures [.1]	LR 54.2(e)(2) (minus 0.7)	Sustained	39.50
445	9/11/2018	Brittany M. Neel	0.30		Exchanged emails with Ms. Tran and Mr. Tittle re: motion for stay relief			0.00
446	9/13/2018	Brittany M. Neel	2.10	525.00	Corresponded with Ms. Tran to follow up re: status of stipulated agreement (.1); corresponded with Mr. Tittle re: lift stay motions [.3]; revised lift stay motions and orders [1 .5]; received and reviewed filed copies of stay relief motions and emailed same to Messrs. Lowden and Allen [.2]			525.00
447	9/14/2018	Brittany M. Neel	0.20		Corresponded with Mr. Jess and Mr. Lowden re: appearance at bankruptcy hearing re: stay relief motions			0.00
448	9/17/2018	Brittany M. Neel	0.40	100.00	Corresponded with Mr. Allen and Mr. Lowden re: document review [.2]; corresponded with Mr. Hirsch re: meeting proposal (.2)			100.00
449	9/18/2018	Brittany M. Neel	1.30	325.00	Corresponded with Mr. Lowden and Mr. Hirsch re: conditions for in-person meeting [.6]; telephone call with Mr. Jess re: same and drafted email to Mr. Hirsch re: ASD text messages [.6]; reviewed Davis and Russell bankruptcy dockets [.1]			325.00
450	9/19/2018	Brittany M. Neel	1.10	275.00	Conferred with Mr. Jess re: case status [.4]; emailed Mr. Lowden re: [redacted for privilege]and communications with Mr. Hirsch re: in-person meeting [.7]	LR 54.2(e)(2); LR 54.2(e)(1)(B)	Sustained; overruled	100.00
451	9/19/2018	Cody J. Jess	1.00	395.00	Reviewed emails related to Davis and Russell lift stay motions and responded to same [.7]; corresponded with Ms. Neel re: Fokas meeting re: ARS disclosures [.3]			395.00
452	9/20/2018	Brittany M. Neel	0.30		Reviewed pro-hac vice motions and corresponded with Mr. Tittle re: same			0.00
453	9/20/2018	Cody J. Jess	0.20		Meeting with Ms. Neel re: pro hac vice admissions in Davis and Russell cases [.1]; reviewed drafts of same [.1]			0.00
454	9/21/2018	Brittany M. Neel	0.60	150.00	Prepared email to Mr. Hirsch re: text messages re: ASD			150.00
455	9/21/2018	Cody J. Jess	0.50	197.50	Reviewed and revised e-mail to Mr. Hirsch re: Webb and Davis text messages and settlement meeting			197.50

456	9/24/2018	Brittany M. Neel	2.20	550.00	Reviewed SESH's second motions for stay relief and emailed Mr. Jess re: same [.5]; read email from Mr. Hirsch re: ASD and conferred with Mr. Jess re: same [.4]; read regulatory opinion from Baker Donelson re: ASD model [.8]; conferred with Mr. Jess re: same and potential meeting with SESH and counsel [.5]			550.00
457	9/24/2018	Cody J. Jess	1.00	395.00	Reviewed SESH's amended motions for stay relief; corresponded with Mr. Tittle re: same [.3]; reviewed and responded to correspondence from Mr. Hirsch re: settlement meeting [.7]			395.00
458	9/25/2018	Brittany M. Neel	2.50	625.00	Reviewed Davis's and Russell's bankruptcy dockets [.1]; conferred with Mr. Jess and Mr. Goldberg re: SESH's accusations re: ASD and prepared agenda for phone call with Mr. Lowden re: [redacted for privilege] (1.4); emailed Mr. Tittle re: response to SESH's second motions for stay relief [.2]; telephone call with Mr. Lowden re: [redacted for privilege] [.5]; reviewed and revised email to Mr. Hirsch re: same [.3]	LR 54.2(e)(2) (minus 2.2)	Sustained	75.00
459	9/25/2018	Cody J. Jess	2.60	1,027.00	Reviewed Russell and Davis bankruptcy dockets [.2]; reviewed Baker Donelson opinion letter re: ASD model and met with Ms. Neel re: same (1.3); prepared for and attended call with clients re: Hirsch allegations of illegal conduct by ARS/ASD; sent Mr. Hirsch e-mail re: same [1.1]			1027.00
460	9/26/2018	Cody J. Jess	0.50	197.50	Meeting with Mr. Sorenson re: SESH claims related to ASD model			197.50
461	9/27/2018	Brittany M. Neel	0.20		Reviewed email from Mr. Hirsch and conferred with Mr. Jess re: same			0.00
462	9/27/2018	Cody J. Jess	0.60	237.00	Corresponded with Mr. Allen and Mr. Lowden re: [redacted for privilege] [.3]; corresponded with Mr. Hirsch re: same [.3]	LR 54.2(e)(2) (minus 0.6)	Sustained	0.00
463	9/26/2018	PS	3.30	1,963.50	Reviewed correspondence and limited pleadings re: alleged kickback scheme [2.5]; discussed same with Mr. Jess and Ms. Neel [.8]	No identity, no qualifications, billing rate exceeds upper limit of hourly rates set forth in SW engagement agreement, no evidence that SW's rates increased beyond rates set forth in SW engagement agreement	Sustained; fee reduced to \$430/hour	1419.00
464	10/3/2018	Brittany M. Neel	0.60	150.00	Reviewed Davis and Russell bankruptcy dockets and emailed same to Mr. Lowden and Mr. Allen [.3]; reviewed Russell's plan of reorganization and disclosure statement and emailed Mr. Jess re: same [.3]			150.00
465	10/3/2018	Cody J. Jess	0.20		Reviewed Davis and Russell dockets [.1]; meeting with Ms. Neel re: same [.1]			0.00
466	10/4/2018	Brittany M. Neel	0.60	150.00	Emailed Mr. Lowden and Mr. Allen re: [redacted for privilege] [.3]; reviewed SESH's proofs of claim filed in Russell's and Davis's bankruptcy case and email Mr. Lowden and Mr. Allen re: [redacted for privilege] (.3)	LR 54.2(e)(2) (minus 0.6)	Sustained	0.00
467	10/4/2018	Cody J. Jess	0.20	79.00	Meeting with Ms. Neel re: SESH proofs of claim in Davis and Russell cases			79.00

468	10/5/2018	Brittany M. Neel	0.20		Reviewed SESH's response to ARS's motion for stay relief			0.00
469	10/9/2018	Brittany M. Neel	3.50	875.00	Drafted reply in support of motions for stay relief, revised same			875.00
470	10/10/2018	Brittany M. Neel	1.00	250.00	Emailed Mr. Tittle re: preliminary hearing re: stay relief motions; reviewed Davis's and Russell's responses to ARS's stay relief motions [.4]; prepared reply in support of stay relief motion filed in Russell's bankruptcy case and emailed same with reply in support of stay relief motion filed in Davis's bankruptcy case to Mr. Lowden and Mr. Allen [.3]; emailed same to Mr. Tittle [.3]			250.00
471	10/10/2018	Cody J. Jess	0.60	237.00	Reviewed and revised reply to SESH response to motion for stay relief in Davis and Russell bankruptcies [.4]; meeting with Ms. Neel re: same [.2]			237.00
472	10/10/2018	Julie S. Larsen	0.20		Reviewed and revised language for reply in support of ARS's motion for stay relief			0.00
473	10/11/2018	Brittany M. Neel	0.30	75.00	Corresponded with Mr. Tittle re: status of preliminary hearing and setting final hearing			75.00
474	10/11/2018	Cody J. Jess	0.80	316.00	Corresponded with Mr. Tittle re: preliminary and final hearings on ARS and SESH lift-stay motions; exchanged emails with Mr. Lowden and Mr. Allen re: [redacted for privilege] [.3]; reviewed Davis and Russell responses to SESH and ARS motions for stay relief [.5]	LR 54.2(e)(2) (minus 0.3)	Sustained	197.50
475	10/15/2018	Brittany M. Neel	0.60	150.00	Telephone call with Mr. Tittle and Mr. Bonds re: evidentiary hearing on stay relief			150.00
476	10/15/2018	Cody J. Jess	1.00	395.00	Prepared for and attended call with Mr. Bonds re: final hearing on lift stay motions in Davis and Russell cases [.8]; meeting with Mr. Schian re: same [.2]			395.00
477	10/15/2018	DCS	0.30	178.50	Reviewed issues related to stay and ability to resolve same			178.50
478	10/16/2018	Brittany M. Neel	3.70	925.00	Emailed Mr. Lowden and Mr. Allen re: [redacted for privilege] (.2); prepared replies in support of motions for stay relief re: Davis's and Russell's opposition to same (3.1); conferred with Mr. Schian and Mr. Jess re: strategy [.4]	LR 54.2(e)(2) (minus 0.2)	Sustained	875.00
479	10/16/2018	Cody J. Jess	1.60	632.00	Meeting with Ms. Neel re: replies to Davis and Russell responses to ARS lift-stay motions [.2]; reviewed nondischargeability issue [.4]; lengthy correspondence to Mr. Allen and Mr. Lowden re: [redacted for privilege] [1.0]	LR 54.2(e)(2) (minus 1.0)	Sustained	237.00
480	10/16/2018	DCS	0.40		Reviewed order and office conference with re: same			0.00
481	10/17/2018	Cody J. Jess	0.70	276.50	Corresponded with Mr. Allen re: Davis dismissal strategy meeting (.2); corresponded with Mr. Tittle re: status of obtaining documents and witnesses for liftstay trial (. 1); reviewed and revised replies to responses to motions for relief in Davis and Russell bankruptcy cases (.4)			276.50

482	10/17/2018	Julie S. Larsen	0.20		Reviewed and revised replies in support of motions for relief re: Davis and Russell Texas bankruptcies			0.00
483	10/22/2018	Brittany M. Neel	0.40	100.00	Conferred with Mr. Jess re: [redacted for privilege]; telephone call with Mr. Lowden re: [redacted for privilege]	LR 54.2(e)(2); LR 54.2(e)(1)(B) (minus 0.4)	Sustained	0.00
484	10/22/2018	Cody J. Jess	1.20	474.00	Prepared for conference call with Mr. Lowden and Mr. Allen re: [redacted for privilege] [.3]; reviewed documents from Mr. Lowden re: [redacted for privilege]; call with Mr. Lowden re: [redacted for privilege] [.8]; email to Ms. Tran re: lift-stay trial [.1]	LR 54.2(e)(2) (minus 1.1)	Sustained	39.50
485	10/23/2018	Brittany M. Neel	0.20		Reviewed Davis and Russell bankruptcy dockets and SESH's objection to Russell's disclosure statement			0.00
486	10/23/2018	Cody J. Jess	0.40	158.00	Corresponded with Mr. Tittle re: lift-stay trial [.2]; meeting with Ms. Neel re: form of stipulation re: same [.1]; call to Ms. Tran re: same [.1]			158.00
487	10/24/2018	Brittany M. Neel	0.50	125.00	Telephone call with Ms. Tran re: settlement proposal			125.00
488	10/24/2018	Cody J. Jess	0.40	158.00	Call with Ms. Tran re: lift-stay stipulation			158.00
489	10/25/2018	Cody J. Jess	0.20	79.00	Corresponded with Ms. Tran re: status of ARS dismissal offer			79.00
490	10/26/2018	Cody J. Jess	0.70	276.50	Corresponded with Ms. Tran re: Russell and Davis agreement re: stay relief [.2]; reviewed and revised draft lift-stay stipulations [.5]			276.50
491	10/29/2018	Cody J. Jess	0.20	79.00	Corresponded with Mr. Tittle re: status of stipulated stay relief order [.1]; sent same to Mr. Allen and Mr. Lowden [.1]			79.00
492	10/30/2018	Brittany M. Neel	1.80	450.00	Reviewed SESH's non-dischargeability complaint [.2]; corresponded with Mr. Tittle re: SESH's threatened objection to stipulated stay relief order [.2]; telephone call with Mr. Tittle and Mr. Jones re: same [1]; emailed Mr. Tittle re: same [.4]			450.00
493	10/30/2018	Cody J. Jess	1.90	750.50	Reviewed Russell and Davis bankruptcy dockets [.2]; corresponded with Mr. Tittle re: SESH nondischargeability complaint re: Davis [.2]; reviewed multiple emails from local counsel re: SESH objection to stipulation [.6]; lengthy call with Mr. Bonds re: same [.4]; meeting with Mr. Schian re: same; reviewed SESH nondischargeability complaint [.5]			750.50
494	10/31/2018	Brittany M. Neel	2.00	500.00	Correspond with Mr. Tittle re: hearing re: SESH's request for stay relief [.4]; telephone call with Ms. Tran re: same [.4]; conferred with Mr. Jess re: strategy for proceeding with stay relief [.7]; reviewed District Court order re: stay [.1]; reviewed minute entry re: judge reassignment, research judge's credentials, and email Messrs. Lowden, Allen, and Grim re: [redacted for privilege] [.4].	LR 54.2(e)(2) (minus 0.4)	Sustained	400.00
495	10/31/2018	Cody J. Jess	1.10	434.50	Corresponded with Mr. Tittle re: SESH adversary complaint against Davis [.1]; emails with Mr. Allen re: same [.2]; prepared email to Mr. Kilmer re: same [.5]; calls with Ms. Tran re: Davis/Russell stipulations [.3]			434.50
496	10/31/2018	Julie S. Larsen	0.30	67.50	Prepared stipulation and proposed order to dismiss Davis			67.50

497	12/7/2018	Cody J. Jess	0.20	79.00	Reviewed order lifting stay; corresponded with client re: same			79.00
498	12/11/2018	Cody J. Jess	0.20	79.00	Reviewed order setting Rule 16 case management conference and sent same to Mr. Allen and Mr. Lowden			79.00
499	12/12/2018	Brittany M. Neel	0.40		Conferred with Mr. Jess re: file transfer			0.00
500	12/12/2018	Cody J. Jess	0.20		Corresponded with Mr. Allen and Mr. Shwer re: file transfer			0.00
501	12/12/2018	Brittany M. Neel	0.70		Phone call with Mr. Shwer and Ms. Marconi re: case transfer [.5]; conferred with Mr. Jess and Ms. Larsen re: same [.2]			0.00
502	12/13/2018	Cody J. Jess	0.80	316.00	Prepared for and attended call with Mr. Shwer and Ms. Marconi re: substitution and case status and strategy; meeting with Ms. Larsen re: preparing and sending exhibits to response to motion to transfer venue	Services related to transition of representation from SE to TS	Sustained	0.00
503	12/28/2018	Brittany M. Neel	0.80		Reviewed and organized emails to prepare to transfer to new counsel			0.00
504	1/7/2019	Brittany M. Neel	1.20		Reviewed emails and prepared same for transferring to new counsel			0.00
505	1/7/2019	Cody J. Jess	1.20		Reviewed and prepared emails for file transfer to Thorpe Shwer			0.00
506	2/1/2019	Brittany M. Neel	0.60		Corresponded with Ms. Larsen re: Thorpe Shwer's inquiries re: various documents; emailed Inertia re: exporting documents from Eclipse			0.00
507	2/4/2019	Brittany M. Neel	0.20		Read and responded to emails from Mr. Fritz and Mr. Paul re: exporting ARS documents from Eclipse			0.00
508	2/5/2019	Brittany M. Neel	0.50		Telephone call with Mr. Paul re: exporting ARS documents from Eclipse			0.00
509	12/11/2018	Andrea Marconi	0.50	167.50	Telephone conference with Mr. Grim to discuss [redacted for privilege] (.2); review of order lifting stay (.1); evaluate next steps in case, including substitution of counsel needed and response to motion to change venue (.2).	Lack of Substance of Communication under LR 54.2(e)(2) and/or LR 54.2(e)(2)(C) - hereinafter "LR 54.2(e)(2)" (minus 0.2)	Sustained	100.50
510	12/11/2018	Sara Witthoft	1.90	617.50	SESH/Joanna Davis Matter: Review and analyze non-dischargeability complaint filed as adversary proceeding in Joanna Davis' bankruptcy case, ARS' motion for partial summary judgment regarding liability in district court case against SESH, ARS' third amended complaint filed in district court, SESH's answer to third amended complaint filed in district court, and SESH's renewed motion to transfer venue to the Southern District of Texas (1.9).	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 1.9)	Sustained	0.00

514	12/13/2018	Andrea Marconi	3.50	1,172.50	Further evaluate issues and strategy regarding [redacted for privilege] (.2); review and analyze numerous pertinent pleadings filed in case, including regarding Bankruptcy Court orders and lifting of stay related to certain discovery and other issues, and motions to suspend deadlines pending resolution of venue, as well as research case docket for other pertinent filings that will assist in preparing response to motion for venue transfer (.8); review draft response to venue motion and evaluate revisions and supplementation needed to same, including because of dismissal of Davis defendant, which impacts motion, as well as refine argument strategy for response to venue motion in light of recent case developments including dismissal of Ms. Davis and motion to reconsider lifting of stay pending in Bankruptcy Court cases regarding Davis and Russell (1.6); review order setting rule 16 conference and evaluate related deadlines and requirements (.2); draft detailed correspondence to client regarding withdrawal and substitution papers and Rule 16 order (.1); correspond with Mr. Jess regarding withdrawal and substitution papers and filing of same (.1); telephone call with Mr. Jess and B. Shwer to discuss transfer of file documents and related issues (.5).	LR 54.2(e)(2) (minus 0.2); Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 1.5)		603.00
							Sustained; sustained	
515	12/13/2018	Sara Witthoft	1.50	487.50	SESH Matter: Confer with Andrea Marconi regarding ex parte application for substitution of counsel and revisions thereto (.3); meeting with Andrea regarding response to renewed motion to transfer venue (.9); review docket for Joanna Davis' chapter 7 bankruptcy case (.3)	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 1.5)		0.00
							Sustained	
516	12/14/2018	Carmen Boubek	2.20	286.00	(Paralegal) Analyze case file documents provided by Schian Walker	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 2.2)		0.00
							Sustained	
517	12/14/2018	Carmen Boubek	0.60	78.00	(Paralegal) Assist with the preparation of response to renewed motion to transfer venue to the Southern District of Texas			78.00
518	12/15/2018	Andrea Marconi	3.60	1,206.00	Review and analyze key case law cited in draft response to renewed motion to transfer venue and evaluate same and potential additional cases for use in response (2.2); review and analyze additional pertinent filings in case, including prior venue motion briefing, motion to suspend deadlines, key affidavits filed in case, and also review and analyze applicable contracts key to claims in case (1.4).	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 1.4)		737.00
							Sustained	
519	12/17/2018	Carmen Boubek	4.40	572.00	(Paralegal) Continue to analyze documents provided by Schian Walker	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 4.4)		0.00
							Sustained	
520	12/17/2018	Andrea Marconi	2.70	1,012.50	Revise and supplement response to renewed motion to dismiss, with emphasis on sections regarding 1404 transfer and forum selection clause arguments.			1012.50

521	12/17/2018	Sara Witthoft	4.50	1,462.50	Review bankruptcy court docket for Joanna Davis and pertinent filings and orders, and work on response to SESH's Renewed Motion to Transfer Venue to the Southern District of Texas.			1462.50
522	12/18/2018	Carmen Boubek	2.80	364.00	(Paralegal) Continue to analyze documents provided by Schian Walker	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 2.8)	Sustained	0.00
523	12/18/2018	Carmen Boubek	2.60	338.00	Paralegal) Analyze documents produced by defendants	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 2.6)	Overruled	338.00
524	12/18/2018	Andrea Marconi	0.40	150.00	Evaluate issues and strategy regarding need for protective order in case as well as appropriateness of disclosure of EBA with response, including review prior filings of EBA with court in public record (.2); telephone conference with Mr. Grim and Mr. Lowden to discuss [redacted for privilege] (.2).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	75.00
525	12/19/2018	Brad Shwer	0.50	187.50	Assess renewed motion to transfer venue			187.50
526	12/19/2018	Andrea Marconi	0.60	225.00	Review and evaluate client comments to draft of response to renewed venue motion and revise and incorporate draft to incorporate same (.6).			225.00
527	12/19/2018	Sara Witthoft	1.00	325.00	Meeting with Andrea Marconi regarding strategy with respect to response to SESH's renewed motion for transfer of venue and confidentiality issues going forward (.3); read and consider email from Doug Lowden regarding [redacted for privilege] (.7).	LR 54.2(e)(2)(A) (minus 0.7)	Sustained	97.50
528	12/20/2018	Andrea Marconi	1.10	412.50	Further revise to incorporate client comments and globally refine response to SESH's venue motion, make final edits and finalize exhibits for filing tomorrow.			412.50
529	12/20/2018	Sara Witthoft	1.40	455.00	Review dockets for Joanna Davis and Devorshia Russell's bankruptcy proceedings in Southern District of Texas and analyze status of same (.3); review and revise response to renewed motion to transfer venue (1.1).			455.00
530	12/21/2018	Brad Shwer	0.80	300.00	Assess response to motion to transfer venue (.7); correspondence with client regarding same (.1)			300.00
531	12/21/2018	Carmen Boubek	0.70	91.00	(Paralegal) Assist with the preparation of response to renewed motion to transfer venue			91.00
532	12/21/2018	Andrea Marconi	0.10	37.50	Correspondence with defense counsel to discuss Rule 26(f) conference (.1).			37.50
533	12/21/2018	Sara Witthoft	0.90	292.50	Finalize response to SESH's renewed motion to transfer venue for filing.			292.50
534	12/26/2018	Brad Shwer	0.60	225.00	Various conferences, correspondence, and issue review related to stipulation to extend SESH's reply to venue brief			225.00

535	12/26/2018	Andrea Marconi	0.60	225.00	Review request for extension of time from SESH counsel and confer with Mr. Lowden regarding same (.2); review and send voluminous emails with legal team and client representatives throughout day to discuss various issues regarding extension and pushing case deadlines and activity moving forward (.4).			225.00
536	12/26/2018	Sara Witthoft	1.00	325.00	Review multiple emails from James Allen, Greg Maldonado, and Doug Lowden regarding [redacted for privilege] (.4); email to James Allen, Greg Maldonado, and Doug Lowden [redacted for privilege] (.3); review draft stipulation and proposed order extending said deadline and email to Kyle Hirsch regarding same (.3).	LR 54.2(e)(2)(A) (minus 0.7)		97.50
							Sustained	
537	1/2/2019	Andrea Marconi	3.50	1,312.50	Review and analyze numerous prior discovery and scheduling orders and joint reports, as well as discovery disputes, pending depositions noticed prior to stay, subpoenas issued and other pertinent filings in case to evaluate prior case deadlines and discovery issues raised and otherwise prepare for Rule 26(f) discovery conference with defense counsel today (1.9); brief review of nature of parties' prior discovery responses and documents produced in case to ascertain scope of prior discovery conducted (.2); further prepare strategy for Rule 26(f) conference with S. Witthoft (.5); telephone conference with S. Witthoft and defense counsel to conduct Rule 26(f) discovery conference (.7); evaluate outcome of call and preliminary next steps (.2).			1312.50
538	1/2/2019	Sara Witthoft	3.50	1,137.50	Review docket and previous filings relating to discovery and scheduling to prepare for Rule 26(f) conference with SESH's counsel (2.1); meeting with Andrea Marconi to prepare for Rule 26(f) conference (.5); participate in telephonic Rule 26(f) conference with SESH's counsel (.7); meeting with Andrea Marconi regarding Rule 26(f) conference and next steps (.2).			1137.50
539	1/3/2019	Carmen Boubek	0.50	65.00	(Paralegal) Prepare joint case management report			65.00
540	1/3/2019	Andrea Marconi	0.90	337.50	Correspondence with client regarding [redacted for privilege] (.1); telephone conference with Messrs. Lowden and Grim and S. Witthoft to discuss Rule 26(f) conference, joint report and related discovery deadlines and case strategy for moving forward (.8).	LR 54.2(e)(2)(A) (minus 0.1)		300.00
							Sustained	
541	1/3/2019	Sara Witthoft	0.90	292.50	Teleconference with Doug Lowden and Tyler Grim regarding [redacted for privilege]	LR 54.2(e)(2)(A) (minus 0.9)		0.00
							Sustained	
542	1/4/2019	Andrea Marconi	0.40	150.00	Review and analyze opinion letter regarding [redacted for privilege]	LR 54.2(e)(2)(A) (minus 0.4)		0.00
							Sustained	
543	1/7/2019	Brad Shwer	0.50	187.50	Evaluate recent briefing, including reply, and correspondence from client regarding same			187.50
544	1/7/2019	Carmen Boubek	2.20	286.00	(Paralegal) Prepare discovery and disclosures for attorney analysis			286.00

545	1/7/2019	Carmen Boubek	2.20	286.00	(Paralegal) Analyze documents produced by SESH	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 2.2)	Overruled	286.00
546	1/7/2019	Andrea Marconi	0.90	337.50	Review and analyze reply filed by defendants in support of renewed motion for venue transfer and evaluate same to address questions raised by client as well as assess allegations regarding defendants' intention to amend complaint to add additional claims and parties (.6); review and draft/exchange detailed correspondence with Mr. Lowden regarding his questions regarding reply brief and assertions made by defense in same (.3).			337.50
547	1/7/2019	Sara Witthoft	1.30	422.50	Review and analyze SESH's reply in support of renewed motion to transfer venue to the Southern District of Texas (.7); read and consider email correspondence from Doug Lowden regarding said reply (.2); meeting with Andrea Marconi to discuss strategy and analyze next steps (.4).			422.50
548	1/8/2019	Carmen Boubek	6.20	806.00	(Paralegal) Continue to analyze documents produced by defendants	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 6.2)	Overruled	806.00
549	1/9/2019	Carmen Boubek	4.20	546.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 4.2)	Overruled	546.00
550	1/9/2019	Andrea Marconi	4.40	1,650.00	Review pertinent case file materials and orders and draft detailed and lengthy joint case management report required by court (4.0); evaluate strategy for potential continued settlement conference (.4).			1650.00
551	1/9/2019	Sara Witthoft	0.40	130.00	Confer with Andrea Marconi regarding strategy going forward and issues related to preparation of Rule 26(f) report.			130.00
552	1/10/2019	Carmen Boubek	5.40	702.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 5.4)	Overruled	702.00

553	1/10/2019	Andrea Marconi	3.40	1,275.00	Continued work on and revisions to draft joint report and send to client for review and comment (.8); preliminary review and analysis of motion for partial summary judgment and state of facts supporting same (.8); evaluate and assess potential impact of third amended complaint and new claim for breach of NDA and its filing after the motion for summary judgment on liability, including consider whether motion can be supplemented to include arguments regarding NDA and related strategy issues (.4); review and analyze correspondence from Mr. Lowden regarding [redacted for privilege] (.1); evaluate strategy and issues regarding re-commencing settlement discussions and timing of same and draft detailed correspondence to client [redacted for privilege] (.8); revise joint report to include client comments and send to SESH counsel for review and comment (.2); evaluate issues relating to and review and exchange emails with client regarding [redacted for privilege] (.1); further review and exchange correspondence with Mr. Lowden regarding various case strategy issues (.2).	LR 54.2(e)(2)(A) (minus 1.0)		900.00
							Sustained	
554	1/10/2019	Sara Witthoft	0.50	162.50	Review and revise draft Rule 26(f) joint report (.5).			162.50
555	1/10/2019	Sara Witthoft	2.70	877.50	Meeting with Andrea Marconi to discuss strategy and discovery-related issues (.4); read and consider emails from Doug Lowden regarding [redacted for privilege](1.1); read and consider emails from Doug Lowden regarding discovery to be conducted (.3); review and consider motion for partial summary judgment and consider discovery to be conducted (.9).	LR 54.2(e)(2)(A) (minus 1.1)		520.00
							Sustained	
556	1/11/2019	Carmen Boubek	6.60	858.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 6.6)	Overruled	858.00
557	1/11/2019	Andrea Marconi	0.60	225.00	Review and analyze court order denying venue motion and draft correspondence to client regarding same (.3); evaluate next steps and strategy in case in light of same (.3).			225.00
558	1/11/2019	Sara Witthoft	0.30	97.50	Review and consider Order denying SESH's renewed motion to transfer venue.			97.50
559	1/14/2019	Carmen Boubek	3.10	403.00	(Paralegal) Continue to analyze 25,000 pages of documents produced by defendants	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 3.1)	Overruled	403.00
560	1/14/2019	Andrea Marconi	1.10	412.50	Review and analyze parties' initial and supplemental MIDP disclosures and evaluate ARS RFP and supplemental responses for use in proceeding with prosecution of case (1.1).			412.50
561	1/15/2019	Carmen Boubek	5.00	650.00	(Paralegal) Continue to analyze 25,000 pages of documents produced by defendants	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 5.0)	Overruled	650.00

562	1/15/2019	Andrea Marconi	0.10	37.50	Correspondence with SESH counsel regarding follow up on draft joint report (.1).			37.50
563	1/15/2019	Sara Witthoft	0.30	97.50	Review and analyze SESH's revisions to draft Rule 26(f) report.			97.50
564	1/16/2019	Brad Shwer	1.00	375.00	Review numerous recent filings, including joint report, and related documents			375.00
565	1/16/2019	Carmen Boubek	6.10	793.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 6.1)	Overruled	793.00
566	1/16/2019	Andrea Marconi	3.10	1,162.50	Review and evaluate additional language and suggested edits from SESH to joint case management report and further revise to incorporate same as well as evaluate next steps and strategy issues regarding upcoming discovery and briefing in case, as well as defense of expected counterclaims and third party claims by SESH (2.2); draft detailed correspondence to clients and exchange follow up communications regarding [redacted for privilege] (.2); further correspondence with Mr. Crane regarding joint report prior to filing (.2); make final edits to joint report and file today (.5).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	1087.50
567	1/16/2019	Sara Witthoft	1.30	422.50	Strategize with Andrea Marconi regarding SESH's changes to draft Rule 26(f) report and changes to ARS's portions of said report in response thereto (.3); review and revise said Rule 26(f) report (.6); review and consider email from Doug Lowden regarding [redacted for privilege] (.2); review email from Dan Crane regarding SESH's additional revisions to Rule 26(f) report and confer with Andrea Marconi regarding finalization of same (.2).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	357.50
568	1/17/2019	Carmen Boubek	2.80	364.00	(Paralegal) Continue to analyze 50,000 page of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 2.8)	Overruled	364.00
569	1/17/2019	Andrea Marconi	0.10	37.50	Correspondence to client regarding joint report filing (.1).			37.50
570	1/18/2019	Carmen Boubek	4.70	611.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 4.7)	Overruled	611.00
571	1/21/2019	Carmen Boubek	5.10	663.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 5.1)	Overruled	663.00
572	1/21/2019	Carmen Boubek	0.20	26.00	(Paralegal) Assist with rule 16 hearing			26.00
573	1/22/2019	Brad Shwer	0.20	75.00	Assess various correspondence from client and attention to same			75.00
574	1/22/2019	Carmen Boubek	0.70	91.00	(Paralegal) Continue to assist with the preparation of Rule 16 case management conference			91.00
575	1/22/2019	Carmen Boubek	1.40	182.00	(Paralegal) Prepare discovery documents for attorney analysis			182.00

576	1/22/2019	Andrea Marconi	2.60	975.00	Review pertinent filings, documents, and other materials and evaluate strategy issues in preparation for tomorrow's case management conference (2.1); review and exchange correspondence with client regarding [redacted for privilege] (.2); assess status of efforts to synthesize and prepare for review 50,000 plus documents produced by parties in case and evaluate strategy regarding preliminary review process (.3).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	900.00
577	1/22/2019	Sara Witthoft	0.50	162.50	Review and consider email correspondence from Doug Lowden regarding [redacted for privilege] (.2); review bankruptcy court dockets for Joanna Davis and Devorshia Russell and analyze status of said bankruptcy cases (.3).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	97.50
578	1/23/2019	Brad Shwer	0.30	112.50	Assess results from conference with court this morning			112.50
579	1/23/2019	Carmen Boubek	5.80	754.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 5.8)	Overruled	754.00
580	1/23/2019	Andrea Marconi	4.20	1,575.00	Final preparations for, travel to and attend Rule 16 case management conference, including communications with SESH counsel after same regarding next steps in case and further evaluate same (3.0); begin to evaluate strategy for next steps in case, including discovery prior to summary judgment motion, consider potential experts and other discovery issues and strategy (.6); telephone conference with Messrs. Grim and Lowden [redacted for privilege](.6).	LR 54.2(e)(2)(A) (minus 0.6)	Sustained	1350.00
581	1/24/2019	Sara Witthoft	4.30	1,397.50	Prepare for Rule 16 scheduling conference (.9); travel to and from Federal Court and participate in Rule 16 scheduling conference (1.8); review and consider minute entry regarding Rule 16 scheduling conference (.1); review and analyze scheduling order entered by Judge Lanza (.3); meeting with Andrea Marconi to discuss strategy regarding discovery including potential expert testimony (.5); teleconference with Tyler Grim and Doug Lowden regarding [redacted for privilege] (.7).	LR 54.2(e)(2)(A) (minus 0.7)	Sustained	1170.00
582	1/24/2019	Carmen Boubek	0.30	39.00	(Paralegal) Analyze court docket regarding membership detail of ARS			39.00
583	1/24/2019	Carmen Boubek	2.00	260.00	(Paralegal) Prepare protective order			260.00
584	1/24/2019	Carmen Boubek	1.10	143.00	(Paralegal) Analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 1.1)	Overruled	143.00
585	1/24/2019	Andrea Marconi	0.20	75.00	Analysis of issues and strategy for protective order needed (.2).			75.00
586	1/25/2020	Carmen Boubek	5.30	689.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 5.3)	Overruled	689.00

587	1/26/2019	Andrea Marconi	2.40	900.00	Review and analyze ARS and SESH discovery requests and all responses, including supplemental responses, and assess key areas of focus for upcoming review of all documents produced as well as evaluate potential areas for follow up party and third-party discovery.			900.00
588	1/28/2019	Carmen Boubek	7.20	936.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 7.2)	Overruled	936.00
589	1/28/2019	Sara Witthoft	1.20	390.00	Review and analyze discovery responses served by ARS and SESH and analyze next steps with respect to additional discovery to be conducted.			390.00
590	1/28/2019	Victoria Dunne	1.90	541.50	Review and analyze Case Docket in preparation for evaluating case status and upcoming discovery needs.			541.50
591	1/28/2019	Victoria Dunne	1.70	484.50	Review and analyze Third Amended Complaint in preparation for engaging in discovery and evaluating potential motion practice.			484.50
592	1/28/2019	Victoria Dunne	1.50	427.50	Review and analyze Answer to Third Amended Complaint in preparation for engaging in discovery and evaluating potential motion practice.			427.50
593	1/28/2019	Victoria Dunne	0.90	256.50	Review and analyze Joint Case Management Report in preparation for anticipating future tactics from Defendants and coordinating discovery.			256.50
594	1/29/2019	Carmen Boubek	4.00	520.00	(Paralegal) Continue to analyze documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 4.0)	Overruled	520.00
595	1/29/2019	Andrea Marconi	0.80	300.00	Telephone call with Mr. Hirsch to discuss issues regarding potential change in counsel and scheduling of upcoming depositions to meet court deadlines (.2); evaluate next steps and strategy in light of same (.3); preliminary assessment of additional file materials received from Schian Walker and strategize for best strategy to accomplish review of same (.3).			300.00
596	1/29/2019	Sara Witthoft	0.40	130.00	Teleconference with Kyle Hirsch regarding status of substitution of counsel and scheduling depositions (.2); strategize with Andrea Marconi regarding next steps (.2).			130.00
597	1/29/2019	Victoria Dunne	1.10	313.50	Review and analyze Plaintiff's Motion for Partial Summary Judgment in preparation for engaging in discovery.			313.50
598	1/29/2019	Victoria Dunne	0.90	256.50	Review and analyze Statement of Facts in support of Motion for Partial Summary Judgment.			256.50
599	1/29/2019	Victoria Dunne	1.30	370.50	Review and analyze Exhibits 1-2 to Statement of Facts in support of Motion for Partial Summary Judgment in preparation for developing discovery strategy.			370.50
600	1/30/2019	Carmen Boubek	5.80	754.00	(Paralegal) Continue to analyze 5,000 documents produced by defendant	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 5.8)	Overruled	754.00

601	1/30/2019	Sara Witthoft	1.30	422.50	Review of categories of documents disclosed/produced and documents held back pursuant to privilege, and analyze strategy with respect to next steps for discovery and case management.			422.50
602	1/30/2019	Victoria Dunne	1.60	456.00	Review and analyze Plaintiff SESH's Original Petition, Request for Temporary Restraining Order, Permanent Injunction, and Disclosure in cv 2017-30828 in preparation for developing discovery plan.			456.00
603	1/30/2019	Victoria Dunne	1.40	399.00	Review and analyze Plaintiff SESH's First Amended Petition an Request for Disclosure in cv 2017-30828 in preparation for developing discovery plan.			399.00
604	1/30/2019	Victoria Dunne	0.20	57.00	Review and analyze November 22, 2017 Correspondence to Plaintiffs' counsel regarding SESH's bad faith denial of Ms. Davis' actual authority to contract on its behalf in preparation for developing discovery plan.			57.00
605	1/30/2019	Victoria Dunne	0.70	199.50	Review and analyze Plaintiff SESH's Second Amended Original Petition and Disclosure in cv 2017-30828 in preparation for developing discovery plan.			199.50
606	1/30/2019	Victoria Dunne	0.10	28.50	Review and analyze Affidavit of Debra Sofia in preparation for developing discovery plan.			28.50
607	1/30/2019	Victoria Dunne	0.60	171.00	Review and analyze Affidavit of Joanna Davis in preparation for developing discovery plan.			171.00
608	1/30/2019	Victoria Dunne	0.40	114.00	Review and analyze Affidavit of Devorshia Janell Russell in preparation for developing discovery plan.			114.00
609	1/30/2019	Victoria Dunne	0.10	28.50	Review and analyze Affidavit of Jeffrey L. Webb in preparation for developing discovery plan.			28.50
610	1/30/2019	Victoria Dunne	0.10	28.50	Review and analyze SESH's Certificate of Formation in preparation for developing discovery plan.			28.50
611	1/30/2019	Victoria Dunne	0.70	199.50	Review and analyze Excellence Medical Group's Mutual Nondisclosure Agreement in preparation for developing discovery plan.			199.50
612	1/30/2019	Victoria Dunne	0.40	114.00	Review and analyze SESH's Business Associates Agreement in preparation for developing discovery plan.			114.00
613	1/30/2019	Victoria Dunne	0.20	57.00	Review and analyze August 31, 2016 SESH Committee Meeting Minutes in preparation for developing discovery plan.			57.00
614	1/30/2019	Victoria Dunne	0.10	28.50	Review and analyze September 26, 2016 SESH Committee Meeting Minutes in preparation for developing discovery plan.			28.50
615	1/30/2019	Victoria Dunne	0.70	199.50	Review and analyze Exclusive Healthcare "Out of Network" Claims Billing Agreement in preparation for developing discovery plan.			199.50
616	1/30/2019	Victoria Dunne	0.10	28.50	Review and analyze outline of contract executed by Ms. Davis, and other executives of interest, on behalf of SESH in preparation for developing discovery plan.			28.50
617	1/31/2019	Carmen Boubek	0.60	78.00	Paralegal) Assist with the preparation of motion for partial summary judgment hearing			78.00

618	1/31/2019	Carmen Boubek	1.20	156.00	(Paralegal) Attend conference regarding discovery issues			156.00
619	1/31/2019	Carmen Boubek	5.10	663.00	(Paralegal) Continue to analyze 10,000 documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 5.1)	Overruled	663.00
620	1/31/2019	Andrea Marconi	2.80	1,050.00	Review summaries of extensive new file documents including privileged documents, drafts, emails and other file materials newly received in case from Schian Walker and evaluate strategy for review of same along with further evaluation of strategy for potential database assistance to review all case documents and assess other discovery and document review strategies (1.0); strategy meeting with legal team to prepare and evaluate strategy for review and analysis of documents produced and voluminous file materials received from Schian Walker, upcoming depositions, and discovery efforts (1.2); draft detailed correspondence to client [redacted for privilege](.2); further evaluate document review and discovery strategy, including review proposals for particular database management systems and draft detailed correspondence to client regarding same (.4).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	975.00
621	1/31/2019	Sara Witthoft	3.20	1,040.00	Meeting with Andrea Marconi, Victoria Dunne, and Carmen Boubek to discuss outstanding issues and strategy relating to discovery, document review, and preparation for depositions (1.4); review and analyze text messages between Joanna Davis and Jeff Webb disclosed by ARS (.5); review email correspondence with Doug Lowden regarding [redacted for privilege] (.2); review and revise draft protective order (1.1).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	975.00
622	1/31/2019	Victoria Dunne	1.00	285.00	Develop document review plan identifying items and topics of special interest.			285.00
623	1/31/2019	Victoria Dunne	0.40	114.00	Review and analyze text messages between Ms. Davis and Mr. Webb to determine whether they tend to support SESH's threatened fraud claims.			114.00
624	1/31/2019	Victoria Dunne	3.40	969.00	Review and analyze remaining ten exhibits to Plaintiff's Statement of Facts in Support of Motion for Partial Summary Judgment in preparation for developing discovery strategy.			969.00
625	2/1/2019	Carmen Boubek	3.90	507.00	(Paralegal) Continue to analyze documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 3.9)	Overruled	507.00
626	2/1/2019	Andrea Marconi	0.20	75.00	Work on further issues and strategy for document review and database set up (.2).			75.00
627	2/1/2019	Sara Witthoft	3.90	1,267.00	Review and analyze ARS's motion for partial summary judgment, accompanying statement of facts, and exhibits (3.7); read and consider Kyle Hirsch's email to Brian Kilmer for purposes of introduction and regarding depositions to be scheduled (.2).			1267.00

628	2/1/2019	Victoria Dunne	0.70	199.50	Review and analyze Plaintiff's Responses to Mandatory Initial Discovery Requests in preparation for engaging in discovery.			199.50
629	2/1/2019	Victoria Dunne	0.60	171.00	Review and analyze Plaintiff's First Supplemental Responses to Mandatory Initial Discovery Requests in preparation for engaging in discovery.			171.00
630	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze Plaintiff's Second Supplemental Responses to Mandatory Initial Discovery Requests in preparation for engaging in discovery.			28.50
631	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze Plaintiff's Third Supplemental Responses to Mandatory Initial Discovery Requests in preparation for engaging in discovery.			28.50
632	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze Plaintiff's Disclosure Regarding Citizenship with attachments in preparation for engaging in discovery.			28.50
633	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze Plaintiff's Fourth Supplemental Responses to Mandatory Initial Discovery Requests in preparation for engaging in discovery.			28.50
634	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze Plaintiff's Fifth Supplemental Responses to Mandatory Initial Discovery Requests in preparation for engaging in discovery.			28.50
635	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze SESH's Mandatory Initial Discovery Responses in preparation for engaging in discovery.			28.50
636	2/1/2019	Victoria Dunne	0.50	142.50	Review and analyze Plaintiff's Response to SESH's First Set of Requests for Production in preparation for engaging in discovery.			142.50
637	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze Plaintiff's First Supplemental Response to SESH's First Set of Requests for Production in preparation for engaging in discovery.			28.50
638	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze Plaintiff's Second Supplemental Response to SESH's First Set of Requests for Production in preparation for engaging in discovery.			28.50
639	2/1/2019	Victoria Dunne	0.50	142.50	Review and analyze SESH's Response to Plaintiff's First Set of Requests for Production in preparation for engaging in discovery.			142.50
640	2/1/2019	Victoria Dunne	0.60	171.00	Review and analyze SESH's First Amended Response to SESH's First Set of Requests for Production in preparation for engaging in discovery.			171.00
641	2/1/2019	Victoria Dunne	0.60	171.00	Review and analyze SESH's Response to Plaintiff's First Set of Requests for Admissions in preparation for engaging in discovery.			171.00
642	2/1/2019	Victoria Dunne	0.60	171.00	Review and analyze SESH's Response to Plaintiff's Non-Uniform Interrogatories in preparation for engaging in discovery.			171.00
643	2/1/2019	Victoria Dunne	0.70	199.50	Review and analyze SESH's Amended Response to Plaintiff's First Set of Requests for Admissions in preparation for engaging in discovery.			199.50
644	2/1/2019	Victoria Dunne	0.30	85.50	Review and analyze SESH's Response to Plaintiff's Request for Admissions.			85.50

645	2/1/2019	Victoria Dunne	0.40	114.00	Review and analyze SESH's Amended Response to Plaintiff's Request for Admissions.			114.00
646	2/1/2019	Victoria Dunne	0.40	114.00	Review and analyze SESH's Amended Response to Plaintiff's Request for Production.			114.00
647	2/1/2019	Victoria Dunne	0.40	114.00	Review and analyze SESH's Response to Plaintiff's Request for Production.			114.00
648	2/1/2019	Victoria Dunne	0.20	57.00	Review and analyze SESH's Response to Plaintiff's Second Set of Non-Uniform Interrogatories in preparation for engaging in discovery.			57.00
649	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze SESH's Responses to Plaintiff's Second Set of Requests for Production in preparation for engaging in discovery.			28.50
650	2/1/2019	Victoria Dunne	0.10	28.50	Review and analyze Davis' Response to Plaintiff's First Set of Non-Uniform Interrogatories.			28.50
651	2/1/2019	Victoria Dunne	0.20	57.00	Review and analyze Davis' Response to Plaintiff's Request for Production.			57.00
652	2/4/2019	Carmen Boubek	7.20	936.00	(Paralegal) Analyze documents produced by SESH	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 7.2)	Overruled	936.00
653	2/4/2019	Andrea Marconi	2.10	787.50	Evaluate issues and strategy regarding status of review of potentially privileged documents and efforts by Schian Walk regarding same, marking of privileged documents and whether any privilege log exists (.2); review and exchange correspondence with Mr. Kilmer, new Texas counsel for SESH regarding upcoming depositions and related issues (.1); evaluate issues and legal requirements concerning whether pro hac vice admission in Arizona is required for SESH Texas counsel to take depositions and briefly evaluate potential objection strategy (.2); review and revise draft protective order for use in case and proposal to SESH counsel and evaluate best way to handle designating voluminous already-produced documents (1.1); brief analysis of new facts learned from Houston case involving EMG and allegations that will underlie proposed counterclaims and cross-claims in case (.4); correspondence to client regarding [redacted for privilege] (.1).	LR 54.2(e)(2)(A) (minus 0.1)	Sustained	750.00
654	2/4/2019	Sara Witthoft	2.90	942.50	Review email correspondence with Brian Kilmer regarding depositions to be scheduled and pro hac vice admission (.2); review and consider email from Cody Jess regarding status of document review at time of file transfer (.3); review and analyze Rule 56(d) briefing and exhibits thereto (1.3); further review protective order and confer with Andrea Marconi regarding revisions thereto (.6); meeting with Andrea Marconi regarding review of exhibits to motion for partial summary judgment and issues related thereto (.3); email to Kyle Hirsch and Dan Crane forwarding draft protective order for review and comment (.2).			942.50

655	2/4/2019	Victoria Dunne	1.40	399.00	Review and analyze pertinent legal authority regarding the unauthorized practice of law in preparation for preparing Admission Requirement for Depositions in District Court Memorandum.			399.00
656	2/4/2019	Victoria Dunne	1.80	513.00	Review and analyze pertinent legal authority regarding admission to the bar in preparation for preparing Admission Requirement for Depositions in District Court Memorandum.			513.00
657	2/4/2019	Victoria Dunne	1.30	370.50	Review and analyze pertinent legal authority regarding consequences associated with opposing counsel's failure to comply with admission requirements in preparation for preparing Admission Requirement for Depositions in District Court Memorandum.			370.50
658	2/4/2019	Victoria Dunne	0.50	142.50	Begin preparing Admission Requirement for Depositions in District Court Memorandum.			142.50
659	2/4/2019	Victoria Dunne	0.70	199.50	Prepare "Material Facts" section of Admission Requirement for Depositions in District Court Memorandum.			199.50
660	2/4/2019	Victoria Dunne	0.60	171.00	Prepare "Applicable Law" section of Admission Requirement for Depositions in District Court Memorandum.			171.00
661	2/4/2019	Victoria Dunne	2.30	655.50	Prepare "Pro Hac Vice Admission Procedure for District Court" section of Admission Requirement for Depositions in District Court Memorandum.			655.50
662	2/4/2019	Victoria Dunne	0.30	85.50	Prepare "Unauthorized Practice of Law" section of Admission Requirement for Depositions in District Court Memorandum.			85.50
663	2/4/2019	Victoria Dunne	1.10	313.50	Prepare "Deposition-Specific Rules" section of Admission Requirement for Depositions in District Court Memorandum.			313.50
664	2/4/2019	Victoria Dunne	0.90	256.50	Prepare "Non-Recoverable Attorneys' Fees" section of Admission Requirement for Depositions in District Court Memorandum.			256.50
665	2/5/2019	Carmen Boubek	4.80	624.00	(Paralegal) Continue to analyze documents produced by defendant	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 4.8)	Overruled	624.00
666	2/5/2019	Sara Witthoft	0.60	195.00	Review and analyze Victoria Dunne's memorandum regarding requirement that Brian Kilmer be admitted pro hac vice to participate in Texas depositions (.3); review SESH's notice of deposition of ARS's Rule 30(b)(6) representative and analyze topics listed therein (.2); review and consider text minute entry order granting Brian Kilmer's application for admission pro hac vice (.1).			195.00
667	2/5/2019	Victoria Dunne	1.60	456.00	Review and analyze pertinent legal authority regarding Texas and Arizona ethical rules in preparation for preparing Admission Requirement for Depositions in District Court Memorandum.			456.00
668	2/5/2019	Victoria Dunne	3.40	969.00	Prepare "Ethical Rules" section of Admission Requirement for Depositions in District Court Memorandum.			969.00

669	2/5/2019	Victoria Dunne	0.80	228.00	Prepare "Conclusion" section of Admission Requirement for Depositions in District Court Memorandum.			228.00
670	2/5/2019	Victoria Dunne	1.20	342.00	Review and revise Admission Requirement for Depositions in District Court Memorandum.			342.00
671	2/6/2019	Carmen Boubek	1.00	130.00	(Paralegal) Assist with the preparation of ARS 30(b)96 deposition and witness prep.			130.00
672	2/6/2019	Carmen Boubek	4.10	533.00	(Paralegal) Continue to analyze 20,000 pages of documents produced by SESH	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 4.1)	Overruled	533.00
673	2/6/2019	Andrea Marconi	0.30	112.50	Review and exchange correspondence with Mr. Kilmer regarding upcoming depositions and related issues (.1); correspondence with client regarding same (.1); preliminary correspondence with Mr. Webb regarding deposition scheduling and issues (.1).			112.50
674	2/6/2019	Sara Witthoft	0.40	130.00	Review and consider email from Brian Kilmer regarding pro hac vice admission and scheduling of depositions (.2); review and consider emails from Doug Lowden and Jeff Webb regarding [redacted for privilege] (.2).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	65.00
675	2/7/2019	Carmen Boubek	1.90	247.00	(Paralegal) Continue to analyze 50,000 pages of documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 1.9)	Overruled	247.00
676	2/7/2019	Carmen Boubek	1.40	182.00	(Paralegal) Attending conference regarding discovery procedures			182.00
677	2/7/2019	Andrea Marconi	1.90	712.50	Review filings with court for substitution of counsel and email to client regarding same (.1); assess strategy and next steps for upcoming depositions and coordination with new counsel regarding protective order (.3); attend training meeting regarding new document database and evaluate further strategy for document review (1.3); evaluate nature of documents not received from SESH or withheld for confidentiality issues and assess communication to counsel regarding same (.1); draft case update correspondence to client (.1).			712.50
678	2/7/2019	Sara Witthoft	2.30	747.50	Review SESH's ex parte motion for withdrawal and substitution of counsel (.2); confer with Andrea Marconi regarding strategy with respect to same, protective order, and scheduling depositions (.4); participate in training for document database (1.2); emails to and from Matthew Kelly regarding protective order and scheduling of depositions (.2); email to Kyle Hirsch and Dan Crane regarding motion for withdrawal and follow up regarding SESH documents not included in Schian Walker's file (.2); review order granting motion for withdrawal and substitution of counsel for SESH (.1).			747.50
679	2/7/2019	Victoria Dunne	1.40	399.00	Strategize details and logistics of in depth document review initiative in preparation for upcoming depositions.			399.00

680	2/8/2019	Carmen Boubek	3.10	403.00	(Paralegal) Continue to analyze documents produced by parties	Services related to transition of representation from SE to TS; "Up to Speed" Fees (minus 3.1)	Overruled	403.00
681	2/8/2019	Victoria Dunne	1.90	541.50	Review and analyze ARS16001-16,288 in preparation for engaging in discovery.			541.50
682	2/11/2019	Carmen Boubek	0.30	39.00	(Paralegal) Analyze privilege documents provided by Schian Walker			39.00
683	2/11/2019	Victoria Dunne	8.90	2,536.50	Review and analyze ARS16,289-18,503 in preparation for engaging in discovery.			2536.50
684	2/12/2019	Sara Witthoft	0.20	65.00	Meeting with Victoria Dunne regarding issues related to review of disclosed documents			65.00
685	2/12/2019	Victoria Dunne	7.50	2,137.50	Review and analyze ARS18,504-19,642 in preparation for engaging in discovery.			2137.50
686	2/13/2019	Sara Witthoft	0.40	130.00	Email to Kyle Hirsch and Dan Crane to follow up regarding documents disclosed and withheld by SESH (.2); email to Matthew Kelly and Kevin McCoy to follow up regarding review of draft protective order (.2).			130.00
687	2/13/2019	Victoria Dunne	6.90	1,966.50	Review and analyze ARS019643-22224 in preparation for engaging in discovery.			1966.50
688	2/18/2019	Andrea Marconi	0.70	262.50	Review and exchange numerous emails with counsel for SESH regarding various deposition issues and draft protective order (.2); evaluate related issues and strategy for same (.3); assess issues regarding scheduling of ARS depositions requested by SESH and review and exchange emails with client and further emails exchanged with SESH counsel regarding same (.2).			262.50
689	2/18/2019	Sara Witthoft	0.80	260.00	Review email correspondence from Brian Kilmer regarding scheduling depositions of Joanna Davis and Devorshia Russell and confer with Andrea Marconi regarding same (.3); review and consider email correspondence from Doug Lowden and Jeff Webb regarding depositions (.3); review and consider email correspondence with Matt Kelly regarding scheduling depositions of Drs. Lee or Nagler, and Jeff Webb (.2).			260.00
690	2/19/2019	Carmen Boubek	3.30	429.00	(Paralegal) Continue to analyze documents produced by parties for preparation of 30(b)(6) depositions			429.00

691	2/19/2019	Andrea Marconi	1.80	675.00	Evaluate further strategy for upcoming depositions of Ms. Davis and Ms. Russell and analyze strategy regarding timing and other issues for SESH and Dr. Baig depositions, including assess whether to conduct same prior to SESH MSJ response or not (.4); telephone call with Mr. Kelly and S. Witthoft regarding comments to draft protective order, next steps in case, including discovery and document production issues, and possible settlement discussions (.4); further evaluate case strategy and next steps in light of call (.3); draft detailed correspondence to Mr. Lowden regarding [redacted for privilege] (.1) ; assess nature of ARS documents reviewed and analyzed thus far in case and evaluate potential use for same in upcoming depositions, as well as evaluate redaction issues and confidentiality concerning patient information and consider further issues and next steps in document review and analysis (.6).	LR 54.2(e)(2)(A) (minus 0.1)		637.50
692	2/19/2019	Sara Witthoft	1.90	617.50	Meeting with Andrea Marconi to discuss strategy with respect to deposition of Dr. Baig and scheduling of depositions of Joanna Davis, Devorshia Russell, Dr. Lee or Dr. Nagler, and Rule 30(b)(6) representatives (.3); telephone calls from (voicemail) and to Matt Kelly regarding review of protective order and revisions thereto, scheduling of depositions, and potential settlement negotiations (.3); review email correspondence with Doug Lowden regarding [redacted for privilege] (.2) ; review and revise draft protective order and email to Matt Kelly regarding same (.7); meeting with Andrea Marconi and Victoria Dunne regarding review of disclosed documents and strategy with respect to review going forward (.4).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	552.50
693	2/19/2019	Victoria Dunne	1.40	399.00	Review and analyze ARS024534-24728 in preparation for engaging in discovery.			399.00
694	2/19/2019	Victoria Dunne	7.10	2,023.50	Review and analyze ARS022224-23134 in preparation for engaging in discovery.			2023.50
695	2/20/2019	Carmen Boubek	6.10	793.00	(Paralegal) Continue to analyze documents produced by parties for preparation of 30(b)(6) depositions			793.00
696	2/20/2019	Andrea Marconi	0.40	150.00	Brief analysis and consideration of potential subpoenas to SESH's new medical billing providers and related issues, including strategic timing of same and confer with Mr. Lowden regarding same (.2); evaluate issues and strategy after request to re-commence settlement discussions raised by new SESH counsel and review and draft communications with client regarding same and next steps (.2).			150.00

697	2/20/2019	Sara Witthoft	0.80	260.00	Read and consider emails from Doug Lowden regarding [redacted for privilege] (.3); review email correspondence with Doug Lowden pertaining to [redacted for privilege] (.3); confer with Victoria Dunne regarding review of Dr. Baig's deposition transcript in Texas matter and implications with respect to arguments regarding Davis's authority (.2).	LR 54.2(e)(2)(A) (minus 0.6)	Sustained	65.00
698	2/20/2019	Victoria Dunne	3.20	912.00	Review and analyze transcript of Dr. Baig's May 2017 deposition testimony in the Texas matter, with numerous exhibits, in preparation for engaging in discovery.			912.00
699	2/20/2019	Victoria Dunne	5.90	1,681.50	Review and analyze ARS024534-25198 in preparation for engaging in discovery.			1681.50
700	2/21/2019	Carmen Boubek	3.10	403.00	(Paralegal) Continue to analyze document produced for preparation of depositions			403.00
701	2/21/2019	Sara Witthoft	2.20	715.00	Review and analyze deposition testimony of Mirza Baig in Texas against against EMG defendants (1.7); email to Brian Kilmer to follow up on notices of Joanna Davis and Devorshia Russell depositions (.2); review and analyze email exchanges between Cody Jess and Evan Schube relating to affidavits and dismissal of Joanna Davis and Devorshia Russell (.3).			715.00
702	2/21/2019	Victoria Dunne	9.20	2,622.00	Review and analyze ARS000587-2298 in preparation for engaging in discovery.			2622.00
703	2/22/2019	Andrea Marconi	0.20	75.00	Evaluate communication from SESH counsel regarding Davis and Russell depositions and evaluate related issues in light of apparent attempt to limit time for same (.2).			75.00
704	2/22/2019	Sara Witthoft	0.90	292.50	Review email from Brian Kilmer regarding depositions of Joanna Davis and Devorshia Russell and short availability as communicated by their counsel, and consider strategy and next steps with respect to same.			292.50
705	2/22/2019	Victoria Dunne	7.40	2,109.00	Review and analyze ARS002299-6938 in preparation for engaging in discovery.			2109.00
706	2/25/2019	Andrea Marconi	0.50	187.50	Evaluate strategy issues regarding settlement posture with SESH and related communications as well as upcoming depositions of Ms. Russell and Ms. Davis and related discovery issues and strategy (.5).			187.50
707	2/25/2019	Sara Witthoft	0.70	227.50	Telephone calls to and from Matt Kelly to follow up on protective order, depositions of Joanna Davis and Devorshia Russell, and potential re-engagement in settlement negotiations (.4); meeting with Andrea Marconi regarding strategy with respect to depositions of Joanna Davis and Devorshia Russell (.3).			227.50
708	2/25/2019	Victoria Dunne	7.10	2,023.50	Review and analyze ARS006939-7668 in preparation for engaging in discovery.			2023.50

709	2/26/2019	Andrea Marconi	2.00	750.00	Evaluate communications with Mr. Kelly regarding amended pleading deadline as well as request for mediation and analyze strategy for same, including assess benefits or drawbacks of mediation as opposed to continuing with informal settlement discussions (.4); telephone call with client to discuss [redacted for privilege] (.5); begin to review and analyze in detail statement of facts in support of motion for partial summary judgment and voluminous exhibits filed with same (1.1).	LR 54.2(e)(2)(A) (minus 0.5)		562.50
710	2/26/2019	Sara Witthoft	0.90	292.50	Meeting with Andrea Marconi to analyze issues and strategy with respect to communication with Matt Kelly regarding time constraints on depositions of Davis and Russell, intentions with respect to amending complaint, and re-engagement in settlement negotiations and/or mediation (.4); teleconference with Tyler Grim and Doug Lowden regarding [redacted for privilege] (.5).	LR 54.2(e)(2)(A) (minus 0.5)	Sustained	130.00
711	2/26/2019	Victoria Dunne	3.20	912.00	Review and analyze ARS007669-8004 in preparation for engaging in discovery.			912.00
712	2/27/2019	Carmen Boubek	2.40	312.00	(Paralegal) Analyze privilege documents for preparation of privilege log			312.00
713	2/27/2019	Andrea Marconi	1.00	375.00	Evaluate strategy issues regarding document review and analysis, including identifying key documents for depositions of Ms. Davis and Ms. Russell (.4); further evaluate strategy for settlement discussions with Mr. Kelly and timing of same (.1); analyze preliminary question strategy for Davis and Russell depositions (.5).			375.00
714	2/27/2019	Sara Witthoft	3.20	1,040.00	Meeting with Andrea Marconi regarding strategy with respect to settlement communication with Matt Kelly, document review, and preparation for depositions of Joanna Davis and Devorshia Russell (.4); analyze motion for partial summary judgment and exhibits thereto and prepare for depositions of Davis and Russell (2.6); work with Carmen Boubek to conduct searches of documents produced in anticipation of depositions of Davis and Russell (.3).			1040.00
715	2/27/2019	Victoria Dunne	7.40	2,109.00	Review and analyze ARS008005-ARS011415 in preparation for engaging in discovery.			2109.00
716	2/28/2019	Carmen Boubek	2.10	273.00	(Paralegal) Continue to analyze privilege documents for preparation of log			273.00
717	2/28/2019	Andrea Marconi	2.70	1,012.50	Continue reviewing and analyzing voluminous exhibits to statement of facts in support of partial motion for summary judgment and evaluate same to consider potential exhibits and topics for questioning of Ms. Davis and Ms. Russell during deposition (2.2); evaluate new filings related to Ms. Davis in Texas cases, including potential admission of facts contrary to positions in current case and assess strategy related to same for depositions (.5).			1012.50

722	3/4/2019	Andrea Marconi	4.20	1,575.00	Evaluate preliminary strategy regarding possible additional written discovery requests to propound on SESH prior to upcoming deadline (.2); evaluate strategy issues regarding potential expert witnesses and rebuttal testimony that may be needed in advance of upcoming deadline (.4); analysis of strategy issues regarding upcoming depositions in light of lack of communication from SESH counsel or receipt of subpoenas (.2); review notices of Rule 2004 exams issued in Texas for Davis and Russell on date of our civil depositions and evaluate related legal issues and strategy, including how to preserve objections and response to same (.9); telephone call with Davis and Russell's bankruptcy lawyer regarding depositions (.2); review and exchange detailed numerous correspondence to SESH counsel regarding depositions, Rule 2004 notices and related issues (.3); review and exchange further communications with counsel for SESH and evaluate strategy issues concerning depositions in light of problems raised regarding same (.3); evaluate strategy concerning SESH potential consideration for more time on discovery and opposition of same (.2); review key communications from Ms. Davis from ARS documents produced in case (.3); review and exchange further communications with SESH counsel regarding depositions and SESH request for extension of discovery deadlines and ARS objections to same (.2); review motion for extension filed by SESH and evaluate argument strategy for response (.6); draft correspondence to client regarding same (.2); further assess response strategy including whether to agree to later depositions if SESH will keep same response date for pending MSJ (.2).			1575.00
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723	3/4/2019	Sara Witthoft	6.30	2,047.50	Analyze deadlines related to written discovery and expert disclosures and confer with Andrea Marconi regarding strategy relating thereto (.3); telephone call (voicemail) to Brian Kilmer to follow up regarding depositions of Joanna Davis and Devorshia Russell (.2); follow up email to Matt Kelly regarding joint motion for entry of protective order (.2); revise and finalize said joint motion (.2); numerous emails from and to Matt Kelly and Brian Kilmer regarding Rule 2004 notices filed in Davis and Russell's bankruptcy cases and regarding SESH's suggestion that deadlines be extended because of Davis and Russell's time constraints (1.1); review notices of Rule 2004 examinations filed by Susan Tran, bankruptcy counsel to Davis and Russell (.2); telephone call to Susan Tran regarding same (.4); emails from and to Tran regarding attempt to correct notices to be depositions conducted in Davis and Russell's bankruptcy cases (.2); emails to and from Brian Kilmer and Matt Kelly regarding ARS's objection to motion to extend deadline for completion of said depositions (.5); review and analyze SESH's motion to extend said deadlines and review and analyze emails with respect to timeline related to scheduling said depositions (.9); confer with Andrea Marconi regarding strategy with respect to response to said motion (.4); emails to and from Matt Kelly regarding same and regarding SESH's intentions with respect to deadline for response to motion for partial summary judgment (.3); begin to prepare response to motion to extend deadline for completion of depositions of Davis and Russell (1.4).		2047.50	
724	3/5/2019	Andrea Marconi	2.30	862.50	Evaluate communications with court regarding deadline to file response today (.1); debrief regarding further communications with Mr. Kelly this morning and evaluate next steps and strategy regarding motion to continue, response, and upcoming depositions in light of same (.4); draft and exchange further correspondence with client regarding same and recommendations for next steps (.2); revise and supplement draft response to motion for continuance, correspond with client regarding draft, prepare proposed order and otherwise finalize documents for filing today (1.6).		862.50	

725	3/5/2019	Sara Witthoft	8.30	2,697.50	Telephone calls to and from Judge Lanza's chambers regarding opportunity to file response to SESH's motion to extend deadline for completion of Davis and Russell depositions (.3); telephone call from Matt Kelly regarding said motion, deadline for response to pending motion for partial summary judgment, and potential to reschedule said depositions for first week of April if April 12 response deadline remains in place (.5); follow up email to Matt Kelly regarding said potential resolution (.2); continue to prepare response to said motion (3.9); email forwarding same to Doug Lowden for review and confer with Lowden regarding same (.2); review and finalize proposed order denying said motion and finalize exhibits to said response (.3); prepare for telephonic meeting with Doug Lowden regarding [redacted for privilege] (.3); telephonic meeting with Doug Lowden regarding [redacted for privilege] (.5); prepare for depositions of Joanna Davis and Devorshia Russell (2.1).	LR 54.2(e)(2)(A) (minus 0.8)		2437.50
726	3/5/2019	Victoria Dunne	2.40	684.00	Begin reviewing SESH's responses to ARS's discovery requests in preparation for determining whether additional requests should be propounded.		Sustained	684.00
727	3/6/2019	Carmen Boubek	1.80	234.00	(Paralegal) Assist with the preparation of 30(b)(6) witness depositions			234.00

728	3/6/2019	Andrea Marconi	4.20	1,575.00	<p>Review and analyze numerous communications with SESH counsel regarding depositions of Davis and Russell and continuing issues with same (.2); evaluate strategy for next steps and dealing with continued deposition issues, including how to handle potential last minute cancellation for depositions and seeking fees and costs for same (.9); analysis of updated accounting on contract damages from client (.1); evaluate strategy for propounding additional discovery to SESH prior to deadline, including consider prior requests propounded and issues to focus on going forward (.4); review and analyze order from court denying SESH request for extension of time to conduct discovery and evaluate impact of same on depositions tomorrow (.2); review and exchange numerous detailed communications with SESH counsel regarding depositions and objections to their continued desire to keep depositions noticed in the bankruptcy case and evaluate related strategy for objections on record tomorrow (.4); draft and exchange correspondence with client regarding [redacted for privilege] (.1); exchange further correspondence with SESH counsel regarding depositions tomorrow and related issues and evaluate strategy regarding same, including whether to allow any continued depositions in April after court order (.2); evaluate strategy for later depositions in case and potential expert testimony needed (1.2); further correspondence with SESH counsel regarding issues for tomorrow depositions and how to handle potential objections and issues in the event depositions run out of time in light of new court ruling disallowing any extension and evaluate related strategy issues (.4); draft correspondence to client regarding</p>	<p>LR 54.2(e)(2)(A) (minus 0.2); Time for ARS has already been compensated pursuant to Doc. 219 and Response in Opposition to ARS' Motion for Attorneys' Fees and Costs at Exhibit "B" (minus 0.6)</p>	<p>Sustained; sustained</p>	1275.00
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729	3/6/2019	Sara Witthoft	12.10	3,932.50	Confer with Andrea Marconi regarding strategy with respect to status of depositions of Davis and Russell in light of SESH's pending motion to extend deadline for same (.3); telephone call from Matt Kelly regarding same (.2); emails to and from Matt Kelly regarding same (.3); review documents and prepare for depositions of Joanna Davis and Devorshia Russell (1.6); email to Matt Kelly and Brian Kilmer regarding reservation of right to seek award against SESH for travel time and travel cost if depositions are cancelled, and regarding intention to object on the record to depositions going forward without proper notices served (.3); travel to Houston for depositions of Joanna Davis and Devorshia Russell and during travel review and analyze Judge Lanza's order denying SESH's motion to extend deadline for same, review and analyze email correspondence between Andrea Marconi and Matt Kelly regarding noticing issues, and review and analyze documents, discovery responses, pleadings and other filings to prepare for defense of said depositions (5.8); continue to review documents, discovery responses, pleadings and other filings to prepare for defense of said depositions (3.6).	Time for ARS has already been compensated pursuant to Doc. 219 and Response in Opposition to ARS' Motion for Attorneys' Fees and Costs at Exhibit "B" (minus 9.7)		780.00
							Sustained	
730	3/6/2019	Victoria Dunne	4.30	1,225.50	Identify documents material to upcoming depositions (1.2); Continue reviewing SESH's responses to ARS's discovery requests in preparation for determining whether additional requests should be propounded (.9); Assess utility and develop plan regarding propounding of additional written discovery and follow-up questions for use during upcoming depositions considering previously received discovery responses from SESH (1.6); Strategize varying approaches at preparing for upcoming depositions in light of pending dispositive motion and the Court's refusal to modify discovery deadlines (.5); Review and analyze March 6, 2019 Order denying SESH's Motion to Extend Discovery Deadlines (.1).	Time for ARS has already been compensated pursuant to Doc. 219 and Response in Opposition to ARS' Motion for Attorneys' Fees and Costs at Exhibit "B" (minus 9.7)	Overruled: Exhibit B does not show this time was already compensated	1225.50

731	3/7/2019	Andrea Marconi	4.10	1,537.50	Review and exchange numerous emails with S. Witthoft and client regarding issues at this morning's depositions of Davis and Russell and cancellation of same (.2); telephone call with S. Witthoft to discuss same and evaluate strategy for next steps, including request for fees and costs for cancelled depositions and potential later subpoena for witnesses (.5); evaluate further strategy issues regarding request for fees and costs, including assess required procedure and meet and confer letter needed ahead of time (.5); analysis of case management order and judge's requirements for attorneys' fee requests and discovery disputes and evaluate same as it applies to current situation (.2); conduct legal research and analysis regarding legal requirements and case law authority in support of seeking sanctions for failure to conduct deposition or timely cancel and evaluate nature of sanction that may be imposed (1.6); evaluate further strategy and arguments for meet and confer and motion thereafter (.5); begin to review prior discovery requests to and responses from SESH and evaluate where follow up responses are needed as well as additional written discovery (.6).	Time for ARS has already been compensated pursuant to Doc. 219 and Response in Opposition to ARS' Motion for Attorneys' Fees and Costs at Exhibit "B" (minus 0.5)		1350.00
732	3/7/2019	Sara Witthoft	10.10	3,282.50	Continue to prepare for depositions of Joanna Davis and Devorshia Russell (1.1); travel from hotel to Brian Kilmer's office for depositions of Joanna Davis and Devorshia Russell scheduled for 8:30 a.m. (.4); appear at Brian Kilmer's firm and confer with Brian Kilmer and Susan Tran regarding said depositions and miscommunication between Kilmer and Matt Kelly such that scheduled depositions are cancelled, and confer with Kilmer regarding same and regarding case in general (1.3); teleconference with Doug Lowden and Tyler Grim regarding [redacted for privilege] (.2); teleconference with Andrea Marconi regarding cancellation of depositions, related issues, and strategy with respect to same (.3); travel from Houston to Phoenix (6.4); meeting with Andrea Marconi to discuss strategy with respect to cancellation of depositions of Joanna Davis and Devorshia Russell and next steps with respect to seeking sanctions related thereto (.4).	LR 54.2(e)(2)(A) (minus 0.2 - part of 9.7 below); Time for ARS has already been compensated pursuant to Doc. 219 and Response in Opposition to ARS' Motion for Attorneys' Fees and Costs at Exhibit "B" (minus 9.7); Total minus 9.7	Sustained	130.00
733	3/7/2019	Victoria Dunne	1.80	513.00	Begin preparing written discovery requests to SESH.			513.00
734	3/8/2019	Carmen Boubek	0.90	117.00	(Paralegal) Analyze documents produced by SESH for SEM contracts			117.00

737	3/8/2019	Victoria Dunne	8.50	2,422.50	Evaluate potential need to take special action to ensure that subpoenas issued to out of state non-parties are in compliance with the rules (.2); Prepare Fourth Set of Non-Uniform Interrogatories (2.9); Prepare Fourth Set of Requests for Production (2.8); Prepare Third Set of Requests for Admission (2.6).			2422.50
738	3/9/2019	Andrea Marconi	0.10	37.50	Review order from Texas court on motion to reconsider filed by SESH concerning Dr. Francis motion to quash and send to client.			37.50
739	3/10/2019	Andrea Marconi	2.20	825.00	Continue review of prior discovery requests to and responses from SESH and evaluate where follow up responses are needed as well as additional written discovery (.8); revise and supplement drafts of additional written discovery to SESH (1.4).			825.00
740	3/10/2019	Sara Witthoft	1.50	487.50	Review and analyze disclosures and discovery responses served to date and consider same with respect to written discovery to be propounded (1.5).			487.50
741	3/11/2019	Carmen Boubek	1.20	156.00	(Paralegal) Prepare multiple subpoenas for records request			156.00
742	3/11/2019	Carmen Boubek	2.10	273.00	(Paralegal) Continue to prepare privilege log			273.00
743	3/11/2019	Andrea Marconi	5.60	2,100.00	Detailed review and analysis of documents and contracts produced by SESH relating to other billing companies that SESH considered or actually contracted with for services, as well as conduct background research on Texas Medical Summit, Vadim, and Collect Rx in preparation for drafting subpoenas and document requests to same (1.8); evaluate strategy for potential notice to court regarding SESH's responses to ARS's third discovery requests outstanding and deadline for same if SESH does not respond (.1); review 2nd RFAs to SESH and evaluate issues and strategy to obtain responses to same (.1); draft follow up correspondence to SESH counsel concerning outstanding discovery responses and consequences if they are not answered by deadline (.1); review and analyze cease and desist letter and responses regarding alleged SESH use of ARS confidential patient forms (.1); further revise and refine draft of additional discovery requests to SESH (.6); draft detailed Exhibit A and requests for documents for subpoenas to Texas Medical Summit, Vadim, and Collect Rx (2.3); conduct additional background research on Texas Medical Summit and Vadim, which may be out of business, to assess proper addresses, stat agents, and service issues (.4); follow up correspondence to SESH counsel regarding outstanding discovery requests and timeline for responding to same (.1).			2100.00

748	3/12/2019	Sara Witthoft	6.00	1,950.00	Prepare itemized listing of fees and costs incurred with respect to cancellation of depositions of Joanna Davis and Devorshia Russell and prepare accompanying letter to Matt Kelly and Brian Kilmer demanding compensation therefor pursuant to Fed. R. Civ. P. 30 (4.2); revise and finalize third set of requests for admission, fourth set of non-uniform interrogatories, and fourth set of requests for production of documents (1.2); revise notice of service of said discovery requests (.2); review email correspondence from Matt Kelly regarding responses to previously-served discovery requests (.2); review memorandum prepared by Victoria Dunne regarding issues related to service of subpoenas duces tecum on Vadim, Collect Rx, and Texas Medical Summit (.2).			1950.00
749	3/12/2019	Victoria Dunne	0.50	142.50	Identify methods for issuance of valid out of state subpoenas to numerous entities.			142.50
750	3/13/2019	Carmen Boubek	0.30	39.00	(Paralegal) Finalize multiple subpoenas for records request			39.00
751	3/13/2019	Andrea Marconi	5.10	1,912.50	Evaluate case strategy issues, including upcoming expert witness deadline, follow up on meet and confer regarding fees request, and review and analysis of SESH documents and issuance of subpoenas (.5); assess correspondence from client regarding [redacted for privilege] (.3) ; follow up correspondence to SESH counsel regarding SESH witness depositions (.1); further evaluate service issues concerning subpoenas to billing companies and make final edits to same (1.5); review and analyze CV of potential expert witness and further assess and evaluate specific areas and topics of potential expert opinion needed (.4); analysis of various next steps and strategy in case, including assessing possible meet and confer on prior deficient discovery responses from SESH, completing document review of SESH and Davis documents, research and evaluation needed regarding experts and disclosure issues prior to deadline, and preparation for upcoming SESH depositions (1.7); review communication from, attempted call, and draft further correspondence with Mr. Kelly to discuss SESH depositions and settlement issues (.3); prepare notice of intent to serve subpoenas for filing with court (.2); briefly assess potential new expert witness for case, Mr. Levy (.1).	LR 54.2(e)(2)(A) (minus 0.3)		1800.00
								Sustained

752	3/13/2019	Sara Witthoft	5.00	1,625.00	Email to Doug Lowden and Tyler Grim regarding [redacted for privilege] (.3); emails from and to Doug Lowden regarding [redacted for privilege]s (.2); analyze case status, upcoming deadlines, and consider next steps (.9); meeting with Andrea Marconi regarding case status, upcoming deadlines, and next steps (1.3); read and consider email from Matt Kelly regarding scheduling Dr. Baig's deposition and SESH's Rule 30(b)(6) representative, and regarding re-engagement in mediation/settlement discussions and telephone call (voicemail) to Kelly regarding same (.4); consider issues with respect to service of subpoenas duces tecum on Vadim, Collect Rx, and Texas Summit Medical and confer with Andrea Marconi regarding same (.5); review curriculum vitae for Stan Panis with respect to potential engagement as expert for damages and industry standards issues, and telephone call (voicemail) to Panis regarding same (.6); telephone call from Panis regarding same and follow up email to Doug Lowden regarding [redacted for privilege] (.5); online research relating to potential expert recommended by Stan Panis (.3).	LR 54.2(e)(2)(A) (minus 1.0)		1300.00
						Sustained		
753	3/14/2019	Andrea Marconi	1.90	712.50	Further evaluate strategy and issues regarding expert witness on rates, industry standards and damage issues (.4); evaluate strategy regarding separation of Dr. Baig and SESH 30(b)(6) depositions and ordering of same as well as other deposition strategy issues (.2); review and exchange correspondence with Mr. Lowden [redacted for privilege] (.2); repeated correspondence with counsel for SESH regarding upcoming depositions and SESH agreement to accept service for Dr. Baig (.2); further assess settlement and mediation strategy issues after renewed communications from Mr. Kelly regarding same (.4); telephone call with Mr. Kelly to discuss settlement and mediation issues (.3); further evaluate response strategy in light of communication (.2).	LR 54.2(e)(2)(A) (minus 0.2)		637.50
						Sustained		

754	3/14/2019	Sara Witthoft	2.60	845.00	Meeting with Andrea Marconi to discuss strategy with respect to expert witness retention, subpoenas duces tecum, and scheduling depositions of Dr. Baig and SESH's Rule 30(b)(6) representative (.7); several emails to and from Brian Kilmer and Matt Kelly regarding scheduling and logistical issues related to depositions of Dr. Baig and SESH's Rule 30(b)(6) representative (.6); telephone call (voicemail) to Daniel S. Levy regarding potential engagement as expert witness (.2); read and consider email from Matt Kelly proposing mediation with Bob Hackett prior to April 12 deadline for SESH's response to motion for partial summary judgment and consider strategy and other issues related thereto (.5); telephone call (voicemail) to Matt Kelly (.2); confer with Andrea Marconi regarding telephone call from Matt Kelly with respect to mediation proposal (.4).			845.00
755	3/15/2019	Carmen Boubek	0.40	52.00	(Paralegal) Analyze documents from Texas Corporation Commission regarding stat agent for Vadim			52.00
756	3/15/2019	Carmen Boubek	0.70	91.00	(Paralegal) Continue to prepare privilege log			91.00
757	3/15/2019	Andrea Marconi	1.30	487.50	Telephone conference with clients [redacted for privilege](.7); attention to issues regarding difficulties in serving Vadim representatives and assess potential next steps in light of same (.2); attempted call to and draft detailed correspondence to Mr. Kelly with response to request for mediation (.2); research alternative service addresses that could be used for Vadim subpoena (.2).	LR 54.2(e)(2)(A) (minus 0.7)		225.00
758	3/15/2019	Sara Witthoft	0.60	195.00	Teleconference with Doug Lowden and Tyler Grim regarding [redacted for privilege]		Sustained	195.00
759	3/18/2019	Carmen Boubek	2.20	286.00	(Paralegal) Finalize privilege log			286.00
760	3/18/2019	Andrea Marconi	1.70	637.50	Evaluate update on service of subpoenas to billing companies and assess alternative forms of service to general partner for Vadim (.3), including potential certified mail and Fed Ex (.2); review and evaluate summary of communication with potential expert witness and further analyze strategy and issues regarding scope of expert testimony needed and potential witnesses for same, including potential company witnesses whether in fact or expert capacity (1.0); review and exchange detailed communications with client [redacted for privilege](.2).	LR 54.2(e)(2)(A) (minus 0.2)		562.50
761	3/18/2019	Sara Witthoft	0.80	260.00	Research regarding service of process on terminated entity and confer with Andrea Marconi regarding same with respect to service of subpoena duces tecum on Vadim (.5); consider issues related to noticing depositions of Dr. Baig and SESH's Rule 30(b)(6) representative (.3).		Sustained	260.00

762	3/18/2019	Sara Witthoft	2.50	812.50	Teleconference with Dan Levy regarding potential engagement as expert witness (.4); prepare memorandum regarding points discussed (.4); follow up email to Levy to provide contact information (.1); confer with Andrea Marconi regarding teleconference with Levy (.2); confer with Bill Thorpe and Andrea Marconi regarding [redacted for privilege] (.5); follow up email to Doug Lowden and Tyler Grim regarding [redacted for privilege] (.9).	LR 54.2(e)(2)(A) (minus 1.4)		357.50
763	3/19/2019	Andrea Marconi	1.60	600.00	Telephone call with counsel for Vadim to discuss subpoena and response to same (.2); follow up correspondence with Vadim counsel regarding protective order and other subpoena response issues (.1); conduct additional research for potential expert witness in case to discuss industry standards of billing rates and other issues (.6); review follow up correspondence from Vadim counsel regarding subpoena and request to narrow and draft detailed response to same (.3); evaluate strategy for next steps and filings after no response from SESH on demand for fees from cancelled depositions (.2); further assess strategy for non retained expert testimony to potentially obtain from client, nature of same and beginning to draft disclosure (.3); review correspondence to client and SESH counsel regarding no payment made on fees demand and next steps (.1).		Sustained	600.00
764	3/19/2019	Sara Witthoft	4.50	1,462.50	Research regarding disclosure requirements for non-retained expert witnesses and regarding admissibility of non-retained expert testimony with respect to damages for unjust enrichment claim and regarding industry standards to counter defendants' argument that contract rate was unconscionable. (2.9); meeting with Andrea Marconi to discuss strategy with respect to SESH's failure to deliver payment for fees and costs incurred with respect to cancelled depositions, disclosure of non-retained expert witnesses, and next steps (.7); review case management order regarding process for resolution of discovery dispute and email to Brian Kilmer and Matt Kelly regarding same and regarding availability for personal consultation called for thereunder (.4); email to Doug Lowden and Tyler Grim regarding same (.2); review and analyze biographies for potential expert witnesses Lamar Blount, Neal Freeman, Christina Melnykovych, and Patrice Morin-Resch (.3).			1462.50
765	3/20/2019	Andrea Marconi	0.20	75.00	Evaluate response from SESH counsel to request for meet and confer after failure to respond to demand for fees and assess related strategy.			75.00

766	3/20/2019	Sara Witthoft	3.20	1,040.00	Instructions to Carmen Boubek to prepare draft notices of deposition for Dr. Baig and SESH's Rule 30(b)(6) representative and subpoena to Dr. Baig for appearance at said deposition (.2); emails from and to Matt Kelly regarding demand for reimbursement of costs and fees incurred with respect to cancelled deposition and personal consultation requirement under case management order with respect to said discovery dispute (.2); telephone call (voicemail) to Lamar Blount regarding potential engagement as expert witness regarding rate charged and services performed by ARS (.2); telephone call (message) to Christina Melnykovich regarding potential engagement as expert witness regarding rate charged and services performed by ARS (.2); meeting with Victoria Dunne regarding status of document review (.2); meeting with Elisabeth Martini regarding case background and instruction with respect to review of documents produced by SESH (.5); teleconference with Daniel Levy regarding potential engagement as expert witness and follow up email to Doug Lowden and Tyler Grim regarding same (.3); emails from and to Doug Lowden regarding [redacted for privilege] (.2) ; review case status, upcoming deadlines, and analyze strategy with respect to next steps (.9); review and consider telephone message and follow-up email from Christina Melnykovich regarding potential engagement as expert witness (.3).	LR 54.2(e)(2)(A) (minus 0.2)		975.00
						Sustained		
767	3/21/2019	Carmen Boubek	1.10	143.00	(Paralegal) Assist with the preparation of Dr. Baig deposition		143.00	
768	3/21/2019	Carmen Boubek	1.10	143.00	(Paralegal) Assist with the preparation of SESH 30(b)(6) deposition		143.00	
769	3/21/2019	Andrea Marconi	0.80	300.00	Review and provide comments to draft amended notice of Rule 30(b)(6) deposition for SESH and accompanying documents and evaluate further strategy issues for deposition (.5); review summary of communications with additional potential billing expert and evaluate related strategy issues and potential retention of same as consulting expert (.3).		300.00	

770	3/21/2019	Sara Witthoft	2.60	845.00	Teleconference with Christina Melnykovach regarding potential engagement as testifying or consulting expert with respect to reasonableness of rate and value of services provided with respect to unjust enrichment claim (.6); review follow up email correspondence from Melnykovych and exhibits thereto, and prepare memorandum regarding same (.6); confer with Andrea Marconi regarding communication with Melnykovych and potential engagement as consultant (.2); work with Joan Peralta with respect to service of subpoena duces tecum on Collect Rx (.3); telephone calls from and to Lamar Blount (voicemails) (.2); confer with Andrea Marconi and revise notices of deposition of Dr. Baig and SESH's Rule 30(b)(6) representative (.7).			845.00
771	3/21/2019	Elisabeth Martini	1.20	342.00	Review affirmative Motion for Summary Judgment in preparation to review documents produced by SESH			342.00
772	3/21/2019	Elisabeth Martini	3.40	969.00	Review documents produced by SESH; identify relevant documents for depositions of M. Baig and SESH 30(b)(6) (approx. 250 pages)			969.00
773	3/22/2019	Andrea Marconi	0.50	187.50	[redacted for privilege] (.2); analyze summary of communications with Mr. Blount, potential expert and assess potential of same as well as evaluate further issues and strategy regarding working with client to identify either Mr. Webb or Mr. Maldonado as a nonretained expert and assess related disclosure needed (.3).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	112.50

774	3/22/2019	Sara Witthoft	2.90	942.50	<p>Teleconference with Lamar Blount regarding potential engagement as consulting or testifying witness with respect to reasonableness of contract rate and value of services provided for unjust enrichment claim (.3); follow up email to Blount forwarding contact information (.1); telephone call from Matt Kelly regarding question with respect to amounts owed on invoices and intent to communicate settlement offer (.2); follow up email to Doug Lowden and Tyler Grim regarding [redacted for privilege] (.2); emails from and to Doug Lowden regarding same (.2); email to Matt Kelly regarding amounts owed on invoices (.2); work with Joan Peralta to prepare acceptance of service for Matt Kelly with regard to subpoena for Dr. Baig's appearance at deposition (.2); teleconference with Doug Lowden and Tyler Grim regarding [redacted for privilege] (.2); email to Matt Kelly forwarding subpoena for Dr. Baig's appearance at deposition and acceptance of service form (.1); email from Matt Kelly forwarding executed acceptance of service and work with Joan Peralta to file same (.2); emails from and to Doug Lowden regarding [redacted for privilege] (.2); email forwarding same to Matt Kelly for settlement discussion purposes (.2); email to Doug Lowden [redacted for privilege] (.2); confer with Andrea Marconi regarding teleconference with Lamar Blount (.2); email to Matt Kelly to follow up regarding personal consultation to discuss demand for fees and costs related to late cancelled depositions (.2).</p>	LR 54.2(e)(2)(A) (minus 1.0)		617.50
						Sustained		
775	3/25/2019	Carmen Boubek	0.90	117.00	(Paralegal) Continue to prepare document tracking chart of all produced materials from parties			117.00
776	3/25/2019	Andrea Marconi	0.60	225.00	Review affidavits of service for subpoenas and arrange for filing of same (.1); evaluate further issues and strategy for disclosure of nonretained expert testimony (.2); analyze correspondence with Mr. Kelly regarding meet and confer on demand for fees from cancelled depositions and evaluate next steps if no meet and confer occurs (.1); evaluate strategy for proceeding in light of plaintiff's failure to respond to second and third sets of discovery by agreed upon deadline (.2).			225.00

777	3/25/2019	Sara Witthoft	3.40	1,105.00	<p>Emails from and to Doug Lowden and Jeff Webb regarding [redacted for privilege] (.2); email to Matt Kelly to follow up on personal consultation with respect to discovery dispute pertaining to demand for ARS's fees and costs incurred with respect to cancelled depositions (.2); review prior correspondence with Matt Kelly regarding responses to written discovery served prior to stay, and confer with Andrea Marconi regarding SESH's failure to timely respond by March 22, 2019 as agreed (.3); email to Matt Kelly to follow up regarding said failure to respond to written discovery and regarding agreement to extend deadline for same to March 29, 2019 (.3); email from Matt Kelly proposing tabling of dispute related to demand for fees and costs incurred with respect to late cancelled depositions (.2); prepare for and participate in telephone call with Doug Lowden and Jeff Webb regarding [redacted for privilege] (1.0); teleconference with Doug Lowden and Tyler Grim regarding [redacted for privilege](.5); read and consider email from Matt Kelly refusing to participate in personal consultation with respect to discovery dispute and consider strategy and next steps with respect thereto (.7).</p>	LR 54.2(e)(2)(A) (minus 1.7)		552.50
						Sustained		
778	3/25/2019	Elisabeth Martini	3.20	912.00	Continue review of documents produced by SESH in order to identify relevant documents/exhibits for depositions of M. Baig and SESH 30(b)(6) (approx. 240 pages)		912.00	
779	3/26/2019	Carmen Boubek	5.30	689.00	(Paralegal) Continue to prepare tracking chart of all documents produced by parties		689.00	
780	3/26/2019	Andrea Marconi	0.80	300.00	Review and provide comments to draft of ARS sections for joint position statement regarding demand for attorneys' fees upon cancelled depositions and evaluate email correspondence with client regarding same as well as evaluate related strategy for arguments and proceeding with next steps in dispute (.5); evaluate summary of potential nonretained expert testimony from Mr. Webb and assess issues and strategy regarding same (.3).		300.00	

781	3/26/2019	Sara Witthoft	3.00	975.00	<p>Emails from and to Tyler Grim and Doug Lowden regarding [redacted for privilege] (.3); prepare Joint Written Summary of Discovery Dispute to be filed with respect to SESH's refusal to pay fees and expenses incurred with respect to late-cancelled depositions (1.5); confer with Andrea Marconi with respect to strategy related thereto and regarding teleconference with Jeff Webb regarding anticipated testimony (.5); emails to and from Matt Kelly regarding brief written summary of discovery dispute, deadline for providing SESH's explanation of its position, and filing of same of March 29 (.2); email to Doug Lowden and Tyler Grim [redacted for privilege] (.2); email to and from Doug Lowden Grim regarding discussion with Greg Maldonado in advance of March 29 expert witness disclosure deadline (.3).</p>	LR 54.2(e)(2)(A) (minus 0.5)		812.50
						Sustained		
782	3/27/2019	Andrea Marconi	5.20	1,950.00	<p>Further evaluate potential non retained expert testimony that Mr. Webb could offer and compare to possible testimony to request from Mr. Maldonado in preparation for call with Mr. Maldonado today (.2); telephone call with Mr. Maldonado, Messrs. Grim and Lowden, and S. Witthoft to discuss potential nonretained expert testimony from same (.6); follow up discussion with Messrs. Grim and Lowden regarding [redacted for privilege] (.1); prepare strategy for nonretained expert disclosure document (.2); evaluate update from Vadim counsel regarding subpoena response and short extension granted (.1); review and analyze correspondence from SESH with settlement offer and evaluate strategy and recommendations to client regarding same (.6); draft correspondence to client with settlement offer (.1); conduct legal research and further analysis of rules and applicable standards and requirements for nonretained expert witness disclosures, including when same is a hybrid fact witness and employee as well (1.1); telephone call with client and S. Witthoft to discuss SESH settlement offer and strategy for response to same (.5); evaluate issues regarding ARS disclosure of back up information for invoices to support damages and assess additional documents and information needed from client as well as further analysis of additional discovery issues and trial testimony needed on damages (.4); draft correspondence to client regarding [redacted for privilege](.1); begin drafting nonretained expert disclosure for Mr. Maldonado and supplement factual disclosure of expected testimony (1.2).</p>	LR 54.2(e)(2)(A) (minus 0.2)		1875.00
						Sustained		

783	3/27/2019	Sara Witthoft	3.70	1,202.50	Prepare for and participate in teleconference with Doug Lowden, Tyler Grim, Greg Maldonado, and Andrea Marconi regarding non-retained expert witness testimony and issues related thereto (1.2); teleconference with Doug Lowden, Tyler Grim, and Andrea Marconi regarding case status and issues relating to non-retained expert witness disclosure deadline (.3); telephone calls from and to Forrest Cohrs regarding continuance of deadline for response to subpoena duces tecum served upon Vadim and follow up emails confirming said extension (.4) read and consider correspondence from Matt Kelly proposing settlement offer and confer with Andrea Marconi regarding same and issues related thereto (.8); teleconference with Doug Lowden, Tyler Grim, and Andrea Marconi regarding SESH's settlement offer and issues related thereto (.5); meeting with Andrea Marconi regarding settlement offer and possible counteroffer thereto, and issues related to damages disclosures (.3); review correspondence to and from Doug Lowden and Tyler Grim regarding disclosures for damages (.2).			1202.50
784	3/28/2019	Carmen Boubek	5.30	689.00	(Paralegal) Continue to prepare tracking chart of documents produced by parties			689.00
785	3/28/2019	Carmen Boubek	0.70	91.00	(Paralegal) Analyze ARS invoices to assist with the preparation of supplemental disclosure			91.00

786	3/28/2019	Andrea Marconi	6.50	2,437.50	<p>Continue drafting and supplement expert witness disclosure and supplementation of fact witness disclosure for Mr. Maldonado (.9); draft notice of service of disclosure for court (.1); prepare supplemental MIDP disclosure with additional information and testimony for Mr. Maldonado and Mr. Webb and update and supplement other required damages and other case information, including additional facts and legal theories, including to support Count 5 and additional damages claimed (2.9); evaluate further strategy issues regarding nonretained expert disclosure and supplementing MIDP disclosures in case (.3); assess and further consider potential options for settlement counter-offer (.2); further review documents produced in case supporting damages and invoices and evaluate additional information needed in light of missing documents from SESH and Shian Walker files (.5); further address issues regarding missing documents from SESH production and confer with counsel regarding same (.3); draft correspondence to client[redacted for privilege] (.1); brief review of file of documents that Schian Walker marked as privileged and ascertain issues regarding same, including documents that need to be disclosed and relevant and non-privileged from this group (.3); confer with client regarding [redacted for privilege] (.1); evaluate meet and confer with Mr. McCoy regarding demand for attorneys' fees from deposition and issues related to same as well as settlement offer, and assess strategy for recommendations to client (.2); telephone conference with clients to discuss[redacted for privilege](.6).</p>	LR 54.2(e)(2)(A) (minus 0.8)	Sustained	2137.50
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787	3/28/2019	Sara Witthoft	4.10	1,332.50	Confer with Andrea Marconi regarding strategy with respect to disclosure of Greg Maldonado's testimony as non-retained expert witness, and regarding SESH's settlement offer (.4); emails from and to Doug Lowden regarding [redacted for privilege] (.4) ; review and revise draft disclosure of expert witness testimony pursuant to Fed. R. Civ. P. 26(a)(2)(C) (.4); telephone call from Kevin McCoy for participation in requisite personal consultation regarding discovery dispute pertaining to fees and expenses incurred with respect to late-cancelled depositions and settlement offer (.3); confer with Andrea Marconi regarding SESH's positions with respect to discovery dispute and request for agreement to hold off on filing written summary of discovery dispute in light of settlement offer and strategy regarding same (.3); email to Doug Lowden and Tyler Grim regarding [redacted for privilege] (.7) ; teleconference with Doug Lowden and Tyler Grim regarding [redacted for privilege] (.9) ; telephone call (voicemail) to Kevin McCoy to follow up on personal consultation with respect to discovery dispute and request for agreement to hold off on filing same (.2); review and revise sixth supplement to MIDP response (.5).	LR 54.2(e)(2)(A) (minus 2.0)		682.50
							Sustained	
788	3/29/2019	Carmen Boubek	1.80	234.00	(Paralegal) Continue to prepare tracking chart of documents produced by parties			234.00
789	3/29/2019	Andrea Marconi	1.90	712.50	Further evaluate strategy regarding demand for fees from cancelled depositions and timing of filing regarding same (.2); telephone conference with client and S. Witthoft to confirm and discuss settlement counteroffer and related correspondence, disclosures to serve today, and fee demand strategy (.4); further evaluate issues and strategy for fee demand filing and draft correspondence to Mr. Kelly and Mr. McCoy regarding same (.2); revise expert disclosure and supplemental MIDP disclosure to include client comments and make final edits to same along with notices of filing for service and filing today (.5); review SESH's response to 2nd RFAs served today (.1); incorporate new admissions into supplemental disclosure (.1); review response communication from Mr. McCoy regarding attorneys' fee demand and evaluate next steps for filing in light of same (.2); review and provide comments to revised draft of joint written summary of discovery dispute concerning fee demand (.2).			712.50

790	3/29/2019	Sara Witthoft	4.90	1,592.50	Email to Doug Lowden and Tyler Grim regarding [redacted for privilege] (.2); review email from Matt Kelly regarding SESH's responses to second set of requests for admission (.2); review SESH's responses to second set of requests for admission and review revised sixth supplement to MIDP in light thereof and confer with Andrea Marconi regarding same (.4); teleconference with Doug Lowden and Tyler Grim [redacted for privilege] (.3); email to SESH's counsel regarding same (.5); review emails from Doug Lowden regarding [redacted for privilege] (.3); review email from Kevin McCoy regarding response to request to hold off on filing written summary of discovery dispute and forwarding SESH's position (.3); revise and finalize written summary of discovery dispute (1.5); and emails from and to Doug Lowden and Tyler Grim regarding [redacted for privilege] (.2); emails from and to Matthew Kelly regarding final written summary of discovery dispute and authority to sign and file same (.2); begin to prepare letter rejecting SESH's settlement offer and proposing counteroffer of settlement (.8).	LR 54.2(e)(2)(A) (minus 1.5)		1105.00
							Sustained	
791	4/1/2019	Carmen Boubek	2.30	299.00	(Paralegal) Prepare tagged hot docs for attorney analysis			299.00
792	4/1/2019	Carmen Boubek	0.50	65.00	(Paralegal) Continue to prepare tracking chart of all documents produced by parties			65.00
793	4/1/2019	Andrea Marconi	0.70	262.50	Address issues concerning Collect Rx subpoena response after contact made by company (.2); evaluate change to settlement counter made by client and further assess strategy for correspondence conveying same (.2); review court order setting hearing on attorneys' fee demand concerning depositions (.1); review and provide comments to draft letter with settlement counteroffer (.2).			262.50
794	4/1/2019	Sara Witthoft	2.40	780.00	Prepare letter to SESH's counsel rejecting settlement offer and proposing counteroffer of settlement as well as issues of which SESH should be aware in considering same (1.8); email to Tyler Grim and Doug Lowden [redacted for privilege] (.2); review minute entry order setting telephonic hearing on discovery dispute and email to Tyler Grim and Doug Lowden regarding [redacted for privilege] (.2); confer with Andrea Marconi regarding strategy related to said hearing (.2).	LR 54.2(e)(2)(A) (minus 0.4)		650.00
							Sustained	
795	4/2/2019	Carmen Boubek	4.50	585.00	Paralegal) Continue to prepare documents produced tracking chart			585.00
796	4/2/2019	Carmen Boubek	0.20	26.00	(Paralegal) Prepare documents for production with plaintiff's 6th supplemental disclosure			26.00

797	4/2/2019	Andrea Marconi	0.70	262.50	Review and evaluate revised version of settlement counteroffer letter and communications with client regarding same (.2); brief review and analysis of documents produced by Collect Rx and provide thoughts on same to client (.5).			262.50
798	4/2/2019	Sara Witthoft	2.20	715.00	Confer with Andrea Marconi regarding revisions to draft letter rejecting SESH's settlement offer and proposing counteroffer and email to Doug Lowden and Tyler Grim regarding [redacted for privilege] (.3); emails from and to Doug Lowden regarding [redacted for privilege] (.3); finalize and transmit said letter to Matthew Kelly and Kevin McCoy (.5); review and analyze documents produced by Collect Rx in response to subpoena duces tecum and email to Doug Lowden and Tyler Grim regarding initial thoughts with respect to same (1.1).	LR 54.2(e)(2)(A) (minus 0.6)		520.00
							Sustained	
799	4/3/2019	Carmen Boubek	4.30	559.00	(Paralegal) Continue to prepare tracking chart of all documents produced by parties			559.00
800	4/3/2019	Andrea Marconi	1.30	487.50	Assess further and refine strategy for today's argument on attorneys' fee issue (.3); attend telephonic hearing on attorneys' fee request (.3); call with client to discuss same and ruling (.1); call with Mr. Kelly to discuss same and upcoming settlement conference call (.2); evaluate related strategy for same (.2); correspondence to client regarding today's order and upcoming settlement conference call requested by SESH (.1); review and exchange communications with Mr. Kelly regarding upcoming settlement conference discussion (.1).			487.50
801	4/3/2019	Sara Witthoft	2.10	682.50	Review and consider email from Doug Lowden regarding [redacted for privilege] (.2); prepare for telephonic hearing on discovery dispute (.8); participate in telephonic hearing on discovery dispute (.3); follow up telephone call to Doug Lowden regarding [redacted for privilege] (.2); telephone call from Matt Kelly regarding request that counsel participate in teleconference with Terry Fokas to discuss ARS's counteroffer of settlement (.2); review minute entry order awarding sanctions and review email from Doug Lowden [redacted for privilege] (.2); emails from and to Matt Kelly confirming teleconference with Terry Fokas scheduled for April 8 (.2).	LR 54.2(e)(2)(A) (minus 0.6)		487.50
							Sustained	
802	4/4/2019	Carmen Boubek	3.50	455.00	(Paralegal) Continue to prepare tracking chart of all documents produced by parties			455.00

803	4/4/2019	Andrea Marconi	0.90	337.50	Confer with client regarding [redacted for privilege] (.1); evaluate disclosure and production methods for additional claim files and confer with Mr. Lowden regarding [redacted for privilege] (.2); evaluate further strategy for upcoming discussion with Mr. Fokas on settlement (.2); assess strategy for next steps in case, including following up on subpoenas and outstanding discovery responses from SESH as well as final disclosure and discovery deadline (.2); telephone call with counsel for Vadim regarding subpoena response issues (.2).	LR 54.2(e)(2)(A) (minus 0.3)		225.00
804	4/4/2019	Sara Witthoft	0.40	130.00	Review correspondence with Doug Lowden regarding [redacted for privilege] (.2); email to Matt Kelly and Kevin McCoy regarding payment of sanctions ordered (.2).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	65.00
805	4/5/2019	Carmen Boubek	2.70	351.00	(Paralegal) Continue to analyze documents produced by parties for preparation of track chart			351.00
806	4/5/2019	Andrea Marconi	0.30	112.50	Evaluate next steps in case to conclude discovery before deadline and assess related strategy issues, including subpoena follow up and outstanding discovery from SESH, as well as final disclosures (.6).			112.50
807	4/5/2019	Sara Witthoft	0.30	97.50	Meeting with Andrea Marconi and Victoria Dunne regarding strategy with respect to follow up on Texas Medical Summit's noncompliance with subpoena duces tecum, follow up with Collect Rx regarding its response to subpoena duces tecum, and follow up with SESH regarding deficient discovery responses and failure to timely respond to third set of requests for production of documents and third set of non-uniform interrogatories (.4).			97.50
808	4/5/2019	Victoria Dunne	0.30	85.50	Strategize desired course of action to address inadequate discovery responses by SESH and two associated non-parties that were recently subpoenaed.			85.50
809	4/7/2019	Andrea Marconi	0.20	75.00	Work further on evaluating discovery strategy for remainder of discovery period.			75.00
810	4/7/2019	Sara Witthoft	0.20	65.00	Email to Matt Kelly to follow up on responses to third set of requests for production and third set of non-uniform interrogatories.			65.00
811	4/8/2019	Brad Shwer	0.50	187.50	Assess numerous issues related to summary judgment, settlement, and attorneys' fees motion			187.50
812	4/8/2019	Carmen Boubek	1.90	247.00	(Paralegal) Continue to prepare tracking chart of all documents produced			247.00

818	4/9/2019	Victoria Dunne	1.20	342.00	Review and analyze documents produced by Collect RX as well as relevant affidavits of service and entity-representative information in preparation for preparing followup correspondences to Collect RX and Texas Medical Summit regarding subpoena responses.			342.00
819	4/9/2019	Elisabeth Martini	0.40	114.00	Meet with S. Witthoft re: discuss status of document review in preparation for deposition of SESH 30(b)(6) and Dr. Baig			114.00
820	4/9/2019	Elisabeth Martini	3.80	1,083.00	Continue review of documents produced by SESH in order to identify possible exhibits for deposition of Dr. Baig and SESH 30(b)(6) (approx. 700 pages)			1083.00
821	4/10/2019	Andrea Marconi	0.70	262.50	Further evaluate next steps in case and related strategy after settlement exchanges yesterday, including expected reply in support of summary judgment and finalizing all discovery.			262.50
822	4/10/2019	Sara Witthoft	0.70	227.50	Confer with Andrea Marconi regarding strategy with respect to next steps in litigation.			227.50
823	4/10/2019	Victoria Dunne	4.90	1,396.50	Prepare followup correspondence to Collect RX regarding subpoena responses (1.4); Prepare followup correspondence to Texas Medical Summit regarding subpoena responses (.7); Evaluate SESH's discovery responses for deficiencies to determine whether followup is warranted (2.8).			1396.50
824	4/10/2019	Elisabeth Martini	3.50	997.50	Continue review of documents produced by SESH in order to identify potential exhibits for SESH 30(b)(6) deposition (approx. 700 pages)			997.50
825	4/11/2019	Andrea Marconi	0.80	300.00	Telephone call with Mr. McCoy to discuss settlement issues (.2); further evaluate issues regarding potential settlement (.2); additional telephone call with Mr. McCoy and thereafter evaluate related strategy (.4).			300.00
826	4/11/2019	Sara Witthoft	1.10	357.50	Teleconference with Andrea Marconi regarding strategy with respect to pending deadlines for SESH's discovery responses, response to motion for summary judgment, and preparation for depositions of Dr. Baig and SESH's Rule 30(b)(6) representative (.3); review and consider memorandum prepared by Victoria Dunne regarding review of SESH's discovery responses to date for deficiencies (.3); review and consider email from Doug Lowden regarding ability to subpoena financial records relating to SESH's refinancing of equipment line of credit and confer with Andrea Marconi regarding same (.5).			357.50
827	4/11/2019	Elisabeth Martini	3.40	969.00	Continue review of documents produced by SESH in order to identify potential exhibits for SESH 30(b)(6) deposition (approx. 700 pages)			969.00

828	4/12/2019	Sara Witthoft	3.50	1,137.50	Review case management order with respect to impending deadlines and analyze strategy with respect to same (.5); confer with Andrea Marconi regarding strategy with respect to deadline for participation in good faith settlement talks (.3); review documents and prepare for deposition of Dr. Baig (1.6); read and analyze SESH's response to motion for partial summary judgment (1.1).			1137.50
829	4/13/2019	Andrea Marconi	1.30	487.50	Preliminary review and analysis of SESH's response in opposition to ARS's motion for partial summary judgment and send to client with thoughts on same, as well as upcoming case deadline to have good faith settlement talks and related issues (.9); review and revise draft follow up letters to Collect Rx and Texas Medical Summit regarding subpoena responses (.4).			487.50
830	4/14/2019	Sara Witthoft	2.30	747.50	Review SESH's disclosures and discovery responses and prepare for deposition of Dr. Baig.			747.50
831	4/15/2019	Carmen Boubek	1.30	169.00	(Paralegal) Prepare documents for production with ARS 6th supplemental disclosure			169.00
832	4/15/2019	Carmen Boubek	1.10	143.00	(Paralegal) Continue to prepare tracking chart of all documents produced by parties			143.00
833	4/15/2019	Andrea Marconi	3.70	1,387.50	Conduct further detailed review and analysis of SESH response to motion for partial summary judgment and evaluate preliminary reply arguments (1.4); further evaluate reply strategy and arguments, including confer with S. Witthoft regarding same (.6); telephone call with Mr. McCoy regarding additional settlement and loan information for SESH (.3); review and exchange detailed emails with Mr. Lowden regarding [redacted for privilege] (.3) ; evaluate legal research needed for reply brief (.2); evaluate particularly testimony to elicit from Dr. Baig during deposition in light of summary judgment response and assess how to try and work testimony into reply in light of judge's order on no evidence in replies (.3); review documents produced by Vadim, LP in response to subpoena (.3); draft correspondence to client regarding [redacted for privilege] (.1) ; review and evaluate whether there are any grounds for meet and confer with SESH regarding prior discovery responses before discovery deadline (.2).	LR 54.2(e)(2)(A) (minus 0.4)		1237.50
								Sustained

834	4/15/2019	Sara Witthoft	10.10	3,282.50	Review and consider documents produced by Vadim pursuant to subpoena duces tecum (.3); work with Victoria Dunne regarding letters to Texas Medical Summit and Collect RX with respect to responses to subpoenas duces tecum (.3); review and further analyze SESH's response to motion for partial summary judgment (3.6); prepare for deposition of Dr. Baig (.5); teleconference with Andrea Marconi regarding analysis of SESH's response to motion for partial summary judgment and communications with Kevin McCoy regarding SESH's refinancing of equipment line of credit (.5); meeting with Victoria Dunne regarding research needed for reply in support of motion for partial summary judgment (.3); confer with Andrea Marconi regarding bankruptcy considerations with respect to SESH's willingness to continue to discuss settlement (.5); confer with Victoria Dunne regarding final supplemental disclosures (.2); begin to prepare reply in support of motion for partial summary judgment (3.9).			3282.50
835	4/15/2019	Victoria Dunne	9.00	2,565.00	Finalize subpoena-related correspondences to Collect RX and Texas Medical Summit (.3); Review and analyze SESH's Response in Opposition to ARS's Motion for Summary Judgment and accompanying affidavits (2.3); Review and analyze pertinent legal authority in preparation for preparing memorandum regarding affidavit opposition (4.3); begin preparing memorandum regarding affidavit opposition (2.1).			2565.00
836	4/16/2019	Carmen Boubek	1.70	221.00	(Paralegal) Continue to prepare documents for production with 6th supplemental disclosure			221.00
837	4/16/2019	Andrea Marconi	0.50	187.50	Assess matters regarding claims files provided by client to support contract damages (.2); review follow up correspondence with Collect Rx regarding supplemental document production (.1); assess issues regarding upcoming depositions in light of refusal from SESH to confirm same (.1); analyze correspondence to SESH regarding outstanding discovery responses and failure to pay sanctions award (.1).			187.50

838	4/16/2019	Sara Witthoft	6.10	1,982.50	Email to Matt Kelly and Kevin McCoy to follow up on SESH's failure to timely respond to written discovery requests (.2); email to Matt Kelly, Kevin McCoy, and Brian Kilmer to follow up on payment of sanctions awarded to ARS and to confirm appearance of Dr. Baig and SESH's Rule 30(b)(6) representative(s) at depositions noticed for April 22, 2019 (.3); emails from and to Allen Vagheitabar regarding claims files to be produced to support damages claim (.2); continue to prepare reply in support of motion for partial summary judgment (3.9); telephone call (voicemail) from Ike Brenner in response to letter following up on Collect Rx's response to subpoena duces tecum (.2); work with Victoria Dunne regarding follow up with Dr. Brenner and review additional documents produced by Collect Rx (.6); work with Allen Vagheitabar with respect to patient claims files organized by invoice to support damages claim and follow up regarding missing claims files (.4); confer with Victoria Dunne regarding research needed with respect to potential waiver argument relating to SESH's prior material breach defense and regarding classification of complaints regarding negligent processing as tort claim that does not constitute prior material breach of contract (.3).			1982.50
839	4/16/2019	Victoria Dunne	6.40	1,824.00	Review and analyze April 15th correspondence, subpoena with attachments, and Collect RX's response in preparation for returning Dr. Brenner's call (.5); Teleconference with Dr. Brenner regarding response to subpoenas (.2); Continue preparing memorandum regarding affidavit opposition (2.3); Exchange multiple correspondence with Dr. Brenner regarding response to Subpoena Duces Tecum (.5); Review and analyze communications produced by Collect RX in preparation for followup and production of the same (2.9).			1824.00
840	4/17/2019	Carmen Boubek	4.50	585.00	(Paralegal) Continue to prepare documents for production with 6th supplemental disclosure			585.00
841	4/17/2019	Andrea Marconi	1.70	637.50	Evaluate further issues and strategy for upcoming SESH depositions (.2); review and evaluate summary of law regarding sham affidavit and ability to use later-acquired deposition testimony to contradict affidavit in reply (.3); begin working to draft reply in support of motion for partial summary judgment (1.2).			637.50

842	4/17/2019	Sara Witthoft	9.00	2,925.00	Email to Matt Kelly, Kevin McCoy, and Brian Kilmer to follow up regarding payment of sanctions for late cancelled depositions and to confirm deponents' appearance at depositions scheduled for April 22 (.2); work with Victoria Dunne regarding disclosure of all documents produced by Collect Rx in response to subpoena duces tecum (.2); review and analyze research memorandum prepared by Victoria Dunne regarding ability to controvert Dr. Baig's affidavit with deposition testimony despite case management order's proscription against including evidence in reply in support of motion for summary judgment (.3); briefly review patient claims files produced by ARS with respect to each invoice issued to SESH so as to support damages claim, and work with Carmen Boubek to bates label and disclose same (.9); work with Carmen Boubek and Victoria Dunne regarding disclosure of documents produced by Collect Rx in response to subpoena duces tecum (.5); analyze documents and issues and prepare for depositions of Dr. Baig and SESH's Rule 30(b)(6) representative, including identification of exhibits to be admitted during said depositions (6.9).			2925.00
843	4/17/2019	Victoria Dunne	9.50	2,707.50	Exchange emails with Dr. Brenner regarding provision of subpoenaed documents (.1); strategize disclosure of documents recently obtained by third parties (.6); Review and analyze pertinent legal authority regarding waiver of breach, failure to satisfy a condition precedent, and professional liability as a non-contractual claim (3.8) ; prepare memorandum regarding waiver of breach, failure to satisfy a condition precedent, and professional liability as a non-contractual claim (3.9); Review and analyze pertinent legal authority regarding failure to rebut arguments in the summary judgment context (1.1).			2707.50
844	4/18/2019	Andrea Marconi	0.60	225.00	Review and evaluate communication from SESH regarding sanctions payment and confirmation of deposition appearance and assess response strategy (.2); evaluate issues and arguments in support of unjust enrichment for reply brief, assess additional fact information needed and confer with client regarding same (.3); review and analyze summary of legal research regarding inapplicability and potential waiver of first material breach argument for use in reply brief (.1).			225.00
845	4/18/2019	CaSandra Green	4.60	598.00	Update ARS' Seventh Supplemental Disclosure Statement with documents recently received, and analysis of case file to identify documents and materials to produce as exhibits.			598.00

846	4/18/2019	Sara Witthoft	6.50	2,112.50	Review and consider research memorandum regarding SESH's failure to address ratification argument and concession of said argument (.3); confer with Andrea Marconi regarding SESH's argument that ARS should not be entitled to damages on unjust enrichment claim after February 23 or April 23, 2017 and consider evidence to rebut same (.4); read and consider email from Matt Kelly confirming Dr. Baig's appearance at depositions noticed for April 22, sanctions award, and settlement negotiations (.3); review documents and prepare for depositions of Dr. Baig in personal capacity, and as Rule 30(b)(6) representative of SESH (4.4); review and consider Dr. Baig's deposition testimony in EMG litigation (.7); confer with Andrea Marconi regarding strategy with respect to depositions and Matt Kelly's email regarding refusal to pay sanctions until case is resolved (.4).			2112.50
847	4/19/2019	Andrea Marconi	0.70	262.50	Work on deposition strategy issues with S. Witthoft for upcoming depositions of SESH and Dr. Baig (.5); evaluate issues regarding request for earlier payment of sanctions and confer with client regarding same (.2).			262.50
848	4/19/2019	CaSandra Green	5.10	663.00	Identify pertinent records, case file documents and additional materials to be reviewed in preparation for and use as exhibits at the upcoming deposition of Mirza N. Baig, M.D.			663.00
849	4/19/2019	Sara Witthoft	7.30	2,372.50	Review email from Doug Lowden regarding[redacted for privilege] (.4); emails to and from Doug Lowden regarding SESH's refusal to pay sanctions until case is resolved (.4); confer with Andrea Marconi regarding strategy with respect to depositions of Dr. Baig and Rule 30(b)(6) representative (.7); emails from and to Doug Lowden regarding telephonic appearance at depositions on April 22 (.2); email to Matt Kelly and Brian Kilmer regarding same (.2); review documents and prepare for depositions of Dr. Baig and Rule 30(b)(6) representative (5.4).	LR 54.2(e)(2)(A) (minus 0.4)	Sustained	2242.50
850	4/20/2019	Sara Witthoft	4.10	1,332.50	Review documents and prepare for deposition of Dr. Mirza Baig (2.2); review documents and prepare for deposition of SESH's Rule 30(b)(6) representative (1.9).			1332.50
851	4/21/2019	Sara Witthoft	7.70	2,502.50	Travel to Houston for depositions of Dr. Baig and SESH's Rule 30(b)(6) representative and continue to review documents and prepare for depositions during travel (7.0); continue to prepare for SESH's Rule 30(b)(6) deposition (.7).			2502.50

852	4/22/2019	Andrea Marconi	6.30	2,362.50	Confer throughout the day with S. Witthoft regarding various matters for today's deposition to assist with same (.4); review and analyze additional legal authority and factual documents for use in reply brief (1.1); continue draft reply brief in support of partial MSJ (4.2); debrief with S. Witthoft regarding today's SESH depositions (.4); evaluate legal research needed to support request to expedite payment of attorneys' fee sanction by SESH and assess related issues (.2).			2362.50
853	4/22/2019	CaSandra Green	0.80	104.00	Identify pertinent records, case file documents and additional materials to be reviewed in preparation for and use as exhibits at the upcoming deposition of Mirza N. Baig, M.D.			104.00
854	4/22/2019	Sara Witthoft	10.60	3,445.00	Review email from Brian Kilmer regarding availability of speakerphone for Doug Lowden's participation in depositions via telephone and emails to and from Lowden regarding same (.2); travel to and from Brian Kilmer's office and conduct depositions of Dr. Baig in his personal capacity and as Rule 30(b)(6) representative of SESH (8.7); teleconference with Andrea Marconi regarding said depositions and preparation of reply in support of motion for partial summary judgment (.4); review email from court reporter forwarding rough transcripts for said depositions and email forwarding same to Doug Lowden and Tyler Grim for review (.2); continue to draft reply in support of motion for partial summary judgment (1.1).			3445.00
855	4/23/2019	Andrea Marconi	7.30	2,737.50	Review and analyze deposition transcript for Dr. Baig (1.2); continue drafting reply in support of ARS partial MSJ (4.8); review certain case law cited by SESH in its response to distinguish and rebut same for reply (.5); review request from client for [redacted for privilege] (.2); review response from Texas Medical Summit and assess next steps, including evaluate content for meet and confer letter (.6).	LR 54.2(e)(2)(A) (minus 0.2)		2662.50
856	4/23/2019	CaSandra Green	6.30	819.00	Continue to update ARS' Seventh Supplemental Disclosure Statement with documents recently received, and analysis of case file to identify documents and materials to produce as exhibits.		Sustained	819.00

857	4/23/2019	Sara Witthoft	10.70	3,477.50	Travel from Houston to Phoenix after taking depositions of Dr. Baig in personal capacity and as SESH's Rule 30(b)(6) representative (7.6); confer with Andrea Marconi regarding arguments to raise in reply in support of motion for partial summary judgment with regard to unjust enrichment and alleged defense of prior material breach (.5); read and consider letter from Texas Medical Summit regarding alleged defects in subpoena duces tecum and refusal to comply with same (.2); emails from and to Doug Lowden regarding [redacted for privilege] (.5) ; continue to prepare reply in support of motion for partial summary judgment (1.9).	LR 54.2(e)(2)(A) (minus 0.5)		3315.00
							Sustained	
858	4/23/2019	Victoria Dunne	6.50	1,852.50	Review and analyze pertinent legal authority regarding the question of whether a party concedes a point when they fail to rebut arguments in a dispositive motion (3.2); Review and analyze pertinent legal authority regarding Rule 30 sanction to determine whether payment timing is specified (.5); Begin working on Seventh Supplemental MIDP (2.8).			1852.50
859	4/23/2019	Matt Baltierra	0.90	256.50	Evaluate federal law and authorities concerning scope of subpoena issued by district court, compliance regarding same as to out of state entities and appropriate objections, including bases for asserting same for use in drafting letter to Texas Medical Summit concerning compliance with ARS subpoena for documents.	LR 54.2(e)(2)(A) (minus 0.5)		256.50
							Overruled	
860	4/23/2019	Matt Baltierra	0.80	228.00	Prepare initial draft of letter to Texas Medical Summit, Inc. to address objections to subpoena and demand production of subpoenaed documents.			228.00
861	4/24/2019	Andrea Marconi	2.50	937.50	Work further on issues regarding meet and confer letter to and objections from Texas Medical Summit regarding subpoena (.1); work on issues concerning final supplemental disclosure and review additional documents to be produced by deadline (.4); analyze issues regarding upcoming deadline for in person good faith settlement talks and assess related strategy (.1); review, revise and supplement draft reply brief in support of partial MSJ for client review (1.5); review and revise draft letter response to Texas Medical Summit regarding subpoena objections (.4).			937.50
862	4/24/2019	CaSandra Green	0.50	65.00	Coordinate with TSG Reporting to confirm acceptance of documents received via subpoena.			65.00
863	4/24/2019	CaSandra Green	3.90	507.00	Continue to update ARS' Seventh Supplemental Disclosure Statement with documents recently received, and analysis of case file to identify documents and materials to produce as exhibits.			507.00

864	4/24/2019	Sara Witthoft	2.30	747.50	Confer with Andrea Marconi regarding revisions to reply in support of motion for partial summary judgment (.3); review and revise reply in support of motion for partial summary judgment (1.0); revise and finalize letter to Adnan Anwar Sheikh with Texas Medical Summit in regard to alleged objections to subpoena duces tecum and refusal to comply with same (.4); work with Tori Dunne on final disclosures (.6).			747.50
865	4/24/2019	Victoria Dunne	11.40	3,249.00	Review and analyze material portions of file documents in preparation for expanding Seventh Supplemental MIDP (1.2); Prepare witness section of Seventh Supplemental MIDP (3.1); Prepare legal arguments section of Seventh Supplemental MIDP (2.4); Continue working on working on Seventh Supplemental MIDP (4.7).			3249.00
866	4/24/2019	Matt Baltierra	0.20	57.00	Finish drafting letter to Texas Medical Summit, Inc. to address objections to subpoena and demand production of subpoenaed documents.			57.00
867	4/25/2019	Brad Shwer	1.40	525.00	Review draft reply in support of motion for summary judgment			525.00
868	4/25/2019	Andrea Marconi	0.50	187.50	Review and revise draft of final disclosure statement.			187.50
869	4/25/2019	CaSandra Green	11.60	1,508.00	Continue to update ARS' Seventh Supplemental Disclosure Statement with documents recently received, and analysis of case file to identify documents and materials to produce as exhibits.			1508.00
870	4/25/2019	Sara Witthoft	1.70	552.50	Review and revise reply in support of motion for partial summary judgment (.9); email forwarding revised version to Doug Lowden and Tyler Grim (.2); emails from and to Doug Lowden regarding [redacted for privilege] (.2) ; work with Tori Dunne and CaSandra Green with respect to final disclosures (.4).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	487.50
871	4/26/2019	Brad Shwer	0.90	337.50	Review reply to motion for summary judgment			337.50
872	4/26/2019	Andrea Marconi	2.20	825.00	Further work on and revise and supplement final supplemental disclosure statement for client review (1.6); make final edits to reply in support of summary judgment (.2); assess response from TMS to subpoena and related strategy (.2); review and revise document production list to append to final disclosure (.2).			825.00
873	4/26/2019	CaSandra Green	9.30	1,209.00	Continue to update ARS' Seventh Supplemental Disclosure Statement with documents recently received, and analysis of case file to identify documents and materials to produce as exhibits.			1209.00

874	4/26/2019	Sara Witthoft	3.90	1,267.50	Emails to and from Doug Lowden regarding [redacted for privilege] (.4); work with CaSandra Green and Victoria Dunne to finalize disclosure statement (2.1); work with Victoria Dunne to double-check all record citations in reply in support of Motion for Partial Summary Judgment (.3); read and consider correspondence from Adnan Shaikh regarding subpoena duces tecum served on Texas Medical Summit and email to Doug Lowden regarding [redacted for privilege] (.6); finalize reply in support of motion for partial summary judgment for filing (.5).	LR 54.2(e)(2)(A) (minus 1.0)		942.50
875	4/26/2019	Victoria Dunne	6.80	1,938.00	Prepare Notice of Service of Seventh Supplemental MIDP Response (.1); Review Motion for Partial Summary Judgment Reply in comparison with the record to determine whether citations require revision (3.9); Review and revise Seventh MIDP Response (2.8).		Sustained	1938.00
876	4/29/2019	CaSandra Green	3.20	416.00	Finalize ARS' Seventh Supplemental Disclosure Statement with documents recently received, and analysis of case file to identify documents and materials to produce as exhibits.			416.00
877	4/29/2019	Sara Witthoft	0.20	65.00	Email to Matt Kelly regarding hand-delivery of documents disclosed with final supplemental disclosure statement.			65.00
878	4/29/2019	Victoria Dunne	2.90	826.50	Continue to review and analyze pertinent legal authority regarding Rule 37, including timing of appealability of sanctions and award of fees in connection with failure to timely comply with civil contempt orders (1.7); Continue preparing memorandum regarding payment of sanctions (1.2).			826.50
879	4/30/2019	Brad Shwer	1.00	375.00	Review deposition transcript of Mirza Baig			375.00
880	4/30/2019	Sara Witthoft	0.50	162.50	Review and analyze research memorandum prepared by Victoria Dunne regarding SESH's failure to pay sanctions awarded.			162.50
881	5/1/2019	CaSandra Green	2.10		No Charge - Analyze case file and prepare pertinent documents to send to Doug Lowden.			
882	5/3/2019	Brad Shwer	1.30	487.50	Correspondence with plaintiff's counsel regarding settlement talks (.2); assess status of dispositive motions, trial setting, and potential for settlement (1.1)			487.50
883	5/3/2019	Sara Witthoft	0.40	130.00	Emails from and to Matt Kelly regarding upcoming deadline for participation in good faith settlement talks (.2); email to Doug Lowden and Tyler Grim [redacted for privilege] (.2).	LR 54.2(e)(2)(A) (minus 0.2)		65.00
884	5/7/2019	Carmen Boubek	1.10	143.00	(Paralegal) Prepare deposition tracking chart		Sustained	143.00
885	5/7/2019	Carmen Boubek	0.90	117.00	(Paralegal) Continue to prepare document production tracking chart			117.00
886	5/7/2019	Sara Witthoft	0.30	97.50	Emails from and to Doug Lowden and Matt Kelly regarding scheduling of good faith settlement talks as required by current scheduling order.			97.50

887	5/8/2019	Carmen Boubek	6.40	832.00	(Paralegal) Continue to prepare tracking chart of all documents produced by parties			832.00
888	5/8/2019	Sara Witthoft	0.60	195.00	Revise and finalize notice of substitution of counsel (.2); review scheduling order with respect to remaining deadlines and analyze strategy with respect to same (.4).			195.00
889	5/9/2019	Carmen Boubek	4.20	546.00	(Paralegal) Continue to prepare tracking chart of all documents produced by SESH			546.00
890	5/9/2019	Sara Witthoft	0.40	130.00	Emails from and to Doug Lowden and Matt Kelly regarding coordination of good faith settlement talks.			130.00
891	5/10/2019	Brad Shwer	0.40	150.00	Evaluate Order granting summary judgment to client			150.00
892	5/10/2019	Carmen Boubek	3.90	507.00	(Paralegal) Continue to prepare tracking chart of all documents produced by SESH			507.00
893	5/10/2019	Victoria Dunne	0.20	57.00	Review and analyze Order granting ARS's Motion for Partial Summary Judgment.			57.00
894	5/13/2019	Brad Shwer	1.20	450.00	Develop strategy for potential dispositive motion on damages, as well as review other key settlement and evidentiary issues to identify quickest way to resolve claim while maximizing recovery			450.00
895	5/13/2019	Carmen Boubek	0.20	26.00	(Paralegal) Analyze order regarding ARS motion for partial summary judgment			26.00
896	5/13/2019	Carmen Boubek	3.20	416.00	(Paralegal) Continue to prepare tracking chart of all documents produced by SESH			416.00
897	5/13/2019	Sara Witthoft	2.10	682.50	Read and analyze Judge Lanza's order granting motion for partial summary judgment, review scheduling order, and consider same with respect to potentially seeking leave to file motion for partial summary judgment for damages on breach of contract claim (1.5); email to Doug Lowden and Tyler Grim regarding [redacted for privilege] (.3); emails from and to Doug Lowden regarding [redacted for privilege] (.3).	LR 54.2(e)(2)(A) (minus 0.6)		487.50
							Sustained	
898	5/13/2019	Sara Witthoft	0.50	162.50	Review pending deadlines and analyze strategy and next steps with respect to same (.3); confer with Victoria Dunne regarding strategy and next steps with respect to Texas Medical Summit's refusal to comply with subpoena duces tecum (.2).			162.50
899	5/14/2019	Carmen Boubek	3.20	416.00	(Paralegal) Finalize tracking chart of all documents produced by SESH			416.00
900	5/14/2019	Sara Witthoft	0.40	130.00	Confer with Tori Dunne regarding strategy and next steps related to Texas Medical Summit's refusal to comply with subpoena duces tecum.			130.00
901	5/14/2019	Victoria Dunne	0.50	142.50	Review and analyze prior correspondences and other subpoena-related materials in preparation for preparing correspondence to A. Shaikh regarding Texas Medical Summit's refusal to respond to ARS's subpoena.			142.50
902	5/14/2019	Victoria Dunne	1.10	313.50	Begin preparing correspondence to A. Shaikh regarding Texas Medical Summit's refusal to respond to ARS's subpoena.			313.50

903	5/15/2019	Victoria Dunne	0.80	228.00	Prepare portion of correspondence to A. Shaikh addressing procedural history.			228.00
904	5/15/2019	Victoria Dunne	1.60	456.00	Prepare portion of correspondence to A. Shaikh addressing TMS's invalid objections.			456.00
905	5/15/2019	Victoria Dunne	0.80	228.00	Prepare portion of correspondence to A. Shaikh addressing TMS's Civil Comtempt.			228.00
906	5/16/2019	Sara Witthoft	3.30	1,072.50	Review and analyze prior settlement discussion correspondence, analyze amounts owed, attorney fee provision in billing agreement, and prepare for good faith settlement discussions (1.5); emails from and to Doug Lowden regarding [redacted for privilege] (.4); and emails to and from Kevin McCoy regarding same (.2); revise and finalize correspondence to Texas Medical Summit regarding failure and refusal to comply with subpoena duces tecum (.5); meeting with Tori Dunne regarding strategy with respect to motion for leave to file motion for summary judgment on damages on breach-of-contract claim and submittal of amended order with respect to sanctions for late-cancelled depositions (.4); email to Doug Lowden regarding [redacted for privilege] (.3).	LR 54.2(e)(2)(A) (minus 0.9)		780.00
							Sustained	
907	5/16/2019	Sara Witthoft	1.20	390.00	Travel to and from Matt Kelly's office and participate in good faith settlement talks (1.0); review scheduling order with respect to joint report to be filed acknowledging participation in same (.2).			390.00
908	5/16/2019	Victoria Dunne	0.80		No Charge - Prepare portion of correspondence to A. Shaikh addressing further action and associated recourse against TMS.			0.00
909	5/16/2019	Victoria Dunne	2.30		No Charge - Review and revise correspondence to A. Shaikh regarding TMS's failure to comply with ARS's subpoena.			0.00
910	5/17/2019	Sara Witthoft	1.70	552.50	Review and revise draft motion and proposed order granting leave to allow ARS to file second motion for partial summary judgment on damages on breach-of-contract claim (.9); review and revise notice of lodging and proposed amended order with respect to sanctions awarded to ARS pursuant to Rule 30(g) (.8).			552.50
911	5/17/2019	Victoria Dunne	1.20	342.00	Prepare Notice of Lodging of Proposed Order Requiring SESH to Issue Payment of Sanctions to ARS Within Ten Days.			342.00
912	5/17/2019	Victoria Dunne	0.50	142.50	Review and analyze pertinent portions or relevant filings and memorandums in preparation for preparing Notice of Lodging of Proposed Order Requiring SESH to Issue Payment of Sanctions to ARS Within Ten Days.			142.50
913	5/17/2019	Victoria Dunne	0.40		No Charge - Prepare Proposed Order Requiring SESH to Issue Payment of Sanctions to ARS Within Ten Days.			0.00
914	5/17/2019	Victoria Dunne	1.20	342.00	Prepare ARS's Expedited Motion for Leave to File One Additional Motion for Summary Judgment.			342.00

923	5/22/2019	Victoria Dunne	0.50	142.50	Begin preparing Motion for Partial Summary Judgment Regarding Damages.			142.50
924	5/22/2019	Victoria Dunne	1.60	456.00	Prepare "Factual Basis for Summary Judgment" section of Motion for Partial Summary Judgment Regarding Damages.			456.00
925	5/22/2019	Victoria Dunne	0.60	171.00	Prepare "Legal Standard" section of Motion for Partial Summary Judgment Regarding Damages.			171.00
926	5/22/2019	Victoria Dunne	1.90	541.50	Begin preparing "Legal Analysis" section of Motion for Partial Summary Judgment Regarding Damages.			541.50
927	5/22/2019	Victoria Dunne	1.10	313.50	Review and analyze pertinent legal authority regarding the Court's ability to interpret the damage provisions within the Business Agreement as a matter of law in preparation for expanding Motion for Partial Summary Judgment Regarding Damages.			313.50
928	5/23/2019	Sara Witthoft	0.20	65.00	Review and consider email from Matt Kelly regarding authorization to sign and file report regarding good faith settlement talks and regarding SESH's intent to make payment for sanctions awarded.			65.00
929	5/23/2019	Victoria Dunne	1.80	513.00	Review and analyze material portions of exhibits to previously filed Motion for Partial Summary Judgment in preparation for continuing to prepare "Legal Analysis" section of Motion for Partial Summary Judgment Regarding Damages.			513.00
930	5/23/2019	Victoria Dunne	1.10	313.50	Continue preparing "Legal Analysis" section of Motion for Partial Summary Judgment Regarding Damages.			313.50
931	5/23/2019	Victoria Dunne	2.20	627.00	Review and analyze Personal Capacity Deposition of Dr. Baig in preparation for expanding Motion for Partial Summary Judgment Regarding Damages.			627.00
932	5/24/2019	Brad Shwer	0.40	150.00	Review response to motion for leave to file MSJ (.2); review order from court granting motion for leave to file MSJ on damages (.2)			150.00
933	5/24/2019	Sara Witthoft	1.30	422.50	Review and consider SESH's response to motion for leave to file second motion for partial summary judgment and email to Tyler Grim regarding [redacted for privilege] (.3); emails from and to Matt Kelly regarding payment of sanctions and authorization to sign and file report on good faith settlement talks (.2); finalize said report for filing (.2); meeting with Victoria Dunne to discuss strategy related to motion for partial summary judgment on damages on breach-of-contract claim (.3); review court's order granting motion for leave to file second motion for partial summary judgment and emails to and from Tyler Grim regarding [redacted for privilege] (.3).	LR 54.2(e)(2)(A) (minus 0.6)		227.50
934	5/24/2019	Victoria Dunne	0.10	28.50	Review and analyze SESH's Response in Opposition to Expedited Motion for Leave to File Additional Motion for Partial Summary Judgment in preparation for determining whether to incorporate into Motion for Partial Summary Judgment Regarding Damages.		Sustained	28.50

935	5/24/2019	Victoria Dunne	0.10	28.50	Review and analyze May 24, 2019 Order granting ARS's Expedited Motion for Leave to File Additional Motion for Partial Summary Judgment Regarding Damages.			28.50
936	5/24/2019	Victoria Dunne	2.00	570.00	Review and analyze 30(b)(6) Deposition of Dr. Baig in preparation for expanding Motion for Partial Summary Judgment Regarding Damages.			570.00
937	5/28/2019	Sara Witthoft	4.80	1,560.00	Telephone call from Tyler Grim [redacted for privilege] (.2); prepare motion for partial summary judgment on damages on breach-of-contract claim (4.6).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	1495.00
938	5/29/2019	Brad Shwer	0.10	37.50	Review emails from opposing counsel regarding sanction amount			37.50
939	5/29/2019	Carmen Boubek	0.90	117.00	(Paralegal) Revise document produced tracking chart			117.00
940	5/29/2019	Sara Witthoft	4.60	1,495.00	Emails from and to Tyler Grim regarding [redacted for privilege] (.2); work on motion for partial summary judgment on damages on breach-of-contract claim and email forwarding same to clients for review and comment (4.4).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	1430.00
941	5/30/2019	Carmen Boubek	0.50	65.00	(Paralegal) Assist with the preparation of ARS's motion for partial summary judgment			65.00
942	5/30/2019	Sara Witthoft	4.10	1,332.50	Emails from and to Doug Lowden [redacted for privilege] (.2); prepare affidavit for Melissa Kohler for motion for partial summary judgment (.9); emails to and from Doug Lowden [redacted for privilege] (.5); continue to work on motion for partial summary judgment (2.2); work with Carmen Boubek with respect to exhibits in lieu of statement of facts in compliance with case management order (.3).	LR 54.2(e)(2)(A) (minus 0.7)	Sustained	1105.00
943	5/31/2019	Brad Shwer	1.50	562.50	Finalize and review motion for partial summary judgment on damages			562.50
944	5/31/2019	Carmen Boubek	1.30	169.00	(Paralegal) Continue to assist with the preparation of ARS's motion for summary judgment			169.00
945	5/31/2019	Sara Witthoft	6.90	2,242.50	Review and consider emails from Doug Lowden regarding [redacted for privilege] (.9); telephone call (voicemail) and follow up email to Doug Lowden regarding [redacted for privilege] (.4); review and revise motion for partial summary judgment on damages (2.1); review and revise affidavit for Melissa Kohler (.4); work with Carmen Boubek to finalize exhibits for said motion (.9); prepare affidavit for Cheryl McLaws and emails from and to Doug Lowden [redacted for privilege] (.8); review and finalize motion for partial summary judgment on breach of contract damages for filing (1.4).	LR 54.2(e)(2)(A) (minus 2.1)	Sustained	1560.00
946	6/3/2019	Sara Witthoft	0.70	227.50	Emails from and to Doug Lowden regarding [redacted for privilege] (.2); email to Matt Kelly regarding adjustment to briefing schedule (.2); emails from and to Kevin McCoy regarding same (.3).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	162.50
947	6/4/2019	Sara Witthoft	1.60	520.00	Review and analyze Am. Power Prods. v. CSK Auto, Inc. with respect to "prevailing party" designation for fee shifting purpose			520.00

948	6/9/2019	Brad Shwer	1.00	375.00	Review final motion for partial summary judgment on damages and assess related issues			375.00
949	6/11/2019	Carmen Boubek	0.40	52.00	(Paralegal) Prepare joint motion to extend deadline to file plaintiff's motion for partial summary judgment reply			52.00
950	6/11/2019	Sara Witthoft	0.50	162.50	Revise draft joint motion and proposed order to extend deadline for reply in support of motion for partial summary judgment on damages on Count 1, and email forwarding same to Matt Kelly and Kevin McCoy for review.			162.50
951	6/12/2019	Sara Witthoft	0.30	97.50	Emails from and to Matt Kelly regarding authorization to sign and file joint motion to extend deadline for filing reply in support of motion for partial summary judgment, and finalize same for filing.			97.50
952	6/13/2019	Sara Witthoft	1.50	487.50	Review and analyze case status and next steps (.5); review Judge Lanza's order granting motion to extend deadline for reply in support of motion for partial summary judgment on contract damages (.1); further analyze American Power Products case with respect to fee shifting provision of ARS 12-341.01 being incorporated into prevailing party provision in billing agreement (.9).			487.50
953	6/19/2019	Carmen Boubek	2.00	260.00	(Paralegal) Analyze client documents for update of tracking chart			260.00
954	6/20/2019	Carmen Boubek	1.00	130.00	(Paralegal) Continue to analyze documents for revision of tracking chart			130.00
955	6/21/2019	Sara Witthoft	0.40	130.00	Email to Doug Lowden and Tyler Grim regarding [redacted for privilege]			130.00
956	6/26/2019	Sara Witthoft	0.60	195.00	Emails from and to Matt Kelly regarding extension of deadline for SESH's response to motion for partial summary judgment on contract damages (.2); review and revise draft motion and propose order regarding said extension, and email to Matt Kelly regarding authority to sign and file same with modifications (.3); review minute entry order granting same (.1).			195.00
957	7/9/2019	Sara Witthoft	1.20	390.00	Initial review and analysis of SESH's response in opposition to motion for partial summary judgment on damages and emails to and from Tyler Grim and Doug Lowden regarding [redacted for privilege]	LR 54.2(e)(2)(A) (minus 1.2)	Sustained	0.00
958	7/11/2019	Brad Shwer	1.50	562.50	Initial review of response to partial MSJ			562.50
959	7/15/2019	Brad Shwer	2.00	750.00	Further assessment of opposition to motion for summary judgment on breach of contract damages to assist with reply			750.00
960	7/15/2019	Sara Witthoft	1.50	487.50	Continue to review and analyze SESH's response in opposition to motion for partial summary judgment on damages.			487.50
961	7/17/2019	Sara Witthoft	3.40	1,105.00	Review and analyze arguments and authorities cited in SESH's response to motion for partial summary judgment on damages and work on reply in support of said motion.			1105.00

962	7/18/2019	Sara Witthoft	3.10	1,007.50	Work on reply in support of motion for partial summary judgment on contract damages.			1007.50
963	7/19/2019	Sara Witthoft	3.40	1,105.00	Work on reply in support of motion for summary judgment on damages (3.2); emails to and from Doug Lowden regarding [redacted for privilege] (.2).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	1040.00
964	7/22/2019	Sara Witthoft	6.20	2,015.00	Continue to prepare reply in support of motion for summary judgment on damages on breach-of-contract claim.			2015.00
965	7/23/2019	Brad Shwer	1.10	412.50	Review reply in support of partial motion for summary judgment			412.50
966	7/23/2019	Sara Witthoft	3.70	1,202.50	Continue to prepare reply in support of motion for summary judgment on damages on breach of contract claim (5.7); prepare draft supplemental affidavit for Melissa Kohler (.8); email to Doug Lowden [redacted for privilege] (.2).	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	1137.50
967	7/24/2019	Sara Witthoft	1.10	357.50	Read and consider email from Doug Lowden regarding [redacted for privilege]	LR 54.2(e)(2)(A) (minus 1.1)	Sustained	0.00
968	7/25/2019	Carmen Boubek	0.50	65.00	(Paralegal) Assist with the preparation of reply to partial motion for summary judgment			65.00
969	7/25/2019	Sara Witthoft	5.80	1,885.00	Emails from and to Doug Lowden regarding [redacted for privilege] (.4); revise and finalize said reply (4.9); review final, as-filed version of reply and email forwarding same to Doug Lowden (.5).	LR 54.2(e)(2)(A) (minus 0.4)	Sustained	1755.00
970	7/26/2019	Sara Witthoft	0.20	65.00	Read and consider SESH's motion for leave to file surreply in response to motion for partial summary judgment.			65.00
971	7/29/2019	Sara Witthoft	0.40	130.00	Review order granting SESH's motion for leave to file surreply and email to clients regarding same.			130.00
972	8/13/2019	Sara Witthoft	0.60	195.00	Review and analyze SESH's surreply filed in opposition to motion for partial summary judgment on damages on breach-of-contract claim and email to Tyler Grim and Doug Lowden regarding [redacted for privilege]	LR 54.2(e)(2)(A) (minus 0.6)	Sustained	0.00
973	12/4/2019	Sara Witthoft	0.20	75.00	Telephone call from Tyler Grim regarding [redacted for privilege]	LR 54.2(e)(2)(A) (minus 0.2)	Sustained	0.00

Total allowable fees: \$ 444,799.70