

**Hourly Rates Awarded for JG&L Professionals by Time Period**

<b>Professional</b>	<b>Hourly Rate</b>			
	<b><i>Laffey 12-13</i></b> <b>(6/1/12 -5/31/13)</b>	<b><i>Laffey 13-14</i></b> <b>(6/1/13 -5/31/14)</b>	<b><i>Laffey 14-15</i></b> <b>(6/1/14 -5/31/15)</b>	<b>USAO 15-16</b> <b>(6/1/15 -5/31/16)</b>
Brian J. Markovitz	\$445.00	\$450.00	\$460.00	\$455.00
Chelsea Fuentes	-	-	\$150.00	\$154.00
Jessica A. Richardson	-	-	\$150.00	-
Jamerra J. Cherry	\$145.00	\$145.00	\$150.00	\$154.00
Jason M. Sarfati	-	-	-	\$154.00
Matthew E. Kresier	-	-	-	\$315.00
Meredith Schramm-Strosser	-	\$250.00	\$255.00	-
Steven B. Vinick	-	-	-	\$530.00
Veronica D. Jackson	\$290.00	\$295.00	\$300.00	\$386.00
Guru Shanmugamani	-	-	\$255.00	\$315.00
William J. Fuller	-	-	-	\$154.00

**Fees Requested and Awarded**

<b>Date</b>	<b>Prof.</b>	<b>Description</b>	<b>Code</b>	<b>Hour Request</b>	<b>Rate Request</b>	<b>Fee Request</b>	<b>Hours Awarded</b>	<b>Rate Awarded</b>	<b>Fee Awarded</b>	<b>Note</b>
10/23/12	VDJ	Meeting with new client P. J. Tridicio; confer with BJM regarding same; review calendar appointments; dictate notice of appearance letter.	CD	2.70	386.00	1,042.20	2.70	290.00	783.00	
10/24/12	VDJ	Review documents from client; review letters re notice of rep and retrieval of client files from prior counsel; email to client regarding files.	CD	1.20	386.00	463.20	1.20	290.00	348.00	
10/25/12	VDJ	Draft letter of representation to former counsel and DCOHR; revise same; review files from client; confer with ADG regarding new file.	CD	1.20	386.00	463.20	1.20	290.00	348.00	
10/26/12	VDJ	Review correspondence from former counsel to client; email to client regarding same.	CD	0.20	386.00	77.20	0.20	290.00	58.00	
10/28/12	VDJ	Review correspondence from client regarding files and documents; prepare same.	CD	1.20	386.00	463.20	1.20	290.00	348.00	
10/30/12	VDJ	Review files.	CD	0.70	386.00	270.20	0.70	290.00	203.00	
11/02/12	VDJ	Review documents from client and DCOHR investigation; confer with BJM regarding files and status conference.	CD	2.40	386.00	926.40	2.40	290.00	696.00	
11/05/12	BJM	Call with ALJ.	CD	0.80	455.00	364.00	0.80	445.00	356.00	
11/05/12	PNG	Strategy discussion w/ VDJ re DCOHR findings and limitations of filing	NC	0.30	386.00	0.00	0	0.00	0.00	No charge
11/05/12	VDJ	Call with ALJ regarding status conference; confer with BJM regarding same; confer with PG regarding DCOHR determination.	CD	1.30	386.00	501.80	1.30	290.00	377.00	
11/08/12	VDJ	Confer with BJM and ADG regarding request for RTS letter from EEOC.	CD/R	0.70	386.00	270.20	0.70	290.00	203.00	
11/09/12	VDJ	Call with client regarding status and strategy	CD	0.80	386.00	308.80	0.80	290.00	232.00	

11/12/12	VDJ	Review EEOC correspondence; email to BJM.	CD/R	1.80	386.00	694.80	1.80	290.00	522.00	
11/12/12	VDJ	Draft discovery requests.	D/R	1.40	386.00	540.40	1.40	290.00	406.00	
11/13/12	BJM	Meeting with VDJ, call with client re: strategy and pursuing title vii claims.	NC	0.30	455.00	0.00	0	0.00	0.00	No charge
11/13/12	VDJ	Draft discovery.	CD/R	2.10	386.00	810.60	2.10	290.00	609.00	
11/13/12	VDJ	Research on Title VII claims; call with client.	D/R	1.50	386.00	579.00	1.50	290.00	435.00	
11/15/12	VDJ	Draft complaint; research regarding USERRA claim.	P	6.40	386.00	2,470.40	6.40	290.00	1856.00	
11/19/12	VDJ	Research and draft complaint; review file and BJM regarding same.	P	3.40	386.00	1,312.40	3.40	290.00	986.00	
11/26/12	BJM	Meeting with VDJ re: filing of complaint.	CD	0.20	455.00	91.00	0.20	445.00	89.00	
11/26/12	VDJ	Review email from DCOHR; review draft motion for stay; file same.	MP	0.40	386.00	154.40	0.40	290.00	116.00	
11/27/12	VDJ	Email with DCOHR; review order.	CD	0.50	386.00	193.00	0.50	290.00	145.00	
11/28/12	BJM	Review of draft of complaint.	P	0.40	455.00	182.00	0.40	445.00	178.00	
11/28/12	VDJ	Review and revise complaint	P/R	3.20	386.00	1,235.20	3.20	290.00	928.00	
11/29/12	VDJ	Call with client regarding draft complaint; revise same.	P	3.90	386.00	1,505.40	3.90	290.00	1131.00	
11/30/12	VDJ	Call with Mindy Weinstein of EEOC; call with David Gonzalez of EEOC; draft email to above regarding conversation; confer with BJM; email to client regarding status.	CD	1.20	386.00	463.20	1.20	290.00	348.00	
11/30/12	VDJ	Call with client regarding complaint draft; revise same.	P/R	3.40	386.00	1,312.40	3.40	290.00	986.00	
12/03/12	VDJ	Complete revisions to draft complaint.	P	0.70	386.00	270.20	0.70	290.00	203.00	
12/10/12	VDJ	Research CourtLink for prior counsel's clients for breach of fiduciary duty; confer with JJC	NC	1.80	386.00	0.00	0	0.00	0.00	No charge
12/24/12	JJC	Research John Berry, Esquire. Re: background, practice history, case types and education. Requested by Veronica Jackson.	NC	0.80	154.00	0.00	0	0.00	0.00	No charge
01/08/13	VDJ	Review notes from client regarding recent harassment/retaliation at work by Sgt. Drummond; research exhaustion requirements for continuing action.	CD	1.70	386.00	656.20	1.70	290.00	493.00	

01/15/13	VDJ	Review EEOC complaint; draft amended complaint.	P	1.70	386.00	656.20	1.70	290.00	493.00	
02/01/13	VDJ	Review file regarding amended complaint; confer with prior counsel regarding same.	P	1.70	386.00	656.20	1.70	290.00	493.00	
02/20/13	VDJ	Call with David Gonzalez at EEOC; call with ALJ.	CD/R	0.40	386.00	154.40	0.40	290.00	116.00	
02/20/13	VDJ	Draft amended complaint.	P/R	0.80	386.00	308.80	0.80	290.00	232.00	
02/22/13	VDJ	Call with client regarding retaliation.	CD/R	1.40	386.00	540.40	1.40	290.00	406.00	
06/18/13	BJM	Review of complaint.	P	1.00	455.00	455.00	1.00	450.00	450.00	
06/18/13	VDJ	Revise complaint; call with client; email to BJM.	P	0.40	386.00	154.40	0.40	295.00	118.00	
06/18/13	VDJ	Revise complaint.	P	0.60	386.00	231.60	0.60	295.00	177.00	
06/19/13	BJM	Meeting re: complaint language.	P	0.20	455.00	91.00	0.20	450.00	90.00	
06/19/13	VDJ	Review complaint comments from BJM.	P	0.50	386.00	193.00	0.50	295.00	147.50	
09/04/13	MSS	Determine proper date of service for complaint	P	0.10	315.00	31.50	0.10	250.00	25.00	
09/10/13	MSS	Enter appearance in case	MP	0.10	315.00	31.50	0.10	250.00	25.00	
09/16/13	BJM	Review of order.	CD	0.20	455.00	91.00	0.20	450.00	90.00	
09/16/13	MSS	Review court correspondence and confer with BJM and GLC re: service of process	P	0.20	315.00	63.00	0.20	250.00	50.00	
10/21/13	BJM	Call with opposing counsel re: extension for answer.	P	0.20	455.00	91.00	0.20	450.00	90.00	
11/12/13	MSS	Review pleadings and case file - and email opp counsel re: 26(f) conference; prepare draft Local Rule 16.3 joint report ; send draft to opp counsel	MP	5.50	315.00	1,732.50	5.50	250.00	1375.00	
11/14/13	MSS	Review Opp counsel's draft of Local Rule 16.3 Joint Status Report	MP	1.20	315.00	378.00	1.20	250.00	300.00	
11/18/13	MSS	Research the ability to bring DCHRA claims	CD	0.30	315.00	94.50	0.30	250.00	75.00	
11/18/13	MSS	Teleconf with client re: status of the case and scheduling conference; review case file; finalize draft of local rule 16.3 joint status order.	MP	2.50	315.00	787.50	2.50	250.00	625.00	
11/20/13	MSS	Review BJM edits to Rule 16.3 joint report draft; send to Opp counsel for review; file document	MP	0.80	315.00	252.00	0.80	250.00	200.00	
11/26/13	MSS	Review protective order draft from opp counsel	MP	0.20	315.00	63.00	0.20	250.00	50.00	

12/03/13	MSS	Prep for scheduling conference tomorrow.	HE	0.60	315.00	189.00	0.60	250.00	150.00	
12/04/13	BJM	Call with MSS re: status conference.	HE	0.20	455.00	91.00	0.20	445.00	89.00	
12/04/13	MSS	<del>Travel to and from scheduling conference</del> ; prep for conference; attend scheduling conference; teleconf with BJM re scheduling conference; email with client re same; teleconf with client	HE	3.40	315.00	1,071.00	1.9	250.00	475.00	Reduced by 1.5 hours (travel time)
12/04/13	MSS	Review and edit protective order.	MP	0.30	315.00	94.50	0.30	250.00	75.00	
12/04/13	MSS	<i>Travel to and from scheduling conference</i>	<i>Travel</i>				<i>1.5</i>	<i>125.00</i>	<i>187.50</i>	<i>Travel time at 50%</i>
12/05/13	BJM	Review of proposed protective order and edits made.	MP	0.50	455.00	227.50	0.50	445.00	222.50	
12/10/13	MSS	Email to client re information needed for discovery; listen to audio recordings; discussion with BJM re same	D	1.00	315.00	315.00	1.00	250.00	250.00	
12/12/13	MSS	Email correspondence re: info needed for intitial disclosures; research initial disclosures	D	1.00	315.00	315.00	1.00	250.00	250.00	
12/13/13	MSS	Draft initial disclosures; teleconf with client re: same	D	0.80	315.00	252.00	0.80	250.00	200.00	
12/16/13	BJM	Review of initial disclosures.	D	0.20	455.00	91.00	0.20	450.00	90.00	
12/16/13	MSS	Draft initial disclosures; finalize and send same	D	4.20	315.00	1,323.00	4.20	250.00	1050.00	
12/30/13	MSS	Review emails and documents sent by Tridico; email to Opp counsel re: good faith letter regarding Rule 26 initial disclosures.	D	0.90	315.00	283.50	0.90	250.00	225.00	
12/30/13	MSS	Phone call with Opp counsel re: protective order	MP	0.10	315.00	31.50	0.10	250.00	25.00	
12/31/13	MSS	Phone call with BJM re: protective order.; send draft back to opposing counsel; finalize and file protective order	MP	0.80	315.00	252.00	0.80	250.00	200.00	
01/14/14	MSS	Research for supporting case law in prep for discovery.	D	1.70	315.00	535.50	1.70	250.00	425.00	
01/14/14	MSS	Research re: dispositive motions practice	MP	1.00	315.00	315.00	1.00	250.00	250.00	
01/21/14	MSS	Review transcriptions of audio files; email correspondence to BJM re: same	D	2.30	315.00	724.50	2.30	250.00	575.00	
01/24/14	MSS	Teleconf with client re facts and information	CD	0.60	315.00	189.00	0.60	250.00	150.00	

01/27/14	MSS	Draft discovery	D	1.60	315.00	504.00	1.60	250.00	400.00	
01/28/14	MSS	Draft discovery; research re same	D	1.10	315.00	346.50	1.10	250.00	275.00	
01/29/14	MSS	Discovery	D	1.00	315.00	315.00	1.00	250.00	250.00	
01/30/14	MSS	Teleconf with client re: strategy and current situation at work.; discussion with BJM re: same.	CD	0.40	315.00	126.00	0.40	250.00	100.00	
01/31/14	MSS	Draft Discovery	D	0.70	315.00	220.50	0.70	250.00	175.00	
02/03/14	MSS	Draft discovery (complete first draft of ROGs, send to BJM for review)	D	2.70	315.00	850.50	2.70	250.00	675.00	
02/04/14	BJM	Review of draft of interrogatories.	D	0.40	455.00	182.00	0.40	450.00	180.00	
02/04/14	MSS	Review BJM comments to ROGS.	D	0.20	315.00	63.00	0.20	250.00	50.00	
02/05/14	MSS	Revise discovery per BJM review; draft remaining discovery	D	3.30	315.00	1,039.50	3.30	250.00	825.00	
02/07/14	BJM	Review of RPDs to defendant.	D	0.30	455.00	136.50	0.30	450.00	135.00	
02/07/14	MSS	Incorporate BJM edits; finalized RPDs	D	0.60	315.00	189.00	0.60	255.00	153.00	
02/26/14	MSS	Review correspondence from client re union representation for personnel action taken b/c of DUI; call with client re: same	NC	0.20	315.00	0.00	0	0.00	0.00	No charge
02/27/14	MSS	Teleconf with client re: union representation in the disciplinary action	NC	0.40	315.00	0.00	0	0.00	0.00	No charge
03/13/14	MSS	Email correspondence to Opp counsel re: discovery	D	0.20	315.00	63.00	0.20	250.00	50.00	
03/18/14	MSS	Draft good faith letter to Opp counsel re: outstanding discovery; send letter re: same; review discovery requests by D	D	1.30	315.00	409.50	1.30	250.00	325.00	
03/20/14	MSS	Call with client and BJM re: discovery and depositions	D	0.40	315.00	126.00	0.40	250.00	100.00	
03/31/14	MSS	Email to M. Mullen re: outstanding discovery; call with client re: same	D	0.40	315.00	126.00	0.40	250.00	100.00	
04/02/14	MSS	Initial review of D's document production to insure all the files worked	D	0.20	315.00	63.00	0.20	250.00	50.00	
04/04/14	MSS	Draft email to Opp counsel re: overdue discovery; research FRCP re requirements to send motion to compel to opp counsel prior to filing; send email	D	0.40	315.00	126.00	0.40	250.00	100.00	
04/07/14	MSS	Email correspondence with Opp counsel re: discovery issues	D	0.20	315.00	63.00	0.20	250.00	50.00	

04/09/14	MSS	Call with opp counsel re: them not having the interrogatory responses back yet.	D/R	0.50	315.00	157.50	0.50	250.00	125.00	
04/10/14	MSS	Review email correspondence from client re: discovery; respond to same correspondence re: discovery	D	0.10	315.00	31.50	0.10	250.00	25.00	
04/15/14	MSS	Meeting with client to discuss depositions and discovery	D	0.40	315.00	126.00	0.40	250.00	100.00	
04/17/14	MSS	Teleconf with opp counsel re: discovery	D	0.40	315.00	126.00	0.40	250.00	100.00	
04/21/14	MSS	Draft joint motion for extension of discovery deadlines	D	0.50	315.00	157.50	0.50	250.00	125.00	
04/22/14	MSS	Finalize draft of joint motion to extend discovery deadlines, send to Opp counsel.	D	0.30	315.00	94.50	0.30	250.00	75.00	
04/28/14	MSS	Finalized latest draft of joint motion to modify the scheduling order; sent to Opp counsel for review.	D	0.20	315.00	63.00	0.20	250.00	50.00	
04/30/14	MSS	Review D's responses to discovery	D	0.80	315.00	252.00	0.80	250.00	200.00	
05/01/14	MSS	Review D's discovery production; research cases in preparation for good faith letter	D	4.20	315.00	1,323.00	4.20	250.00	1050.00	
05/02/14	MSS	Continue drafting good faith discovery letter; start drafting responses to Def's discovery requests	D	4.10	315.00	1,291.50	4.10	250.00	1025.00	
05/05/14	BJM	Review of letter to opposing counsel re: discovery deficiencies, research on case law re: duty to answer interrogatories viewed as over broad to the fullest extent possible.	D	1.10	455.00	500.50	1.10	450.00	495.00	
05/05/14	MSS	Draft discovery responses	D	5.50	315.00	1,732.50	5.50	250.00	1375.00	
05/06/14	MSS	Draft discovery; teleconf with Opp Counsel Aaron Finkhousen re: same	D	2.60	315.00	819.00	2.60	250.00	650.00	
05/13/14	MSS	Draft responses to discovery	D	3.50	315.00	1,102.50	3.50	250.00	875.00	
05/13/14	MSS	Review latest email correspondence from client	NC	0.20	315.00	0.00	0	0.00	0.00	No charge
05/13/14	MSS	Teleconf with client re: latest emails he sent to me	NC	0.20	315.00	0.00	0	0.00	0.00	No charge

05/21/14	JAR	Telephone call to Mr. Tridico re: paystubs.	D	0.10	154.00	15.40	0.10	150.00	15.00	
05/22/14	JAR	Telephone call and e-mail to Mr. Tridico re: paystubs.	D	0.20	154.00	30.80	0.20	150.00	30.00	
05/22/14	JAR	Download client's 2011-2014 paystubs from D.C. Government portall website and review.	D	1.30	154.00	200.20	1.30	150.00	195.00	
05/23/14	BJM	Meeting with MSS re: discovery.	D	0.50	455.00	227.50	0.50	450.00	225.00	
05/23/14	JAR	Download client's 2007-2014 paystubs from D.C. Government portall website and review.	D	0.50	154.00	77.00	0.50	150.00	75.00	
05/23/14	MSS	Confer with BJM re: responses to discovery	D	0.50	315.00	157.50	0.50	250.00	125.00	
05/27/14	JAR	Continue to download client's 2007-2014 paystubs from D.C. Government portall website.	D	1.00	154.00	154.00	1.00	150.00	150.00	
05/28/14	JAR	Download client's 2007-2014 paystubs from D.C. Government portall website and review.	D	1.00	154.00	154.00	1.00	150.00	150.00	
05/28/14	MSS	Discovery answers	D	1.40	315.00	441.00	1.40	250.00	350.00	
06/05/14	MSS	Email correspondence with Opp counsel re: discovery and noting depositions	D	0.20	315.00	63.00	0.20	255.00	51.00	
06/06/14	MSS	Draft discovery answers to ROGS; review client medical records	D	1.60	315.00	504.00	1.60	255.00	408.00	
06/10/14	MSS	Discovery responses	D	1.50	315.00	472.50	1.50	255.00	382.50	
06/11/14	BJM	Review of client's interrogatory answers.	D	0.70	455.00	318.50	0.70	460.00	322.00	
06/11/14	MSS	Document review in prep for doc production	D	1.00	315.00	315.00	1.00	255.00	255.00	
06/12/14	BJM	Review of interrogatory answers, research on document requests in interrogatories, review of documents for production purposes.	D	1.90	455.00	864.50	1.90	460.00	874.00	
06/12/14	MSS	Review D's latest document production	D	3.00	315.00	945.00	3.00	255.00	765.00	
06/12/14	MSS	Draft P's responses do D's RPDs	D	1.50	315.00	472.50	1.50	255.00	382.50	
06/12/14	MSS	Teleconf and email correspondence to Opp Counsel re: Octo email search	D	0.20	315.00	63.00	0.20	255.00	51.00	
06/12/14	MSS	Review and revise BJM's edits to first draft of ROGs	D	0.50	315.00	157.50	0.50	255.00	127.50	



06/12/14	MSS	Prepare and research responses to D's response to our good faith letter in preparation for tomorrow's teleconf	D	0.90	315.00	283.50	0.90	255.00	229.50	
06/13/14	BJM	Review of discovery answers, call with DC counsel re: discovery dispute and depositions.	D	0.70	455.00	318.50	0.70	460.00	322.00	
06/13/14	MSS	Prep and research for call with opp counsel re: good faith letter	D	1.00	315.00	315.00	1.00	255.00	255.00	
06/13/14	MSS	Review D's doc production	D	1.60	315.00	504.00	1.60	255.00	408.00	
06/13/14	MSS	Teleconf with client re: extra document requests	D	0.50	315.00	157.50	0.50	255.00	127.50	
06/16/14	BJM	Review of discovery production.	D	0.20	455.00	91.00	0.20	460.00	92.00	
06/16/14	MSS	Discovery - prepare doc production	D	0.50	315.00	157.50	0.50	255.00	127.50	
06/17/14	MSS	Finalize RPD responses	D	1.00	315.00	315.00	1.00	255.00	255.00	
06/18/14	MSS	Teleconf with Opp counsel: follow up to last week's good faith discovery discussion ; Teleconf with client re: discovery	D	0.50	315.00	157.50	0.50	255.00	127.50	
06/19/14	MSS	Finalize ROGS for delivery	D	0.40	315.00	126.00	0.40	255.00	102.00	
06/24/14	MSS	Email to opp counsel re: discovery	D	0.30	315.00	94.50	0.30	255.00	76.50	
07/11/14	MSS	Email correspondence with client re: deposition and need to confirm dates for depo; teleconf with client re: depo dates	D	0.40	315.00	126.00	0.40	255.00	102.00	
08/04/14	MSS	Email to client re: DC's search results regarding his court complaint being circulated around the office.	D	0.10	315.00	31.50	0.10	250.00	25.00	
08/15/14	MSS	Discussion with BJM re: prepping for depo; listen to oral recording produced; review transcripts of internal EEO interviews	D	1.00	315.00	315.00	1.00	255.00	255.00	
08/20/14	MSS	Prepare for P's deposition; review discovery; send email to client re: preparing for deposition	D	1.30	315.00	409.50	1.30	255.00	331.50	
08/22/14	MSS	Final prep and attend deposition	D	8.50	315.00	2,677.50	8.50	255.00	2167.50	
08/25/14	BJM	Meeting with MSS re: client's deposition, and other potential depositions as well as expert deadlines.	D	0.40	455.00	182.00	0.40	460.00	184.00	
08/25/14	MSS	Confer with BJM re: depo	D/R	0.50	315.00	157.50	0.50	255.00	127.50	

08/26/14	MSS	Email correspondence to opp counsel re: extension of expert deadline; review medical records and track down previous therapist; draft motion for extension of expert deadlines	D	0.80	315.00	252.00	0.80	255.00	204.00	
08/27/14	MSS	Teleconf with client re: research; review docs from client again; update discovery responses	D/R	3.30	315.00	1,039.50	3.30	255.00	841.50	
08/28/14	MSS	Documents that need to be produced; supplemental discovery responses	D	0.70	315.00	220.50	0.70	255.00	178.50	
09/02/14	MSS	Call to Dr's office re: Tridico; confer with BJM re: other depositions; draft depo notice; email correspondence to Opp counsel re: depo of Ofc. Alberti; email correspondence with client re: follow-up on additional discovery points	D	0.80	315.00	252.00	0.80	255.00	204.00	
09/03/14	MSS	Call with Gina Sangster, treating LCSW	D/R	0.50	315.00	157.50	0.50	255.00	127.50	
09/12/14	MSS	Draft supplemental discovery responses	D	0.90	315.00	283.50	0.90	255.00	229.50	
09/15/14	MSS	Finalize supplemental discovery answers; call with Opp Counsel re: depositions; confer with BJM re: same	D	1.00	315.00	315.00	1.00	255.00	255.00	
09/16/14	MSS	Teleconf with Expert re: economic loss report	NC	0.10	315.00	0.00	0	0.00	0.00	No charge
09/18/14	JJC	Revise and edit Notice of Deposition and Subpoena for Alberti.	D	0.50	154.00	77.00	0.50	150.00	75.00	
09/18/14	MSS	Call to opp counsel re: scheduling depositions	D	0.30	315.00	94.50	0.30	255.00	76.50	
09/19/14	MSS	Call with Richard Lockley (expert) re: damages; call with client re: same	NC	0.90	315.00	0.00	0	0.00	0.00	No charge
09/23/14	MSS	Review audio recording for supplemental interrogatory responses	D/R	1.40	315.00	441.00	1.40	255.00	357.00	
09/25/14	MSS	Email to expert re: expert designation	NC	0.40	315.00	0.00	0	0.00	0.00	No charge
09/26/14	MSS	Arrange subpoena and service for Officer Alberti	D/R	0.80	315.00	252.00	0.80	255.00	204.00	
09/29/14	MSS	Prepare and finalize subpoena for Alberti	D	0.20	315.00	63.00	0.20	255.00	51.00	
10/02/14	MSS	Send supplemental documents to defendant; read deposition transcript	D	0.90	315.00	283.50	0.90	255.00	229.50	
10/03/14	MSS	Review deposition transcript	D	2.50	315.00	787.50	2.50	250.00	625.00	
10/06/14	MSS	Continue reading deposition transcript.	D	0.50	315.00	157.50	0.50	255.00	127.50	

10/07/14	MSS	Draft questions for Ofc. Alberti depo	D	0.70	315.00	220.50	0.70	255.00	178.50	
10/08/14	BJM	Review of deposition outline from MSS for deposition of Officer Albertini.	D	0.20	455.00	91.00	0.20	460.00	92.00	
10/08/14	MSS	Continue depo prep for officer alberti; continue reviewing Tridico depo transcript	D	5.00	315.00	1,575.00	5.00	255.00	1275.00	
10/09/14	BJM	Meeting with MSS re: deposition, attending deposition of Officer Alberti.	D/R	3.50	455.00	1,592.50	3.50	460.00	1610.00	
10/09/14	MSS	Prep for deposition; finish reviewing Tridico's deposition transcript for errata;	D	2.50	315.00	787.50	2.50	255.00	637.50	
10/10/14	MSS	Follow-up email to Opp Counsel re: additional documents to be produced in response to our RPD request.	D	0.20	315.00	63.00	0.20	255.00	51.00	
10/22/14	MSS	Errata sheet for client	D	1.60	315.00	504.00	1.60	255.00	408.00	
10/22/14	MSS	Review transcript from 3rd party witness, alberti	D	0.30	315.00	94.50	0.30	255.00	76.50	
10/23/14	MSS	Review alberti depo; send witness email re: errata sheet	D	2.30	315.00	724.50	2.30	255.00	586.50	
10/24/14	MSS	Teleconf with client re: deposition errata - email to client re: same	D	0.50	315.00	157.50	0.50	255.00	127.50	
10/27/14	MSS	Email correspondence with client re: depo; call with client re: same	D	0.20	315.00	63.00	0.20	255.00	51.00	
10/28/14	MSS	Call with expert re: bill; call with client re: same	NC	0.30	315.00	0.00	0	0.00	0.00	No charge
10/30/14	MSS	Finalize the errata sheet; meet with client to sign errata sheet	D	0.80	315.00	252.00	0.80	255.00	204.00	
11/05/14	MSS	Research methods of stipulating authenticity	D	0.50	315.00	157.50	0.50	255.00	127.50	
11/06/14	MSS	Review latest document production from DC	D	0.70	315.00	220.50	0.70	255.00	178.50	
11/11/14	BJM	Review of depositions, research on RFAs for authentication purposes.	D	1.70	455.00	773.50	1.70	460.00	782.00	
11/11/14	MSS	Teleconf with client re: update on discovery and discussion of future motions.	D	0.40	315.00	126.00	0.40	255.00	102.00	
11/13/14	MSS	Email to Opp counsel re: stipulations	D	0.10	315.00	31.50	0.10	255.00	25.50	
11/18/14	BJM	Call with economic expert.	NC	0.20	455.00	0.00	0	0.00	0.00	No charge
12/08/14	BJM	Call with DCAG re: conference call with Judge Huvelle.	D	0.20	455.00	91.00	0.20	460.00	92.00	

12/09/14	BJM	Call with client re: status and mediation.	D	0.20	455.00	91.00	0.20	460.00	92.00	
12/12/14	VXM	Discussed district court admission with BJM and DC Bar requirements.	NC	0.20	315.00	0.00	0	0.00	0.00	No charge
12/17/14	VXM	Began review of pleadings in case and DCOHR docs and medical records.	CD	0.50	315.00	157.50	0.50	255.00	127.50	
12/19/14	BJM	Demand to MPD counsel for mediation.	ADR	0.20	455.00	91.00	0.20	460.00	92.00	
12/23/14	VXM	Continued review of discovery responses and began reading through client's deposition.	D	2.00	315.00	630.00	2.00	255.00	510.00	
12/23/14	VXM	Reviewed and edited motion for pro hac and edited exhibit declaration and forms for submission.	MP	0.60	315.00	189.00	0.60	255.00	153.00	
12/23/14	VXM	Reviewed local DDC Rules for pro hoc process for compliance.	NC	0.30	315.00	0.00	0	0.00	0.00	No charge
12/30/14	BJM	Call with VM re: mediation statement.	ADR	0.20	455.00	91.00	0.20	460.00	92.00	
12/30/14	CXF	Read complaint; Initial phone meeting with Brian Markovitz and Vijay Mani regarding the background of the case and what needs to be included in the draft of mediation statement. Read through the depositions of Plaintiff and Alberti	ADR	4.30	154.00	662.20	4.30	150.00	645.00	
12/30/14	VXM	Began review of discovery responses and depo to familiarize with case and prepare for mediation.	ADR	1.00	315.00	315.00	1.00	255.00	255.00	
12/30/14	VXM	Communication with law clerk concerning mediation statement.	ADR	0.20	315.00	63.00	0.20	255.00	51.00	
12/30/14	VXM	Meeting with BJM regarding mediation statement, case history, and model sample.	ADR	0.40	315.00	126.00	0.40	255.00	102.00	
12/30/14	VXM	Sent law clerk settlement demand, relevant transcripts, and sample statements for review and for drafting mediation statement.	ADR	0.20	315.00	63.00	0.20	255.00	51.00	

12/31/14	CXF	Continued to work on the Mediation Statement. Read new settlement offer. Read Defendant's responses to interrogatories and the EEOC decision, drafting mediation statement.	ADR/R	3.30	154.00	508.20	3.30	150.00	495.00	
12/31/14	VXM	Read and sent analysis from letter of determination to C. Fuentes.	ADR	0.30	315.00	94.50	0.30	255.00	76.50	
01/05/15	BJM	Deposition review and drafting mediation statement.	ADR	2.30	455.00	1,046.50	2.30	460.00	1058.00	
01/05/15	CXF	Editing mediation letter and preparing exhibits for the judge	ADR	0.40	154.00	61.60	0.40	150.00	60.00	
01/05/15	VXM	Completed latest revisions and edits to mediation statement.	ADR	1.30	315.00	409.50	1.30	255.00	331.50	
01/05/15	VXM	Organized and gathered all exhibits and covers to accompany mediation statement.	ADR	0.50	315.00	157.50	0.50	255.00	127.50	
01/05/15	VXM	Proofread and finalized mediation statement for filing.	ADR	0.50	315.00	157.50	0.50	255.00	127.50	
01/05/15	VXM	Meeting with Chelsea Fuentes regarding review of statement, and preparation of final exhibits to mediation statement.	ADR	0.30	315.00	94.50	0.30	255.00	76.50	
01/06/15	CXF	Finalized and scanned exhibits to the mediation statement. Final proofread of mediation statement.	ADR	1.30	154.00	200.20	1.30	154.00	200.20	
01/06/15	VXM	Met with J. Richardson regarding verification of all exhibits to be sent for mediation to Judge Kay.	ADR	0.20	315.00	63.00	0.20	255.00	51.00	
02/05/15	BJM	Review of mediation statement.	ADR	0.50	455.00	227.50	0.50	460.00	230.00	
02/05/15	VXM	Communication with G. Chandler to ensure updated exhibits are sent with mediation statement.	ADR	0.20	315.00	63.00	0.20	255.00	51.00	
02/24/15	BJM	Preparation and travel for mediation with Judge Kaye.	NC	6.70	455.00	0.00	0	0.00	0.00	No charge
02/24/15	VXM	Calendared all items discussed in mediation and began review of docs for settlement demand per discussion with opposing counsel.i	ADR	0.50	315.00	157.50	0.50	255.00	127.50	

02/24/15	VXM	Preparation and travel for mediation with Judge Kaye.	NC	6.70	315.00	0.00	0	0.00	0.00	No charge
02/27/15	VXM	Began drafting settlement demand breaking down elements in case needed to prevail and justifying demand per discussion at mediation.	ADR	1.00	315.00	315.00	1.00	255.00	255.00	
03/02/15	BJM	Review of consent motion.	MP	0.20	455.00	91.00	0.20	460.00	92.00	
03/02/15	VXM	Communication with BJM regarding drafting motion for Judge Huvelle.	MP	0.20	315.00	63.00	0.20	255.00	51.00	
03/02/15	VXM	Reviewed all communication between counsel, reviewed scheduling order and all deadlines; drafted motion to modify scheduling order and proposed order, and sent to BJM for review and review by opposing counsel	MP	1.50	315.00	472.50	1.50	255.00	382.50	
03/03/15	VXM	Reviewed and edited motion to modify scheduling order and order.	MP	0.40	315.00	126.00	0.40	255.00	102.00	
03/03/15	VXM	Communication with M. Mullen (opposing counsel) regarding approval for motion to be filed.	MP	0.30	315.00	94.50	0.30	255.00	76.50	
03/03/15	VXM	Follow-up communication with Owen Williams regarding approval for motion to be filed.	MP	0.30	315.00	94.50	0.30	255.00	76.50	
03/03/15	VXM	Finalized motion and order post-DC Gov review and prepared for filing.	MP	0.30	315.00	94.50	0.30	255.00	76.50	
03/23/15	BJM	Review of statement to Martha Mullen re: settlement.	ADR	0.30	455.00	136.50	0.30	460.00	138.00	
04/29/15	VXM	Discussion with BJM regarding request for extension and previous communication with opposing counsel.	MP	0.20	315.00	63.00	0.20	255.00	51.00	
05/01/15	VXM	Discussion with BJM re: cross-motion for SJ.	MP	0.20	315.00	63.00	0.20	255.00	51.00	
05/18/15	BJM	Review of motion for sj, research on worksharing agreement between DCOHR and EEOC.	MP	1.50	455.00	682.50	1.50	460.00	690.00	

05/20/15	VXM	Began outline of facts and elements needed for each separate claim in preparation for opposition to MSJ.	MP	2.00	315.00	630.00	2.00	255.00	510.00	
05/20/15	VXM	Researching issue of USERRA hostile work environment and whether case law supporting HWE claims.	MP	2.00	315.00	630.00	2.00	255.00	510.00	
05/28/15	VXM	Communication with opposing counsel regarding motion for extension and consent.	MP	0.20	315.00	63.00	0.20	255.00	51.00	
05/28/15	VXM	Researched work share agreement regarding DCHRC and procedural arguments for MSJ opp. argument subsection 1.	MP	1.00	315.00	315.00	1.00	255.00	255.00	
06/02/15	VXM	Review of latest order and recalendaring of MSJ deadlines.	MP	0.30	315.00	94.50	0.30	315.00	94.50	
06/04/15	VXM	Continued review of docs, depositions, discovery responses for excerpts and support for each element of each claim in complaint for opposition to MSJ.	MP	3.00	315.00	945.00	3.00	315.00	945.00	
06/04/15	VXM	Researched cases to support that severity of harassment claim under religious discrimination may include comments as in this case.	MP	1.50	315.00	472.50	1.50	315.00	472.50	
06/08/15	VXM	Tridico review of depositions	MP	2.00	315.00	630.00	2.00	315.00	630.00	
06/09/15	VXM	Meeting with BJM on Tridico update	MP	0.20	315.00	63.00	0.20	315.00	63.00	
06/09/15	VXM	Tridico review of all facts in depositions and docs, corresponding to each paragraph in SOMF from D, and evaluation of disputed and unaddressed facts.	MP	2.50	315.00	787.50	2.50	315.00	787.50	
06/09/15	VXM	Tridico work on SOMFD	MP	2.00	315.00	630.00	2.00	315.00	630.00	
06/12/15	VXM	Research DC minimum regulations on initial disclosures and discovery	D	0.80	315.00	252.00	0.80	315.00	252.00	
06/12/15	VXM	Tridico review of depositions, drafting oppositions to SOMF & MSJ	MP	5.00	315.00	1,575.00	5.00	315.00	1575.00	
06/15/15	VXM	Tridico depo notes for Opposition to SOMF & MSJ	MP	2.00	315.00	630.00	2.00	315.00	630.00	

06/15/15	VXM	Reviewed deposition of Officer Alberti and taking deposition notes and excerpts for Motion for Summary Judgment Opposition	MP	2.00	315.00	630.00	2.00	315.00	630.00	
06/16/15	VXM	Tridico SOMFD	MP	4.00	315.00	1,260.00	4.00	315.00	1260.00	
06/19/15	VXM	Completed drafting revisions to introduction, procedural background, and fact statement for opposition to msj and mtd, and proofread same.	MP	4.00	315.00	1,260.00	4.00	315.00	1260.00	
06/19/15	VXM	Completed all citations and revisions to statement of material facts in dispute and proofread same and prepared for BJM review.	MP	3.00	315.00	945.00	3.00	315.00	945.00	
06/21/15	VXM	Completed drafting standard of review for msj and mtd opposition and researched issue of DCHRA claims being barred if a remedy is sought with DCOHR.	MP	2.50	315.00	787.50	2.50	315.00	787.50	
06/21/15	VXM	Reviewed all administrative documents and began drafting argument subsection on exhaustion in EEO for title VII and retaliation claims.	MP	3.00	315.00	945.00	3.00	315.00	945.00	
06/22/15	BJM	Editing opposition to motion for summary judgment, meeting with VXM re: same, review of SOMF, research on USERRA HWE claims	MP	3.70	455.00	1,683.50	3.70	455.00	1683.50	
06/22/15	MEK	Reviewed Def's SJ argument on Negilgent Retention; Researched Negligent Retention and ability to bring claim in addition to Title VII cases; Reviewed Def's case law citations; Drafted short argument as to why a negligent retention claim can be coupled with Title VII claims	NC	1.50	315.00	0.00	0	0.00	0.00	No charge
06/22/15	VXM	Researched cases that reflect that an EEOC complaint need not allege retaliation if the facts encompass a retaliation claim.	MP	2.00	315.00	630.00	2.00	315.00	630.00	



06/22/15	VXM	Researched elements for a USERRA discrimination claim and cases supporting discrimination based on demotion and other adverse actions and disparate treatment.	MP	2.00	315.00	630.00	2.00	315.00	630.00	
06/22/15	VXM	Completed drafting argument subsection that there are material facts in dispute for title vii and userra discrimination claims.	MP	2.00	315.00	630.00	2.00	315.00	630.00	
06/22/15	VXM	Researched retaliation elements alligned with facts in this case and completed drafting argument subsections for disputed facts for reprisal claims under USERRA and Title VII.	MP	3.00	315.00	945.00	3.00	315.00	945.00	
06/22/15	VXM	Gathered all exhibits, finalized all edits based on BJM comments, proofread entire opposition and MPA and SOMFD, and filed all with district court.	MP	2.00	315.00	630.00	2.00	315.00	630.00	
06/22/15	VXM	Researched severity and frequency cases for hostile work environment claims and completed argument subsection on USERRA and title VII hostile work environment claims.	MP/R	3.00	315.00	945.00	3.00	315.00	945.00	
06/22/15	VXM	Completed drafting argument subsection on negligent retention basaed on MK research.	NC	0.50	315.00	0.00	0	0.00	0.00	No charge
07/01/15	BJM	Call with opposing counsel re: extension of time to file reply	MP	0.20	455.00	91.00	0.20	455.00	91.00	
07/10/15	MEK	Pulled RTS Letter from DOJ; Pulled original complaint; Verified dates for filing within 90 days of issuance; Forwarded RTS Letter to opposing counsel	MP	0.40	315.00	126.00	0.40	315.00	126.00	
07/15/15	BJM	Call with client re: status of the motions, email to clerk re: extension.	MP	0.40	455.00	182.00	0.40	455.00	182.00	
07/15/15	VXM	Review of latest motion from DC and lack of consent for same.	MP	0.30	315.00	94.50	0.30	315.00	94.50	
07/17/15	VXM	Reviewed reply to MSJ opp to dermine if surreply needed.	MP	1.50	315.00	472.50	1.50	315.00	472.50	

07/17/15	VXM	Discussed new arguments and other issues raised by DC in reply and whether warrants a surreply with BJM.	MP	0.40	315.00	126.00	0.40	315.00	126.00	
09/01/15	BJM	Review of summary judgment opinion.	MP	0.40	455.00	182.00	0.40	455.00	182.00	
09/02/15	VXM	Call with BJM on Tridico	CD	0.30	315.00	94.50	0.30	315.00	94.50	
09/02/15	VXM	Tridico review and notes regarding memo opposition	MP	1.00	315.00	315.00	1.00	315.00	315.00	
09/11/15	BJM	Drafting consent motion to reschedule status conference.	CD	0.20	455.00	91.00	0.20	455.00	91.00	
09/22/15	BJM	Meeting with DCAG re: mediation.	ADR/R	0.20	455.00	91.00	0.20	455.00	91.00	
09/22/15	BJM	<del>Travel and</del> attending status conference.	HE/R	3.20	455.00	1,456.00	1.7	455.00	773.50	Reduced by 1.5 hours (travel time)
09/22/15	BJM	Travel to status conference	Travel				1.5	227.50	341.25	Travel time at 50%
10/02/15	VXM	Discussion with BJM on Tridico mediation	ADR	0.20	315.00	63.00	0.20	315.00	63.00	
10/12/15	VXM	USDC DC application	NC	0.60	315.00	0.00	0	0.00	0.00	No charge
10/30/15	VXM	Reviewed docs from discovery responses to see if any hearing use narratives in IROG responses to help show hostile work environment and retaliation.	T	1.00	315.00	315.00	1.00	315.00	315.00	
11/05/15	VXM	Reviewed all remaining deadlines and trial details to create timeline of tasks to be prepared leading up to trial.	T	0.40	315.00	126.00	0.40	315.00	126.00	
11/05/15	VXM	Reviewed opposition to MSJ to prepare issues to develop and create trial strategy when meeting with S. Vinick.	T	0.60	315.00	189.00	0.60	315.00	189.00	
11/06/15	BJM	Meeting with VXM and SBV re: trial preparation, document review, pretrial order.	T	0.50	455.00	227.50	0.50	455.00	227.50	
11/06/15	VXM	Reviewed memo opinion and outlined each claim and summary of each claim to be tried for prep meeting with SBV and BJM.	T	0.60	315.00	189.00	0.60	315.00	189.00	
11/06/15	VXM	Reviewed mediation order and pretrial scheduling order, and emailed updated dates for all deadlines to SBV and BJM.	T	0.30	315.00	94.50	0.30	315.00	94.50	

11/06/15	VXM	Meeting with SBV and BJM regarding case claims and damages, and timeline of deadlines and tasks.	T/R	0.80	315.00	252.00	0.80	315.00	252.00	
11/10/15	VXM	Review of correspondence from BJM to M. Mullen and comment on same re: mediation and previous demand.	ADR	0.30	315.00	94.50	0.30	315.00	94.50	
11/10/15	VXM	Discussion with BJM concerning opposing counsel response and resent demand letter.	ADR	0.30	315.00	94.50	0.30	315.00	94.50	
11/11/15	VXM	Discussion with BJM on mediation and communication with Judge Kay.	ADR	0.30	315.00	94.50	0.30	315.00	94.50	
11/11/15	VXM	Reviewed opposition to SJ, memo opinion and made notes for mediation, continued reading original demand.	ADR	1.80	315.00	567.00	1.80	315.00	567.00	
11/12/15	BJM	Preparation, <del>travel</del> and attending mediation with federal magistrate.	ADR	4.20	455.00	1,911.00	2.7	455.00	1228.50	Reduced by 1.5 hours (travel time)
11/12/15	BJM	<i>Travel to mediation</i>	<i>Travel</i>				<i>1.5</i>	<i>227.50</i>	<i>341.25</i>	<i>Travel time at 50%</i>
11/12/15	VXM	Travel to mediation in Judge Kay's Chambers at DDC.	NC	0.80	315.00	0.00	0	0.00	0.00	No charge
11/12/15	VXM	Travel to JGL from mediation in DDC.	NC	0.80	315.00	0.00	0	0.00	0.00	No charge
11/12/15	VXM	Mediation at Judge Kay's chambers.	NC	3.00	315.00	0.00	0	0.00	0.00	No charge
11/17/15	VXM	Discussion with BJM and A. Taylor re: deadlines with rescheduled pretrial conference and new calendared items.	T	0.30	315.00	94.50	0.30	315.00	94.50	
11/17/15	VXM	Discussion with BJM on in limine motions and trial brief and need for same.	T	0.40	315.00	126.00	0.40	315.00	126.00	
11/17/15	VXM	Reviewed model and drafting initial portions of pretrial statement.	T	1.00	315.00	315.00	1.00	315.00	315.00	
11/18/15	VXM	Gathered evidence and identified each for inclusion in joint pretrial statement.	T	2.00	315.00	630.00	2.00	315.00	630.00	
11/19/15	JJC	Pre-Trial Statement Prep meeting with VXM.	T	0.30	154.00	46.20	0.30	154.00	46.20	
11/19/15	VXM	Researched dates for pretrial deadlines based on source email and recalendared and confirmed with BJM.	T	0.40	315.00	126.00	0.40	315.00	126.00	
11/19/15	VXM	Discussed with M. Mullen DC's request for extension	T	0.20	315.00	63.00	0.20	315.00	63.00	

11/20/15	VXM	Meeting with J. Cherry regarding facts of case and joint pretrial statement tasks.	T	0.50	315.00	157.50	0.50	315.00	157.50	
11/23/15	BJM	Meeting with VXM re: pretrial.	T	0.20	455.00	91.00	0.20	455.00	91.00	
11/23/15	VXM	Mediation communication with opposing counsel.	ADR/R	0.30	315.00	94.50	0.30	315.00	94.50	
11/24/15	JJC	Trial preparation meeting with Vijay Mani.	T	0.10	154.00	15.40	0.10	154.00	15.40	
11/29/15	VXM	Continued work on pretrial statement and in limine motion.	T	2.00	315.00	630.00	2.00	315.00	630.00	
11/30/15	VXM	Meeting with J. Cherry on outstanding tasks for joint pretrial statement.	T	0.20	315.00	63.00	0.20	315.00	63.00	
12/01/15	BJM	Call with opposing counsel re: settlement, call with client re: defendant's proposal.	ADR	0.40	455.00	182.00	0.40	455.00	182.00	
12/01/15	BJM	Call with VXM re: pretrial statement and motions in limine, research on jury instructions.	T	0.30	455.00	136.50	0.30	455.00	136.50	
12/02/15	VXM	Meeting with BJM and communication with J. Cherry on pretrial statement.	T	0.30	315.00	94.50	0.30	255.00	76.50	
12/02/15	VXM	Meeting with SBV re: trial prep, in limine strategy.	T	0.50	315.00	157.50	0.50	255.00	127.50	
12/02/15	VXM	Researched rules 401, 403, 603 and 608 for motion in limine and cases in DDC.	T	3.00	315.00	945.00	3.00	315.00	945.00	
12/02/15	VXM	Continued drafting argument section and revised facts for motion in limine and trial motions.	T	3.00	315.00	945.00	3.00	315.00	945.00	
12/03/15	JMS	Meeting with VXM to review hostile work environment, USERRA, and retaliation claims, + future drafting of opposition to motion in limine.	T	0.30	154.00	46.20	0.30	154.00	46.20	
12/03/15	VXM	Review of D's motion in limine and discussion with BJM on same.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/03/15	VXM	Discussion with BJM on timeline for pretrial statement, and merits of motion in limine.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/03/15	VXM	Meeting with J. Sarfati re: merits of motion in limine, facts of case, opposition arguments and timeline for filing.	T	0.40	315.00	126.00	0.40	315.00	126.00	
12/04/15	JMS	Review of Defendant's Motion in Limine to exclude Officer Alberti's testimony for drafting opposition.	T	0.30	154.00	46.20	0.30	154.00	46.20	

12/04/15	JMS	Review of 7 DDC cases interpreting 401-404 in "me too" testimony context.	T	0.60	154.00	92.40	0.60	154.00	92.40	
12/04/15	JMS	Drafting and revision of Draft #1 of Plaintiff's Opposition to Defendant's MIL to exclude Officer Alberti's testimony.	T	4.80	154.00	739.20	4.80	154.00	739.20	
12/04/15	VXM	Communication with expert re: trial date and set-up of follow-up call.	NC	0.30	315.00	0.00	0	0.00	0.00	No charge
12/04/15	VXM	Discussed and reviewed Judge Huvelle's pretrial statement previously approved, and jury instructions, and entries of objections/responses to witness schedule for our pretrial statement.	T	0.50	315.00	157.50	0.50	315.00	157.50	
12/07/15	BJM	Drafting pretrial statement, review of documents, drafting voir dire, jury instructions, etc.	T	4.20	455.00	1,911.00	4.20	455.00	1911.00	
12/07/15	JMS	Incorporated track-changes from BJM, and added extra memorandum opinion citations in order to finalize Opposition to Defendant's Motion in Limine.	T	2.30	154.00	354.20	2.30	154.00	354.20	
12/07/15	VXM	Read and edited, and provided a revised version of opposition to motion in limine from District.	T	0.70	315.00	220.50	0.70	315.00	220.50	
12/07/15	VXM	Made second round of revisions to opposition to motion in limine by adding case citation, changing language on limiting instructions (ad citation/research on same), and adding new deposition testimony excerpt.	T	0.50	315.00	157.50	0.50	315.00	157.50	
12/07/15	VXM	Meeting with J. Sarfati re: edits to Motion in Limine.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/07/15	VXM	Proofread opposition to Motion in Limine and noted additional list of minor corrections for J. Sarfati and arranged for filing.	T	0.50	315.00	157.50	0.50	315.00	157.50	
12/08/15	BJM	Drafting pretrial statement, review of documents, drafting voir dire, jury instructions, etc., call and emails with opposing counsel re: status, drafting joint motion for extension for pretrial.	T	10.40	455.00	4,732.00	10.40	455.00	4732.00	

12/08/15	JMS	Legal research of 6 cases and 2 statutes, and drafted internal memorandum to BJM re whether Plaintiff can recover punitive damages from the District of Columbia.	NC	1.40	154.00	0.00	0	0.00	0.00	No charge
12/08/15	JMS	Review of Memorandum Opinion to identify whether Court upheld retaliation and hostile work environment claims.	NC	0.60	154.00	0.00	0	0.00	0.00	No charge
12/08/15	MEK	Researched case law for whether a government municipality is immune from awards of punitive or liquidated damages under USERRA; Reviewed jury instructions concerning liquidated damages and willfulness under USERRA.	T	2.50	315.00	787.50	2.50	315.00	787.50	
12/08/15	VXM	Continued working on witness list, and summaries of expected testimonies and sent to BJM for jury instructions purposes.	T	2.00	315.00	630.00	2.00	315.00	630.00	
12/08/15	VXM	Communications and discussions with opposing counsel re: objections and D's portions for complete version for pretrial statement.	T	0.50	315.00	157.50	0.50	315.00	157.50	
12/08/15	VXM	Communication with BJM re: pretrial statement.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/08/15	VXM	Revised and completed deposition excerpts, witness schedule and exhibit lists of initial draft of joint pretrial statement and sent to BJM to send to opposing counsel.	T	4.50	315.00	1,417.50	4.50	315.00	1417.50	
12/08/15	VXM	Reviewed/Edited joint motion to extend deadline.	T/R	0.40	315.00	126.00	0.40	315.00	126.00	
12/09/15	BJM	Emails with opposing counsel, review of pretrial statement.	T	0.90	455.00	409.50	0.90	455.00	409.50	
12/09/15	BJM	Preparation for trial, meeting with VXM re: trial preparation and pretrial statement.	T	4.30	455.00	1,956.50	4.30	455.00	1956.50	
12/09/15	VXM	Discussion with BJM on exchange of exhibits and correspondence with M. Mullen.	T	0.30	315.00	94.50	0.30	315.00	94.50	

12/09/15	VXM	Communication with M. Mullen on preserving objections for all exhibits and timeline for filing.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/09/15	VXM	Communication with M. Mullen on defendant's changes for filing final version.	T	0.20	315.00	63.00	0.20	315.00	63.00	
12/09/15	VXM	Drafted a joint motion to extend filing of pretrial statement, proofread and filed with court.	T	0.60	315.00	189.00	0.60	315.00	189.00	
12/09/15	VXM	Continued edits and arguments to D's portions of pretrial and researched certain jury instructions.	T	2.50	315.00	787.50	2.50	315.00	787.50	
12/09/15	VXM	Call with S. Vinick re: joint pretrial, and exchange of exhibits.	T/R	0.40	315.00	126.00	0.40	315.00	126.00	
12/10/15	BJM	Communication with opposing counsel re: pretrial, review of deposition transcript for witness, trial prep, meeting with VXM re: trial.	T	2.90	455.00	1,319.50	2.90	455.00	1319.50	
12/10/15	VXM	Communication re: Dr. Paige and notification for his appearance at trial.	NC	0.30	315.00	0.00	0	0.00	0.00	No charge
12/10/15	VXM	Finished draft of pretrial by completing Plaintiff's objections and analysis, and revisions and additions, and sent to M. Mullen for final approval and her objections to jury instructions.	T	3.70	315.00	1,165.50	3.70	315.00	1165.50	
12/11/15	BJM	Drafting pretrial, including objections to defendant's today produced jury instructions, and research on the same.	T	5.70	455.00	2,593.50	5.70	455.00	2593.50	
12/11/15	VXM	Communication with M. Mullen re: corrected documents, tracked changes and voir dire and jury instructions.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/11/15	VXM	Discussion with BJM and finalization of verdict form.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/11/15	VXM	Revised and finalized our jury instructions and verdict forms and sent to M. Mullen for final approval and review (still awaiting D's jury instructions (proposed)).	T	3.00	315.00	945.00	3.00	315.00	945.00	

12/11/15	VXM	Worked with BJM to respond to each of D's jury instructions where objectionable, including basis for objection and proposed alternative.	T	2.00	315.00	630.00	2.00	315.00	630.00	
12/11/15	VXM	Reviewed, edited, and finalized, incorporating and objecting to Defendant's jury instructions, and its authority and alternative instructions; proofread entire pretrial, finalized, formatted and filed with the court.	T	2.00	315.00	630.00	2.00	315.00	630.00	
12/14/15	VXM	Discussion with BJM on final filed joint pretrial statement.	T	0.20	315.00	63.00	0.20	315.00	63.00	
12/14/15	VXM	Meeting and organization of exhibits and bates numbers to pull and exchange exhibits with opposing counsel.	T	0.40	315.00	126.00	0.40	315.00	126.00	
12/14/15	VXM	Reviewed D's exhibits for objections and worked on pretrial memo.	T	1.00	315.00	315.00	1.00	315.00	315.00	
12/15/15	VXM	Discussion with BJM on getting admitted to DDC and prep for Tridico.	NC	0.20	315.00	0.00	0	0.00	0.00	No charge
12/15/15	VXM	Drafted motion for pro hac vice admission to DDC.	NC	0.60	315.00	0.00	0	0.00	0.00	No charge
12/15/15	VXM	Drafted declaration for pro hac vice after researching local rules for requirements and compliance with 44.1.	NC	0.70	315.00	0.00	0	0.00	0.00	No charge
12/15/15	VXM	Revised and edited motion for admission pro hac vice, revised declaration and drafted proposed order, proofread all docs and filed with the court.	NC	1.00	315.00	0.00	0	0.00	0.00	No charge
12/15/15	VXM	Discussions with BJM re: pro hac vice process and edits to final motion and notarizing declaration.	NC	0.40	315.00	0.00	0	0.00	0.00	No charge
12/15/15	VXM	Reviewed orders for pre-trial conference and continued gathering complete exhibits for P's binder.	T	0.60	315.00	189.00	0.60	315.00	189.00	
12/16/15	JMS	Legal research of 7 cases to determine whether back-pack in the absence of reinstatement is a legal or equitable remedy in the context of Title 7 and USERRA.	T	0.80	154.00	123.20	0.80	154.00	123.20	



12/16/15	JMS	Legal Research to determine latest SCOTUS definiton of "but for" causation in the context of Title 7 claims and retaliation claims.	T	0.60	154.00	92.40	0.60	154.00	92.40	
12/17/15	BJM	Meeting re: trial preparation and pretrial preparation with VXM and SBV, dividing up tasks.	T	1.80	455.00	819.00	1.80	455.00	819.00	
12/17/15	VXM	Meeting with S. Vinick and BJM on Tridico prep and trial notes.	T	0.50	315.00	157.50	0.50	315.00	157.50	
12/18/15	BJM	Research on ethics of contacting current officers at MPD (i.e. fact witnesses that are government employees).	NC	1.20	455.00	0.00	0	0.00	0.00	No charge
12/18/15	BJM	Meeting to prepare for pretrial.	T	0.40	455.00	182.00	0.40	455.00	182.00	
12/18/15	BJM	Drafting bench memo on right to jury trial under USERRA and right to jury trial under Title VII when no reinstatement sought.	T	3.80	455.00	1,729.00	3.80	455.00	1729.00	
12/18/15	JMS	Drafted legal memorandum for BJM review and future submission to judge re whether back-pay should be viewed as a legal or equitable remedy under USERRA and Title VII.	T	4.10	154.00	631.40	4.10	154.00	631.40	
12/18/15	JMS	Drafted legal memorandum for BJM review and future submission to judge re but for causation for a retaliation claim under Title VII.	T	2.20	154.00	338.80	2.20	154.00	338.80	
12/18/15	VXM	Meeting with S. Areizaga re: docs needed for pretrial conference and binder and authority.	T	0.50	315.00	157.50	0.50	315.00	157.50	
12/18/15	VXM	Continued preparing all exhibits for pretrial, and trial motion, and memo for pretrial.	T	0.50	315.00	157.50	0.50	315.00	157.50	
12/18/15	VXM	Continued breakdown of facts per element and cross examination sheets for 2 of D's witnesses.	T	2.50	315.00	787.50	2.50	315.00	787.50	
12/20/15	BJM	Research and drafting memorandum on but for causation and whether backpay is a jury determination.	T	2.90	455.00	1,319.50	2.90	455.00	1319.50	

12/21/15	BJM	Preparation for pretrial, research on jury determination issues, causation standard, and admissibility of EEOC findings, document review, meeting with SBV re: same and pretrial motions preparation.	T	8.20	455.00	3,731.00	8.20	455.00	3731.00	
12/21/15	SBV	Mt BJM; Prepare for pre trial conference	T	3.50	530.00	1,855.00	3.50	530.00	1855.00	
12/21/15	VXM	Discussed pretrial questions for conference with BJM.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/22/15	BJM	Preparation, <del>travel</del> and participation at pretrial.	T	4.50	455.00	2,047.50	3	455.00	1365.00	Reduced by 1.5 hours (travel time)
12/22/15	BJM	<i>Travel to pretrial</i>	<i>Travel</i>				1.5	227.50	341.25	<i>Travel time at 50%</i>
12/22/15	SBV	<del>Travel time to and from U.S.D.C. Pre trial Conference;</del> discussion with BJM; trial preparation	T/R	6.00	530.00	3,180.00	4.5	530.00	2385.00	Reduced by 1.5 hours (travel time)
12/22/15	SBV	<i>Travel to and from Pre-trial conference</i>	<i>Travel</i>				1.5	265.00	397.50	<i>Travel time at 50%</i>
12/28/15	VXM	Call with BJM to discuss tasks in order, subpoenas, and brief on causation.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/28/15	VXM	Communication with T. Avind at OAG regarding deposition in the case.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/29/15	JJC	Correspondence to USDC District of Columbia. Re: Technology needs for trial on Jan 11th.	T	0.20	154.00	30.80	0.20	154.00	30.80	
12/29/15	JJC	Trial Prep for the Tridico case. Re: Trial Prep checklist for attorneys.	T	0.70	154.00	107.80	0.70	154.00	107.80	
12/29/15	VXM	Communication with BJM re: proffer requested by the court and motion.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/29/15	VXM	Communication with J. Cherry, S. Vinick and BJM on trial prep.	T	0.30	315.00	94.50	0.30	315.00	94.50	
12/29/15	VXM	Research on Causation for USERRA in all circuits and reconciliation with Title VII.	T	2.00	315.00	630.00	2.00	315.00	630.00	
12/29/15	VXM	Drafted motion addressing causation for J. Huvelle.	T	2.00	315.00	630.00	2.00	315.00	630.00	
12/29/15	VXM	Began review of Alberti deposition and affidavit for facts concerning each detail of her claim against Vice and MPD.	T	1.10	315.00	346.50	1.10	315.00	346.50	

12/30/15	BJM	Review of motion on causation and proffer, research on appropriate jury instructions.	T	2.80	455.00	1,274.00	2.80	455.00	1274.00	
12/30/15	JJC	Trial Preparation. Re: update checklist for items needed at trial.	T	0.50	154.00	77.00	0.50	154.00	77.00	
12/30/15	VXM	Completed review of docs and depo for Alberti and drafted proffer requested by court.	T	2.20	315.00	693.00	2.20	315.00	693.00	
12/30/15	VXM	Finalized exhibit for reconcilable jury instruction for USERRA and Title VII and prepared for filing, also proofread motion and proffer and filed all with DDC.	T	1.10	315.00	346.50	1.10	315.00	346.50	
01/02/16	BJM	Drafting petition for fees, research on applicable case law,	FP	7.80	455.00	3,549.00	7.80	455.00	3549.00	
01/02/16	SBV	Review file and exhibits; trial preparation	T	2.00	530.00	1,060.00	2.00	530.00	1060.00	
01/02/16	VXM	Began review of pleadings file and docket, emails and	FP	2.00	315.00	630.00	2.00	315.00	630.00	
01/03/16	SBV	Review deposition transcripts of the client and Officer Alberti	T	3.00	530.00	1,590.00	3.00	530.00	1590.00	
01/04/16	BJM	Trial Preparation	T	6.70	455.00	3,048.50	6.70	455.00	3048.50	
01/04/16	SBV	Discussion with BJM and VM; trial preparation; file review	T	2.00	530.00	1,060.00	2.00	530.00	1060.00	
01/04/16	VXM	Meeting with SBV, BJM and J. Cherry regarding trial prep.	T	0.80	315.00	252.00	0.80	315.00	252.00	
01/04/16	VXM	Communication with SBV and BJM on trial prep matters .	T	0.20	315.00	63.00	0.20	315.00	63.00	
01/04/16	VXM	Reviewed joint proposed voir dire questions, revised and sent to BJM.	T	0.40	315.00	126.00	0.40	315.00	126.00	
01/04/16	VXM	Communication with J. Cherry re: S. Guthrie.	T	0.30	315.00	94.50	0.30	315.00	94.50	
01/04/16	VXM	Follow-up email from M. Mullen on status of joint voir dire.	T	0.20	315.00	63.00	0.20	315.00	63.00	
01/04/16	VXM	Reviewed M. Mullen edits and revised all joint voir dire and reviewed standard questions for court and finalized and proofread, sent to M. Mullen for final approval.	T	1.50	315.00	472.50	1.50	315.00	472.50	
01/04/16	VXM	Formatted final joint voir dire, and filed with USDC.	T	0.30	315.00	94.50	0.30	315.00	94.50	

01/05/16	BJM	Research on USERRA, preparation of outline for witnesses, meetings with VXM and JMC re: trial preparation, review of defendant's causation memorandum.	T	6.80	455.00	3,094.00	6.80	455.00	3094.00	
01/05/16	VXM	Follow-up communication with opposing counsel to confirm filing of joint voir dire.	T	0.20	315.00	63.00	0.20	315.00	63.00	
01/05/16	VXM	Discussion with BJM on opposition to USERRA damages motion by District.	T	0.30	315.00	94.50	0.30	315.00	94.50	
01/05/16	VXM	Discussions and emails to SBV re: Grant admission and DCOHR affidavits.	T	0.20	315.00	63.00	0.20	315.00	63.00	
01/05/16	VXM	Researched online for information on Sergeant Grant for impeachment and discussed appeal ruling on misconduct with BJM.	T	0.50	315.00	157.50	0.50	315.00	157.50	
01/05/16	VXM	Continued review of IAD docs and other impeachment material for witnesses and continued work on outline for opening statement.	T	1.70	315.00	535.50	1.70	315.00	535.50	
01/06/16	BJM	Research and drafting motion, meetings with JMC and VXM re: trial issues, preparation of outline for witnesses, trial preparation, call with opposing counsel re: motions.	T	7.90	455.00	3,594.50	7.90	455.00	3594.50	
01/06/16	MEK	Bluebooked citation to jury instructions.	NC	0.20	315.00	0.00	0	0.00	0.00	No charge
01/06/16	MEK	Reviewed filings regarding admissibility of Officer Alberti's testimony; Drafted response letter to District's reponse to plaintiff's informal correspondence with Court regarding testimony of Officer Alberti	T/R	2.70	315.00	850.50	2.70	315.00	850.50	
01/06/16	VXM	Meeting and discussion with W. Fuller on impeachment material for D's witnesses.	T	0.40	315.00	126.00	0.40	315.00	126.00	
01/06/16	VXM	Began pulling docs from online research from W. Fuller and including relevant docs in folders for each of D's witnesses.	T	0.50	315.00	157.50	0.50	315.00	157.50	
01/06/16	VXM	Meeting with J. Cherry concerning blow-ups from D's Statement of undisputed facts.	T	0.30	315.00	94.50	0.30	315.00	94.50	

01/06/16	VXM	Read through and discussed D's response to P's proffer on Alberti testimony, and our reply to same.	T	0.50	315.00	157.50	0.50	315.00	157.50	
01/06/16	VXM	Meeting with M. Kreiser to discuss proffer reply and outline of our argument in the reply.	T	0.40	315.00	126.00	0.40	315.00	126.00	
01/06/16	VXM	Reviewed, edited, revised, formatted and filed our response to D's motion on damages.	T	0.70	315.00	220.50	0.70	315.00	220.50	
01/06/16	VXM	Drafted slides for all callouts to go with opening statement and sent to J. Cherry and SBV for edits.	T	1.80	315.00	567.00	1.80	315.00	567.00	
01/06/16	VXM	Reviewed main depositions and IROG responses for a timeline for SBV and TimeMap and possibly the opening.	T	1.00	315.00	315.00	1.00	315.00	315.00	
01/06/16	VXM	Continued references to depo excerpts and evidentiary docs for each the HWE claim under religion and military service.	T	2.00	315.00	630.00	2.00	315.00	630.00	
01/06/16	WJF	Reviewed defendant's discovery file for material for impeachment during trial	T	5.50	154.00	847.00	5.50	154.00	847.00	
01/07/16	BJM	Call with judge re: damages; review of witness testimony, trial preparation.	T	8.00	455.00	3,640.00	8.00	455.00	3640.00	
01/07/16	MEK	Conferenced with BJM and VXM regarding case and assisting with last minute drafting; Discussed themes for opening statement to jury; Discussed defendant's response to informal letter to judge regarding Officer Alberti testimony.	T	0.50	315.00	157.50	0.50	315.00	157.50	
01/07/16	VXM	Discussed settlement options with BJM and SBV, and opposing counsel's response to offer with \$25K counter.	ADR	0.30	315.00	94.50	0.30	315.00	94.50	
01/07/16	VXM	Meeting with J. Richardson, J. Cherry, BJM and SBV to moot opening statement with powerpoint presentation and discuss criticism to better prepare for trial.	NC	1.00	315.00	0.00	0	0.00	0.00	No charge

01/07/16	VXM	Reviewed Paige report and drafted correspondence to Judge Huvelle with copy of report and explanation of numbers in the report to include frontpay portion as backpay, and sent to Judge's clerk.	NC	0.40	315.00	0.00	0	0.00	0.00	No charge
01/07/16	VXM	Redrafted and revised other portions of reply to Defendant's opposition to proffer on Alberti testimony, and prepared for filing.	T	1.20	315.00	378.00	1.20	315.00	378.00	
01/07/16	VXM	Reviewed W. Fuller's findings for impeachment material and forwarded to SBV for witness crosses.	T	0.50	315.00	157.50	0.50	315.00	157.50	
01/07/16	VXM	Finished highlighting expected testimony and drafted opening statement and began practicing opening statement.	T	3.00	315.00	945.00	3.00	315.00	945.00	
01/07/16	VXM	Meeting with J. Cherry re: timeline through TimeMap and callouts for opening.	T	0.30	315.00	94.50	0.30	315.00	94.50	
01/07/16	VXM	Call with opposing counsel re: motion for clarification and request to withdraw USERRA claim.	T	0.30	315.00	94.50	0.30	315.00	94.50	
01/07/16	VXM	Meeting with BJM to discuss D's motion for clarification and rejection of USERRA withdrawal request.	T	0.30	315.00	94.50	0.30	315.00	94.50	
01/07/16	VXM	Discussion with BJM and J. Cherry re: pre-trial communication with Officer Alberti re: her expected trial testimony.	T	0.40	315.00	126.00	0.40	315.00	126.00	
01/07/16	VXM	Call with Officer Alberti re: trial prep and testimony from deposition to used during direct.	T	0.70	315.00	220.50	0.70	315.00	220.50	
01/07/16	VXM	Researched provisions of USERRA for qualified individuals to be protected under statute 4311 and case law on issue; printed out relevant statute provision for call with judge.	T	0.70	315.00	220.50	0.70	315.00	220.50	

01/07/16	VXM	Call with Judge and opposing counsel re: damages motions, motion for clarification, jury instructions, and arguments to dismiss USERRA claims.	T	0.60	315.00	189.00	0.60	315.00	189.00	
01/07/16	VXM	Teleconference with BJM and M. Mullen discussing and refusing consent for motion for clarification and motion to dismiss USERRA claim.	T/R	0.30	315.00	94.50	0.30	315.00	94.50	
01/07/16	WJF	Reviewed defendant's discovery material for impeachment	T/R	4.10	154.00	631.40	4.10	154.00	631.40	
01/08/16	BJM	Trial preparation, drafting motions requested by judge.	T	8.40	455.00	3,822.00	8.40	455.00	3822.00	
01/08/16	JMS	Drafting of Trial Motion to Exclude evidence pertaining to June 2013 DUI at upcoming trial.	NC	3.80	154.00	0.00	0	0.00	0.00	No charge
01/08/16	MLS	Review and revise BJM motion to strike defense exhibits	NC	0.20	255.00	0.00	0	0.00	0.00	No charge
01/08/16	SBV	Trial preparation; review exhibits; prepare examination questions; telephone call with client	T	8.00	530.00	4,240.00	8.00	530.00	4240.00	
01/08/16	VXM	Went through all prior exhibit folders and corrected errors from pretrial conference in exhibits included, and revised exhibits based on latest call with Judge, and arranged for correct exhibits to be copied and discussed with A. Taylor and J Cherry	T	0.70	315.00	220.50	0.70	315.00	220.50	
01/08/16	VXM	Reviewed, revised, added language to response to motion for clarification and filed with DDC.	T	0.70	315.00	220.50	0.70	315.00	220.50	
01/08/16	VXM	Discussion with BJM and SBV re: D's lack of exhibit copies provided to us, and edit of correspondence to opposing counsel on same issue.	T	0.40	315.00	126.00	0.40	315.00	126.00	
01/08/16	VXM	Researched case law on issue of client not being qualified under USERRA, and sent to BJM for response to motion due Sunday.	T	0.50	315.00	157.50	0.50	315.00	157.50	

01/08/16	VXM	Reviewed D's last minute production of report from letter to. Fitzgerald on knife issue, and new payroll records offered for the first time and discussed with SBV and BJM.	T	0.60	315.00	189.00	0.60	315.00	189.00	
01/08/16	VXM	Listened to audio transcripts from IAD interviews for all of D's witnesses and discussed and sent to SBV for his crosses.	T	0.80	315.00	252.00	0.80	315.00	252.00	
01/08/16	VXM	Calls with client re: his deposition testimony and clarification of facts for opening and slides for opening.	T	0.50	315.00	157.50	0.50	315.00	157.50	
01/08/16	VXM	Drafted summary memo of main points to include in USERRA opposition to BJM, including list of 8 points with authority.	T	0.50	315.00	157.50	0.50	315.00	157.50	
01/08/16	VXM	Because Defendant lost pretrial exhibits it was provided, I discussed final exhibit list and resent to Defendant via email.	T	0.40	315.00	126.00	0.40	315.00	126.00	
01/08/16	VXM	Revised opening statement based on yesterday's feedback from J. Cherry, J. Richardson, SBV and BJM, and practiced opening for final moot on Sunday.	T	2.00	315.00	630.00	2.00	315.00	630.00	
01/09/16	BJM	Trial preparation, meeting with client, drafting motions.	T	7.80	455.00	3,549.00	7.80	455.00	3549.00	
01/09/16	SBV	Trial preparation; meeting with client; work on examination questions	T	5.00	530.00	2,650.00	5.00	530.00	2650.00	
01/10/16	BJM	Trial preparation, meeting with client, drafting motions.	T	8.90	455.00	4,049.50	8.90	455.00	4049.50	
01/10/16	JJC	Trial Prep for the trial.	T	6.00	154.00	924.00	6.00	154.00	924.00	
01/10/16	SBV	Trial preparation; telephone call with client; review documents	T	8.00	530.00	4,240.00	8.00	530.00	4240.00	
01/10/16	VXM	Meeting to run through opening statement, review witness testimony, and prepare client for witness stand, and discuss questions with client to fill in details for opening.	T	8.00	315.00	2,520.00	8.00	315.00	2520.00	



01/10/16	VXM	Revised and memorized/mooted opening based on feedback from BJM and SBV; created new slides for opening to include new timeline, org chart, claims, etc.	T	3.00	315.00	945.00	3.00	315.00	945.00	
01/10/16	VXM	Reviewed, revised, edited, formatted, finalized and filed opposition to motion to dismiss USERRA claims.	T	1.00	315.00	315.00	1.00	315.00	315.00	
01/11/16	BJM	Trial, <del>travel to and from</del> , preparation for witness, call with witness.	T/R	13.20	455.00	6,006.00	11.7	455.00	5323.50	Reduced by 1.5 hours (travel time)
01/11/16	<del>BJM</del>	<del>Travel to and from trial</del>	<del>Travel</del>				1.5	227.50	341.25	<del>Travel time at 50%</del>
01/11/16	JJC	Tridico Trial at United States District Court of DC.	T	8.00	154.00	1,232.00	8.00	154.00	1232.00	
01/11/16	SBV	<del>Travel time to and from D.C. Federal Court;</del> trial; trial preparation; discussion with BJM and VM	T	12.00	530.00	6,360.00	10.5	530.00	5565.00	Reduced by 1.5 hours (travel time)
01/11/16	<del>SBV</del>	<del>Travel time to and from D.C. Federal Court</del>	<del>Travel</del>				1.5	265.00	397.50	<del>Travel time at 50%</del>
01/11/16	VXM	Travel to and from Greenbelt to District Court DC for trial (45 min. each way); opening Statement	NC	3.00	315.00	0.00	0	0.00	0.00	No charge
01/11/16	VXM	Trial (Jury Voir Dire and P's testimony).	NC	7.50	315.00	0.00	0	0.00	0.00	No charge
01/12/16	BJM	Trial, <del>travel to and from</del> .	T	10.30	455.00	4,686.50	8.8	455.00	4004.00	Reduced by 1.5 hours (travel time)
01/12/16	<del>BJM</del>	<del>Travel to and from trial</del>	<del>Travel</del>				1.5	227.50	341.25	<del>Travel time at 50%</del>
01/12/16	JJC	Tridico Trial at United States District Court of DC.	T	8.00	154.00	1,232.00	8.00	154.00	1232.00	
01/12/16	SBV	<del>Travel time to and from D.C. Federal Court;</del> trial; trial preparation; discussion with BJM and VM	T	12.00	530.00	6,360.00	10.5	530.00	5565.00	Reduced by 1.5 hours (travel time)
01/12/16	<del>SBV</del>	<del>Travel time to and from D.C. Federal Court</del>	<del>Travel</del>				1.5	265.00	397.50	<del>Travel time at 50%</del>
01/12/16	VXM	Travel to and from Greenbelt to District Court DC for trial (45 min. each way).	NC	1.50	315.00	0.00	0	0.00	0.00	No charge
01/12/16	VXM	Trial Day 2 (testimony of P, Ofc. Alberti, J. Paige, Sgt Nickerson, Cap DeVille).	T	7.50	315.00	2,362.50	7.50	315.00	2362.50	

01/12/16	VXM	Cued up all audio excerpts from IAD interview of letter to Fitzgerald, and revised cross examination notes and outline to include closed door, meeting, EEO training and N-word matter.	T	2.00	315.00	630.00	2.00	315.00	630.00	
01/12/16	VXM	Provided concerns and edits to verdict form for BJM and SBV consideration.	T	0.30	315.00	94.50	0.30	315.00	94.50	
01/13/16	BJM	<del>Trial, travel to and from.</del>	T/R	10.50	455.00	4,777.50	9	455.00	4095.00	Reduced by 1.5 hours (travel time)
01/13/16	<i>BJM</i>	<i>Travel to and from trial</i>	<i>Travel</i>				<i>1.5</i>	<i>227.50</i>	<i>341.25</i>	<i>Travel time at 50%</i>
01/13/16	JJC	Tridico Trial in United States District Court of DC.	T	8.00	154.00	1,232.00	8.00	154.00	1232.00	
01/13/16	SBV	<del>Travel time to and from D.C. Federal Court;</del> trial; trial preparation; discussion with BJM and VM	T	10.00	530.00	5,300.00	8.5	530.00	4505.00	Reduced by 1.5 hours (travel time)
01/13/16	<i>SBV</i>	<i>Travel to and from D.C. Federal Court</i>	<i>Travel</i>				<i>1.5</i>	<i>265.00</i>	<i>397.50</i>	<i>Travel time at 50%</i>
01/13/16	VXM	Travel to and from Greenbelt to District Court DC for trial (45 min. each way).	NC	1.50	315.00	0.00	0	0.00	0.00	No charge
01/13/16	VXM	Trial Day 3 (testimony of letter Lt Fitzgerald, Sgt Grant, motions, Closing Args).	T/R	7.50	315.00	2,362.50	7.50	315.00	2362.50	
01/14/16	BJM	<del>Trial, travel to and from.</del>	NC	0.20	455.00	0.00	0	0.00	0.00	No charge
01/14/16	BJM	<del>Travel and trial.</del>	T	8.50	455.00	3,867.50	7	455.00	3185.00	Reduced by 1.5 hours (travel time)
01/14/16	<i>BJM</i>	<i>Travel to trial</i>	<i>Travel</i>				<i>1.5</i>	<i>227.50</i>	<i>341.25</i>	<i>Travel time at 50%</i>
01/14/16	SBV	<del>Travel time to and from D.C. Federal Court;</del> trial; discussion with all counsel	T	6.00	530.00	3,180.00	4.5	530.00	2385.00	Reduced by 1.5 hours (travel time)
01/14/16	<i>SBV</i>	<i>Travel time to and from D.C. Federal Court</i>	<i>Travel</i>				<i>1.5</i>	<i>265.00</i>	<i>397.50</i>	<i>Travel time at 50%</i>
01/14/16	VXM	Travel to and from Greenbelt to District Court DC for trial (45 min. each way).	NC	1.50	315.00	0.00	0	0.00	0.00	No charge
01/14/16	VXM	Trial Day 4 (closing arg, rebuttal, motions, and jury instructions/deliberations).	NC	6.00	315.00	0.00	0	0.00	0.00	No charge
01/15/16	BJM	<del>Travel and</del> trial, post-verdict meeting with client.	T	5.30	455.00	2,411.50	3.8	455.00	1729.00	Reduced by 1.5 hours (travel time)

01/15/16	BJM	Travel to trial	Travel				1.5	227.50	341.25	Travel time at 50%
01/15/16	SBV	Discussion with BJM; review jury verdict	T	0.50	530.00	265.00	0.50	530.00	265.00	
01/15/16	VXM	Travel to and from Greenbelt to District Court DC for trial (45 min. each way).	NC	1.50	315.00	0.00	0	0.00	0.00	No charge
01/15/16	VXM	Trial Day 5 (jury deliberations and verdict and final trial matters).	NC	2.20	315.00	0.00	0	0.00	0.00	No charge
01/18/16	BJM	Research for fee petition.	FP	3.70	455.00	1,683.50	3.70	455.00	1683.50	
01/19/16	BJM	Research on case law re: case law for the fee petition, drafting fee petition.	FP	5.90	455.00	2,684.50	5.90	455.00	2684.50	
01/19/16	VXM	Discussion with M. Holland on SBV and BJM fee petition discussion and schedule.	FP	0.20	315.00	63.00	0.20	315.00	63.00	
01/19/16	VXM	Discussion with N. Woodfield regarding trial and fee petition.	FP	0.20	315.00	63.00	0.20	315.00	63.00	
01/19/16	VXM	Meeting with SBV and BJM on post trial motions and next steps.	FP	1.00	315.00	315.00	1.00	315.00	315.00	
01/20/16	BJM	Research and drafting fee petition and affidavits for fee petition.	FP	4.30	455.00	1,956.50	4.30	455.00	1956.50	
01/23/16	BJM	Research on case law for fee petition.	FP	1.20	455.00	546.00	1.20	455.00	546.00	
01/27/16	VXM	Reviewed, edited and finalized motion for enlargement of	FP	0.50	315.00	157.50	0.50	315.00	157.50	
01/27/16	VXM	Researched final judgment elements in case law for trigger of petition deadline.	NC	0.50	315.00	0.00	0	0.00	0.00	No charge
01/27/16	VXM	Discussed and edited email to opposing counsel for consent	NC	0.30	315.00	0.00	0	0.00	0.00	No charge
01/28/16	BJM	Drafting fee petition, affidavits, review of time records and	FP	7.10	455.00	3,230.50	7.10	455.00	3230.50	
01/29/16	BJM	Drafting petition for fees, research on applicable case law,	FP	7.20	455.00	3,276.00	7.20	455.00	3276.00	
02/02/16	BJM	Drafting petition for fees, research on applicable case law,	FP	6.70	455.00	3,048.50	6.70	455.00	3048.50	
02/04/16	BJM	Drafting fees petition and affidavits.	FP	4.90	455.00	2,229.50	4.90	455.00	2229.50	
02/05/16	BJM	Drafting petition for fees, research on applicable case law,	FP	4.60	455.00	2,093.00	4.60	455.00	2093.00	
02/05/16	VXM	Continued drafting factual and procedural background	FP	2.50	315.00	787.50	2.50	315.00	787.50	
02/08/16	BJM	Drafting petition for fees, research on applicable case law,	FP	5.60	455.00	2,548.00	5.60	455.00	2548.00	

02/09/16	BJM	Drafting petition for fees, research on applicable case law,	FP	6.90	455.00	3,139.50	6.90	455.00	3139.50	
02/09/16	VXM	Continued working on factual background and case	FP	2.50	315.00	787.50	2.50	315.00	787.50	
02/12/16	BJ M	Finalizing fee petition , meeting with AG re: time, call with LHT re: affidavit.	FP	3.20	455.00	1,456.00	3.20	455.00	1456.00	
02/12/16	VXM	Created separate files for memo, drafted order, created PDFs of exhibits and filed all with DOC.	FP	0.60	315.00	189.00	0.60	315.00	189.00	
02/12/16	VXM	Discussed final exhibits with BJM and labeling issue, discussed declaration with L. Thatcher, and incorporated final version per BJ M.	FP	0.50	315.00	157.50	0.50	315.00	157.50	
02/12/16	VXM	Completed final proofread and edits of fee petition, gathered, incorporated and finalized exhibits, and prepared for filing.	FP	3.00	315.00	945.00	3.00	315.00	945.00	
02/12/16	VXM	Made changes to argument subsections on novelty of issues and reduction of fees, and incorporated new additions into args sections.	FP	2.00	315.00	630.00	2.00	315.00	630.00	
02/22/16	VXM	Reviewed rules for response of motion deadline, discussed district's request for extension and after correct calendaring, drafting communication to district consenting to request	FP	0.40	315.00	126.00	0.40	315.00	126.00	
03/02/16	BJM	Drafting petition for fees, research on applicable case law,	FP	7.60	455.00	3,458.00	7.60	455.00	3458.00	
03/07/16	VX M	Review of latest request from District re: fee petition in voice and discussion with JPH and BJ M on same.	FP	0.30	315.00	94.50	0.30	315.00	94.50	
03/11/16	VX M	Reviewed exhibits filing in fee petition and researched additional info requested by District, discussed with BJ m and drafted response to District re: fee info and request for extension.	FP	0.40	315.00	126.00	0.40	315.00	126.00	
03/22/16	VXM	Downloaded opposition to fees, circulated	FP	1.00	315.00	315.00	1.00	315.00	315.00	
03/23/16	BJM	Research on case law for reply to fee petition, drafting outline for fee petition.	FP	2.30	455.00	1,046.50	2.30	455.00	1046.50	

03/24/16	BJM	Research on case law for reply to fee petition , including case law cited by Defendant , drafting outline for reply to fee petition	FP	3.30	455.00	1,501.50	3.30	455.00	1501.50	
03/25/16	BJM	Reply to fee petition - research on case law and drafting reply .	FP	3.20	455.00	1,456.00	3.20	455.00	1456.00	
03/28/16	BJM	Call with client re: factual information, review of billing receipts for reply, drafting reply for fee petition , research on case law for reply	FP	3.50	455.00	1,592.50	3.50	455.00	1592.50	
03/30/16	BJM	Finalization of research on current value of attorney rates, drafting reply memorandum.	FP	1.30	455.00	591.50	1.30	455.00	591.50	
03/31/16	VXM	Began draft of all arguments in reply brief, and research supporting argument subsection on reas. of fees and costs and lawyer rates.	FP	3.00	315.00	945.00	3.00	315.00	945.00	
03/31/16	VXM	Reviewed all exhibits and number proffered by Defendant's for reduction , and completed calculations to verify and argue against D's numbers	FP	2.00	315.00	630.00	2.00	315.00	630.00	
04/02/16	VXM	Continued drafting Reply Memorandum in support of fees argument subsections.	FP	7.00	315.00	2,205.00	7.00	315.00	2205.00	
04/04/16	BJM	Review of final reply and edits made.	FP	0.70	455.00	318.50	0.70	455.00	318.50	
04/04/16	VXM	Completed final draft of reply memorandum , gathered and prepared exhibits, revised and edited reply based on discussion with BJM, proofread final brief and filed with Court.	FP	5.40	315.00	1,701.00	5.40	315.00	1701.00	
									\$294,255.80	Total

-11,639.50 (Pl.'s additional reductions for duplicative time)

-28,261.63 (Reduction of 10% for Limited Success)

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**\$254,354.67 Total fees awarded**

**Costs Requested and Awarded**

<b>Date</b>	<b>Prof.</b>	<b>Description</b>	<b>Category</b>	<b>Units Req.</b>	<b>Rate Req.</b>	<b>Cost Req.</b>	<b>Units Awarded</b>	<b>Rate Awarded</b>	<b>Cost Awarded</b>
12/4/12	BJM	Photocopying 11/16-11/30	Copies	1.00	1.05	1.05	1.00	1.05	1.05
9/30/14	BJM	Photocopying/Printing	Copies	316.00	0.15	47.40	316.00	0.15	47.40
9/30/14	BJM	Color copies - Copitrak 8/15/14 - 8/31/14	Copies	5.00	0.75	3.75		0.25	
11/11/14	BJM	Photocopying/Printing - Copitrak Report 10/1-10/15/2014	Copies	336.00	0.15	50.40	336.00	0.15	50.40
11/11/14	BJM	Color copies - Copitrak Report 10/1-10/15/2014	Copies	20.00	0.75	15.00		0.25	
11/17/14	BJM	Photocopying/Printing - Copitrak Report 10/15-10/31/15	Copies	53.00	0.15	7.95	53.00	0.15	7.95
6/19/15	BJM	Photocopying/Printing - COPITRAK REPORT 6/1- 6/15	Copies	146.00	0.15	21.90	146.00	0.15	21.90
7/14/15		Photocopying/ Printing - Copitrak Report 6/ 16-6/31	Copies	230.00	0.15	34.50	230.00	0.15	34.50
12/21/15		Photocopying/ Printing	Copies	39.00	0.15	5.85	39.00	0.15	5.85
1/7/16		Photocopying/ Printing	Copies	42.00	0.15	6.3	42.00	0.15	6.3
1/7/16		Photocopying/ Printing	Copies	33.00	0.15	4.95	33.00	0.15	4.95
1/7/16		Photocopying/ Printing	Copies	78.00	0.15	11.7	78.00	0.15	11.7
1/11/16		Photocopying/ Printing	Copies	78.00	0.15	11.7	78.00	0.15	11.7
1/13/16		Photocopying/ Printing	Copies	16.00	0.15	2.4	16.00	0.15	2.4
1/19/16		Photocopying/ Printing	Copies	6.00	0.15	0.9	6.00	0.15	0.9
10/31/12		Clerk, United State District Court - District of Maryland, Filing Fee	Court Costs	1.00	350.00	350.00	1.00	350.00	350.00
10/28/14	JGL	Capital Reporting Company - Transcript of client	Deposition / Court Reoorters	1.00	647.25	647.25	1.00	647.25	647.25
11/14/14	JGL	Planet Depos Transcript fee of OFC. Tabitha Alberti	Deposition / Court Reoorters	1.00	532.50	532.50	1.00	532.50	532.50

4/1/15	JGL	Jerome Paige Professional Services - Economic Loss Reports	NC	1.00	2,750.00	0.00	0.00	0.00	0
2/9/16	JGL	Jerome Paige Professional Services - Economic Loss Reports	NC	1.00	3,839.00	0.00	0.00	0.00	0
1/2/13	JGL	LexisNexis LEXIS-NEXIS Online Charges	Online Research	1.00	10.57	10.57	1.00	10.57	10.57
11/4/13	JGL	Pacer Service Center	Online Research	1.00	0.30	0.30	1.00	0.30	0.30
8/1/14	JGL	Pacer Service Center COURT COMPUTER ACCESS RESEARCH	Online Research	1.00	2.10	2.10	1.00	2.10	2.10
10/1/14	BJM	Westlaw Research - August 2014	Online Research	1.00	6.01	6.01	1.00	6.01	6.01
2/24/14	JGL	LexisNexis LEXIS-NEXIS Online Charges	Online Research	1.00	6.06	6.06	1.00	6.06	6.06
2/28/14	JGL	Pacer Service Center	Online Research	1.00	1.00	1.00	1.00	1.00	1.00
2/18/15	JGL	Pacer Service Center - Pacer Usage 10/01/2014 12/31/2014	Online Research	1.00	5.10	5.10	1.00	5.10	5.10
2/24/15	BJM	Westlaw Research - November 2014	Online Research	1.00	0.00	0.00	1.00	0.00	0.00
4/3/15	BJM	Westlaw Research - March 2015	Online Research	1.00	10.42	10.42	1.00	10.42	10.42
6/4/15	BJM	Westlaw Research - May 2015 Report	Online Research	1.00	18.13	18.13	1.00	18.13	18.13
8/6/15		Westlaw Research - June 2015	Online Research	1.00	137.56	137.56	1.00	137.56	137.56
11/11/15		PACER Service 2015 3rd Quarter	Online Research	1.00	10.1	10.1	1.00	10.1	10.1
2/3/16		Westlaw Research - December 2015	Online Research	1.00	278.07	278.07	1.00	278.07	278.07
10/4/13	BJM	Postage - 912411 3	Postage	1.00	14.74	14.74	1.00	14.74	14.74
6/26/13	BJM	Postage - 6/21/13	Postage	1.00	1.72	1.72	1.00	1.72	1.72
7/1/14	BJM	Postage - 6/20	Postage	1.00	1.82	1.82	1.00	1.82	1.82
7/1/14	BJM	Postage - 6117	Postage	1.00	1.40	1.40	1.00	1.40	1.40
2/21/14	BJM	Postage - 217114	Postage	1.00	1.61	1.61	1.00	1.61	1.61
9/26/14	BJM	Postage	Postage	1.00	1.82	1.82	1.00	1.82	1.82

3/5/15	BJM	Postage - 02106115	Postage	1.00	5.95	5.95	1.00	5.95	5.95
12/10/15		Postage - 1217/2015	Postage	1.00	1.20	1.20	1.00	1.20	1.20
10/7/14	JGL	L.H. Levy Investigations, Inc. Service of Process Officer Tabitha Alberti	Process Service	1.00	100.00	100.00	1.00	100.00	100.00
9/15/15		Vijay Mani - Parking 02/24/2015 USDC for DC - 333 Constitution Ave NW #4400 Washington DC 20001	Travel/ Meals/ Parking	1.00	22.00	22.00	1.00	22.00	22.00
1/20/16		Jamerra Cherry - Parking January 8, 12 & 16 601 Pennsylvania Avenue	Travel/ Meals/ Parking	1.00	75.00	75.00	1.00	25	25
2/4/16		Steven B. Vinick - Parking Jan. 11-14 601 Pennsylvania Avenue	Travel/ Meals/ Parking	1.00	108.00	108.00	1.00	108.00	108.00
1/12/16		Steven B. Vinick - Parking 12/22/2015 U Street	Travel/ Meals/ Parking	1.00	15.00	15.00	1.00	15.00	15.00
1/12/16		Steven B. Vinick - Parking 12/22/2015	Travel/ Meals/ Parking	1.00	22.00	22.00	0.00	0	0
9/29/14	JGL	Tabitha Alberti - Witness Mileage for Depo Attendance	Witness Fee	1.00	20.00	20.00	1.00	20.00	20.00
3/28/16		Westlaw Research - February 2016	Online Research	1.00	179.08	179.08	1.00	179.08	179.08

**Total Costs Awarded 2,721.51**