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

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Matthew Oskowis,

Plaintiff,

v.

Sedona Oak-Creek Unified School District
#9,

Defendant.

No. CV-17-08070-PCT-DWL

ORDER

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Pending before the Court is an amended motion for attorneys’ fees filed by Defendant Sedona Oak-Creek Unified School District #9 (“the District”) (Doc. 124) and a motion to review taxation of costs filed by Plaintiff Matthew Oskowis (Doc. 129). For the following reasons, both motions will be granted in part and denied in part.

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BACKGROUND

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Oskowis is the father of E.O., a minor diagnosed with infantile autism. Because E.O. suffers from an intellectual disability, he is entitled to a free appropriate public education (“FAPE”) as guaranteed by the Individuals with Disabilities Education Act (“IDEA”), 20 U.S.C. § 1400, et seq. This case arises from three administrative proceedings that were initiated when Oskowis filed due process complaints with the Arizona Department of Education, each arguing that E.O. had been denied a FAPE.

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Oskowis filed those due process complaints between June 2016 and March 2017, initiating administrative proceedings 16C-DP-066-ADE, 17C-DP-013-ADE, and 17C-DP-053-ADE. In each of those proceedings, the respective administrative law judge (“ALJ”)

1 dismissed Oskowis’s complaint without a hearing, determining that the complaint was
2 frivolous.

3 On April 13, 2017, Oskowis filed this lawsuit. (Doc. 1.) The operative complaint
4 asserted three causes of action, each corresponding to one of the administrative
5 proceedings. (Doc. 17.) Oskowis claimed that the ALJs erred in dismissing his due process
6 complaints. (Id.)

7 On June 22, 2018, the District moved for summary judgment on all three causes of
8 action. (Doc. 68.)

9 On February 19, 2019, the Court granted summary judgment in favor of the District.
10 (Doc. 77.)

11 On August 22, 2019, the District filed an amended motion for attorneys’ fees. (Doc.
12 124.)

13 On August 28, 2019, Oskowis filed a motion to review taxation of costs. (Doc.
14 129).

15 **DISCUSSION**

16 I. The District’s Motion For Attorneys’ Fees

17 The District seeks attorneys’ fees incurred while defending the action in this Court
18 and while pursuing the pending request for attorneys’ fees. It does not, in contrast, seek
19 any fees arising from its defense of the three administrative proceedings. Nevertheless,
20 because the administrative proceedings are relevant to understanding Oskowis’s causes of
21 action in this case, the Court reviews them below.

22 A. **Oskowis’s Causes Of Action**

23 1. Cause Of Action I: 17C-DP-013-ADE

24 Cause of Action I arose from administrative proceeding 17C-DP-013-ADE, which
25 Oskowis initiated on September 1, 2016 by filing a due process complaint. (Doc. 17 ¶ 36.)
26 Oskowis argued the District denied E.O. a FAPE by (1) failing “to monitor [E.O.’s]
27 progress against the annual goals & objectives of [his] IEP [individualized education
28 program] [and] their corresponding STOs [short term objectives]” and (2) failing “to

1 engage the IEP Team to revise the IEP to address the lack of expected progress of [E.O.]
2 toward those STOs.” (Id. ¶ 38.)

3 The ALJ dismissed Oskowis’s due process complaint on March 10, 2017. (Doc.
4 75-1 at 2-6.) The ALJ’s order concluded: “Petitioners’ Complaint fails as a matter of law
5 and should be dismissed as the claims therein are not supported by the IDEA or its
6 regulations. Given the [rejection of the same argument in past proceedings] and the lack
7 of any support in the IDEA or its regulations on this claimed issued, the Petitioners’ instant
8 Complaint is deemed to be frivolous.” (Doc. 75-1 at 6.)¹

9 This Court subsequently granted summary judgment in favor of the District on
10 Cause of Action I, determining that the ALJ had properly rejected each of Oskowis’s claims
11 in that proceeding. (Doc. 77.) The Court rejected Oskowis’s first claim—that the District
12 had failed to monitor E.O.’s progress in relation to the objectives set out in his IEP—
13 because, under the IDEA, how progress toward short-term objectives or benchmarks is to
14 be monitored or provided “is left up to the IEP drafters.” (Id. at 9-10.) E.O.’s IEP “only
15 required the District to provide three progress reports during the school year,” which
16 Oskowis acknowledged he received. (Id.) The Court also rejected Oskowis’s second
17 claim, that the District should have amended E.O.’s IEP because E.O. wasn’t meeting his
18 STOs, because “[t]here is no requirement that a school revise an IEP midway through the
19 school year when a student isn’t making progress toward STOs.” (Id. at 10-11.)

20 2. Cause Of Action II: 16C-DP-066-ADE

21 Cause of Action II arose from administrative proceeding 16C-DP-066-ADE, which
22 Oskowis initiated on June 16, 2016 by filing a due process complaint. (Doc. 17 ¶ 57.)
23 Oskowis argued the District denied E.O. a FAPE over three calendar years because: (1) the
24 District didn’t provide a qualified paraprofessional to E.O.; (2) the paraprofessional
25 provided by the District wasn’t adequately supervised by the special education teacher; and

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27 ¹ Although the order stated the “Complaint is dismissed as a matter of law for failure
28 to state a claim” (Doc. 75-1 at 6), it also included a footnote suggesting the ALJ was making
a “summary judgment determination” rather than “a possible sufficiency determination.”
(Doc. 75-1 at 2 n.1.)

1 (3) the IDEA precluded E.O.’s paraprofessional from providing services within E.O.’s self-
2 contained special education classroom. (Id. ¶ 59; Doc. 69-1 at 42-56.)

3 The District filed a response on June 24, 2016. Included as attachments to the
4 response were “affidavits from two of [E.O.’s] prior special education teachers attesting
5 that they provided direct supervision of the paraprofessional” as well as evidence
6 demonstrating the paraprofessional’s qualifications. (Doc. 75-1 at 11; see also Doc. 69
7 ¶¶ 12-15, 17-20.)

8 During a “prehearing conference,” the ALJ asked Oskowis to address the evidence
9 that had been submitted by the District. Oskowis “acknowledged . . . that [he] had no
10 information or belief to support [his] allegation that the paraprofessional did not meet the
11 requirements . . . to be considered a qualified paraprofessional” and similarly “offered no
12 basis for [his] allegation that the special education teacher did not properly supervise the
13 paraprofessional.” (Doc. 75-1 at 10-11; see also Doc. 69 ¶ 16.)

14 Accordingly, on March 13, 2017, the ALJ issued an order dismissing Oskowis’s
15 complaint for failure to state a claim. (Doc. 75-1 at 9-12.) The order concluded: “Given
16 the baseless assertions presented in the Complaint, Petitioners’ Complaint is deemed
17 frivolous. IT IS ORDERED granting Respondent School District’s Motion to Dismiss the
18 Complaint.” (Id. at 12, emphasis omitted.)

19 This Court granted summary judgment to the District on Cause of Action II, holding
20 that the ALJ had properly dismissed each of Oskowis’s claims in that proceeding. (Doc.
21 77 at 11-13.) First, the Court held that E.O.’s paraprofessional—Ms. Parry—was qualified
22 because she “holds a high school diploma (Doc. 69-2 at 10) and she obtained a passing
23 score on Education Testing Services’ ParaPro Assessment (id. at 12-15),” which means she
24 satisfied the requirements to be deemed “highly qualified” under the NCLB, which was in
25 effect during the three years at issue. (Doc. 77 at 12.) The Court also noted that, at the
26 prehearing conference held by the ALJ in the administrative proceeding, Oskowis admitted
27 “he didn’t have any evidence to show the paraprofessional was unqualified.” (Id., citing
28 Doc. 75-1 at 10-11.)

1 Second, for similar reasons, the Court upheld the ALJ’s determination that Oskowis
2 hadn’t demonstrated that the special education teacher failed to supervise Ms. Parry. (Id.
3 at 13.) The Court explained that the District had presented evidence during the
4 administrative proceedings that satisfied each of the supervision requirements in the
5 NCLB.² Moreover, Oskowis “conceded, during the prehearing conference, that he didn’t
6 have any contrary evidence,” and had, during an earlier due process hearing, “testified he
7 had never observed E.O. in the classroom and didn’t have any first-hand knowledge of
8 what occurred in the classroom.” (Doc. 77 at 13 & n.9, citing Doc. 75-1 at 11 n.2.)

9 Third, the Court determined the ALJ correctly rejected Oskowis’s claim “that the
10 IDEA prohibits supplementary aids from rendering services outside a regular education
11 classroom.” (Doc. 77 at 13.) This is because “[u]nder 34 C.F.R. § 300.42, ‘supplementary
12 aids and services’ mean ‘aids, services, and other supports that are provided in regular
13 education classes, other education-related settings, and in extracurricular and nonacademic
14 settings, to enable children with disabilities to be educated with nondisabled children to the
15 maximum extent appropriate’ Id. (emphases added). Therefore, “the ALJ properly
16 concluded that ‘supplementary aids and services may be provided in a variety of academic
17 and nonacademic settings’ (Doc. 75-1 at 11) and that Oskowis’s arguments on this issue
18 didn’t state a claim as a matter of law.” (Doc. 77 at 13.)

19 3. Cause Of Action III: 17C-DP-053-ADE

20 The third cause of action arose from proceeding 17C-DP-053-ADE, which Oskowis
21 initiated by filing a due process complaint on March 2, 2017. (Doc. 17 ¶ 78.) Oskowis
22 alleged the District denied E.O. a FAPE because, between August 5, 2015 and December
23 16, 2015, the District didn’t begin delivering services to E.O. until 9:00 a.m., which “would
24 not allow enough time for the services of the IEP to be adequately delivered.” (Doc. 69-3
25 at 8.)

26 ² Under the NCLB, a paraprofessional works under the direct supervision of a special
27 education teacher if (1) “[t]he teacher plans the instructional activities that the
28 paraprofessional carries out”; (2) “[t]he teacher evaluates the achievement of the students
with whom the paraprofessional is working”; and (3) “[t]he paraprofessional works in close
and frequent physical proximity to the teacher.” 34 C.F.R. § 200.59(c)(2).

1 The ALJ issued an order on March 10, 2017 dismissing Oskowis’s due process
2 complaint and an order on March 28, 2017 denying reconsideration. (Doc. 75-1 at 14-17.)
3 The March 28 order concluded: “Petitioners’ instant due process complaint fails as a matter
4 of law and should be dismissed. Based on the fact that Petitioners’ previous two complaints
5 on the exact same issue were dismissed, Petitioners knew or should have known that the
6 Complaint does not raise a valid claim under the IDEA. For this reason, Petitioners’ instant
7 due process complaint is deemed to be frivolous.” (Doc. 75-1 at 16.)

8 This Court granted summary judgment on Cause of Action III in favor of the
9 District. (Doc. 77 at 14-15.) The Court reasoned that, even if “the District didn’t begin
10 delivering services to E.O. until 9:00 a.m.” each day, there would still be 1,725 minutes in
11 the school week in which to administer E.O.’s IEP, and the IEP only provided for 1,170
12 minutes of special instruction. (Id.) Thus, Oskowis failed to state a claim as a matter of
13 law.

14 **B. Analysis**

15 The District moves for attorneys’ fees, arguing that Oskowis’s lawsuit was both
16 frivolous and brought for an improper purpose. (Doc. 124.) The District seeks fees for
17 both its defense of Oskowis’s claims and the time spent preparing its fee request. *Banda*
18 *v. Antelope Valley Union High Sch. Dist.*, 637 F. App’x 335, 336 (9th Cir. 2016) (district
19 court may award “fees on fees”). 20 U.S.C. § 1415(i)(3)(B)(i)(III) permits the Court to
20 award “reasonable attorneys’ fees as part of the costs” to a prevailing educational agency
21 against a parent who brought an action “for any improper purpose, such as to harass, to
22 cause unnecessary delay, or to needlessly increase the cost of litigation.” Thus, for the
23 Court to award fees to the District, it must determine (1) the District was the prevailing
24 party and (2) Oskowis brought the action for an improper purpose. If the Court finds in
25 the affirmative on both those issues, it must assess the reasonableness of the fees sought.

26 1. Prevailing Party

27 The District argues it was the prevailing party and Oskowis doesn’t dispute this
28 assertion. The Court agrees. On February 19, 2019, the Court granted summary judgment

1 to the District on all of Oskowis’s affirmative claims. (Doc. 77). A party that has obtained
2 a judgment on the merits, like the District has here, is a prevailing party under the IDEA.
3 P.N. v. Seattle Sch. Dist. No. 1, 474 F.3d 1165, 1172-73 (9th Cir. 2007) (holding that “some
4 judicial sanction,” which includes a judgment on the merits, is necessary to be a “prevailing
5 party” under the IDEA); G.M. v. Saddleback Valley Sch. Dist., 2012 WL 5947213, *1 n.3
6 (C.D. Cal. 2012) (district that was successful in defending against IDEA action brought by
7 parent was prevailing party).

8 2. Improper Purpose

9 The Court must first determine whether Oskowis’s action was frivolous before it
10 considers whether the action was brought for an improper purpose. R.P. ex rel. C.P. v.
11 Prescott Unified Sch. Dist., 631 F.3d 1117, 1126 (9th Cir. 2011) (“As a matter of law, a
12 non-frivolous claim is never filed for an improper purpose.”).³

13 When determining whether an action was frivolous, the district court should “resist
14 the understandable temptation to engage in post hoc reasoning by concluding that, because
15 a plaintiff did not ultimately prevail, his action must have been unreasonable or without
16 foundation.” C.W. v. Capistrano Unified Sch. Dist., 784 F.3d 1237, 1245 (9th Cir. 2015)
17 (citation omitted). Accordingly, “[a] case may be deemed frivolous only when the result
18 is obvious or the . . . arguments of error are wholly without merit.” Id. (citation omitted).
19 A case is less likely to be considered frivolous “when there is very little case law on point
20 and a claim raises a novel question.” Id.

21 All three of Oskowis’s causes of action were frivolous. First, Cause of Action I
22 (17C-DP-013-ADE) was wholly without merit. Oskowis’s first claim, that the District
23 wasn’t monitoring E.O.’s progress, was flatly contradicted by Oskowis’s acknowledgment
24 that he had received three progress reports during the 2015-2016 school year. (Doc. 75-1
25 at 5.) His second claim relied on an objectively baseless interpretation of the regulations

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27 ³ The standard to determine whether a claim is frivolous under the IDEA is the same
28 as that employed in civil rights cases and, thus, the Court employs the standard developed
in *Christiansburg Garment Co. v. EEOC*, 434 U.S. 412, 421-22, (1978). R.P., 631 F.3d at
1124-25.

1 implementing the IDEA that had previously been rejected. The Supreme Court has
2 explained that an educational agency is required to review, and if appropriate, revise a
3 child’s IEP, but not more frequently than each year. *Bd. of Educ. of Hendrick Hudson*
4 *Cent. Sch. Dist., Westchester Cty. v. Rowley*, 458 U.S. 176, 182 (1982) (“Local or regional
5 educational agencies must review, and where appropriate revise, each child’s IEP at least
6 annually.”) (citation omitted) (emphasis added). Oskowis had argued that the District was
7 required to amend E.O.’s IEP “as appropriate,” which he asserted was more than once a
8 year. (Doc. 70 at 6-7.) This wasn’t the first time Oskowis had unsuccessfully made this
9 argument—in the administrative proceeding giving rise to this cause of action, the ALJ
10 explained that, during an earlier administrative proceeding (Case No. 14C-DP-006-ADE),
11 an ALJ had rejected Oskowis’s argument that the District failed to revise his IEP “as
12 appropriate.” (Doc. 75-1 at 4.) Thus, Cause of Action I was frivolous.

13 In his response to the District’s motion, Oskowis only identifies one reason why
14 Count I should be deemed non-frivolous—because the underlying ALJ decisions were
15 issued within a day of each other and he suspected this “strong temporal . . . relationship”
16 showed the decisions were issued in retaliation for his filing of complaints against the
17 District with the Arizona Department of Education. (Doc. 128-1 at 10.) This conspiracy
18 theory hardly illustrates that the claims Oskowis was advancing in Count I had a reasonable
19 foundation in fact or law.

20 All three claims in Cause of Action II (16C-DP-066-ADE) were also frivolous.
21 Oskowis’s first two claims, that E.O.’s paraprofessional was unqualified and lacked
22 adequate supervision, didn’t have any evidentiary support. Indeed, at a pre-hearing
23 conference during the administrative proceeding, Oskowis “acknowledged . . . that [he]
24 had no information or belief to support [his] allegation that the paraprofessional did not
25 meet the requirements . . . to be considered a qualified paraprofessional” and similarly
26 “offered no basis for [his] allegation that the special education teacher did not properly
27 supervise the paraprofessional.” (Doc. 75-1 at 10-11.) At the same time, the District
28 offered evidence affirmatively showing that E.O.’s paraprofessional was both qualified and

1 adequately supervised. Nevertheless, Oskowis brought this action appealing the ALJ's
2 decision. Because Oskowis had no basis to believe that E.O.'s paraprofessional was
3 unqualified or inadequately supervised, those claims were frivolous.

4 Oskowis's third claim in Cause of Action II was frivolous as well. Oskowis's legal
5 argument that IDEA doesn't allow a paraprofessional to provide services in a self-
6 contained special education classroom is obviously wrong—the plain language of the
7 statute explicitly provides that “supplementary aids and services” are “aids, services, and
8 other supports that are provided in regular education classes [and] other education-related
9 settings.” 34 C.F.R. § 300.42 (emphasis added).

10 In his response to the District's motion, Oskowis contends that Count II should be
11 deemed non-frivolous (1) due to the same conspiracy theory he advances with respect to
12 Count I (Doc. 128-1 at 10) and (2) because a litigant's failure to submit affirmative
13 evidence in support of a claim shouldn't be viewed as proof the claim was frivolous (id. at
14 11). These arguments are unavailing. As the District persuasively argues in its reply: “The
15 failure to present additional evidence in an IDEA appeal alone does not indicate an
16 improper purpose. However, in the specific context of Cause of Action #2, it very much
17 does. Plaintiff's claims in Cause of Action #2 in the underlying due process complaint
18 failed because he ‘didn't have any evidence to show the paraprofessional was unqualified
19 or improperly supervised.’ Yet, he filed this lawsuit, and this Court granted the District's
20 summary judgment for the same reason. Plaintiff could not have objectively believed that
21 this Court would overrule the ALJ's decision in the absence of any evidence supporting his
22 claims.” (Doc. 133 at 3, citation omitted.)

23 Finally, Cause of Action III (17C-DP-053-ADE) was frivolous. Oskowis argued
24 that, because E.O.'s bus arrived late to pick him up, there wasn't enough time in the day to
25 deliver the services required by his IEP. Notably, administrative proceeding 17C-DP-053-
26 ADE was not the first time Oskowis had unsuccessfully argued E.O. was denied a FAPE
27 because his bus was late. (Doc. 75-1 at 16.) Basic math disproves this theory. Even if the
28 bus didn't arrive until 9:00 a.m. each day, there were still 1,725 minutes of potential

1 instruction time remaining per week. (Doc. 77 at 15.) E.O.’s IEP only provided for 1,170
2 minutes of special education and related services per week. (Id.) Therefore, Oskowis’s
3 argument that E.O. was deprived of a FAPE was baseless.

4 In his response to the District’s motion, Oskowis contends that Count III should be
5 deemed non-frivolous because the ALJs failed to clearly indicate, in the administrative
6 orders denying his earlier complaints concerning the late bus, that the orders were final
7 judgments. (Doc. 128-1 at 7-9.) But this argument misses the point—Oskowis has not
8 identified any objective reason why he could have reasonably hoped to prevail on this
9 claim.

10 Finally, Oskowis also argues that, in general, his claims couldn’t have been
11 frivolous because the District filed a Rule 12(c) motion for judgment on the pleadings at
12 the outset of the case (Doc. 38), this motion was stricken due to the District’s failure to
13 meet-and-confer with him before filing it (Doc. 61), and the District thereafter declined to
14 refile it. (Doc. 128-1 at 4-7.) According to Oskowis, “the District’s failure to refile their
15 12(c) Motion is in itself a clear indication that [the] District was acknowledging through
16 inaction that the . . . Amended Complaint actually had claim(s) on which relief could be
17 granted.” (Id. at 6-7.) But there are all sorts of legitimate tactical reasons why the District
18 could have concluded the most efficient way to dispose of Oskowis’s frivolous claims,
19 after its Rule 12(c) motion was stricken, was to proceed to summary judgment. Indeed,
20 the order granting Oskowis’s motion to strike the Rule 12(c) motion noted that the “volume
21 and substance” of the parties’ early motions was “very concerning to the Court in that they
22 are highly indicative of . . . the parties’ general inability to engage in good faith discussions
23 prior to seeking judicial intervention.” (Doc. 61 at 1 n.1.)

24 Having determined the action was frivolous, the Court next considers whether
25 Oskowis brought the action for an improper purpose. IDEA’s improper-purpose prong
26 “comes from another well-established Federal law: Federal Rule of Civil Procedure 11,”
27 R.P., 631 F.3d at 1124, so Rule 11(b) governs the Court’s analysis, C.W., 784 F.3d at 1248.
28 20 U.S.C. § 1415(i)(3)(B)(i)(III) “gives examples of improper purposes, including ‘to

1 harass, to cause unnecessary delay, or to needlessly increase the cost of litigation.” C.W.,
2 784 F.3d at 1244. “An improper purpose is tested by objective standards and may be found
3 where a motion or paper, other than a complaint, is filed in the context of a persistent
4 pattern of clearly abusive litigation activity.” Id. at 1248-49 (citations and internal
5 quotation marks omitted).

6 The Court agrees with the District that Oskowis brought this action for the improper
7 purposes of harassing the District and driving up litigation costs. Over the past nine years,
8 Oskowis has initiated 43 separate legal actions against the District. Although it is true, as
9 Oskowis points out in his response, that a handful of those actions resulted in rulings in
10 Oskowis’s favor (Doc. 128-1 at 1-2, 14-15), the overall pattern is one of excessive
11 litigiousness. More important, in this action, Oskowis advanced frivolous, indefensible
12 claims and consistently exhibited harassing litigation tactics. For example, Oskowis filed
13 five motions to strike. (Docs. 21, 32, 39, 88, 110.) “[M]otions to strike often needlessly
14 extend litigation . . . [and] are generally disfavored.” *McAllister v. Adecco USA Inc.*, 2017
15 WL 11151051, *2 (D. Haw. 2017) (citation omitted). Oskowis also opposed the District’s
16 request for a 10-day extension to file a reply in support of its motion for summary
17 judgment. (Doc. 73.)

18 Oskowis’s most blatant gamesmanship occurred with respect to the District’s
19 motion for attorneys’ fees. On April 24, 2019, the Court issued an order holding that the
20 District couldn’t move for attorneys’ fees until a final judgment was entered. (Doc. 101.)
21 In response, the District moved to dismiss its counterclaims so there could be a final
22 judgment. (Doc. 104.) In response, Oskowis stated he would “consent to the dismissal of
23 the District’s counterclaims, if the District’s counterclaims [were] dismissed with
24 prejudice.” (Doc. 105 at 2.) Oskowis explained that he was “concerned if the District fails
25 to prevail to collect attorney fees under Rule 54 and that the current counterclaims are
26 dismissed without prejudice, that the District can pursue the current counterclaims for
27 attorney fees again either in federal or state court.” (Id.) The Court considered Oskowis’s
28 concerns and dismissed the District’s counterclaims with prejudice, but specifically noted

1 in its dismissal order that the District could still file a motion for attorneys' fees "[w]ithin
2 14 days of entry of judgment." (Doc. 107.) After the District timely filed such a motion,
3 Oskowis moved to strike, arguing that the Court had "granted [his] request that the
4 District's counterclaims be dismissed with prejudice," which "effectively precludes the
5 District from seeking attorney's fees and costs." (Doc. 110 at 1-2.) In hindsight, Oskowis's
6 offer to consent to dismissal with prejudice appears to have been an attempt to trick the
7 District into agreeing to seek dismissal, so that Oskowis could then argue the with-
8 prejudice dismissal precluded the District from recovering attorneys' fees against him.

9 In sum, Oskowis's tactics in litigating this case demonstrate he brought this action
10 for the improper purposes of harassing the District and driving up litigation costs.

11 3. Reasonableness Of Attorney Fees

12 The District seeks attorneys' fees in the amount of \$47,627.54 for defending this
13 action and seeking attorneys' fees. (Doc. 133 at 7.) Pursuant to the Court's June 24, 2019
14 order, the District provided the Court with an electronic Microsoft Excel spreadsheet
15 "containing an itemized statement of legal services with all information required by Local
16 Rule 54.2(e)(1)." (Doc. 107 at 2.) In response, Oskowis indicated in the spreadsheet his
17 objections to each contested entry. The District then provided responses to Oskowis's
18 objections and voluntarily reduced some of the entries. The final version of the spreadsheet
19 is provided as an attachment to this order.

20 "The burden of establishing entitlement to an attorneys' fees award lies solely with
21 the claimant. . . . Where the documentation is inadequate, the district court is free to reduce
22 an applicant's fee award accordingly." *Trustees of Directors Guild of Am.-Producer*
23 *Pension Benefits Plans v. Tise*, 234 F.3d 415, 427 (9th Cir.), opinion amended on denial of
24 reh'g, 255 F.3d 661 (9th Cir. 2000); see also LRCiv. 54.2(e)(2) ("If the time descriptions
25 are incomplete, or if such descriptions fail to adequately describe the service rendered, the
26 court may reduce the award accordingly.").

27 The Court has reviewed each contested billing entry. Rather than address each one
28 individually, which would unnecessarily lengthen this opinion (there are more than 200

1 contested entries), the Court has organized the entries into categories.

2 **a. Duplicate Time Entries**

3 Oskowis identifies several time entries that he argues are duplicates.⁴ The District
4 acknowledges that many of those time entries are duplicates, due to “an error in
5 transcription from the billing statement to the Excel spread sheet.” (Doc. 133 at 4.) The
6 Court will not award fees for the duplicates.

7 The District has indicated that the remaining contested entries, reference numbers
8 91-92, 882, 1034, and 1039, are multiple entries for tasks that were done over a continuing
9 period of time, rather than duplicates. Specifically, reference numbers 882, 1034, and 1039
10 all relate to drafting the motion for summary judgment and the reply, which the District
11 argues it “researched, drafted, and revised over the course of several days if not weeks.”
12 (Id. at 5.) The Court is satisfied those entries aren’t duplicates, so it won’t remove them as
13 such.

14 **b. Excessive Or Unnecessary Time Entries**

15 Oskowis objects to 15 entries as “excessive, redundant or otherwise unnecessary.”
16 (Doc. 128-1 at 12.)⁵ He argues that certain individuals “never billed for less than 0.2 of an
17 hour, even for those time entries that would reasonably take less than 0.1 of an hour (or 6
18 minutes) to do so.” (Id.)

19 The District has voluntarily deleted reference number 970. The District has also
20 voluntarily reduced reference numbers 12, 27, 58, 70, 216, 217, 249, 840, 908, and 1062.
21 The District’s reduction of each of these reference numbers (most by .1) is sufficient. As
22 for two other challenged entries—reference numbers 225 and 609—the District notes these
23 entries had “already been discounted by 50 percent.” The District’s reduction of the entries
24 by half is sufficient.

25 Finally, the District contends that reference numbers 90 (Review Notice of Service

26 ⁴ The time entries at issue are reference numbers 26, 91-92, 373, 391, 399, 404-406,
27 411-413, 421-423, 442, 451, 461, 529, 544, 619, 621, 634, 735, 767, 830, 864, 867, 882,
899, 901, 909, 1034, 1039, 1043-1044, and 1048.

28 ⁵ The time entries at issue are reference numbers 12, 27, 58, 70, 90, 158, 216, 217,
225, 249, 609, 840, 908, 970, and 1062.

1 of Amended Complaint: .2 hours) and 158 (E-mail M. Oskowis regarding scheduling: .2
2 hours) aren't excessive, redundant, or otherwise unnecessary. The Court agrees that these
3 fees are reasonable.

4 **c. Vague Time Entries**

5 Oskowis argues that more than 200 of the District's time entries are "[l]acking
6 appropriate detail" pursuant to LRCiv 54.2(e)(2). The Court has reviewed each entry for
7 sufficiency under the local rules.

8 First, there are 15 entries related to telephone calls or telephone conferences that fail
9 to provide sufficient details. The Local Rules provide that, when seeking attorneys' fees
10 for telephone conferences, the "time entry must identify all participants and the reason for
11 the telephone call." LRCiv 54.2(e)(2)(A). Fourteen of the telephone entries don't include
12 the subject matter of the conversation⁶ and one fails to identify the counterparty.⁷ The
13 Court will not award fees for these 15 entries.

14 Next, there are approximately 40 entries related to drafting or reviewing emails or
15 letters that fail to provide sufficient details. Although the local rules don't provide an
16 explanatory example for how emails or letters should be documented in an attorneys' fee
17 motion, the closest parallel is telephone conferences. See LRCiv 54.2(e)(2)(A). Thus, the
18 Court will not grant attorneys' fees for email/letter time entries that don't identify to whom
19 the email/letter was sent⁸ or the subject matter of the email/letter.⁹

20 _____
21 ⁶ Those entries are reference numbers 8, 26, 28, 32, 168, 459, 599, 603, 606, 619,
22 623, 626, 673, and 863.

23 ⁷ That entry is reference number 1016.

24 ⁸ The email/letter time entries without a listed recipient are reference numbers 716,
25 924, and 998.

26 ⁹ The email/letter time entries without the subject matter listed are reference numbers
27 1, 25, 30, 46, 48, 50, 52-55, 64, 93, 137, 286, 395, 504, 592, 605, 620, 624, 627-628, 752,
28 798, 805, 809, 826, 868, 875-876, 883-884, 890, 898, 920, 1040, 1061, and 1089. Some
of these entries were voluntarily deleted by the District. As to the remaining entries,
although the District argues that some of the emails and letters are protected by attorney-
client privilege, the District could have indicated the subject matter of the emails/letters
without violating that privilege. *Stein v. Tri-City Healthcare Dist.*, 2014 WL 12695385,
*2 (S.D. Cal. 2014) ("The attorney-client privilege attaches to the content of the
communications between the client and attorney, not the fact or general topic of the
confidential communication.").

1 There are approximately 40 entries related to reviewing various documents. In 30
2 of those entries, the District indicated that it reviewed various documents filed with the
3 Court or otherwise provided sufficient detail regarding exactly what was reviewed. See,
4 e.g., reference number 166 (“Review Joint Statement and Oskowis’ response”); reference
5 number 891 (“Review joint report and good faith settlement talks”); reference number 939
6 (“Read MO’s due process complaint”). The Court will award attorneys’ fees for those
7 entries.¹⁰ The Court deems insufficient, however, those entries in which the District didn’t
8 make clear what exactly it reviewed.¹¹

9 The largest category of time entries relates to drafting, revising, and editing various
10 documents filed with the Court. This category includes 105 entries. When seeking
11 attorneys’ fees for preparing pleadings or other papers, LRCiv 54.2(e)(2)(C) requires that
12 the time entry “identify the pleading, paper or other document prepared and the activities
13 associated with its preparation.” Each of the 105 entries indicates the document being
14 prepared and associated task (i.e., drafting, revising, editing, finalizing). The Court will
15 therefore award attorneys’ fees for those tasks.¹²

16 Finally, there are some miscellaneous time entries. For example, there are four
17 entries related to fact development. Three of those entries—reference numbers 117, 239,
18 and 865—specify the document for which the fact investigation was being conducted. The
19 Court will award attorneys’ fees for those entries. However, the Court won’t award
20 attorneys’ fees for reference number 704, which merely states “strategy and fact finding.”
21 Next, there are three entries related to research. LRCiv 54.2(e)(2)(B) requires that those

22 ¹⁰ Those entries are reference numbers 22, 166, 311, 327, 330, 369, 371, 591, 602,
23 607, 608, 611, 618, 622, 625, 635, 686, 810, 819, 827, 851, 853, 854, 891, 900, 906, 917,
939, 973, and 984.

24 ¹¹ Those entries are reference numbers 84, 361-362, 523, 598, 703, 717, 731, 907, 928,
25 and 1054. The District has already voluntarily deleted some of those.

26 ¹² Those entries are reference numbers 20, 42, 59, 67, 76, 79, 80, 82, 96, 102, 116,
27 139, 141, 143, 147, 153, 160, 113, 164, 174, 176, 177, 182, 186, 198, 209, 232, 235, 240,
241, 242, 243, 248, 257, 258, 259, 263, 372, 376, 402, 414, 443, 488, 490, 494, 498, 524,
28 530, 531, 536, 539, 550, 541, 581, 584, 604, 672, 693, 733, 734, 751, 768, 796, 797, 807,
849, 888, 889, 922, 948, 951, 954, 961, 962, 963, 969, 971, 972, 974, 975, 976, 979, 986,
987, 988, 993, 995, 996, 1020, 1027, 1036, 1037, 1039, 1042, 1047, 1049, 1059, 1060,
1071, 1078, 1080, 1085, 1088, 1092, and 1094.

1 entries “identify the specific legal issue researched and, if appropriate, . . . identify the
2 pleading or document the preparation of which occasioned the conduct of the research.”
3 None of the research entries “identify the specific legal issue researched.”¹³ And reference
4 numbers 305, 307, 328, 385, and 866 are either too vague or do not make clear what exactly
5 was done. Accordingly, the Court won’t award attorneys’ fees for those time entries.

6 **d. Other Objections**

7 Oskowis objects to several entries as “block billing.”¹⁴ The Court will not reduce
8 the fees based on this objection. First, to the extent these entries were deficient for other
9 reasons, the Court has already addressed those deficiencies and reduced the fees
10 accordingly. Second, as the District indicated in some of its responses, many of the entries
11 at issue were not actually block-billing. Third, Oskowis has not pointed to a rule or any
12 case law categorically prohibiting block-billing—although the Ninth Circuit has stated that
13 “block billing makes it more difficult to determine how much time was spent on particular
14 activities,” *Welch v. Metro. Life Ins. Co.*, 480 F.3d 942, 948 (9th Cir. 2007), because the
15 entries provided sufficient detail regarding the various tasks that were performed, the fact
16 that the tasks are included in a single entry does not render the entries deficient.

17 Oskowis also objects to several entries on the basis that “[i]nter-office
18 communications should not be billed.”¹⁵ He contends “[c]ommunications within a law
19 firm, regarding the case, whether personal, phone, or email should be part of doing business
20 and thus part of the firm[’]s overhead.” (Doc. 128-1 at 13.) The Court rejects this
21 objection. Oskowis does not cite any rule or case law in support of this objection and the
22 Court finds this is a proper task for attorneys to bill.

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24
25 ¹³ Those entries are reference numbers 255, 1032, and 1072.

26 ¹⁴ Those entries are reference numbers 57, 63, 85, 101, 116, 136, 139, 163, 166, 193,
27 200, 213, 234, 383, 432, 437, 478, 491, 493, 496, 524, 552, 553, 556, 586, 591, 598, 635,
28 672, 686, 751, 876, 891, 906, 931, 951, 953, 965, 968, 976, 987, 989, 990, 991, 994, 1034,
1037, 1039, 1074, and 1091.

¹⁵ Those entries are reference numbers 218, 360, 370, 382, 496, 610, 799, 877, 930,
942, 943, 945, 951, 978, 983, and 1053.

1 **e. Total Award**

2 After adjusting the amount sought consistent with the reductions identified above,
3 the Court awards the District \$41,244.38.¹⁶

4 **II. Oskowis’s Motion To Review Taxation Of Costs**

5 On July 25, 2019, the District filed an amended bill of costs seeking \$574.70. (Doc.
6 119.) These costs include “[f]ees for service of summons and subpoena” (\$177.50) and
7 “[f]ees for printed or electronically recorded transcripts necessarily obtained for use in the
8 case” (\$397.20). (Id. at 1.) The District attached corresponding receipts. (Id. at 3-4.)

9 Oskowis filed objections to the amended bill of costs. (Doc. 120.) His objections
10 fall into two categories: (1) the District’s alleged costs were not associated with Oskowis’s
11 affirmative claims and were instead only associated with the District’s counterclaims,
12 which the District voluntarily dismissed, and (2) under LRCiv. 54.1(e)(3), a party may not
13 seek deposition costs “associated with a video recording,” so the District cannot seek
14 subpoena or transcript fees related to the video-recorded deposition. (Id. at 3-5.)

15 On August 21, 2019, the clerk taxed costs in the amount of \$574.70 for the District.
16 (Doc. 123.)

17 Oskowis moves for the Court to (1) “review the action of the Clerk in taxing costs,
18 on the ground that the nature and amount of costs taxed for service of summons and
19 subpoena, and printed or electronically recorded transcripts necessarily obtained for use in
20 the case are incorrect and contrary to law,” and (2) “direct[] the Clerk to re-tax and adjust
21 the costs.” (Doc. 129.) The District has filed a response. (Doc. 132.)

22 The motion will be denied. First, that the deposition was used in connection with
23 the District’s counterclaims seeking attorneys’ fees is not a valid basis to object to the
24 deposition costs. Recoverable costs in an IDEA case are those set forth in 28 U.S.C.
25 § 1920. *Arlington Cent. Sch. Dist. Bd. of Educ. v. Murphy*, 548 U.S. 291, 297-98 (2006).
26 That statute permits a court to tax as costs “[f]ees of the clerk and marshal,” which the

27 _____
28 ¹⁶ This number was generated by reducing the total of the adjusted fees, \$54,992.50,
by 25 percent, which is what the District had agreed to do in its motion and reply. (Doc.
124-2 at 12; Doc. 133 at 7 n.1.)

1 Local Rules have clarified covers service fees, LRCiv. 54.1(e)(1), as well as “[f]ees for
2 printed or electronically recorded transcripts necessarily obtained for use in the case,” 28
3 U.S.C. § 1920(1)-(2). Neither 20 U.S.C. § 1415(i)(3)(B)(i)(III) nor 28 U.S.C. § 1920 limits
4 costs to those incurred in connection with defending against the opposing party’s claims.
5 Here, the costs the District is seeking could be characterized as incurred in connection with
6 litigating the District’s counterclaims or in seeking attorneys’ fees. Oskowis has not cited,
7 and the Court is not aware of, any authority prohibiting the Court from awarding such costs.
8 Thus, the Court will not deny the District’s request for costs on that basis.

9 The Court also rejects Oskowis’s second objection—that the District’s deposition
10 costs are not recoverable because they were incurred in connection with a videotaped
11 deposition. LRCiv. 54.1(e)(3), the provision addressing taxable deposition costs, states
12 that “[c]osts associated with a video recording are not taxable.” Notably, it does not state
13 that all costs associated with a videotaped deposition are not taxable. The logical
14 interpretation of that provision is that costs incurred in connection with a videotaped
15 deposition, other than those associated with the actual recording of the deposition, remain
16 taxable. The District provided in its response that it contacted the deposition reporting
17 service to determine why the invoice states “Rate Reflects Videotaped Deposition” and
18 learned it was charged 25 cents more per page for transcription because the deposition was
19 videotaped. (Doc. 132 at 3.) Thus, the District has agreed to decrease the costs it is seeking
20 by \$17.50, which is equal to the number of pages of the transcript (70) multiplied by 25
21 cents. This seems reasonable to the Court, and Oskowis chose not to file a reply
22 challenging this concession.

23 Thus, the clerk of court is directed to amend its taxation order to tax costs for the
24 District in the amount of \$557.20.

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Accordingly, **IT IS ORDERED** that:

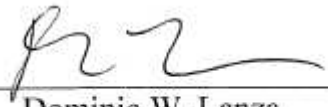
(1) The District's amended motion for attorneys' fees (Doc. 124) is **granted in part and denied in part;**

(2) Oskowis's motion to review taxation of costs (Doc. 129) is **granted in part and denied in part;**

(3) Oskowis must pay the District \$41,244.38 in attorneys' fees; and

(4) The clerk of court is directed to amend its taxation order to tax costs for the District in the amount of \$557.20.

Dated this 9th day of October, 2019.



Dominic W. Lanza
United States District Judge

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
1	4/19/2017	PMH	Review email from G. Staton and respond (2X).	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service is adequate. Moreover, attorney work product.		
2	4/19/2017	ADI	Review emails from Georgia Staton regarding new Complaint.	0.20	\$ 35.00	N				\$ 35.00
4	4/20/2017	PMH	Review acceptance of service; email District.	0.40	\$ 80.00	N				\$ 80.00
5	4/20/2017	ADI	Review venue requirement.	0.30	\$ 52.50	N				\$ 52.50
7	4/24/2017	PMH	Review complaint/file.	1.00	\$ 200.00	N				\$ 200.00
8	4/24/2017	PMH	Telephone conference with G. Staton and G. Lewis.	0.60	\$ 120.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service is adequate. Moreover, attorney work product.		
9	4/24/2017	ADI	Review service of process and authorization policy.	0.20	\$ 35.00	N				\$ 35.00
12	4/25/2017	ADI	Draft Notice of Appearance.	0.40	\$ 70.00	N	Excessive, redundant or otherwise unnecessary.	The District has decreased this entry to .1	0.1	\$ 17.50
13	4/25/2017	ADI	Telephone conference with Kacey Gregson regarding outstanding decisions.	0.30	\$ 52.50	N				\$ 52.50
14	4/25/2017	ADI	Draft letter to Matthew Oskowis regarding assignment of case.	0.30	\$ 52.50	N				\$ 52.50
15	4/25/2017	ADI	Review docket and Magistrate Judge jurisdiction consent form.	0.30	\$ 52.50	N				\$ 52.50
16	4/25/2017	ADI	Review FRCP 19 (Required Joinder).	0.30	\$ 52.50	N				\$ 52.50
17	4/25/2017	PMH	Telephone conference with M. Remus regarding service of complaint.	0.20	\$ 40.00	N				\$ 40.00
18	4/25/2017	ADI	Review FRCP 13 (Counterclaims).	0.30	\$ 26.25	Y				\$ 26.25
19	4/25/2017	PMH	Review Trust Documents and sign.	0.20	\$ 20.00	Y				\$ 20.00
20	4/26/2017	ADI	Draft Answer to Complaint.	0.80	\$ 140.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate.		\$ 140.00
21	4/27/2017	ADI	Draft letter to Plaintiff Parent regarding Waiver of Service and Defect of Complaint.	0.60	\$ 105.00	N				\$ 105.00
22	4/27/2017	PMH	Review answer.	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate.		\$ 80.00
23	4/27/2017	ADI	Revise letter to Plaintiff Parent regarding waiver and conferral.	0.40	\$ 70.00	N				\$ 70.00
24	4/27/2017	PMH	Review letter to M. Oskowis regarding notice.	0.30	\$ 60.00	N				\$ 60.00
25	4/27/2017	PMH	Review email from M. Remus and letter.	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate. Moreover, attorney client privilege		
26	4/27/2017	PMH	Telephone conference with M. Wright.	0.30	\$ 60.00	N	Duplicate of no charge #33	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
27	4/27/2017	PMH	Review and sign waiver of service.	0.20	\$ 40.00	N	Excessive, redundant or otherwise unnecessary.	The District has decreased this entry to .1	0.1	\$ 20.00
28	4/27/2017	PMH	Telephone conference with M. Remus.	0.20	\$ 40.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate. Moreover, attorney client privilege.		
29	4/27/2017	ADI	Review Order discouraging 12(b) Motions.	0.20	\$ 35.00	N				\$ 35.00
30	4/27/2017	ADI	Review email from Michael Remus and departure letter.	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate. Moreover, attorney client privilege.		
31	4/27/2017	ADI	Facts investigation regarding service, venue, counterclaim and joinder	0.40	\$ 35.00	Y				\$ 35.00
32	4/27/2017	ADI	Telephone Conference with Matthew Wright	0.30	\$ 26.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate. Moreover, attorney client privilege.		
37	4/28/2017	ADI	Review complaint and Orders of Dismissal in 17C-DP-044-ADE, 17C-DP-048-ADE, and 17C-DP-053-ADE	0.80	\$ 140.00	N				\$ 140.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
38	4/28/2017	ADI	Review Complaint and Order of Dismissal in 16C-DP-066-ADE.	0.50	\$ 87.50	N				\$ 87.50
39	4/28/2017	ADI	Review Complaint and Order of Dismissal in 17C-DP-013-ADE.	0.50	\$ 87.50	N				\$ 87.50
40	4/28/2017	PMH	Letter to Oskowis with Waiver of Service.	0.30	\$ 60.00	N				\$ 60.00
41	4/28/2017	ADI	Review 34 CFR 300.577 related to award of attorneys' fees against a parent.	0.20	\$ 35.00	N				\$ 35.00
42	4/28/2017	ADI	Draft Counterclaim.	2.50	\$ 218.75	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service is adequate. Moreover, this charge has been cut in half.		\$ 218.75
43	4/28/2017	PMH	Review draft counterclaim.	0.40	\$ 40.00	Y				\$ 40.00
46	5/4/2017	ADI	Draft letter to Superintendent	0.20	\$ 17.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate. Moreover, attorney client privilege. Furthermore, this entry has already been discounted by 50 percent.		
47	5/5/2017	ADI	Review Federal #1 Order regarding ALJ delay in issuance of decision.	0.50	\$ 87.50	N				\$ 87.50
48	5/5/2017	PMH	Review email from M. Oskowis and respond.	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service is adequate. Because Plaintiff was a party to the email reviewed, he is aware of its contents.		
49	5/5/2017	ADI	Review email from Matt Oskowis regarding conferral.	0.20	\$ 35.00	N				\$ 35.00
50	5/5/2017	ADI	Revise and finalize letter to Superintendent	0.60	\$ 52.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate. Moreover, attorney client privilege. Furthermore, this entry has already been discounted by 50 percent.		
51	5/8/2017	VF	Revise motions for summary judgment.	1.20	\$ 210.00	N	Legal representative not engaged at this time.	date of this entry must have been transcribed incorrectly because the motion for summary judgment was not yet pending. Regardless, the District has deleted this entry.	0	\$ -
52	5/8/2017	PMH	Review and revise letters.	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The District has deleted this entry.	0	\$ -
53	5/9/2017	PMH	Review email from G. Staton firm and respond.	0.20	\$ 40.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	Work product privilege		
54	5/9/2017	ADI	Review email.	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The District has deleted this entry.	0	\$ -
55	5/12/2017	PMH	Review email and respond to District.	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service is adequate. Moreover, it involves attorney client privilege.		
56	5/12/2017	ADI	Draft letter to Matthew Oskowis regarding dates/times for conferral.	0.30	\$ 52.50	N				\$ 52.50
57	5/16/2017	PMH	Review Waiver of Service; telephone conference with M. Remus.	0.30	\$ 60.00	N	Block billing	The description is specific enough to determine whether a reasonable amount of time was billed.		\$ 60.00
58	5/16/2017	PMH	Sign Notice of Appearance.	0.20	\$ 40.00	N	Excessive, redundant or otherwise unnecessary.	The District has decreased this entry to .1	0.1	\$ 20.00
59	5/16/2017	ADI	Finalize Notice of Appearance for filing.	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service is adequate		\$ 35.00
60	5/16/2017	ADI	Review Notice of Service and filing of Waiver of Summons.	0.20	\$ 35.00	N				\$ 35.00
61	5/16/2017	ADI	Review local rules and draft judge election form.	0.20	\$ 35.00	N				\$ 35.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
63	5/17/2017	PMH	Review file, court order, OSC against M. Oskowis; prepare for conferral meeting with M. Oskowis; conference with M. Oskowis.	0.70	\$ 140.00	N	Block billing	All of the activities in this billing relate to preparing for a conference with Mr. Oskowis. Therefore it is not impermissible block billing.		\$ 140.00
64	5/17/2017	PMH	Review emails and amendment; email district.	0.50	\$ 100.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate. Counsel finished her review of the amended complaint and then notified her client.		
65	5/17/2017	PMH	Review M. Oskowis' amended complaint.	0.40	\$ 80.00	N				\$ 80.00
66	5/17/2017	ADI	Telephone conference with Matt Oskowis regarding meet and confer over 12(b) dismissal issue.	0.30	\$ 52.50	N				\$ 52.50
67	5/17/2017	ADI	Draft response to Plaintiff regarding first Amended Complaint.	0.30	\$ 52.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	Because Plaintiff reviewed the response the District sent him regarding the first amended complaint, Plaintiff is aware of the details of this work.		\$ 52.50
68	5/17/2017	ADI	Review proposed first Amended Complaint submitted by Plaintiff.	0.20	\$ 35.00	N				\$ 35.00
70	5/18/2017	PMH	Review Petitioner's request to transfer from Magistrate.	0.20	\$ 40.00	N	Excessive, redundant or otherwise unnecessary.	The District has decreased this entry to .1	0.1	\$ 20.00
71	5/18/2017	ADI	Review latest filings from Plaintiff (i.e., judge election form) and court docket entry.	0.20	\$ 35.00	N				\$ 35.00
73	5/24/2017	PMH	Review M. Oskowis' Motion to Amend.	0.30	\$ 60.00	N				\$ 60.00
75	5/29/2017	PMH	Review Petitioner's Motion for Leave to Amend.	0.80	\$ 160.00	N				\$ 160.00
76	5/30/2017	ADI	Draft Answer to First Amended Complaint.	3.00	\$ 525.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate.		\$ 525.00
77	5/30/2017	ADI	Research 12(f) Motions to Strike.	0.50	\$ 87.50	N				\$ 87.50
78	5/30/2017	ADI	Review Complaint.	0.40	\$ 70.00	N				\$ 70.00
79	5/31/2017	ADI	Revise Answer to Complaint.	1.00	\$ 175.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate.		\$ 175.00
80	5/31/2017	ADI	Draft Defendant's Affirmative Defenses.	0.60	\$ 105.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate		\$ 105.00
81	5/31/2017	ADI	Draft jurisdictional section and background section of Counterclaim.	0.70	\$ 61.25	Y				\$ 61.25
82	5/31/2017	ADI	Draft Prayer for Relief and revise Counterclaim.	2.00	\$ 175.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service provided is adequate. Furthermore, this entry has already been discounted by 50 percent.		\$ 175.00
84	6/2/2017	PMH	Review electronic filing.	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The District has deleted this entry.	0	\$ -
85	6/6/2017	PMH	Review emails, answer and counterclaim.	0.20	\$ 20.00	Y	Block billing	This entry was for the review of the answer and amended counterclaim and associated activities. Thus, it is not impermissible block billing. Furthermore, this entry has already been halved.		\$ 20.00
87	6/7/2017	PMH	Review Amended Complaint.	0.50	\$ 100.00	N				\$ 100.00
90	6/9/2017	ADI	Review Notice of Service of Amended Complaint.	0.20	\$ 35.00	N	Excessive, redundant or otherwise unnecessary.			\$ 35.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
91	6/12/2017	PMH	Review revised Amended Complaint.	0.80	\$ 160.00	N	Duplicate of #87	This is not a duplicative entry. Counsel was simply continuing her review of the first amended complaint. A total of 1.7 hours was spent reviewing Plaintiff's first amended complaint.		\$ 160.00
92	6/13/2017	PMH	Review Amended Complaint.	0.40	\$ 80.00	N	Duplicate of #87	See above		\$ 80.00
93	6/13/2017	EAP	Review emails, reply	0.30	\$ 58.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The District has deleted this entry.	0	\$ -
96	6/14/2017	PMH	Review Answer to First Amended Complaint and Counterclaim and redraft.	1.00	\$ 100.00	Y	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is inadequate.		\$ 100.00
100	6/15/2017	ADI	Review Plaintiff's Motion to Amend Complaint and Court's Order granting Motion.	0.30	\$ 52.50	N				\$ 52.50
101	6/15/2017	ADI	Review Federal Rules of Civil Procedure 15 and calculate extension for filing Answer.	0.20	\$ 35.00	N	Block billing	This is not block billing.		\$ 35.00
102	6/16/2017	ADI	Revise Counterclaim.	0.30	\$ 26.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is inadequate.		\$ 26.25
103	6/19/2017	ADI	Review Answer and Counterclaim.	1.20	\$ 105.00	Y				\$ 105.00
104	6/19/2017	ADI	Review transcript from previous due process hearing regarding plaintiff's comments about Trina Spencer.	0.40	\$ 35.00	Y				\$ 35.00
116	6/20/2017	PMH	Review revised Answer and Counterclaim and revise both.	1.30	\$ 260.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	This is not block billing as both entries relate to the same document.		\$ 260.00
117	6/20/2017	ADI	Facts investigation regarding responses in Answer.	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 35.00
118	6/20/2017	PMH	Review Revisions to Answer and Counterclaim.	0.50	\$ 50.00	Y				\$ 50.00
131	6/27/2017	ADI	Review Fed. R. Civ. P. 12 regarding timeline for answering a counterclaim and calculate deadline.	0.20	\$ 17.50	Y				\$ 17.50
132	6/30/2017	ADI	Review Order Setting Rule 16 Scheduling Conference.	0.20	\$ 35.00	N				\$ 35.00
133	6/30/2017	ADI	Review local rules regarding Motions to Strike and time to file response; calculate deadline for filing response	0.30	\$ 26.25	Y				\$ 26.25
134	6/30/2017	PMH	Review Oskowis' Motion to Strike.	0.80	\$ 80.00	Y				\$ 80.00
135	7/3/2017	ADI	Review Plaintiff's Motion to Strike.	0.40	\$ 35.00	Y				\$ 35.00
136	7/5/2017	PMH	Review Rule 16 Scheduling Order and M. Oskowis' email.	0.40	\$ 80.00	N	Block billing	There are only two entries for a short period of time, which would reasonably take .4 hours. The description of services is adequate.		\$ 80.00
137	7/5/2017	PMH	Email M. Oskowis.	0.20	\$ 40.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	Plaintiff was a party to this email and can review how long it was.		
138	7/5/2017	ADI	Review email from Plaintiff regarding scheduling Rule 16 Conference and status of settlement negotiations.	0.20	\$ 35.00	N				\$ 35.00
139	7/10/2017	PMH	Review and finalize Answer and Counterclaim.	0.40	\$ 40.00	Y	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate and is not impermissible block billing. Furthermore, the entry has already been discounted by 50 percent.		\$ 40.00
140	7/10/2017	ADI	Review cases cited by Plaintiff in Motion to Strike.	0.40	\$ 35.00	Y				\$ 35.00
141	7/10/2017	ADI	Draft Response to Plaintiff's Motion to Strike.	0.90	\$ 78.75	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 78.75
142	7/10/2017	ADI	Review Responses to Plaintiff's Motions to Strike Affirmative Defenses in Fed. #3.	0.20	\$ 17.50	Y				\$ 17.50

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
143	7/11/2017	ADI	Revise Response to Motion to Strike.	1.00	\$ 87.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry had already been discounted by 50 percent.		\$ 87.50
146	7/12/2017	ADI	Review Plaintiff's Answer to Defendant's Counterclaim.	0.30	\$ 26.25	Y				\$ 26.25
147	7/12/2017	ADI	Finalize draft Response to Plaintiff's Motion to Strike.	0.60	\$ 52.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 52.50
149	7/13/2017	ADI	Draft letter to Plaintiff regarding availability for discovery scheduling conference pursuant to Court Order and the Fed. R. Civ. P.	0.40	\$ 70.00	N				\$ 70.00
150	7/13/2017	PMH	Review letter regarding conference meet and confer dates.	0.20	\$ 40.00	N				\$ 40.00
151	7/13/2017	PMH	Review Oskowis' Answer.	0.60	\$ 60.00	Y				\$ 60.00
152	7/13/2017	PMH	Review Response to Motion to Strike	0.50	\$ 50.00	Y				\$ 50.00
153	7/13/2017	ADI	Finalize for filing with the court the District's Response to Plaintiff's Motion to Strike.	0.50	\$ 43.75	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent..		\$ 43.75
154	7/13/2017	TM	Review Attorney Ivan's Citations and Shepardize cases in Motion to Strike.	0.50	\$ 26.25	Y				\$ 26.25
157	7/14/2017	PMH	Review proposed Joint Case Management Plan and revise.	1.00	\$ 200.00	N				\$ 200.00
158	7/18/2017	PMH	E-mail M. Oskowis regarding scheduling.	0.20	\$ 40.00	N	Excessive, redundant or otherwise unnecessary.	This entry is not excessive, redundant or otherwise unnecessary. It involved not only writing the words in the email to Plaintiff but also thinking about what should be in that email.		\$ 40.00
159	7/19/2017	PMH	Review conference meeting dates. Draft Joint Proposed Case	0.20	\$ 40.00	N				\$ 40.00
160	7/21/2017	ADI	Management Plan (Defendant's portion) pursuant to Court's Order Setting Rule 16 Scheduling Conference.	4.00	\$ 700.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 700.00
161	7/21/2017	ADI	Review Rule 26 regarding initial disclosure obligations in relation to Counterclaim.	0.40	\$ 35.00	Y				\$ 35.00
162	7/21/2017	ADI	Review Rules 16 and 26 regarding discovery of electronically stored information and assertions of privilege or protected work product.	0.30	\$ 26.25	Y				\$ 26.25
163	7/24/2017	ADI	Revise draft Joint Proposed Case Management Plan and email to Plaintiff regarding same in anticipation of conference.	1.40	\$ 245.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. It is not impermissible block billing as all entries relate to the joint case management plan.		\$ 245.00
164	7/25/2017	PMH	Review and finalize proposed Joint Case Management Plan.	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 60.00
165	7/25/2017	DA	Draft name and contact information portion of Defendant's Initial Discovery pleading.	0.30	\$ 15.75	Y				\$ 15.75
166	7/26/2017	PMH	Review Joint Statement and Oskowis' response.	1.00	\$ 200.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. It is not impermissible block billing as all entries relate to the joint case management plan.		\$ 200.00
167	7/26/2017	PMH	Telephone Conference with M. Oskowis regarding Joint Statement.	0.40	\$ 80.00	N				\$ 80.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
168	7/26/2017	PMH	Conference with T. Alley and M. Remus.	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Moreover, attorney client privilege		
169	7/26/2017	ADI	Review Plaintiff's proposed revisions and insertions into the draft Joint Proposed Case Management Plan.	0.40	\$ 70.00	N				\$ 70.00
170	7/26/2017	ADI	Telephone conference with Matthew Oskowis to discuss Joint Proposed Case Management Plan.	0.40	\$ 70.00	N				\$ 70.00
174	7/28/2017	ADI	Draft Defendant's Initial Disclosure pleading.	1.50	\$ 131.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 131.25
175	8/1/2017	ADI	Revise Defendant's portion of draft Joint Proposed Case Management Plan.	0.50	\$ 87.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 87.50
176	8/1/2017	ADI	Draft Notice of Service of Initial Disclosures.	0.30	\$ 26.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 26.25
177	8/4/2017	PMH	Review and revise answer.	0.50	\$ 100.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 100.00
178	8/4/2017	PMH	Review for documents to add to answer.	0.30	\$ 60.00	N				\$ 60.00
179	8/4/2017	ADI	Revise Defendant's Initial Disclosures with remaining witness address and phone contact information.	0.40	\$ 35.00	Y				\$ 35.00
182	8/5/2017	PMH	Review and revise Joint Statement.	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 80.00
184	8/7/2017	ADI	Review files for initial disclosures and identify documentation in support of claim for attorneys' fees to be copied.	0.80	\$ 70.00	Y				\$ 70.00
185	8/8/2017	ADI	Review files and identify documentation for initial disclosures to support counterclaim for attorneys's fees.	1.60	\$ 140.00	Y				\$ 140.00
186	8/8/2017	ADI	Finalize review of remaining files and identification of documents in support of claim.	1.20	\$ 105.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 105.00
187	8/8/2017	ADI	Review and finalize initial disclosures (documents and formal correspondences).	0.30	\$ 26.25	Y				\$ 26.25
188	8/8/2017	TM	Compile and Organize E-mails for Counter Claim.	0.70	\$ 36.75	Y				\$ 36.75
192	8/9/2017	ADI	Review and finalize emails to be released with Defendant's Initial Disclosures.	0.80	\$ 70.00	Y				\$ 70.00
193	8/9/2017	ADI	Finalize Attorney Fee and cost computations and initial disclosure pleading and sign same.	0.20	\$ 17.50	Y	Block billing	The attorney fee and cost computation are part of the initial disclosure and thus this is not impermissible block billing. Furthermore, this entry has already been discounted by 50 percent.		\$ 17.50
198	8/10/2017	ADI	Revise and finalize for filing Notice of Service of Defendant's Initial Disclosures.	0.20	\$ 17.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		\$ 17.50
200	8/14/2017	ADI	Finalize Proposed Joint Case Management Plan for Plaintiff's final review and approval and email to Plaintiff regarding same.	0.60	\$ 105.00	N	Block billing	Both entries go to the same activity - finalizing the case management plan. Thus, this entry is not impermissible block billing.		\$ 105.00
201	8/14/2017	ADI	Revise draft Joint Proposed Case Management Plan with Plaintiff's insertions.	0.50	\$ 87.50	N				\$ 87.50

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
202	8/14/2017	ADI	Draft letter to Plaintiff regarding receipt of revisions to Joint Proposed Case Management Plan.	0.40	\$ 70.00	N				\$ 70.00
203	8/14/2017	ADI	Review Plaintiff's email with revisions to Joint Case Management Plan and incorporate therein. Review email from Rebecca Vess	0.30	\$ 52.50	N				\$ 52.50
204	8/14/2017	ADI	regarding current contact information and willingness to assist District.	0.20	\$ 17.50	Y				\$ 17.50
205	8/16/2017	ADI	Review pleadings and draft letter to Plaintiff regarding confirmation of current mailing address.	0.60	\$ 105.00	N				\$ 105.00
206	8/17/2017	ADI	E-mail follow-up with Plaintiff regarding approval of final Joint Proposed Case Management Plan.	0.30	\$ 52.50	N				\$ 52.50
207	8/18/2017	ADI	Draft letter to Superintendent regarding submission of Joint Proposed Case Management Plan and current update.	0.60	\$ 105.00	N				\$ 105.00
208	8/18/2017	ADI	Draft letter to Plaintiff regarding filing of Joint Proposed Case Management Plan in lieu of approval.	0.40	\$ 70.00	N				\$ 70.00
209	8/18/2017	ADI	Finalize and file Joint Proposed Case Management Plan.	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 35.00
210	8/18/2017	ADI	Review email from Plaintiff regarding approval of Joint Proposed Case Management Plan and election to file.	0.20	\$ 35.00	N				\$ 35.00
211	8/23/2017	ADI	Compile necessary documentation for creation of pretrial scheduling conference notebook and potential oral argument on Palintiff's Motion to Strike.	0.50	\$ 43.75	Y				\$ 43.75
212	8/27/2017	ADI	Prepare for Pretrial Scheduling Conference.	1.00	\$ 175.00	N				\$ 175.00
213	8/28/2017	ADI	Prepare for and attend Pretrial Scheduling Conference.	1.00	\$ 175.00	N	Block billing	Both entries go to the same activity - participating in the pretrial scheduling conference. Thus, this entry is not impermissible block billing.		\$ 175.00
216	8/29/2017	ADI	Review email notice from court regarding Plaintiff's change of physical mailing address.	0.20	\$ 35.00	N	Excessive, redundant or otherwise unnecessary.	The District has decreased this entry to .1	0.1	\$ 17.50
217	8/29/2017	ADI	Review Minute Entry regarding appearance of parties for Rule 16 Scheduling Conference.	0.20	\$ 35.00	N	Excessive, redundant or otherwise unnecessary.	The District has decreased this entry to .1	0.1	\$ 17.50
218	8/30/2017	PMH	Conference with Attorney Ivan.	0.20	\$ 40.00	N	Inter-office communications should not be billed.	Inter-office communications relating to the billing of the case are properly billed.		\$ 40.00
219	8/30/2017	PMH	Review strategy regarding depositions.	0.30	\$ 30.00	Y				\$ 30.00
220	8/30/2017	ADI	Draft letter to Plaintiff regarding failure to timely serve Plaintiff's initial disclosures on Defendant.	0.50	\$ 43.75	Y				\$ 43.75
222	8/31/2017	PMH	Review Order regarding dismissal of some counterclaims.	0.50	\$ 50.00	Y				\$ 50.00
223	9/1/2017	PMH	Review Order regarding affirmative defense.	0.40	\$ 80.00	N				\$ 80.00
224	9/1/2017	ADI	Review Rule 16 Scheduling Order	0.40	\$ 35.00	Y				\$ 35.00
225	9/1/2017	ADI	Calculate dates set forth in Scheduling Order.	0.30	\$ 26.25	Y	Excessive, redundant or otherwise unnecessary.	This entry has already been discounted by 50 percent.		\$ 26.25
226	9/1/2017	ADI	Review Court's Order on Plaintiff's Motion to Strike.	0.30	\$ 26.25	Y				\$ 26.25
227	9/8/2017	PMH	Review Initial Disclosure	0.50	\$ 50.00	Y				\$ 50.00
228	9/10/2017	ADI	Review Plaintiff's email with list of initial disclosures.	0.30	\$ 26.25	Y				\$ 26.25
229	9/10/2017	ADI	Follow-up with Plaintiff regarding receipt of initial disclosure list.	0.20	\$ 17.50	Y				\$ 17.50

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
230	9/14/2017	ADI	Facts investigation regarding Plaintiff's initial discovery and scope thereof.	0.20	\$ 17.50	Y				\$ 17.50
232	10/23/2017	ADI	Revise First Amended Answer to Complaint.	1.00	\$ 175.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 175.00
233	10/23/2017	ADI	Draft track changes to First Amended Answer to Complaint for filing alongside Notice of Filing.	1.00	\$ 175.00	N				\$ 175.00
234	10/23/2017	ADI	Draft Notice of Filing Amended Pleading after review of Local Rules of Civil Procedure governing amended pleadings.	0.50	\$ 87.50	N	Block billing	These entries all go to the same activity - drafting notice of filing amended pleading - and therefore do not constitute impermissible block billing.		\$ 87.50
235	10/25/2017	PMH	Review and Revise counterclaim.	1.00	\$ 100.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 100.00
237	10/26/2017	EAP	Study cases from 9th Circuit and 2 District Court findings on pleadings.	0.90	\$ 175.50	N				\$ 175.50
238	10/26/2017	EAP	Research regarding standards for pleading, fees against parent.	0.80	\$ 156.00	N				\$ 156.00
239	10/26/2017	ADI	Facts investigation regarding First Amended Answer.	0.30	\$ 52.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 52.50
240	10/26/2017	ADI	Revise First Amended Answer and Counterclaim.	1.30	\$ 113.75	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 113.75
241	10/26/2017	ADI	Finalize for filing First Amended Answer and Counterclaim.	0.50	\$ 43.75	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 43.75
242	10/26/2017	PMH	Review and revise Amened Answer and Counterclaim.	1.00	\$ 100.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 100.00
243	10/26/2017	PMH	Review and revise third draft of counterclaim and finalize.	3.00	\$ 300.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 300.00
245	11/1/2017	ADI	Review Plaintiff's Initial Disclosures.	0.70	\$ 61.25	Y				\$ 61.25
246	11/3/2017	ADI	Facts investigation regarding underlying claims and case options.	0.60	\$ 105.00	N				\$ 105.00
247	11/3/2017	ADI	Review confirmation of transfer of administrative records to federal court in underlying due process complaints on appeal.	0.20	\$ 35.00	N				\$ 35.00
248	11/5/2017	PMH	Review and revise Motion to Strike.	0.50	\$ 50.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 50.00
249	11/6/2017	ADI	Calculate deadline to file Response to Motion to Strike.	0.20	\$ 17.50	Y	Excessive, redundant or otherwise unnecessary.	The District has decreased this entry to .1	0.1	\$ 8.75
250	11/6/2017	ADI	Review Motion to Strike.	0.20	\$ 17.50	Y				\$ 17.50
251	11/8/2017	ADI	Facts investigation regarding Rule 11 Sanctions related to recent Motion to Strike.	0.30	\$ 26.25	Y				\$ 26.25
252	11/8/2017	PMH	Review Motion to Dismiss under John's.	0.40	\$ 40.00	Y				\$ 40.00
254	11/9/2017	ADI	Research pro se representation on behalf of minor children under federal law and 9th Circuit precedent.	1.40	\$ 245.00	N				\$ 245.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
255	11/10/2017	ADI	Research related to Motion to Strike Defendant's Amended Counterclaim.	1.00	\$ 87.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
257	11/10/2017	ADI	Draft Response to Motion to Strike Defendant's Amended Counterclaim.	1.50	\$ 131.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 131.25
258	11/11/2017	ADI	Revise Response to Motion to Strike Defendant's Amended Counterclaim.	1.00	\$ 87.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 87.50
259	11/16/2017	PMH	Review Motion to Strike and Defendant's response; revise response.	1.00	\$ 100.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 100.00
260	11/16/2017	ADI	Finalize for filing the Response to Plaintiff's Second Motion to Strike and calendar deadline for Plaintiff to file reply.	0.20	\$ 17.50	Y				\$ 17.50
262	11/20/2017	ADI	Facts investigation regarding oral and written depositions.	0.60	\$ 52.50	Y				\$ 52.50
263	11/20/2017	PMH	Review file and prepare counterclaim.	0.80	\$ 80.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 80.00
266	11/21/2017	ADI	Research remote (i.e., telephonic or video-conferencing) oral depositions in federal Rules of Civil Procedure.	0.30	\$ 26.25	Y				\$ 26.25
267	11/21/2017	PMH	Review deposition schedule/Court Order.	0.30	\$ 30.00	Y				\$ 30.00
269	11/22/2017	PMH	Review deposition requirements of Federal Court.	0.50	\$ 50.00	Y				\$ 50.00
282	11/30/2017	ADI	Review Notice of Filing/Lodging of Administrative Record by Plaintiff.	0.20	\$ 35.00	N				\$ 35.00
283	11/30/2017	ADI	Review filing by Court regarding receipt of Administrative Record.	0.20	\$ 35.00	N				\$ 35.00
284	11/30/2017	ADI	Facts investigation regarding timeline for drafting of affidavits and deposition of Matthew Oskowis.	0.30	\$ 26.25	Y				\$ 26.25
286	12/1/2017	ADI	Draft letter to Trust	0.60	\$ 52.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Moreover, the content of the letter is subject to attorney client privilege and the entry has already been discounted by 50 percent.		
287	12/1/2017	ADI	Facts investigation regarding projected time for affidavits, witness consultation, deposition and Motion for Summary Judgment.	0.20	\$ 17.50	Y				\$ 17.50
289	12/5/2017	EAP	Research regarding attorneys fees standard	1.00	\$ 195.00	N				\$ 195.00
290	12/6/2017	ADI	Draft letter to Plaintiff regarding Notice of Intent to file 12© Motion.	0.50	\$ 87.50	N				\$ 87.50
295	12/7/2017	EAP	Research "improper purpose" under IDEA	2.00	\$ 390.00	N				\$ 390.00
296	12/7/2017	EAP	Research for award of attorneys fees, IDEA	1.40	\$ 273.00	N				\$ 273.00
297	12/7/2017	EAP	Study cases discussing improper purpose from around nation	1.40	\$ 273.00	N				\$ 273.00
298	12/7/2017	EAP	Research regarding "frivolous" case under IDEA	1.20	\$ 234.00	N				\$ 234.00
301	12/8/2017	NDS	Review caselaw on pleading standards and 28 USC 1415(i)(3)	1.50	\$ 262.50	N				\$ 262.50

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
302	12/8/2017	EAP	Study cases finding improper purpose	0.50	\$ 97.50	N				\$ 97.50
303	12/8/2017	EAP	summarize key factors for improper purpose, cases where rejected as not improper or findings was improper	0.70	\$ 136.50	N				\$ 136.50
304	12/8/2017	ADI	Facts investigation regarding affidavits, prima facie elements, and proving counterclaim.	2.20	\$ 192.50	Y				\$ 192.50
305	12/8/2017	RGT	Develop case plan; identify issues and response. Strategy for next steps in Federal #4, Affidavits, Motion for Summary Judgment	2.10	\$ 204.75	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		
306	12/8/2017	EAP		1.30	\$ 126.75	Y				\$ 126.75
307	12/8/2017	PMH	Develop case plan and research Memorandum	2.00	\$ 200.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		
311	12/11/2017	PMH	Review Request for Discovery.	0.80	\$ 80.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		\$ 80.00
313	12/12/2017	NDS	Review 1/22/16 D.P. transcript of Tiffany Wilson testimony.	2.20	\$ 192.50	Y				\$ 192.50
314	12/12/2017	NDS	Review 1/21/16 transcript testimony of Rebecca Vess and Michael Ramus	1.50	\$ 131.25	Y				\$ 131.25
319	12/14/2017	NDS	Review Oskowis Initial Disclosure pet873-936; 1/30/2015 transcript	2.70	\$ 236.25	Y				\$ 236.25
320	12/15/2017	NDS	Review Oskowis initial disclosure: pet873-733	3.00	\$ 262.50	Y				\$ 262.50
321	12/15/2017	NDS	Review Oskowis initial disclosure, pet. 733-661; 4/12/2014 transcript of Traci Parry.	3.00	\$ 262.50	Y				\$ 262.50
322	12/15/2017	ADI	Review Plaintiff's First Request for Production.	0.40	\$ 35.00	Y				\$ 35.00
323	12/15/2017	ADI	Review Local Rules and Rule 34 and 26 of Fed. R. Civ. P.	0.60	\$ 52.50	Y				\$ 52.50
326	12/16/2017	NDS	Research caselaw on improper purpose; Bethlehem Sch. Dist. V. Zhou	0.50	\$ 87.50	N				\$ 87.50
327	12/18/2017	PMH	Review notice letter and sign.	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The District has decreased this entry to .2	0.2	\$ 40.00
328	12/18/2017	RGT	Initial determination of elements; proof response, use of affidavits.	1.90	\$ 370.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
329	12/18/2017	NDS	Review pet. 658-661, transcripts from Nov. 2013 D. P. Proceedings.	2.50	\$ 218.75	Y				\$ 218.75
330	12/18/2017	PMH	Review Request for Production of Documents.	0.60	\$ 60.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		\$ 60.00
331	12/18/2017	ADI	Facts regarding objections to Request for Production submitted by Plaintiff.	0.40	\$ 35.00	Y				\$ 35.00
336	12/19/2017	EAP	Research regarding Zhu case, subsequent history.	0.50	\$ 97.50	N				\$ 97.50
337	12/19/2017	NDS	Review casefile nad notes, organizing information for affidavits.	1.50	\$ 131.25	Y				\$ 131.25
338	12/19/2017	PMH	Telephone conference with Sara Leon regarding Motion for Summary Judgment.	1.00	\$ 100.00	Y				\$ 100.00
344	12/20/2017	NDS	Research caselaw: Rule 11, standard of review, sufficiency of allegations, IDEA pleading standards.	1.50	\$ 262.50	N				\$ 262.50
345	12/20/2017	EAP	Review pleadings in Texas fees case, research citations	0.60	\$ 117.00	N				\$ 117.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
346	12/20/2017	ADI	Review documents/pleadings/motions forwarded by Texas attorney; review Memorandum regarding Zhou decision.	0.60	\$ 105.00	N				\$ 105.00
347	12/20/2017	EAP	Draft summary regarding Zhou case	0.40	\$ 78.00	N				\$ 78.00
348	12/20/2017	NDS	Draft MSJ: Background info.	1.60	\$ 280.00	N				\$ 280.00
349	12/20/2017	NDS	Draft MSJ; count 1 of counterclaim.	4.20	\$ 735.00	N				\$ 735.00
353	12/22/2017	NDS	Edit MSJ: Counterclaims.	1.00	\$ 175.00	N				\$ 175.00
356	12/26/2017	NDS	Draft MSJ on counterclaims: Intro and Conclusion.	2.00	\$ 350.00	N				\$ 350.00
357	12/26/2017	NDS	Draft MSJ on counterclaims	0.30	\$ 52.50	N				\$ 52.50
358	12/27/2017	NDS	Edit and Revise MSJ on counterclaims: added harassment claim.	3.00	\$ 525.00	N				\$ 525.00
359	12/28/2017	NDS	Revise MSJ: counterclaims	1.00	\$ 175.00	N				\$ 175.00
360	12/28/2017	NDS	Email partners draft of MSJ on counterclaims, discussing thoughts and strategies moving forward regarding Rule 12(c) motion.	1.00	\$ 175.00	N	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 175.00
361	1/1/2018	PMH	Review extensive research.	0.50	\$ 100.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate.		
362	1/2/2018	PMH	Review file and e-mails.	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
363	1/2/2018	ADI	Draft Response to Plaintiff's First Request for Production (Preliminary Statement, General Objections, and Objections to Instructions and Definitions).	2.00	\$ 175.00	Y				\$ 175.00
369	1/3/2018	ADI	Review draft analysis for Motion.	0.30	\$ 52.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 52.50
370	1/3/2018	NDS	Conference with Alex regarding supplemental disclosures.	0.20	\$ 17.50	Y	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 17.50
371	1/3/2018	RGT	Review correspondence and reply.	0.30	\$ 29.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 29.25
372	1/3/2018	ADI	Draft Notice of Service of Response to Request for Production.	0.30	\$ 26.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The Description of services is adequate.		\$ 26.25
373	1/3/2018	ADI	Draft Objections and Responses to Plaintiff's First request for Production.	1.80	\$ 157.50	Y	Duplicate of no charge #379	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
374	1/3/2018	ADI	Preview pleadings in prior consolidated hearing from 2013/2014 for disclosure.	0.40	\$ 35.00	Y				\$ 35.00
375	1/3/2018	ADI	Facts investigation regarding supplemental disclosure.	0.20	\$ 17.50	Y				\$ 17.50
376	1/3/2018	ADI	Draft Supplemental Disclosure.	0.30	\$ 26.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 26.25
382	1/4/2018	NDS	Prepare for attorney meeting on all pending Oskowis matters with Patrice, Gehl, Alex, Eve, Sheri.	0.50	\$ 87.50	N	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 87.50
383	1/4/2018	RGT	Develop litigation plan; draft deposition Questions.	1.20	\$ 117.00	Y	Block billing	This entry is sufficiently specific to determine whether the time allotted is reasonable. Furthermore, the entry has already been discounted by 50 percent.		\$ 117.00
384	1/4/2018	ADI	Facts investigation regarding litigation strategy.	0.30	\$ 26.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 26.25
385	1/4/2018	EAP	Consider strategy regarding next steps.	0.50	\$ 48.75	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
389	1/5/2018	ADI	Research and review Fed. R. Civ. P. 28 and 30 regarding depositions	0.40	\$ 35.00	Y				\$ 35.00
391	1/5/2018	NDS	Draft 12(c) motion for judgment on the pleadings—background, statement of facts, research on 12(c) standards.	1.75	\$ 153.13	Y	Duplicate of no charge #392	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
394	1/7/2018	ADI	Facts investigation regarding revisions to and finalizing of Reponse to Plaintiff's Request for Production; finalize for service on Plaintiff.	0.40	\$ 35.00	Y				\$ 35.00
395	1/7/2018	ADI	Draft letter to Trust.	0.40	\$ 35.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the service is adequate. Moreover, subject to attorney client privilege		
397	1/8/2018	ADI	Facts investigation regarding remaining disclosures and audio from OAH prehearing conferences.	0.30	\$ 26.25	Y				\$ 26.25
398	1/8/2018	EAP	Review draft Response and Request for Production, comments	0.80	\$ 78.00	Y				\$ 78.00
399	1/8/2018	NDS	research standard review for 12(c) motions; Research how they relate to 1415(i)(2) appeals; draft "Standard of Review: Fed. R. Civ. P. (12(c) " section.	2.60	\$ 227.50	Y	Duplicate of no charge #400	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
402	1/9/2018	ADI	Finalize Response to Plaintiff's First Request for Production.	0.40	\$ 35.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. The alleged duplicate was a no charge and has been removed from this excel spread sheet.		\$ 35.00
404	1/9/2018	NDS	Revise/Edit Rule 12(c) Motion for Judgment on the Pleadings.	0.40	\$ 35.00	Y	Duplicate of no charge #409	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
405	1/9/2018	NDS	Draft 12(c) motion, Analysis section and Count 1.	0.90	\$ 78.75	Y	Duplicate of no charge #408	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
406	1/9/2018	NDS	Draft 12(c) Motion for Judgment on the Pleadings, update analysis section and draft Counts 1, 2, and 3.	1.30	\$ 113.75	Y	Duplicate of no charge #407	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
411	1/10/2018	NDS	Edit 12(c) motion for judgment on the pleadings: analysis section.	0.35	\$ 30.63	Y	Duplicate of no charge #416	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
412	1/10/2018	NDS	Draft 12(c) Motion for Judgment on the Pleadings; Count 3, Conclusion sections.	1.00	\$ 87.50	Y	Duplicate of no charge #415	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
413	1/10/2018	NDS	Research whether 12(c) motion in this context, if granted, is with prejudice or without.	0.35	\$ 30.63	Y	Duplicate of no charge #417	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
414	1/10/2018	NDS	Edit Rule 12(c) Motion for Judgment on the Pleadings.	0.70	\$ 61.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate.		\$ 61.25
420	1/11/2018	NDS	Edit 12(c) Motion for Judgment on the Pleadings; revise count 3 analysis.	0.80	\$ 70.00	Y				\$ 70.00
421	1/12/2018	SA	Reviewed Fed 4 Amended Answer to determine disclosure needs.	0.35	\$ 22.75	Y	Duplicate of no charge #429	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
422	1/12/2018	SA	Prepare Supplemental Disclosure Fed 4	0.70	\$ 45.50	Y	Duplicate of no charge #426	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
423	1/12/2018	SA	Research Initial Disclosure Docs	0.50	\$ 32.50	Y	Duplicate of no charge #428	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
432	1/15/2018	ADI	Review Federal Rules of Civil Procedure regarding Notice of Deposition; draft Notice to Plaintiff of Oral deposition.	0.70	\$ 61.25	Y	Block billing	This entry describes services both related to drafting the notice of oral deposition and thus are not impermissible block billing.		\$ 61.25
433	1/15/2018	ADI	Draft Notice of Service on Plaintiff of Notice of Deposition.	0.30	\$ 26.25	Y				\$ 26.25
434	1/15/2018	ADI	Review Motion for Judgment on the Pleadings.	0.30	\$ 26.25	Y				\$ 26.25

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
435	1/16/2018	ADI	Facts investigation regarding discovery to be supplemented.	1.00	\$ 87.50	Y				\$ 87.50
436	1/16/2018	SA	Reviewed Model Rules of Civil Procedure for Depositions.	0.20	\$ 13.00	Y				\$ 13.00
437	1/16/2018	NDS	Edit 12(c) Motion for Judgment on the Pleadings; email draft to Team for input.	0.50	\$ 43.75	Y	Block billing	The entry describes services that are both related to drafting of the Rule 12(c) motion for judgment on the pleadings and thus are not impermissible block billing.		\$ 43.75
438	1/16/2018	ADI	Finalize letter to Plaintiff regarding notice of intent to file 12(c) Motion.	0.30	\$ 26.25	Y				\$ 26.25
442	1/18/2018	SA	Prepare Discovery for Supplemental Disclosure	0.90	\$ 58.50	Y	Duplicate of no charge #444	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
443	1/18/2018	PMH	Review and revise Judgment on the Pleadings.	0.80	\$ 80.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 80.00
448	1/20/2018	RGT	Review 17C and draft deposition questions.	1.10	\$ 107.25	Y				\$ 107.25
451	1/21/2018	NDS	Edit 12(c) motion for judgment on the pleadings in Fed #4 after receiving input from Attorney Horstman, Attorney Tucker, and Attorney Ivan.	0.75	\$ 65.63	Y	Duplicate of no charge #458	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
452	1/21/2018	ADI	Facts investigation regarding 12(c) Motion and revisions.	1.60	\$ 140.00	Y				\$ 140.00
459	1/22/2018	ADI	Conference and lunch with Attorney Tucker.	1.20	\$ 105.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	Work product privilege. Nonetheless, the District has decreased this entry to 5	0.5	
461	1/22/2018	NDS	Edit 12(c) Motion for Judgment on the Pleadings.	0.80	\$ 70.00	Y	Duplicate of no charge #461	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
478	1/29/2018	ADI	Review Fed. R. Civ. P. 45 regarding proof of service of subpoena and tendering fees; review 28 U.S.C. 1821 regarding per diem mileage and attendance fees; review uniformed table of distances and mileage reimbursement rates from Administrator of General Services.	1.00	\$ 87.50	Y	Block billing	All of the activities in this billing relate to to the preparation of the notice and subpoena for Plaintiff's deposition. Therefore it is not impermissible block billing. Furthermore, this entry has already been discounted by 50 percent.		\$ 87.50
479	1/30/2018	ADI	Telephone call to Plaintiff and voicemail regarding availability to receive Notice of Deposition and subpoena.	0.20	\$ 17.50	Y				\$ 17.50
488	1/31/2018	ADI	Draft Response to Plaintiff's Motion to Strike.	2.30	\$ 201.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		\$ 201.25
490	2/1/2018	ADI	Revise and finalize Notice of Taking Deposition.	0.30	\$ 26.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		\$ 26.25
491	2/1/2018	ADI	Voicemail to Plaintiff regarding personal service of subpoena; follow-up email.	0.50	\$ 43.75	Y	Block Billing	All of the activities in this billing relate to a communication with Plaintiff, a phone call and an email. Therefore it is not impermissible block billing. Furthermore, this entry has already been discounted by 50 percent.		\$ 43.75

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
493	2/1/2018	NDS	Review response to motion to strike out 12(c) motion. Suggest edits for Attorney Horstman and Ivan and discuss same with Attorney Ivan.	2.00	\$ 175.00	Y	Block billing	All of the activities in this billing relate to a revision of the Rule 12(c) motion. Therefore it is not impermissible block billing. Furthermore, this entry has already been discounted by 50 percent.		\$ 175.00
494	2/1/2018	ADI	Revise Response to Plaintiff's Motion to Strike	0.60	\$ 52.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		\$ 52.50
496	2/2/2018	NDS	Conference with Attorney Alex Ivan and Paralegal Sheri F-S on supplemental disclosures in Fed. #4. Redact certain bills for disclosure.	0.50	\$ 43.75	Y	Block billing. Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed. Furthermore, this entry has already been discounted by 50 percent.		\$ 43.75
497	2/2/2018	PMH	Review e-mail from Matt Oskowis (x2) regarding disclosure and service of subpoena.	0.30	\$ 30.00	Y				\$ 30.00
498	2/2/2018	PMH	Review and revise response to Motion to Strike.	0.30	\$ 30.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, this entry has already been discounted by 50 percent.		\$ 30.00
499	2/5/2018	SA	Draft letter to District Finance and Business Manager regarding: Discovery Requests.	0.30	\$ 19.50	Y				\$ 19.50
500	2/5/2018	SA	Telephone call with Paula Tallini, Process Server regarding: serving Mr. Oskowis at the IEP meeting.	0.20	\$ 13.00	Y				\$ 13.00
501	2/5/2018	ADI	Review, revise and finalize letter to Kathleen Hutchison regarding employee information.	0.50	\$ 43.75	Y				\$ 43.75
502	2/5/2018	ADI	Review, revise and finalize letter to finance director regarding invoices, etc. from Dr. Trina Spencer.	0.50	\$ 43.75	Y				\$ 43.75
503	2/5/2018	SA	Phone call with Paula Tallini regarding: serving Matthew Oskowis	0.20	\$ 13.00	Y				\$ 13.00
504	2/5/2018	PMH	Review and revise letter to Trust.	0.20	\$ 20.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	Attorney client privilege. Furthermore, this entry has already been discounted by 50 percent.		
505	2/6/2018	ADI	Review email response from H.R. Director regarding timeline for provision of employee documentation.	0.20	\$ 17.50	Y				\$ 17.50
513	2/7/2018	ADI	Review Plaintiff's Response to Defendant's 12(c) Motion.	0.30	\$ 52.50	N				\$ 52.50
514	2/7/2018	ADI	Review response from H.R. Director regarding employee information.	0.20	\$ 17.50	Y				\$ 17.50
515	2/7/2018	PMH	Review Oskowis mandatory initial disclosure.	0.30	\$ 30.00	Y				\$ 30.00
516	2/7/2018	PMH	Review emails regarding Oskowis avoiding service and respond.	0.20	\$ 20.00	Y				\$ 20.00
520	2/8/2018	PMH	Review initial discovery disclosure (Oskowis)	0.60	\$ 60.00	Y				\$ 60.00
523	2/9/2018	PMH	Review strategy	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
524	2/9/2018	ADI	Draft, revise and finalize acceptance of service; send to Plaintiff.	0.50	\$ 43.75	Y	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	All of the services described are related to the acceptance of service and thus do not constitute impermissible block billing.		\$ 43.75
529	2/12/2018	NDS	Draft Reply to Matt's Response to our 12(c) Motion for judgment on the Pleadings.	3.60	\$ 630.00	N	Duplicate #530	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
530	2/12/2018	NDS	Draft Reply to Matt's Response to our 12(c) Motion for judgment on the Pleadings.	2.20	\$ 385.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)			\$ 385.00
531	2/12/2018	SA	Draft Acceptance of Service for Subpoena	0.20	\$ 13.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 13.00
532	2/12/2018	PMH	Review emails regarding service	0.30	\$ 30.00	Y				\$ 30.00
535	2/14/2018	NDS	Edit Reply on 12(c) motion addressing attorney Alex Ivan's Comments	1.00	\$ 175.00	N				\$ 175.00
536	2/14/2018	ADI	Review and revise Reply to Plaintiff's Response.	0.80	\$ 140.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 140.00
537	2/14/2018	ADI	Revise and finalize for filing Defendant's Reply Brief.	0.70	\$ 122.50	N				\$ 122.50
538	2/14/2018	NDS	Finalize Reply on 12(c) motion addressing attorney Alex Ivan's Comments	0.60	\$ 105.00	N				\$ 105.00
539	2/14/2018	PMH	Review, reply and revise.	0.50	\$ 100.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 100.00
540	2/14/2018	PMH	Review Joint Statement.	0.30	\$ 60.00	N				\$ 60.00
541	2/14/2018	ADI	Draft Motion to Summary Judgment.	1.50	\$ 262.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 262.50
543	2/15/2018	ADI	Facts investigation regarding applicability of prevailing party test to Defendants.	0.60	\$ 105.00	N				\$ 105.00
544	2/15/2018	ADI	Draft Summary Judgment Motion.	1.50	\$ 262.50	N	Duplicate of #541	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
547	2/16/2018	PMH	Review prevailing party cases.	0.50	\$ 100.00	N				\$ 100.00
550	2/17/2018	RGT	Draft questions for deposition.	3.40	\$ 331.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 331.50
552	2/18/2018	RGT	Review complaint and counterclaim; draft questions for deposition.	3.90	\$ 380.25	Y	Block billing	All of the services described are related to the preparation for the deposition and thus do not constitute impermissible block billing. Furthermore, the entry has already been discounted by 50 percent.		\$ 380.25
553	2/19/2018	RGT	Internet search for Oskowis websites; draft final questions.	4.20	\$ 409.50	Y	Block billing	All of the services described are related to the preparation for the deposition and thus do not constitute impermissible block billing. Furthermore, the entry has already been discounted by 50 percent.		\$ 409.50
556	2/20/2018	RGT	Prepare for deposition; conduct deposition; follow up regarding deposition information Olmsted/Mesa/Tav.	4.80	\$ 468.00	Y	Block billing	All of the services described are related to the preparation for the deposition and thus do not constitute impermissible block billing. Furthermore, the entry has already been discounted by 50 percent.		\$ 468.00
564	2/21/2018	ADI	Research prevailing party determination/eligibility.	0.70	\$ 122.50	N				\$ 122.50
565	2/21/2018	ADI	Review email from Sally Cadigan regarding Oskowis call to public.	0.20	\$ 35.00	N				\$ 35.00
573	2/23/2018	ADI	Telephone conference with Danielle Allocco, Director of Chrysalus Academy regarding subpoena.	0.40	\$ 70.00	N	Inconsistent billing. Refer to #567, 571, 572, and 578	The District has deleted this entry.	0	\$ -
577	2/26/2018	PMH	Review Oskowis evaluation regarding EIS submission response (2x)	0.40	\$ 40.00	Y				\$ 40.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
581	2/27/2018	SA	Draft Supplemental Disclosure.	2.00	\$ 130.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 130.00
584	2/28/2018	SA	Revise Supplemental disclosure.	0.40	\$ 26.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 26.00
585	2/28/2018	PMH	Review Oskowis email regarding ESI and response.	0.40	\$ 40.00	Y				\$ 40.00
586	2/28/2018	PMH	Review TERIS Agreement and email TERIS	0.20	\$ 20.00	Y	Block billing	All of the services described are related to the retention of internet based research form and thus do not constitute impermissible block billing. Furthermore, the entry has already been discounted by 50 percent.		\$ 20.00
587	2/28/2018	PMH	Review email regarding Rule 16 and Order.	0.40	\$ 40.00	Y				\$ 40.00
588	3/2/2018	PMH	Review and finalize disclosure request for documents.	0.40	\$ 40.00	Y				\$ 40.00
591	3/5/2018	PMH	Review emails regarding TERIS production and email Assistant Allamong (2X)	0.60	\$ 60.00	Y	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	All of the services described are related to the retention of internet based research form and thus do not constitute impermissible block billing. Furthermore, the entry has already been discounted by 50 percent.		\$ 60.00
592	3/5/2018	PMH	Review emails	0.30	\$ 30.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
595	3/6/2018	ADI	Telephone conference with TERIS regarding production methods.	0.60	\$ 52.50	Y				\$ 52.50
596	3/6/2018	ADI	Facts investigation regarding review of documentation and release of such to Plaintiff.	0.40	\$ 35.00	Y				\$ 35.00
597	3/6/2018	ADI	E-mail to Plaintiff regarding production of documentation.	0.30	\$ 26.25	Y				\$ 26.25
598	3/6/2018	PMH	Review TERIS emails and prepare for electronic product.	0.80	\$ 80.00	Y	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	All of the services described are electronic records production and thus and thus do not constitute impermissible block billing. Furthermore, the entry has already been discounted by 50 percent.		
599	3/6/2018	PMH	Teleconference with TERIS	0.40	\$ 40.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
602	3/7/2018	PMH	Review electronic records/ privileged documents	2.50	\$ 250.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 250.00
603	3/7/2018	PMH	Telephone conference with TERIS (3x)	0.40	\$ 40.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
604	3/7/2018	PMH	Review and finalize response to initial disclosure	0.30	\$ 30.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		\$ 30.00
605	3/7/2018	PMH	Review and finalize letter to Oskowis	0.30	\$ 30.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		
606	3/7/2018	PMH	Telephone conference with Sharon/TERIS (3x)	0.60	\$ 60.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		
607	3/7/2018	PMH	Review electronic records - 900 X	2.50	\$ 250.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		\$ 250.00
608	3/7/2018	ADI	Review documentation for responsiveness and privilege.	3.50	\$ 306.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		\$ 306.25
609	3/7/2018	ADI	Review confirmation e-mail and Proof of Service.	0.20	\$ 17.50	Y	Excessive, redundant or otherwise unnecessary.	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		\$ 17.50
610	3/7/2018	EAP	Discussion with team regarding review	0.50	\$ 48.75	Y	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 48.75
611	3/7/2018	EAP	Review emails for disclosure.	3.20	\$ 312.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		\$ 312.00
618	3/8/2018	PMH	Review electronic records privilege and redaction.	0.50	\$ 50.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		\$ 50.00
619	3/8/2018	PMH	Telephone conference with Sharon Brown	0.20	\$ 20.00	Y	Duplicate of #623. Lacking appropriate detail. LRCiv 54.2(e)(2)	The alleged duplicate was a no charge and has been removed from this excel spread sheet. The description of services is adequate.		
620	3/8/2018	PMH	Review emails from Sharon Brown and respond	0.30	\$ 30.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		
621	3/8/2018	PMH	Telephone conference with Sharon Brown	0.30	\$ 30.00	Y	Duplicate of #623. Lacking appropriate detail. LRCiv 54.2(e)(2)	The District has deleted this entry.	0	\$ -
622	3/8/2018	PMH	Review and finalize relectronic records	1.50	\$ 150.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		\$ 150.00
623	3/8/2018	PMH	Telephone conference with Sharon Brown (2x)	0.30	\$ 30.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Futhermore, the entry has already been discounted by 50 percent.		

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
624	3/8/2018	PMH	Emails from Sharon Brown (2x)	0.40	\$ 40.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
625	3/8/2018	EAP	Further review of emails for disclosure	2.10	\$ 204.75	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 204.75
626	3/8/2018	EAP	Telephone calls (2) to Teris and Sharon Brown	0.30	\$ 29.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
627	3/8/2018	EAP	Emails (2) to TERIS and Sharon Brown	0.20	\$ 19.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
628	3/8/2018	EAP	Review additional email, Reply	0.20	\$ 19.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
633	3/12/2018	SA	Review emails regarding: Fed 4 from last week (54 total)	1.00	\$ 130.00	N				\$ 130.00
634	3/12/2018	SA	Review emails regarding: Fed 4 from last week (54 total)	4.00	\$ 130.00	N	Duplicate #633	The District has deleted this entry.	0	\$ -
635	3/12/2018	EAP	Review current status, disclosure	0.40	\$ 78.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 78.00
672	3/16/2018	ADI	Review, revise, and finalize Defendant's final supplemental disclosures.	0.30	\$ 26.25	Y	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	All of the services described are related to the finalization of Defendant's initial disclosures thus do not constitute impermissible block billing. Furthermore, the entry has already been discounted by 50 percent.		\$ 26.25
673	3/16/2018	ADI	Telephone conference with Attorney Tucker and Sheri Smith-Fetzer	0.30	\$ 26.25	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequately detailed. Furthermore, the entry has already been discounted by 50 percent.		
686	3/19/2018	PMH	Review discovery requests and respond (2x)	0.40	\$ 40.00	Y	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	This is not block billing.		\$ 40.00
693	3/20/2018	ADI	Review, revise, and finalize Notice of Service of Defendant's Supplemental Disclosures.	0.20	\$ 17.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequately detailed. Furthermore, the entry has already been discounted by 50 percent.		\$ 17.50
703	3/21/2018	PMH	Review documents regarding discovery	1.00	\$ 100.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequately detailed. Furthermore, the entry has already been discounted by 50 percent.		
704	3/21/2018	PMH	Strategy and fact finding	1.00	\$ 100.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequately detailed. Furthermore, the entry has already been discounted by 50 percent.		
715	3/22/2018	PMH	E-mail Oskowis regarding Motion in Limine	0.30	\$ 60.00	N				\$ 60.00
716	3/22/2018	PMH	E-mail and respond regarding settlement	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
717	3/22/2018	PMH	Review Oskowis email (3x)	0.60	\$ 60.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
729	3/23/2018	ADI	Draft letter to Plaintiff regarding availability to hold good faith settlement discussions.	0.50	\$ 87.50	N				\$ 87.50
730	3/23/2018	PMH	Email Oskowis regarding settlement meeting	0.40	\$ 80.00	N				\$ 80.00
731	3/23/2018	PMH	Review Oskowis email and respond	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
732	3/23/2018	ADI	Respond to Plaintiff regarding proposed Motion to Limine.	0.20	\$ 35.00	N				\$ 35.00
733	3/23/2018	ADI	Revise and finalize Notice of Service of Supplemental Disclosures.	0.20	\$ 17.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 17.50
734	3/23/2018	ADI	Revise and finalize Notice of Service of Documentation Responsive to Plaintiff's First Request for Production.	0.20	\$ 17.50	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		\$ 17.50
735	3/23/2018	PMH	Review affidavits and joint motion for summary judgment	1.25	\$ 125.00	Y	Duplicate of no charge #737	The alleged duplicate was a no charge and has been removed from this excel spreadsheet.		
750	3/27/2018	PMH	Review Oskowis email regarding settlement and respond	0.30	\$ 60.00	N				\$ 60.00
751	3/27/2018	PMH	Review file and preparation of summary judgment.	1.00	\$ 200.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 200.00
752	3/27/2018	PMH	Review email and respond	0.20	\$ 20.00	Y	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Furthermore, the entry has already been discounted by 50 percent.		
767	3/28/2018	ADI	Draft Motion for Summary Judgment on Counterclaim.	1.75	\$ 306.25	N	Duplicate of no charge #772	The alleged duplicate was no charged and has been removed from this excel spreadsheet.		
768	3/28/2018	ADI	Draft Statement of Undisputed Facts in Support of Motion for Summary Judgment.	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 35.00
769	3/28/2018	ADI	Review research for summary judgment motion.	2.50	\$ 437.50	N				\$ 437.50
776	3/29/2018	PMH	Review good faith settlement discussion and Rule 16 order	0.50	\$ 100.00	N				\$ 100.00
777	3/29/2018	PMH	Review email regarding prevailing party status and research	0.40	\$ 80.00	N				\$ 80.00
780	3/30/2018	EAP	Consider Approach regarding Motion for Summary Judgment	0.40	\$ 78.00	N				\$ 78.00
787	4/2/2018	PMH	Review email regarding settlement and conference and review Rule 16	0.50	\$ 100.00	N				\$ 100.00
788	4/2/2018	PMH	Review email regarding counterclaim research.	0.30	\$ 30.00	Y				\$ 30.00
795	4/3/2018	PMH	Conference with Matt Oskowis regarding good faith settlement	1.00	\$ 200.00	N				\$ 200.00
796	4/3/2018	PMH	Review and finalize memos and notes to files	1.00	\$ 200.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 200.00
797	4/3/2018	PMH	Prepare and review Order	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 80.00
798	4/3/2018	PMH	Email Trish Alley	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Moreover, the contents was subject to attorney client privilege.		
799	4/3/2018	PMH	Conference with Sheri regarding drafting Notice for Court	0.30	\$ 60.00	N	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 60.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
804	4/4/2018	PMH	Review and redraft minutes of settlement.	0.80	\$ 160.00	N				\$ 160.00
805	4/4/2018	PMH	Review email and respond to District.	0.80	\$ 160.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Moreover, the contents was subject to attorney client privilege.		
806	4/4/2018	ADI	Review various-email correspondence from Plaintiff questioning good faith settlement discussions; follow up regarding same.	0.50	\$ 87.50	N				\$ 87.50
807	4/4/2018	PMH	Draft notice to court of settlement	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 80.00
809	4/5/2018	PMH	Review Oskowis email and respond (3x)	1.00	\$ 200.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
810	4/5/2018	PMH	Review finalized minutes	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 60.00
818	4/6/2018	PMH	Review Oskowis email and respond Good Faith Settlement (2x)	0.60	\$ 120.00	N				\$ 120.00
819	4/6/2018	PMH	Review Oskowis response and respond	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 80.00
823	4/8/2018	ADI	Review Federal Rule of Evidence 408 regarding confidentiality of settlement negotiations.	0.20	\$ 35.00	N				\$ 35.00
825	4/9/2018	PMH	Draft good faith settlement report	0.80	\$ 160.00	N				\$ 160.00
826	4/9/2018	PMH	Review email Oskowis and respond (2x)	0.60	\$ 120.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
827	4/9/2018	PMH	Review Court Order regarding status	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 60.00
828	4/9/2018	PMH	Review and finalize Joint Report	0.30	\$ 60.00	N				\$ 60.00
829	4/9/2018	ADI	Review appellate brief in D.C. Circuit case regarding prevailing status determination.	0.30	\$ 52.50	N				\$ 52.50
830	4/9/2018	EAP	Review emails for use as exhibits. Research definition of party for political subdivision; draft memorandum regarding same.	0.25	\$ 24.38	Y	Duplicate of no charge #833	The alleged duplicate was no charged and has been removed from this excel spreadsheet.		
835	4/10/2018	ADI	Research issue of prevailing party for fees	1.50	\$ 262.50	N				\$ 262.50
836	4/10/2018	EAP	Review Court Order regarding rule 12(c)	1.00	\$ 195.00	N				\$ 195.00
837	4/10/2018	PMH	Review Court's various orders relating to motions and telephonic status conference.	0.80	\$ 160.00	N				\$ 160.00
838	4/10/2018	ADI	Review definition of Party	0.50	\$ 87.50	N				\$ 87.50
839	4/10/2018	PMH	Review definition of Party	0.30	\$ 60.00	N				\$ 60.00
840	4/10/2018	PMH	Review Court Order regarding Notice of Telephonic Conference	0.30	\$ 60.00	N	Excessive, redundant or otherwise unnecessary.	The District has decreased this entry by .1	0.1	\$ 20.00
849	4/11/2018	ADI	Draft Motion for Summary Judgment on Plaintiff's underlying causes of action.	1.50	\$ 262.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 262.50
850	4/11/2018	ADI	Facts regarding change of strategy in addressing underlying appealed due process decision and summary judgment motion.	0.70	\$ 122.50	N				\$ 122.50
851	4/11/2018	PMH	Review matter regarding motion for summary judgment	0.50	\$ 100.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 100.00
852	4/11/2018	PMH	E-mail Oskowis regarding Motion in Limine	0.40	\$ 80.00	N				\$ 80.00
853	4/11/2018	PMH	Review and finalize response and reply	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 60.00
854	4/11/2018	PMH	Review 2nd response and reply	0.20	\$ 40.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 40.00
863	4/12/2018	PMH	Telephone conference with Matt Oskowis	0.50	\$ 100.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)			
864	4/12/2018	PMH	Telephone conference with Matt Oskowis	0.50	\$ 100.00	N	Duplicate #863	This should be deleted.	0	\$ -
865	4/12/2018	ADI	Facts investigation regarding administrative record.	0.40	\$ 70.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 70.00
866	4/12/2018	PMH	Memorandum to file	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description to services is adequate.		
867	4/12/2018	PMH	Review email Matt Oskowis and respond	0.30	\$ 60.00	N	Duplicate #868	This should be deleted.	0	\$ -
868	4/12/2018	PMH	Review email Oskowis and respond	0.20	\$ 40.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
871	4/13/2018	PMH	Attend conference call with Judge	1.00	\$ 200.00	N				\$ 200.00
872	4/13/2018	PMH	Review Rule 16 Order and prepare for call with Judge	0.50	\$ 100.00	N				\$ 100.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
873	4/13/2018	ADI	Review Rule 16 pretrial conference attendance requirements; draft Memorandum regarding same.	0.50	\$ 87.50	N				\$ 87.50
874	4/13/2018	ADI	Facts regarding possible extension of dispositive motion deadline and good faith settlement discussions.	0.50	\$ 87.50	N				\$ 87.50
875	4/13/2018	PMH	Email Matt Oskowis	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
876	4/13/2018	PMH	Discovery transmittal of record and review emails	0.30	\$ 60.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	For services provided under this entry relate to the review and production of emails in discovery and thus is not impermissible block billing.		
877	4/13/2018	PMH	Conference with Alex Ivan	0.06	\$ 12.00	N	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 12.00
882	4/15/2018	ADI	Draft Motion for Summary Judgment on Plaintiff's underlying causes of Action.	2.50	\$ 437.50	N	Duplicate of #849	This is not a duplicate entry and instead is the continuation of work begun on April 11, 2018.		\$ 437.50
883	4/16/2018	PMH	Letter to David Lykins	1.00	\$ 200.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
884	4/16/2018	PMH	Review Oskowis email respond	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
888	4/17/2018	PMH	Draft joint report and request to extend deadline, review and revise	0.80	\$ 160.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 160.00
889	4/17/2018	PMH	Review joint report and redraft	0.80	\$ 160.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 160.00
890	4/17/2018	PMH	letter to D. Lykins and finalize	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
891	4/17/2018	VF	Review joint report and good faith settlement talks.	0.10	\$ 17.50	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Because this is the same thing it is not block billing.		\$ 17.50
898	4/19/2018	PMH	Review email Oskowis (2x)	0.50	\$ 100.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
899	4/19/2018	PMH	Redraft joint report and finalize	0.50	\$ 100.00	N	Duplicate of no charge #892	The alleged duplicate was no charged and has been removed from this excel spreadsheet.		
900	4/19/2018	PMH	Review final report	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 80.00
901	4/19/2018	ADI	Review and revise Joint Status Report regarding settlement talks.	0.30	\$ 52.50	N	Duplicate of no charge #904	The alleged duplicate was no charged and has been removed from this excel spreadsheet.		
902	4/19/2018	PMH	Email Oskowis regarding settlement meeting	0.20	\$ 40.00	N				\$ 40.00
905	4/20/2018	PMH	regarding settlement talks.	0.50	\$ 100.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The District has deleted this entry.	0	\$ -
906	4/20/2018	PMH	Review court order and Oskowis emails	0.40	\$ 80.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is specific enough to determine whether the time is reasonable.		\$ 80.00
907	4/20/2018	VF	Review and finalize	0.25	\$ 43.75	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The District has deleted this entry.	0	\$ -
908	4/20/2018	ADI	Review Order extending deadline regarding settlement and dispositive motions.	0.20	\$ 35.00	N	Excessive, redundant or otherwise unnecessary.	The District has discounted this entry to .1.	0.1	\$ 17.50
909	4/20/2018	VF	Meeting with Attorney Horstman and Sheri Smith-Fetzer to discuss status and plan future steps.	0.10	\$ 17.50	N	Duplicate #915	The alleged duplicate was no charged and has been removed from this excel spreadsheet.		
917	4/24/2018	PMH	Review record and determine maintenance of files	0.20	\$ 40.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 40.00
918	4/24/2018	VF	E-mail to Attorney Horstman, Attorney Ivan and Sheri Smith-Fetzer regarding Matthew Oskowis's latest e-mail.	0.20	\$ 35.00	N				\$ 35.00
919	4/26/2018	ADI	Facts investigation regarding discovery, settlement and motions.	1.20	\$ 210.00	N				\$ 210.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
920	4/26/2018	PMH	Review emails an transcript	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
922	4/29/2018	ADI	Revise Motion for Summary Judgment.	1.20	\$ 210.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 210.00
923	4/30/2018	ADI	Review correspondence and facts investigation regarding discovery, settlement, and possible subpoena of e-mail records.	0.60	\$ 105.00	N				\$ 105.00
924	4/30/2018	PMH	E-mail regarding transcript	0.20	\$ 40.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
925	5/1/2018	VF	Reviewed ALJ record regarding paraprofessional complaint, revised section regarding the same in motion for summary judgment.	1.30	\$ 227.50	N				\$ 227.50
926	5/1/2018	VF	Letter to Matthew Oskowis regarding settlement.	0.60	\$ 105.00	N				\$ 105.00
927	5/1/2018	ADI	Review section in motion for Summary Judgment on Counterclaim related to frivolous claims under IDEA; incorporate Motion for Summary Judgment on underlying civil action.	0.50	\$ 87.50	N				\$ 87.50
928	5/1/2018	VF	Review and update Oskowis Matters.	0.30	\$ 52.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
929	5/2/2018	ADI	Draft sections of Motion for Summary Judgment related to Plaintiff's Counts 1 and 2.	2.50	\$ 437.50	N				\$ 437.50
930	5/2/2018	VF	Review emails from Attorney Ivan and make revisions to settlement letter to Matthew Oskowis.	0.10	\$ 17.50	N	inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 17.50
931	5/2/2018	VF	Finalize letter to Matthew Oskowis. Email to DL to send out.	0.10	\$ 17.50	N	Block billing	These services both relate to the letter to Matthew Oskowis and therefore are not impermissible block billing.		\$ 17.50
933	5/6/2018	ADI	Draft section of Motion for Summary Judgment related to Plaintiff's Count 3; revise additional portions of motion.	2.50	\$ 437.50	N				\$ 437.50
934	5/7/2018	VF	Review initial motion for summary judgment and email Attorney Ivan regarding suggested revisions.	0.70	\$ 122.50	N	Block billing	These services both relate to the revision of the motion for summary judgment and therefore are not impermissible block billing.		\$ 122.50
935	5/7/2018	VF	Review email sent to Trish Alley regarding EO's medical condition.	0.10	\$ 17.50	N				\$ 17.50
936	5/10/2018	ADI	Facts regarding delay in ALI determinations and allegations in DP 15 regarding paraprofessional qualification and supervision.	0.60	\$ 105.00	N				\$ 105.00
937	5/10/2018	VF	Read decision on attorney's fees.	0.10	\$ 17.50	N				\$ 17.50
938	5/11/2018	ADI	Facts regarding administrative record and IEPs contained therein.	0.40	\$ 70.00	N				\$ 70.00
939	5/11/2018	VF	Read MO's due process complaint.	0.30	\$ 52.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 52.50
940	5/14/2018	ADI	Facts regarding proceeding to hearing, data sheets in the record, and pre-hearing audio recordings.	0.60	\$ 105.00	N				\$ 105.00
941	5/14/2018	ADI	Facts regarding Notice of Readiness; review Court Rule 16 Scheduling Order and Order Extending Dispositive Motion Deadline.	0.50	\$ 87.50	N				\$ 87.50
942	5/14/2018	PMH	Telephone conference with Veronika regarding Association of counsel	0.40	\$ 80.00	N	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 80.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
943	5/14/2018	PMH	Review emails and respond regarding deadline	0.30	\$ 60.00	N	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 60.00
944	5/14/2018	ADI	Draft memorandum Regarding party obligations to file Notice of Readiness and deadline to file same.	0.30	\$ 52.50	N				\$ 52.50
945	5/14/2018	VF	Review Paralegal Smith-Fetzer's email regarding notice of readiness and order, respond.	0.10	\$ 17.50	N	inter-office communications should not be billed.			\$ 17.50
948	5/16/2018	VF	Finalize initial draft of motion for summary judgment.	2.70	\$ 472.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 472.50
949	5/17/2018	ADI	Review and revise draft Motion for Summary Judgment on Plaintiff's underlying civil action.	1.50	\$ 262.50	N				\$ 262.50
950	5/17/2018	ADI	Facts regarding STO's, including their purpose and the District's obligation to revise them.	0.70	\$ 122.50	N				\$ 122.50
951	5/17/2018	VF	Finalize initial draft of motion for summary judgment and emailed to Attorney Ivan for review.	0.70	\$ 122.50	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2). Inter-office communications should not be billed.	The description is specific enough to determine whether a reasonable amount of time was billed.		\$ 122.50
952	5/17/2018	VF	Research on short-term objectives to include in motion for summary judgment.	0.40	\$ 70.00	N				\$ 70.00
953	5/18/2018	VF	Review and incorporate Attorney Ivan's edits into motion for summary judgment; proofread to make more concise.	1.10	\$ 192.50	N	Block billing	The description is specific enough to determine whether a reasonable amount of time was billed.		\$ 192.50
954	5/18/2018	ADI	Review and revise draft Motion for Summary Judgment on Plaintiff's underlying civil action.	0.50	\$ 87.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 87.50
955	5/19/2018	ADI	Facts regarding guidance found in former Appendix to IDEAS regulations relative to STO's and their purpose.	0.40	\$ 70.00	N				\$ 70.00
956	5/19/2018	ADI	Facts regarding progress reports; review of the administrative record and Plaintiff's acknowledged receipt thereof.	0.30	\$ 52.50	N				\$ 52.50
957	5/19/2018	ADI	Research and review Tenth Circuit Case interpreting purpose of STO's.	0.20	\$ 35.00	N				\$ 35.00
958	5/23/2018	ADI	Follow-up regarding Plaintiff's response to District's offer of settlement and report with Court on status of negotiations.	0.20	\$ 35.00	N				\$ 35.00
959	5/24/2018	ADI	Facts regarding separate statement of facts incorporated into body of motion for summary judgment.	0.30	\$ 52.50	N				\$ 52.50
960	5/25/2018	VF	Proofread and made revisions to motion for summary judgment to make more concise, more coherent.	1.50	\$ 262.50	N				\$ 262.50
961	5/25/2018	ADI	Revise motion for summary judgment.	1.20	\$ 210.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 210.00
962	5/25/2018	PMH	Draft updated report to court regarding settlement.	1.00	\$ 200.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 200.00
963	5/25/2018	PMH	Draft updated settlement report	0.60	\$ 120.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 120.00
964	5/25/2018	ADI	Facts regarding IDEA progress report requirements and notation with an IEP.	0.40	\$ 70.00	N				\$ 70.00
965	5/27/2018	ADI	Review administrative record; revise and finalize motion for summary judgment.	1.50	\$ 262.50	N	Block billing	The services related to incorporating administrative record into the motion for summary judgment and therefore is not impermissible block billing.		\$ 262.50
966	5/29/2018	VF	Proofread and made additional revisions to motion for summary judgment.	1.20	\$ 210.00	N				\$ 210.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
967	5/29/2018	ADI	Facts regarding statement of facts citations, progress reports, citations to repealed law, and strategy for timing of filing motion for summary judgment.	0.80	\$ 140.00	N				\$ 140.00
968	5/29/2018	VF	Review and incorporate Attorney Ivan's edits into motion for summary judgment.	0.60	\$ 105.00	N	Block billing	This is not block billing.		\$ 105.00
969	5/29/2018	ADI	Review and revise Defendant's notice/update on status of settlement discussions.	0.50	\$ 87.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	This is not block billing.		\$ 87.50
970	5/29/2018	VF	Calculate deadlines for filing motion for summary judgment.	0.40	\$ 70.00	N	Excessive, redundant or otherwise unnecessary.	The District has deleted this entry.	0	\$ -
971	5/30/2018	VF	Drafted statement of facts in support of motion for summary judgment.	1.20	\$ 210.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate.		\$ 210.00
972	5/30/2018	VF	Proofread and made revisions to motion for summary judgment.	0.30	\$ 52.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate.		\$ 52.50
973	5/30/2018	ADI	Review edits to Defendant's notice/update on status of settlement discussions and finalize for filing.	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate.		\$ 35.00
974	5/30/2018	VF	Reviewed and revised and made edits to update on settlement discussions.	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate.		\$ 35.00
975	5/31/2018	VF	Finalized initial draft of statement of facts.	0.60	\$ 105.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate.		\$ 105.00
976	5/31/2018	VF	Review and incorporate DL's edits into motion for summary judgment.	0.30	\$ 52.50	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate. This is not block billing.		\$ 52.50
977	6/7/2018	ADI	Facts investigation regarding settlement discussions related to Federal 4 and 5 and finalizing separate statement of facts for summary judgment motion.	0.40	\$ 70.00	N				\$ 70.00
978	6/7/2018	VF	Review email from Attorney Ivan regarding MSI and respond.	0.10	\$ 17.50	N	inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 17.50
979	6/8/2018	ADI	Revise draft Statement of Facts.	2.50	\$ 437.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of the services is adequate.		\$ 437.50
980	6/8/2018	ADI	Review administrative record, complaint; cross-reference citations in draft Statement of Facts	2.00	\$ 350.00	N				\$ 350.00
981	6/8/2018	PMH	Review final motion for summary judgment	0.60	\$ 120.00	N				\$ 120.00
982	6/13/2018	ADI	Review Bluebook and administrative record; revise state of facts.	3.00	\$ 525.00	N				\$ 525.00
983	6/13/2018	PMH	Conference with Veronika regarding update and adding counsel	0.30	\$ 60.00	N	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 60.00
984	6/19/2018	PMH	Review Notice of Association	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 60.00
985	6/20/2018	ADI	Facts investigation regarding finalizing of motion for summary judgment and statement of facts.	0.20	\$ 35.00	N				\$ 35.00
986	6/21/2018	ADI	Revise Motion for Summary Judgment on Plaintiff's affirmative action.	1.20	\$ 210.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 210.00
987	6/21/2018	VF	Finalized statement of facts, double checking exhibits, and email to Attorney Ivan.	1.20	\$ 210.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	All of the activities in this entry relate to the finalization of the statement of facts and is thus not impermissible block billing.		\$ 210.00
988	6/21/2018	ADI	Revise Statement of Facts accompanying Motion for Summary Judgment on Plaintiff's affirmative action.	0.80	\$ 140.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 140.00
989	6/21/2018	VF	Review and incorporate Attorney Ivan's revisions into state of facts.	0.60	\$ 105.00	N	Block billing	This is not block billing.		\$ 105.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
990	6/21/2018	VF	Proofread motion for summary judgment and send to Attorney Ivan.	0.30	\$ 52.50	N	Block billing	All of the activities in this entry relate to drafting the motion for summary judgment and is thus not impermissible block billing.		\$ 52.50
991	6/21/2018	VF	Review settlement offer and forwarded to Attorney Horstman and Attorney Ivan.	0.20	\$ 35.00	N	Block billing	All of the activities in this entry relate to a settlement offer and are thus not impermissible block billing.		\$ 35.00
992	6/21/2018	ADI	Facts investigation regarding level of administrative record citation detail included in Statement of Facts accompanying summary judgment motion.	0.30	No Charge	N				No Charge
993	6/22/2018	VF	Finalize revisions to Motion for Summary Judgment on Plaintiff's affirmative claims and Statement of Facts.	2.70	\$ 472.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 472.50
994	6/22/2018	DL	Proofread Statement of Facts in support of Motion for Summary Judgment and cross referenced with exhibits. Redacted E.O.'s name and DOB on exhibits. Prepared and filed Motion for Summary Judgment, Statement of Facts and exhibits.	4.00	\$ 420.00	N	Block billing	All of the activities in this entry relate to finalizing the motion for summary judgment and thus is not impermissible block billing.		\$ 420.00
995	6/22/2018	ADI	Finalize for filing Statement of Facts accompanying Motion for Summary Judgment.	1.50	\$ 262.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 262.50
996	6/22/2018	ADI	Finalize for filing the Motion for Summary Judgment on Plaintiff's Affirmative Action.	1.30	\$ 227.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 227.50
997	6/22/2018	ADI	Cite check Motion for Summary Judgment and research authority related to ALJ dismissals of due process complaints without a hearing.	0.80	\$ 140.00	N				\$ 140.00
998	6/22/2018	PMH	Review email regarding authority to Dismiss without hearing and respond (2x)	0.40	\$ 80.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
999	6/22/2018	VF	Review exhibits for statement of facts in support of Motion for Summary Judgment.	0.40	\$ 70.00	N				\$ 70.00
1000	6/22/2018	ADI	Facts investigation regarding supplementary aids and services in relation to special education and related service minutes.	0.60	No Charge	N				No Charge
1001	6/24/2018	PMH	Review statement of facts and exhibits	1.00	\$ 200.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 200.00
1007	6/27/2018	ADI	Facts investigation regarding likelihood of settlement, Governing Board approval, and discussions surrounding possible offer of settlement to Plaintiff.	0.30	\$ 52.50	N				\$ 52.50
1009	6/29/2018	PMH	Review research regarding Due Process hearing.	0.40	\$ 80.00	N				\$ 80.00
1016	7/6/2018	VF	Telephonic conference regarding potential settlement	0.40	\$ 70.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate. Moreover, protected by the work product doctrine.		
1017	7/6/2018	ADI	Facts regarding settlement proposal and timing in relation to appeal rights	0.30	\$ 52.50	N				\$ 52.50
1018	7/24/2018	ADI	Review Plaintiff's Response to Motion for Summary Judgment, controverted statement of facts, and exhibits	1.40	\$ 245.00	N				\$ 245.00
1019	7/25/2018	ADI	Facts regarding Plaintiff's Response to Motion for Summary Judgment	0.30	\$ 52.50	N				\$ 52.50
1020	7/27/2018	VF	Begin drafting reply Memorandum, Review Response to Motion for Summary Judgment	0.40	\$ 70.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 70.00
1021	7/29/2018	VF	Review Response to Motion for Summary Judgment	0.70	\$ 122.50	N				\$ 122.50
1022	7/31/2018	VF	Begin researching reply Memorandum,	0.60	\$ 105.00	N				\$ 105.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
1023	8/1/2018	ADI	Research A:J dismissals and facts investigation regarding same.	1.20	\$ 210.00	N				\$ 210.00
1024	8/1/2018	DL	Draft Motion for Extension to File Reply in support of Motion for Summary Judgment along with proposed order	0.30	\$ 31.50	N				\$ 31.50
1025	8/1/2018	VF	E-mail to MO to see if he objects to a ten day extension on reply	0.10	\$ 17.50	N				\$ 17.50
1026	8/1/2018	VF	Proofread and make revisions to request for extension.	0.10	\$ 17.50	N				\$ 17.50
1027	8/2/2018	VF	Begin drafting reply memorandum in support of motion for summary judgment	0.90	\$ 157.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 157.50
1028	8/2/2018	ADI	Review motion requesting extension to deadline for filing Reply, Plaintiff's objection, and Court's Order granting extension.	0.40	\$ 70.00	N				\$ 70.00
1029	8/2/2018	VF	E-mail to EO regarding extension revisions to request for extension, email to DL	0.30	\$ 52.50	N				\$ 52.50
1031	8/3/2018	ADI	Review Tenth Circuit Opinion regarding ALJ dismissal for failure to state a claim and draft Memorandum regarding same.	0.90	\$ 157.50	N				\$ 157.50
1032	8/3/2018	VF	Research on reply memorandum	0.50	\$ 87.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
1033	8/3/2018	ADI	Facts regarding parent legal claims and failure to request IEP meeting after progress reporting.	0.30	\$ 52.50	N				\$ 52.50
1034	8/6/2018	VF	Research and drafted reply in support of motion for summary judgment.	4.30	\$ 752.50	N	Block billing. Duplicate of #1020, #1027, and #1022	This is not block billing. Nor is it duplicative as counsel simply continued to research and draft the reply memorandum. The alleged duplicates were not charged and have been removed from this excel spreadsheet.		\$ 752.50
1035	8/7/2018	ADI	Facts regarding IDEA due process complaint sufficiency and annual goal data sheets.	0.60	\$ 105.00	N				\$ 105.00
1036	8/8/2018	VF	Draft reply in support of motion for summary judgment	1.20	\$ 210.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 210.00
1037	8/9/2018	VF	Continued researching and drafting reply in support of MSJ	1.60	\$ 280.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2)	This is not block billing. The description of services is adequate.		\$ 280.00
1038	8/9/2018	PMH	Review notice for summary judgment response from Matt Oskowis	1.00	\$ 200.00	N				\$ 200.00
1039	8/10/2018	VF	Researched and drafted reply in support of MSJ	3.20	\$ 560.00	N	Block billing. Lacking appropriate detail. LRCiv 54.2(e)(2). Duplicate of #1020, #1027, #1034, 1037	This is not block billing. Nor is it duplicative as counsel simply continued to research and draft the reply memorandum. The alleged duplicates were no charged and have been removed from this excel spreadsheet.		\$ 560.00
1040	8/10/2018	PMH	Review emails from Veronika and respond (2x)	0.60	\$ 120.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
1041	8/10/2018	ADI	Facts regarding judicata, complaint sufficiency, and parent communications from the District.	0.40	\$ 70.00	N				\$ 70.00
1042	8/12/2018	VF	Proofread and made revisions to reply to make more concise.	0.80	\$ 140.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 140.00
1043	8/13/2018	VF	Proofread and made revisions to reply memorandum, email to AI for review.	0.95	\$ 166.25	N	Duplicate of no charge #1045	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
1044	8/13/2018	ADI	Review and revise initial draft of Reply Brief.	0.75	\$ 131.25	N	Duplicate of no charge #1046	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
1047	8/14/2018	VF	Proofread and made revisions to reply memorandum based on AI's comments	2.60	\$ 455.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 455.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
1048	8/14/2018	ADI	Review and revise second draft Reply Brief with detailed citation checks.	0.80	\$ 140.00	N	Duplicate of no charge #1048	The alleged duplicate was a no charge and has been removed from this excel spread sheet.		
1049	8/14/2018	VF	Review and incorporate AI's edits	0.60	\$ 105.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 105.00
1051	8/15/2018	VF	Proofread and made additional revisions to reply in support of motion for summary judgment	1.80	\$ 315.00	N				\$ 315.00
1052	8/15/2018	VF	Read and edited VF's reply regarding SJM.	0.50	\$ 87.50	N				\$ 87.50
1053	8/16/2018	VF	Telephone conference with PH to discuss reply, made edits and revisions based on discussion, review and incorporate AI's revisions to reply.	1.70	\$ 297.50	N	Inter-office communications should not be billed.	Inter-office communications relating to the processing of the case are properly billed.		\$ 297.50
1054	8/16/2018	PMH	Review and revise	1.40	\$ 280.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
1055	8/16/2018	ADI	Facts regarding entitlement to due process hearings and service minute calculations.	0.30	\$ 52.50	N				\$ 52.50
1058	8/17/2018	PMH	Review final reply	0.50	\$ 100.00	N				\$ 100.00
1059	8/17/2018	ADI	Finalize Reply Brief.	0.50	\$ 87.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 87.50
1060	8/17/2018	VF	Final revisions to reply	0.50	\$ 87.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 87.50
1061	9/29/2018	PMH	Review email and update Trish Alley	0.30	\$ 60.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
1062	10/31/2018	ADI	Review minute order transferring case to Judge Lanza	0.20	\$ 35.00	N	Excessive, redundant or otherwise unnecessary.	The District has discounted this entry to .1.	0.1	\$ 17.50
1065	2/15/2019	VF	Read order granting motion for summary judgment	0.30	\$ 52.50	N				\$ 52.50
1066	2/19/2019	ADI	Review and analyze Order granting summary judgment and accompanying judgment	1.00	\$ 175.00	N				\$ 175.00
1067	2/19/2019	ADI	Facts regarding entry of judgment and erroneous termination in its entirety, including District's Counterclaim.	0.50	\$ 87.50	N				\$ 87.50
1069	2/20/2019	ADI	Facts investigation regarding styling of claims for attorneys' fees as Counterclaim against Plaintiff	0.50	\$ 87.50	N				\$ 87.50
1070	2/20/2019	ADI	Review and revise motion to amend judgment in accordance with order to preserve District's Counterclaim	0.50	\$ 87.50	N				\$ 87.50
1071	2/20/2019	VF	Draft motion to amend judgment	0.40	\$ 70.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 70.00
1072	2/20/2019	VF	Research on counterclaim	0.20	\$ 35.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
1073	2/21/2019	VF	Review and incorporate AI's edits into motion to amend	0.20	\$ 35.00	N				\$ 35.00
1074	2/21/2019	DL	Proofread Motion to Amended Judgment. Drafted Proposed Order and email to Attorney Fabian. Filed Motion to proposed order with USDC. Email to judge chambers	0.20	\$ 21.00	N	Block billing	All of the activities in this entry relate to the finalization of the motion to amend judgment and is thus not impermissible block billing.		\$ 21.00
1075	2/22/2019	ADI	Review and analyze Court's order granting motion to amend judgment.	0.20	\$ 35.00	N				\$ 35.00
1077	2/26/2019	VF	Research on how to proceed with respect to the attorney's fees claim.	0.70	\$ 122.50	N				\$ 122.50
1078	2/26/2019	VF	Began drafting motion for attorney's fees and memorandum in support.	0.60	\$ 105.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 105.00
1079	2/26/2019	ADI	Review and analyze the applicability of judgment in Federal 4 to adjudication of issues in Federal 6	0.50	\$ 87.50	N				\$ 87.50
1080	2/27/2019	VF	Continued research and drafting memorandum in support of motion for attorney's fees and costs.	1.90	\$ 332.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 332.50
1081	2/27/2019	VF	Review Oskowis deposition for purposes of filing motion for attorney's fees.	1.00	\$ 175.00	N				\$ 175.00

Ref #	Date	Time Keeper	Description	Hours	Amount	Halved	Billing Issue Identified	The District's Response	Revised Hours	Revised Charge
1082	2/27/2019	ADI	Draft memorandum regarding standards for fee awards against pro se parents and standard for showing improper purposes	0.70	\$ 122.50	N				\$ 122.50
1083	2/27/2019	ADI	Research and facts regarding applicability of Rule 56 to IDEA fee-seeking actions.	0.40	\$ 70.00	N				\$ 70.00
1085	2/28/2019	VF	Worked on memorandum in support of motion for attorney's fees.	1.60	\$ 280.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 280.00
1086	2/28/2019	ADI	Review Order in Federal 1 and revised proposed language for fee application	0.70	\$ 122.50	N				\$ 122.50
1087	2/28/2019	ADI	Communications with Plaintiff regarding conferral to discuss settlement in lieu of pursuit of fee award	0.20	\$ 35.00	N				\$ 35.00
1088	3/1/2019	VF	Continued draft memorandum in support of attorney's fees	1.20	\$ 210.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 210.00
1089	3/1/2019	VF	Review email from Matthew and respond	0.30	\$ 52.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		
1090	3/1/2019	VF	Drafted motion for leave to file motion regarding liability for attorney's fees only	0.30	\$ 52.50	N				\$ 52.50
1091	3/1/2019	DL	Proofread Motion for Leave to File Motion. Drafted proposed Order and email to Attorney Fabian. Filed Motion and proposed order with USDC. Emailed motion and proposed order to judge chambers.	0.20	\$ 21.00	N	Block billing	All of the activities in this entry relate to the finalization of a motion for filing and is thus not impermissible block billing.		\$ 21.00
1092	3/4/2019	VF	Continued drafting memorandum in support of motion for attorney's fees	5.70	\$ 997.50	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 997.50
1094	3/5/2019	VF	Finalize memorandum in support of motion for Attorney's Fees and Costs and supporting documentation.	3.00	\$ 525.00	N	Lacking appropriate detail. LRCiv 54.2(e)(2)	The description of services is adequate.		\$ 525.00
Total				609	\$ 64,883.13					\$ 54,992.50