Van Loo v. Cajun Operating Co. (14-10604)

Court's Appendix A: Fee Reductions

^{***}DDS denotes Daniel D. Swanson. TTR denotes Tad T. Roumayah.

Date	j	Hours	Rate	R	equested	Task	Allowed after line reduction	Explanation	Pre-globa reduction	ì	Allow ed after global	Final
11/26/13	TTR***	2.5	\$ 225.00	\$	562.50	Review research; Prepare Complaint;		Both defendants	\$ 281	.25	95%	\$ 267.19
12/02/13	TTR	0.3	\$ 225.00	\$	67.50	Prepare Complaint;		Both defendants	\$ 33	.75	95%	\$ 32.06
12/07/13	TTR	4.5	\$ 225.00	\$	1,012.50	Prepare Complaint;	50.0%	Both defendants	\$ 506	.25	95%	\$ 480.94
12/09/13	TTR	1	\$ 225.00	\$	225.00	Prepare Complaint;		Both defendants	\$ 112	.50	95%	\$ 106.88
12/12/13	TTR	0.5	\$ 225.00	\$	112.50	Prepare Complaint;		Both defendants	\$ 56	.25	95%	\$ 53.44
12/17/13	TTR	3.5	\$ 225.00	\$	787.50	Prepare Complaint;		Both defendants	\$ 393	.75	95%	\$ 374.06
12/18/13	TTR	7.5	\$ 225.00	\$	1,687.50	Prepare Complaint;		Both defendants	\$ 843	.75	95%	\$ 801.56
12/23/13	TTR	4.5	\$ 225.00	\$	1,012.50	Conference w/DDS; Revise Complaint;		Both defendants	\$ 506	.25	95%	\$ 480.94
12/23/13	DDS***	2	\$ 400.00	\$	800.00	Review and revise complaint;		Both defendants	\$ 400	.00	95%	\$ 380.00
01/28/14	DDS	0.8	\$ 400.00	\$	320.00	Review cases and revise the complaint;		Both defendants	\$ 160	.00	95%	\$ 152.00
01/31/14	DDS	1	\$ 400.00	\$	400.00	Review and revise complaint;		Both defendants	\$ 200	.00	95%	\$ 190.00
02/01/14	DDS	1.5	\$ 400.00	\$		Review and revise complaint;		Both defendants	\$ 300		95%	\$ 285.00
02/03/14	TTR	2	\$ 225.00	\$	450.00	Correspondence w/DDS; Revise Complaint; Forward to clients for review;		Both defendants	\$ 225	.00	95%	\$ 213.75
02/06/14	TTR	0.5	\$ 225.00	\$	112.50	Correspondence w/client; Correspondence w/DDS;		Both defendants	\$ 56	.25	95%	\$ 53.44

^{*} All entries wholly related to work performed as to Defendant Reliance Standard Life Insurance Company were deleted.

^{**}Entries detailing work performed both as to Defendant Reliance and Church's were discounted by 50% to reflect the amount of time spent on the Church's matter.

							Allowed after		 	Allow	
Date	Attorney	Hours	Rate		Requested	Task	line reduction	Explanation	re-global reduction	ed after global	Final
02/07/14	TTR	0.5	\$ 225.	.00	\$ 112.50	Revise and finalize Complaint;	50.0%	Both defendants	\$ 56.25	95%	\$ 53.44
02/10/14	TTR	1	\$ 225.	.00	\$ 225.00	File and Serve Complaint on Defendants;	47.5%	Both defendants;	\$ 106.88	95%	\$ 101.53
02/25/14	DDS	0.3	\$ 400.	.00	\$ 120.00	Review and respond to e-mail extension request from Church's attorney;	100.0%		\$ 120.00	95%	\$ 114.00
02/26/14	DDS	0.3	\$ 400.	.00	\$ 120.00	Review and respond to e-mail from opposing attorney RE amendments to complaint;	100.0%		\$ 120.00	95%	\$ 114.00
03/06/14	DDS	0.5	\$ 400.	.00	\$ 200.00	Telephone conference with opposing attorney RE extension to file answer; draft status update e-mail to client;	100.0%		\$ 200.00	95%	\$ 190.00
03/12/14	DDS	0.5	\$ 400.	.00	\$ 200.00	Review e-mail from opposing counsel RE dismissal of certain claims; review Case law;	100.0%		\$ 200.00	95%	\$ 190.00
04/01/14	DDS	0.3	\$ 400.	.00	\$ 120.00	Review and respond to e-mail from opposing attorney RE motion to dismiss;	100.0%		\$ 120.00	95%	\$ 114.00
04/02/14	DDS	4	\$ 400.	.00	\$ 1,600.00	Correspondence w/DDS; Review opposing counsel e-mail; Research Case law; Prepare analysis of opposing counsel arguments;	100.0%		\$ 1,600.00	95%	\$ 1,520.00
04/03/14	TTR	7	\$ 225.	.00	\$ 1,575.00	Research case law; Analyze opposing counsel arguments;	100.0%		\$ 1,575.00	95%	\$ 1,496.25
04/04/14	TTR	4.6	\$ 225.	.00	\$ 1,035.00	Research ERISA Case law; Review Defendant Church's Motion to Dismiss; Review Defendant Reliance's Motion to Dismiss; **	100.0%		\$ 1,035.00	95%	\$ 983.25
04/05/14	TTR	4.5	\$ 225.	.00	\$ 1,012.50	Research Case law; Prepare Response to Church's Motion to Dismiss;	100.0%		\$ 1,012.50	95%	\$ 961.88
04/06/14	TTR	2.5	\$ 225.	.00	\$ 562.50	Research Case law; Prepare Response to Church's Motion to Dismiss;	100.0%		\$ 562.50	95%	\$ 534.38
04/07/14	TTR	1.6	\$ 225.	.00	\$ 360.00	Prepare Response to Church's Motion to Dismiss;	100.0%		\$ 360.00	95%	\$ 342.00
04/08/14	TTR	3.3	\$ 225.	.00	\$ 742.50	Correspondence w/DDS; Prepare Response to Church's Motion to Dismiss;	100.0%		\$ 742.50	95%	\$ 705.38
04/08/14	DDS	0.3	\$ 400.	.00	\$ 120.00	Conference with Tad RE response to SJ motions;	50.0%	Both defendants	\$ 60.00	95%	\$ 57.00

Date	Attorney	Hours	Ra	ıte	R	equested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
04/14/14	TTR	3.7	\$ 22	25.00	\$	832.50	Prepare Response to Church's Motion to Dismiss;	100.0%		\$ 832.50	95%	\$ 790.88
04/15/14	TTR	7.5	\$ 22	25.00	\$	1,687.50	Prepare Response to Church's Motion to Dismiss;	100.0%		\$ 1,687.50	95%	\$ 1,603.13
04/16/14	TTR	1.75	\$ 22	25.00	\$	393.75	Prepare Response to Church's Motion to Dismiss; Prepare Response to Reliance Motion to Dismiss; **	100.0%		\$ 393.75	95%	\$ 374.06
04/17/14	TTR	2.2	\$ 22	25.00	\$	495.00	Prepare responses to motions to dismiss; **	100.0%		\$ 495.00	95%	\$ 470.25
04/18/14	TTR	3.6	\$ 22	25.00	\$	810.00	Prepare responses to motions to dismiss; **	100.0%		\$ 810.00	95%	\$ 769.50
04/19/14	TTR	2.4	\$ 22	25.00	\$	540.00	Prepare responses to Defs' motions to dismiss; **	100.0%		\$ 540.00	95%	\$ 513.00
04/21/14	TTR	2.25	\$ 22	25.00	\$	506.25	Prepare responses to motions to dismiss; **	100.0%		\$ 506.25	95%	\$ 480.94
04/22/14	TTR	1.6	\$ 22	25.00	\$	360.00	Correspondence w/DDS; Correspondence w/court; Prepare stip and order to extend time to respond to motions; Correspondence w/opposing counsel;		Both defendants	\$ 180.00	95%	\$ 171.00
04/23/14	TTR	0.5	\$ 22	25.00	\$	112.50	Prepare stip and order to extend time to respond to Church's and Reliance's MTD; Correspondence w/opposing counsel; Conference w/DDS; ***	100.0%		\$ 112.50	95%	\$ 106.88
04/28/14	DDS	1	\$ 40	00.00	\$	400.00	Review and revise response to dismissal motion;		Both defendants	\$ 200.00	95%	\$ 190.00
04/29/14	DDS	1	\$ 40	00.00	\$	400.00	Review and revise response to dismissal motion;	50.0%	Both defendants	\$ 200.00	95%	\$ 190.00
04/30/14	DDS	1	\$ 40	00.00	\$	400.00	Continue review and revision of response to dismissal motion;		Both defendants	\$ 200.00	95%	\$ 190.00
04/30/14	TTR	1.5	\$ 22	25.00	\$	337.50	Correspondence w/DDS; Research jury trial issue;	100.0%		\$ 337.50	95%	\$ 320.63
05/01/14	TTR	0.8	\$ 22	25.00	\$	180.00	Revise Response to Church's MTD; Revise Response to Reliance's MTD; **	100.0%		\$ 180.00	95%	\$ 171.00
05/05/14	DDS	0.3	\$ 40	00.00	\$	120.00	Conference with Tad Re jury demand issue; review Reliance reply brief; **	100.0%		\$ 120.00	95%	\$ 114.00
05/06/14	TTR	2	\$ 22	25.00	\$	450.00	Revise Responses to Motions to Dismiss; Correspondence w/DDS;	50.0%		\$ 225.00	95%	\$ 213.75

Date	Attorney	Hours	Rate	Re	equested	Task	Allowed after line reduction	Explanation	re-global eduction	Allow ed after global	Final
05/08/14	TTR	3.5	\$ 225.00	\$	787.50	Finalize Responses to MTD; Prepare exhibits for filing;	47.5%	Both defendants; clerical	\$ 374.06	95%	\$ 355.36
05/09/14	TTR	1.5	\$ 225.00	\$	337.50	Finalize and file Responses to MTD;	47.5%	Both defendants; clerical	\$ 160.31	95%	\$ 152.30
05/12/14	TTR	1	\$ 225.00	\$	225.00	Correspondence w/DDS; Prepare joint statement of the case; Correspondence w/opposing counsel; Conference w/DDS;	100.0%		\$ 225.00	95%	\$ 213.75
05/12/14	DDS	0.5	\$ 400.00	\$	200.00	Review e-mail from opposing attorney RE joint statement; conference with Tad RE same; review and revise plaintiff's submission;	100.0%		\$ 200.00	95%	\$ 190.00
05/13/14	TTR	0.5	\$ 225.00	\$	112.50	Conference w/law clerk RE research project; Review Reliance modifications to joint statement; Review Church's modifications; Correspondence w/Court; **	100.0%		\$ 112.50	95%	\$ 106.88
05/14/14	TTR	1.2	\$ 225.00	\$	270.00	Correspondence w/DDS; Conference w/law clerk re research project; Revise joint statement; Correspondence w/opposing counsel;	100.0%		\$ 270.00	95%	\$ 256.50
05/14/14	DDS	0.3	\$ 400.00	\$	120.00	Review and revise joint case summary;	50.0%	Both defendants	\$ 60.00	95%	\$ 57.00
05/16/14	DDS	0.3	\$ 400.00	\$	120.00	Conference with Tad RE supplemental brief;	50.0%	Both defendants	\$ 60.00	95%	\$ 57.00
05/16/14	TTR	0.5	\$ 225.00	\$	112.50	Correspondence w/DDS; Review case; Correspondence w/opposing counsel;	100.0%		\$ 112.50	95%	\$ 106.88
05/28/14	TTR	3.2	\$ 225.00	\$	720.00	Correspondence w/DDS; Conference w/DDS; Prepare supplemental brief;	50.0%	Both defendants	\$ 360.00	95%	\$ 342.00
05/28/14	DDS	0.3	\$ 400.00	\$	120.00		50.0%	Both defendants	\$ 60.00	95%	\$ 57.00
05/29/14	TTR	1.2	\$ 225.00	\$	270.00	Prepare supplemental brief;	50.0%	Both defendants	\$ 135.00	95%	\$ 128.25
05/30/14	TTR	2.6	\$ 225.00	\$	585.00	Prepare supplemental brief; Correspondence w/DDS; Revise supplemental brief;	50.0%	Both defendants	\$ 292.50	95%	\$ 277.88

Date	Attorney	Hours	Rate	R	equested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
05/30/14	DDS	1	\$ 400.00	\$	400.00	Review and revise supplemental brief;	50.0%	Both defendants	\$ 200.00	95%	\$ 190.00
07/02/14	TTR	0.3	\$ 225.00	\$	67.50	Correspondence w/Court; Correspondence w/DDS;	100.0%		\$ 67.50	95%	\$ 64.13
07/15/14	TTR	1.9	\$ 225.00	\$	427.50	Prepare binders for 7/22 hearing;	47.5%	Both defendants; clerical	\$ 203.06	95%	\$ 192.91
07/15/14	DDS	0.3	\$ 400.00	\$	120.00	Review and respond to client e-mail RE status update on case;	100.0%		\$ 120.00	95%	\$ 114.00
07/18/14	DDS	4	\$ 400.00	\$	1,600.00	Review motions and response in preparation for hearing;		Both defendants	\$ 800.00	95%	\$ 760.00
07/18/14	TTR	1	\$ 225.00	\$	225.00	Correspondence w/DDS; Research Case law;	100.0%		\$ 225.00	95%	\$ 213.75
07/21/14	TTR	0.5	\$ 225.00	\$	112.50	Conference w/DDS; Search file for letter;	100.0%		\$ 112.50	95%	\$ 106.88
07/21/14	DDS	5	\$ 400.00	\$	2,000.00	Review file in preparation for hearing;	50.0%	Both defendants	\$ 1,000.00	95%	\$ 950.00
07/22/14	DDS	5	\$ 400.00	\$	2,000.00	Complete preparation for hearing; drive to and from Detroit; attend hearing; conference with Tad RE same;	50.0%	Both defendants	\$ 1,000.00	95%	\$ 950.00
08/22/14	TTR	0.5	\$ 225.00	\$	112.50	Correspondence w/DDS; Correspondence w/Court;	100.0%		\$ 112.50	95%	\$ 106.88
12/01/14	TTR	1.5	\$ 225.00	\$	337.50	Review opinion; Research Case law; Correspondence w/DDS;	50.0%	Both defendants	\$ 168.75	95%	\$ 160.31
12/01/14	DDS	1	\$ 400.00	\$	400.00	Review court opinion denying SJ motions; draft email status update to client;		Both defendants	\$ 200.00	95%	\$ 190.00
12/02/14	DDS	1.7	\$ 400.00	\$	680.00	Further review of SJ opinion and prepare list of things to do; conference with Tad Re legal strategy;			\$ 680.00	95%	\$ 646.00
12/02/14	TTR	2	\$ 225.00	\$	450.00	Conference w/DDS; Review opinion; Research Case law RE discovery standards;	100.0%		\$ 450.00	95%	\$ 427.50
12/03/14	TTR	1	\$ 225.00	\$	225.00	Conference w/DDS; Correspondence w/DDS; Review Case law;	100.0%		\$ 225.00	95%	\$ 213.75
12/03/14	DDS	0.5	\$ 400.00	\$	200.00	Telephone conference with clients RE summary judgment decision and litigation strategy;	100.0%		\$ 200.00	95%	\$ 190.00

Date	Attorney	Hours	Rate	Requested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
12/04/14	DDS	0.4	\$ 400.00	\$ 160.00	Telephone conference with court RE scheduling conference; draft email to opposing attorneys RE 26(f) conference;	50.0%	Both defendants	\$ 80.00	95%	\$ 76.00
12/05/14	DDS	3	\$ 400.00	\$ 1,200.00	Review file in preparation for scheduling conference and drafting of reports to court; exchange email with opposing attorneys RE scheduling conference date;	50.0%	Both defendants	\$ 600.00	95%	\$ 570.00
12/05/14	TTR	0.7	\$ 225.00	\$ 157.50	Conference w/DDS; Correspondence w/opposing counsel;	100.0%		\$ 157.50	95%	\$ 149.63
12/08/14	TTR	0.4	\$ 225.00	\$ 90.00		100.0%		\$ 90.00	95%	\$ 85.50
12/08/14	DDS	0.5	\$ 400.00	\$ 200.00		50.0%	Both defendants	\$ 100.00	95%	\$ 95.00
12/16/14	DDS	0.5	\$ 400.00	\$ 200.00	Review Church's cross-claim and answer to complaint;	100.0%		\$ 200.00	95%	\$ 190.00
01/05/15	DDS	0.3	\$ 400.00	\$ 120.00	Conference with Tad RE discovery conference call;	100.0%		\$ 120.00	95%	\$ 114.00
01/05/15	TTR	0.2	\$ 225.00	\$ 45.00	Conference w/DDS;	100.0%		\$ 45.00	95%	\$ 42.75
01/06/15	TTR	3.5	\$ 225.00	\$ 787.50	Correspondence w/DDS; Review e-discovery rules; Prepare for Rule 26(f) Conference. Research Case law; Attend Rule 26(f) Conference; Conference w/DDS;	50.0%	Both defendants	\$ 393.75	95%	\$ 374.06
01/06/15	DDS	4.2	\$ 400.00	\$ 1,680.00		50.0%	Both defendants	\$ 840.00	95%	\$ 798.00
01/08/15	DDS	0.3	\$ 400.00	\$ 120.00	Draft email to potential mediators RE ERISA experience; draft email to opposing counsel with list of potential mediators;	100.0%		\$ 120.00	95%	\$ 114.00
01/08/15	TTR	0.6	\$ 225.00	\$ 135.00		100.0%		\$ 135.00	95%	\$ 128.25

Date	Attorney	Hours	Rate	Requested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	F	inal
01/09/15	TTR	3.5	\$ 225.00	\$ 787.50	Conference w/DDS; Correspondence w/DDS; Correspondence w/opposing counsel; Prepare joint discovery plans; telephone conference w/Court; Correspondence w/client;	100.0%		\$ 787.50	95%	\$	748.13
01/09/15	DDS	0.5	\$ 400.00	\$ 200.00	Review and revise scheduling orders;	100.0%		\$ 200.00	95%	\$	190.00
01/12/15	DDS	0.6	\$ 400.00	\$ 240.00	Review email RE mediators and related matters; research proposed mediators; draft email to opposing council RE same;	100.0%		\$ 240.00	95%	\$	228.00
01/12/15	TTR	2	\$ 225.00	\$ 450.00	Correspondence w/opposing counsel; Revise discovery plans; telephone conference w/Court; Conference w/DDS;	50.0%	Both defendants	\$ 225.00	95%	\$	213.75
01/13/15	TTR	1	\$ 225.00	\$ 225.00	Finalize and file discovery plans;	50.0%	Both defendants	\$ 112.50	95%	\$	106.88
01/15/15	TTR	0.3	225.00		Review correspondence from opposing counsel and DDS;	100.0%		\$	95%	\$	64.13
01/16/15	TTR	0.5	225.00		Correspondence w/opposing counsel; Conference w/DDS;	100.0%		\$ 112.50		\$	106.88
01/16/15	DDS	0.3	\$ 400.00	\$ 120.00	Review and respond to email RE cancelation and rescheduling of scheduling conference;	100.0%		\$ 120.00	95%	\$	114.00
01/20/15	DDS	0.3	\$ 400.00	\$ 120.00	Draft email to Shel Stark RE mediation;	50.0%	Both defendants	\$ 60.00	95%	\$	57.00
01/21/15	DDS	0.6	\$ 400.00	\$ 240.00	Telephone conference with mediator; review mediator letter;	50.0%	Both defendants	\$ 120.00	95%	\$	114.00
02/02/15	DDS	1.5	\$ 400.00	\$ 600.00	Review scheduling order; draft email to client RE same; participate in telephone conference with mediator; conference with Tad RE mediation statement;	50.0%	Both defendants	\$ 300.00	95%	\$	285.00
02/02/15	TTR	0.5	\$ 225.00	\$ 112.50	Correspondence w/DDS; Conference w/DDS;	100.0%		\$ 112.50	95%	\$	106.88
02/05/15	TTR	0.3	\$ 225.00	\$ 67.50	Conference w/DDS;	100.0%		\$	95%	\$	64.13
02/10/15	TTR	2.5	\$ 225.00	\$ 562.50	Organize documents; Prepare initial disclosures; Correspondence w/opposing counsel; Finalize and send initial disclosures document;	47.5%	Both defendants; clerical	\$ 267.19	95%	\$	253.83

Date	Attorney	Hours	Rate	R	Requested	Task	Allowed after line reduction	Explanation	re-global eduction	Allow ed after global	Final
02/12/15	DDS	0.5	\$ 400.00	\$	200.00	Review and revise proposed protective order; draft email to opposing attorney RE same;	100.0%		\$ 200.00	95%	\$ 190.00
03/02/15	DDS	0.6	\$ 400.00	\$	240.00	Conference with Tad RE mediation; draft email to Church's attorney RE initial disclosures;		Both defendants	\$ 120.00	95%	\$ 114.00
03/02/15	TTR	1.5	\$ 225.00	\$	337.50	Conference w/DDS; Review Plaintiffs' Initial Disclosures; Send Plaintiffs' Initial Disclosures;	50.0%	Both defendants	\$ 168.75	95%	\$ 160.31
03/05/15	TTR	0.5	\$ 225.00	\$	112.50	Conference w/DDS;	100.0%		\$ 112.50	95%	\$ 106.88
03/06/15	TTR	1	\$ 225.00	\$	225.00	Conference w/extern RE research;	100.0%		\$	95%	\$ 213.75
03/13/15	DDS	1.5	\$ 400.00	\$	600.00	Telephone conference with client RE status update and mediation meeting; review documents produced by Church's and conference with Tad RE incontestiblity clause;	100.0%		\$ 600.00	95%	\$ 570.00
03/16/15	TTR	3.5	\$ 225.00	\$	787.50	Review pleadings; Review documents; Prepare mediation summary;	50.0%	Both defendants	\$ 393.75	95%	\$ 374.06
03/17/15	TTR	2	\$ 225.00	\$	450.00	Prepare mediation statement;	50.0%	Both defendants	\$ 225.00	95%	\$ 213.75
03/17/15	DDS	0.3	\$ 400.00	\$	120.00	Telephone conference estate planning attorney RE status;	100.0%		\$ 120.00	95%	\$ 114.00
03/18/15	TTR	7.5	\$ 225.00	\$	1,687.50	Review defendants document production; Prepare mediation summary;	50.0%	Both defendants	\$ 843.75	95%	\$ 801.56
03/19/15	TTR	8.5	\$ 225.00	\$	1,912.50	Prepare mediation summary; Correspondence w/DDS; telephone conference w/DDS;	50.0%	Both defendants	\$ 956.25	95%	\$ 908.44
03/20/15	TTR	0.7	\$ 225.00	\$	157.50	Conference w/DDS; Organize and send exhibits to mediation summary;		Both defendants; clerical	\$ 74.81	95%	\$ 71.07
03/20/15	DDS	3	400.00	\$	1,200.00	Drive to and from Troy; conference with clients RE mediation; conference with Tad RE interest issue and preparation of the mediation statement;	50.0%	Both defendants	\$	95%	\$ 570.00
03/21/15	DDS	1	\$ 400.00	\$	400.00	Review and revise mediation statement;	50.0%	Both defendants	\$ 200.00	95%	\$ 190.00

Date	Attorney	Hours	Rate	R	equested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
03/22/15	TTR	6	\$ 225.00	\$	1,350.00	Research Case law; Revise mediation summary; Correspondence w/DDS;	100.0%		\$ 1,350.00	95%	\$ 1,282.50
03/23/15	TTR	2.5	\$ 225.00	\$	562.50	Correspondence w/DDS; Organize exhibits; Finalize mediation summary;	50.0%	Both defendants	\$ 281.25	95%	\$ 267.19
03/24/15	TTR	1	\$ 225.00	\$	225.00	Finalize and submit mediation summary;	50.0%	Both defendants	\$ 112.50	95%	\$ 106.88
03/29/15	TTR	0.5	\$ 225.00	\$	112.50	Correspondence w/DDS;	100.0%		\$ 112.50	95%	\$ 106.88
03/29/15	DDS	2	\$ 400.00	\$	800.00	Review mediation statements; draft notes;	50.0%	Both defendants	\$ 400.00	95%	\$ 380.00
03/30/15	TTR	0.3	\$ 225.00	\$	67.50	Conference w/DDS;	100.0%		\$ 67.50	95%	\$ 64.13
03/31/15	TTR	1.6	\$ 225.00	\$	360.00	Review mediation summaries; Conference w/DDS; Prepare for mediation; **	100.0%		\$ 360.00	95%	\$ 342.00
03/31/15	DDS	1.4	\$ 400.00	\$	560.00	Telephone conference mediator RE preparation; conference with Tad RE preparation for mediation;	50.0%	Both defendants	\$ 280.00	95%	\$ 266.00
04/01/15	DDS	11	\$ 400.00	\$	4,400.00	Complete preparation for mediation; attend mediation;	50.0%	Both defendants	\$ 2,200.00	95%	\$ 2,090.00
04/01/15	TTR	11	\$ 225.00	\$	2,475.00	Travel to and attend mediation; Research Case law; Prepare memo; Correspondence w/DDS;	50.0%	Both defendants	\$ 1,237.50	95%	\$ 1,175.63
04/07/15	TTR	5.5	\$ 225.00	\$	1,237.50	Conference w/DDS; Research Case law;	100.0%		\$ 1,237.50	95%	\$ 1,175.63
04/07/15	DDS	1	\$ 400.00	\$	400.00	Conference with Tad RE preparation for telephone conference with mediator; telephone conference with mediator; telephone conference with client RE settlement;	100.0%		\$ 400.00	95%	\$ 380.00
04/08/15	DDS	2	\$ 400.00	\$	800.00	Review Tad's research memo and cases; conference with Tad RE same; telephone conference with mediatior RE settlement demand and legal analysis;	100.0%		\$ 800.00	95%	\$ 760.00
04/08/15	TTR	3.5	\$ 225.00	\$	787.50	Correspondence w/DDS; Conference w/DDS; Research Case law; telephone conference w/mediator;	100.0%		\$ 787.50	95%	\$ 748.13
04/09/15	DDS	0.8	\$ 400.00	\$	320.00	Alleged Church's website posting RE summary plan and draft email to Stark RE same; conference with Stark RE same;	100.0%		\$ 320.00	95%	\$ 304.00
04/10/15	DDS	0.3	\$ 400.00	\$	120.00	Conference with Stark Re mediation;	100.0%		\$ 120.00	95%	\$ 114.00

Date	Attorney	Hours	Rate	Requested	Task	Allowed after line reduction	Explanation	re-global eduction	Allow ed after global	Final
04/13/15	DDS	1	\$ 400.00	\$ 400.0	Telephone conference with mediator RE no settlement; conference with clients RE status update; conference with Tad RE discovery, amended complaint and SJ motions;	100.0%		\$ 400.00	95%	\$ 380.00
04/14/15	DDS	0.3	\$ 400.00	\$ 120.0	Telephone conference with client RE summary plan description;	100.0%		\$ 120.00	95%	\$ 114.00
04/15/15	DDS	1	\$ 400.00	\$ 400.0	Draft requests for production of documents to Church's;	100.0%		\$ 400.00	95%	\$ 380.00
04/16/15	DDS	2	\$ 400.00	\$ 800.0	Complete draft of request for production of documents to Church's; draft email to opposing attorney RE depositions;	100.0%		\$ 800.00	95%	\$ 760.00
04/20/15	DDS	0.3	\$ 400.00	\$ 120.0	Review and revise first request for production of documents;	100.0%		\$ 120.00	95%	\$ 114.00
04/27/15	DDS	0.3	\$ 400.00	\$ 120.0	Telephone conference with opposing attorney RE discovery issues;	100.0%		\$ 120.00	95%	\$ 114.00
04/29/15	DDS	0.5	\$ 400.00	\$ 200.0	Telephone conference with opposing attorney RE discovery issues; draft email to opposing attorney RE same; conference with Tad RE same and amended complaint;	100.0%		\$ 200.00	95%	\$ 190.00
04/30/15	DDS	0.3	\$ 400.00	\$ 120.0		100.0%		\$ 120.00	95%	\$ 114.00
04/30/15	TTR	2	\$ 225.00	\$ 450.0	Conference w/DDS; Review Church's Motion and amended Complaint; Research Case law; Prepare 30(b)(6) topics for Reliance witness;	50.0%	Both defendants	\$ 225.00	95%	\$ 213.75
04/30/15	DDS	0.3	\$ 400.00	\$ 120.0	O Conference w/Tad re Church's pending motion;	100.0%		\$ 120.00	95%	\$ 114.00
05/01/15	TTR	2.7	\$ 225.00	\$ 607.5	Prepare amended Complaint; Prepare motion to amend; Finalize 30(b)(6) topics for Reliance; Correspondence w/DDS; telephone conference w/client; **	100.0%		\$ 607.50	95%	\$ 577.13
05/04/15	TTR	2	\$ 225.00	\$ 450.0		100.0%		\$ 450.00	95%	\$ 427.50
05/05/15	TTR	2	\$ 225.00	\$ 450.0	Revise amended Complaint; Research Case law;	0.0%		\$ -	95%	\$ -
05/05/15	DDS	0.5	\$ 400.00	\$ 200.0	Review amended complaint;	0.0%		\$ -	95%	\$ -

Date	Attorney	Hours	Rate	Requested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
05/06/15	DDS	0.3	\$ 400.00	\$ 120.00	Telephone conference with Tad RE revisions to complaint;	0.0%		\$ -	95%	\$ -
05/06/15	TTR	2	\$ 225.00	\$ 450.00	Revise Amended Complaint and Motion to Amend; Correspondence w/DDS; telephone conference w/DDS; Research Case law;	0.0%		\$ -	95%	\$ -
05/10/15	DDS	0.5	\$ 400.00	\$ 200.00	Review and revise amended complaint and motion;	0.0%		\$ -	95%	\$ -
05/11/15	DDS	1	\$ 400.00	\$ 400.00	Conference with Tad RE motion to amend complaint; draft email RE corporate representative and other depositions;	0.0%		\$ -	95%	\$ -
05/11/15	TTR	2.5	\$ 225.00	\$ 562.50		0.0%		\$ -	95%	\$ -
05/12/15	TTR	3.5	\$ 225.00	\$ 787.50		0.0%		\$ -	95%	\$ -
05/20/15	DDS	0.3	\$ 400.00	\$ 120.00	Telephone conference with Church's attorney RE discovery;	100.0%		\$ 120.00	95%	\$ 114.00
05/21/15	TTR	1	\$ 225.00	\$ 225.00	Telephone conference w/Court; Conference w/DDS; Correspondence w/opposing counsel;	100.0%		\$ 225.00	95%	\$ 213.75
05/21/15	DDS	0.3	\$ 400.00	\$ 120.00	Conference w/Tad RE discovery issues;	100.0%		\$ 120.00	95%	\$ 114.00
05/22/15	TTR	0.3	\$ 225.00	\$ 67.50	Call Court;	100.0%		\$ 67.50	95%	\$ 64.13
05/26/15	TTR	0.5	\$ 225.00	\$ 112.50	Review Defendant's Response to Motion to Amend Complaint;	0.0%		\$ -	95%	\$ -
05/27/15	DDS	0.3	\$ 400.00	\$ 120.00	Telephone conference with opposing attorney RE depositions;	100.0%		\$ 120.00	95%	\$ 114.00
05/28/15	DDS	0.3	\$ 400.00	\$ 120.00	document requests;	100.0%		\$ 120.00	95%	\$ 114.00
05/29/15	DDS	0.4	\$ 400.00	\$ 160.00	Telephone conference with client RE mediical authorization; draft email to opposing attorney RE same;	100.0%		\$ 160.00	95%	\$ 152.00
05/29/15	TTR	1.5	\$ 225.00	\$ 337.50	Review Motions and Responses to Amend Complaint; Prepare Reply brief; **	100.0%		\$ 337.50	95%	\$ 320.63

Date	Attorney	Hours	Rate	Requested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
06/01/15	TTR	6.8	\$ 225.00	\$ 1,530.00	Prepare Reply Brief in support of Motion to Amend; Prepare for and attend telephonic status conference w/Court;	50.0%		\$ 765.00	95%	\$ 726.75
06/01/15	DDS	1.5	\$ 400.00	\$ 600.00	Review file in preparation for telephone conference with court; telephone conference with court RE motion to amend and filing cross summary judgment motions	50.0%		\$ 300.00	95%	\$ 285.00
06/02/15	DDS	1.3	\$ 400.00	\$ 520.00	Review and revise reply brief; conference with Tad RE cross motions for summary judgment;	50.0%		\$ 260.00	95%	\$ 247.00
06/02/15	TTR	4	\$ 225.00	\$ 900.00	Revise, finalize and file Reply Brief; Conference w/DDS RE SJ Motion and other matters; Prepare stip and order RE motion to amend; Correspondence w/opposing counsel;	50.0%		\$ 450.00	95%	\$ 427.50
06/03/15	TTR	1	\$ 225.00	\$ 225.00	Finalize and file stip and order RE amended Complaint; Correspondence w/opposing counsel; Conference w/DDS; Review Church's discovery requests;	50.0%		\$ 112.50	95%	\$ 106.88
06/03/15	DDS	0.4	\$ 400.00	\$ 160.00	Draft email to opposing attorney for Church's RE discovery; review Church's discovery requests to Reliance;	100.0%		\$ 160.00	95%	\$ 152.00
06/04/15	DDS	0.5	\$ 400.00	\$ 200.00	Telephone conference with opposing attorney RE Church's depositions; exchange email RE same;	100.0%		\$ 200.00	95%	\$ 190.00
06/04/15	TTR	2.5	\$ 225.00	\$ 562.50	Review Church's document production; Conference w/DDS;	100.0%		\$ 562.50	95%	\$ 534.38
06/09/15	DDS	0.5	\$ 400.00	\$ 200.00	prepare corporate representative deposition notice and witness subpoenas;	100.0%		\$ 200.00	95%	\$ 190.00
06/10/15	TTR	0.5	\$ 225.00	\$ 112.50	Review subpoenas and deposition notice; Correspondence w/Kim;	100.0%		\$ 112.50	95%	\$ 106.88
06/26/15	TTR	0.4	\$ 225.00	\$ 90.00	Review Correspondences from DDS;	100.0%		\$ 90.00	95%	\$ 85.50
06/26/15	DDS	0.5	\$ 400.00	\$ 200.00	Review defendant's discovery to plaintiffs; draft email to opposing attorney RE status of depositions; review revised medical release and forward it to client;	100.0%		\$ 200.00	95%	\$ 190.00

Date	Attorney	Hours]	Rate	R	equested	Task	Allowed after line reduction	Explanation	re-global reduction	Allow ed after global	Final
06/28/15	TTR	1	\$:	225.00	\$	225.00	Review FRCP and Case law; Correspondence w/DDS;	100.0%		\$ 225.00	95%	\$ 213.75
06/29/15	DDS	1.5	\$	400.00	\$	600.00	Review and revise SJ brief; review document request and documents produced by Church's RE summary plan description; draft email to opposing attorney RE same; **	100.0%		\$ 600.00	95%	\$ 570.00
07/02/15	TTR	1	\$:	225.00	\$	225.00	Conference w/DDS; Review stip and order RE motions; Correspondence w/opposing counsel; Correspondence w/client; Review HIPPA authorization;	100.0%		\$ 225.00	95%	\$ 213.75
07/09/15	TTR	0.5	\$:	225.00	\$	112.50	Review Church's Response to Reliance's Motion to Stay Discovery;	100.0%		\$ 112.50	95%	\$ 106.88
07/09/15	DDS	0.3	\$ 4	400.00	\$	120.00	Draft email to opposing attorney RE summary plan description; review Church's brief RE discovery;	100.0%		\$ 120.00	95%	\$ 114.00
07/14/15	DDS	0.7	\$ 4	400.00	\$	280.00	Review email and documents from Church's attorney; draft email to Church's RE summary plan description; telephone conference with M. Johnson RE deposition;	100.0%		\$ 280.00	95%	\$ 266.00
07/15/15	TTR	3	\$:	225.00	\$	675.00	Travel to and attend discovery meeting w/clients;	100.0%		\$ 675.00	95%	\$ 641.25
07/19/15	DDS	4.5	\$ 4	400.00	\$	1,800.00	Review file and draft outline in prepation for Church's corporate representative deposition;	100.0%		\$ 1,800.00	95%	\$ 1,710.00
07/20/15	DDS	1.5	\$ 4	400.00	\$	600.00	Continue preparation for corporate representative deposition;	100.0%		\$ 600.00	95%	\$ 570.00
07/20/15	DDS	0.3	\$ 4	400.00	\$	120.00	Conference w/Tad RE motions and discovery issues;	100.0%		\$ 120.00	95%	\$ 114.00
07/21/15	DDS	8	\$	400.00	\$	3,200.00	Travel to Atlanta; review documents in preparation for deposition; exchange email with opposing counsel RE additional documents;	100.0%		\$ 3,200.00	95%	\$ 3,040.00
07/21/15	TTR	2.5	\$	225.00	\$	562.50	Prepare Discovery Responses; Correspondence w/DDS; telephone conference w/DDS;	100.0%		\$ 562.50	95%	\$ 534.38

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Date	Attorney	Hours	Rate	R	Requested	Task	line reduction	Explanation	Pre-global reduction	ed after global	Final
07/22/15	TTR	3	\$ 225.00	\$	675.00	Telephone conference w/client; Prepare discovery responses; Correspondence w/DDS; telephone conference w/DDS; Correspondence w/opposing counsel;	100.0%		\$ 675.00	95%	\$ 641.25
07/22/15	DDS	7	\$ 400.00	\$	2,800.00	Complete preparation for deposition; take Church's corporate representative's deposition;	100.0%		\$ 2,800.00	95%	\$ 2,660.00
07/23/15	TTR	1	\$ 225.00	\$	225.00	Correspondence w/DDS; Revise discovery responses;	100.0%		\$ 225.00	95%	\$ 213.75
07/24/15	TTR	1.5	\$ 225.00	\$	337.50	Revise and finalize discovery responses; Send to opposing counsel;	100.0%		\$ 337.50	95%	\$ 320.63
07/26/15	DDS	4	\$ 400.00	\$	1,600.00	Return to Detroit;	100.0%		\$ 1,600.00	95%	\$ 1,520.00
07/27/15	TTR	2	\$ 225.00	\$	450.00	Review Defendant's Motion to Dismiss; Research Case law;	100.0%		\$ 450.00	95%	\$ 427.50
07/28/15	TTR	2	\$ 225.00	\$	450.00	Telephone conference w/DDS; Research Case law; Correspondence w/opposing counsel;	100.0%		\$ 450.00	95%	\$ 427.50
07/28/15	DDS	0.6	\$ 400.00	\$	240.00	Telephone conference with opposing attorney RE settlement; telephone conference with client RE status update;	100.0%		\$ 240.00	95%	\$ 228.00
07/30/15	DDS	0.5	\$ 400.00	\$	200.00	Telephone conference with opposing atty RE settlement;	100.0%		\$ 200.00	95%	\$ 190.00
07/30/15	TTR	1	225.00	\$	225.00	Conference w/DDS; Prepare witness list;	100.0%		\$ 225.00	95%	\$ 213.75
07/31/15	TTR	1	\$ 225.00	\$	225.00	Conference w/DDS; Prepare witness list; Correspondence w/DDS;	100.0%		\$ 225.00	95%	\$ 213.75
07/31/15	DDS	0.6	\$ 400.00	\$		Review and revise witness list; conference w/Tad RE same;	100.0%		\$ 240.00	95%	\$ 228.00
08/06/15	DDS	0.2	\$ 400.00	\$	80.00	Draft email to opposing atty RE settlement discussions;	100.0%		\$ 80.00	95%	\$ 76.00
08/12/15	TTR	0.5	225.00	\$		Telephone conference w/DDS; Search for deposition exhibits; Review corporate representative deposition exhibits;	100.0%		\$	95%	\$ 106.88
08/16/15	TTR	2	\$ 225.00	\$		Prepare for deposition of Miikii Johnson;	100.0%	,	\$ 450.00		\$ 427.50
08/17/15	TTR	6	\$ 225.00	\$	1,350.00	Telephone conference w/DDS; Prepare for deposition of Miikii Johnson;	100.0%		\$ 1,350.00	95%	\$ 1,282.50

Date	Attorney	Hours	Rate	R	equested	Task	Allowed after line	Explanation		Pre-global	Allow ed	Final
Date	rittorney	Hours	Rate	K	equested	1 45K	reduction	Explanation	1	reduction	after global	1 mai
08/18/15	TTR	4	\$ 225.00	\$	900.00	Take deposition of Miikii Johnson; telephone conference w/DDS; Review court reporter letter; Prepare Response to Defendant's Motion to Dismiss Count III; **	100.0%		\$	900.00	95%	\$ 855.00
08/25/15	DDS	0.3	\$ 400.00	\$	120.00	Conference with Tad RE Johnson deposition, future discovery plan and pending motions;	100.0%		\$	120.00	95%	\$ 114.00
08/26/15	TTR	1	\$ 225.00	\$	225.00	Prepare for continued deposition of Miikii Johnson;	100.0%		\$	225.00	95%	\$ 213.75
08/27/15	TTR	3	\$ 225.00	\$	675.00	Prepare for and attend continued deposition of Miikii Johnson;	100.0%		\$	675.00	95%	\$ 641.25
08/27/15	DDS	0.5	\$ 400.00	\$	200.00	Telephone conference with Church's attorney RE settlement/facilitation; conference with Tad RE Johnson deposition up date;	100.0%		\$	200.00	95%	\$ 190.00
08/28/15	DDS	0.6	\$ 400.00	\$	240.00	Telephone conference with mediator RE restart mediation; telephone conference with client RE status update;	100.0%		\$	240.00	95%	\$ 228.00
08/28/15	TTR	0.2	\$ 225.00	\$	45.00	Conference w/DDS;	100.0%		\$	45.00	95%	\$ 42.75
09/09/15	DDS	0.5	\$ 400.00	\$	200.00	Telephone conference with mediator and opposing attorneys RE process for continuing mediation;	50.0%		\$	100.00	95%	\$ 95.00
09/17/15	DDS	0.3	\$ 400.00	\$	120.00	Review court's decision RE Church's motion to amend complaint;	100.0%		\$	120.00	95%	\$ 114.00
09/17/15	DDS	0.3	\$ 400.00	\$		Eead court opinion RE Reliance motion to dismiss Church's cross-claim;	100.0%		\$	120.00	95%	\$ 114.00
09/17/15	TTR	0.7	225.00	\$		Review Court's opinion RE defendant's cross- claim; Conference w/DDS;	100.0%		\$		95%	\$ 149.63
09/21/15	TTR	5.5	\$ 225.00	\$	1,237.50	Correspondence w/DDS and AMD; Review Court's Opinion RE defendants' cross-claim; Prepare damage analysis for mediation summary; Research Case law; Conference w/DDS; Revise damage analysis for mediation summary;	50.0%		\$	618.75	95%	\$ 587.81

Date	Attorney	Hours	Rate	R	Lequested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
09/21/15	DDS	6	\$ 400.00	\$	2,400.00	Review the Corporate Representative and Johnson depositions; begin draft of supplemental mediation statement; conference with Tad RE the court's opinion on Church's motion to amend, damage issues, liability issues etc.:	50.0%		\$ 1,200.00	95%	\$ 1,140.00
09/22/15	DDS	4	\$ 400.00	\$	1,600.00	Draft of supplementary mediation statement; revise draft of same; organize exhibits;	47.5%	Clerical	\$ 760.00	95%	\$ 722.00
09/22/15	TTR	1	\$ 225.00	\$		Review and finalize mediation summary; Conference w/DDS re mediation summary;	50.0%		\$ 112.50	95%	\$ 106.88
09/23/15	DDS	0.3	400.00	\$		Conference with with Tad RE atty fee calculation/analysis;	100.0%		\$ 120.00		\$ 114.00
09/24/15	DDS	8.5	400.00	\$		Review file in preparation for mediation; drive to and from Detroit; attend meditation;	50.0%		\$ 1,700.00		\$ 1,615.00
09/24/15	TTR	1	225.00	\$		Telephone conference w/DDS RE mediation; Research pleadings;	50.0%		\$ 112.50		\$ 106.88
09/25/15	DDS	0.8	\$ 400.00	\$		Draft email to Tad RE SJ motion; review and respond to email from Stark RE mediation; review Reliance chart RE 10% increase issue;	50.0%		\$ 160.00	95%	\$ 152.00
10/02/15	TTR	0.5	\$ 225.00	\$	112.50	Review Church's correspondence RE case law; Correspondence w/DDS re case law;	100.0%		\$ 112.50	95%	\$ 106.88
10/06/15	DDS	2	\$ 400.00	\$		Review Church's memo and cases RE futility issue; review and summarize vol 2 of Johnson deposition; begin draft of SJ motion;	100.0%		\$ 800.00	95%	\$ 760.00
10/09/15	DDS	0.2	\$ 400.00	\$	80.00	Review and respond to email from opposing attorney RE discovery extension;	100.0%		\$ 80.00	95%	\$ 76.00
10/12/15	DDS	0.3	\$ 400.00	\$		Review client's medical records received per subpoena;	100.0%		\$ 120.00	95%	\$ 114.00
10/13/15	DDS	0.5	400.00	\$		Review motion to extend discovery; conference with Tad RE response;			\$	95%	\$ 190.00
10/13/15	TTR	1	225.00	\$		Review Church's Motion to Amend Scheduling Order; Conference w/DDS;	100.0%		\$	95%	\$ 213.75
10/13/15	DDS	0.3	\$ 400.00	\$	120.00	Conference w/Tad re Church's pending motion;	100.0%		\$ 120.00	95%	\$ 114.00

							Allowed after				Allow		
Date	Attorney	Hours	Rate		Requested	Task	line	Explanation		Pre-global	ed		Final
Date	rttorney	Hours	Rate		requested	Lask	reduction	Explanation		reduction	after		1 IIIai
10/15/15	DDS	3	\$ 400.00	\$	1,200.00	Continue work on SJ motion;	100.0%		\$	1,200.00	global 95%	\$	1,140.00
		3	 400.00	\$,			\$		95%	\$	1,140.00
10/16/15	DDS	3	\$	Þ		Complete draft of fact statement for SJ motion against Church's;	100.0%		Þ	1,200.00		Þ	,
10/16/15	TTR	0.5	\$ 225.00	\$	112.50	Conference w/DDS; Review statement of facts for SJ Motion;	100.0%		\$	112.50	95%	\$	106.88
10/16/15	DDS	0.3	\$ 400.00	\$	120.00	Conference w/Tad RE preparation of SJ motion;	100.0%		\$	120.00	95%	\$	114.00
10/19/15	TTR	7	\$ 225.00	\$	1.575.00	Prepare Motion for Summary Judgment;	100.0%		\$	1,575.00	95%	\$	1,496.25
10/20/15	TTR	6	\$ 225.00	\$		Prepare Motion for Summary Judgment;	100.0%		\$	1,350.00	95%	\$	1,282.50
10/21/15	TTR	4	\$ 225.00	\$	900.00	Revise SJ Motion; Correspondence w/DDS RE SJ Motion; Prepare Response to Church's Motion to Extend Discovery;	100.0%		\$	900.00	95%	\$	855.00
10/22/15	TTR	3	\$ 225.00	\$	675.00	Prepare Response to Defendant's Motion to Extend Discovery;	100.0%		\$	675.00	95%	\$	641.25
10/23/15	TTR	2.5	\$ 225.00	\$	562.50	Prepare Response to Defendant's Motion to Extend Discovery; Correspondence w/DDS; Research Case law;	100.0%		\$	562.50	95%	\$	534.38
10/26/15	TTR	4	\$ 225.00	\$	900.00	Revise, Organize, Finalize and File Plaintiffs' SJ Motion;	100.0%		\$	900.00	95%	\$	855.00
10/26/15	DDS	2	\$ 400.00	\$	800.00	review and revise SJ motion and brief; review and revise response to motion to extend discovery; conference with Tad RE SJ motion;	100.0%		\$	800.00	95%	\$	760.00
10/27/15	TTR	2.5	\$ 225.00	\$	562.50	Conference w/AMD re Plaintiffs' Motion for SJ; Revise and finalize Response to Defendant's Motion to Amend Scheduling Order;	100.0%		\$	562.50	95%	\$	534.38
10/29/15	TTR	1	\$ 225.00	\$	225.00	Conference w/DDS re medical authorization; Telephone conference w/client re medical authorization; review medical authorization form;	100.0%		\$	225.00	95%	\$	213.75
10/29/15	DDS	0.3	\$ 400.00	\$	120.00	Conference w/Tad RE medical authorization issue:	100.0%		\$	120.00	95%	\$	114.00
10/30/15	TTR	1	\$ 225.00	\$	225.00	Review court papers RE administrator of DVL's estate; Correspondence w/opposing counsel;	100.0%		\$	225.00	95%	\$	213.75
11/17/15	TTR	0.5	\$ 225.00	\$	112.50	Telephone conference w/client;	100.0%		\$	112.50	95%	\$	106.88

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Date	Attorney	Hours		Rate	R	Requested	Task	line reduction	Explanation		re-global eduction	ed after global		Final
11/23/15	DDS	1	\$	400.00	\$	400.00	Review Church's SJ response and countermotion; conference with Tad Re same;	100.0%		\$	400.00	95%	\$	380.00
12/04/15	TTR	1	Φ	225.00	\$	225.00	Review opinion and order; Correspondence	100.0%		\$	225.00	95%	\$	213.75
12/04/13	IIK	1	Ф	223.00	Þ		w/DDS;	100.0%		Þ	223.00	93%	Ф	213.73
12/07/15	DDS	1.5	\$	400.00	\$	600.00	Review SJ opinion; conference with Tad RE impact of opinion on the Church's claim;	100.0%		\$	600.00	95%	\$	570.00
							conference with Tad and clerk RE research							
							assignment; telephone conference with							
							opposing attorney RE extension to file response							
12/07/15	TTR	1.5	Φ	225.00	\$	227.50	as to pending SJ motions: Conference w/DDS; Conference w/law clerk;	100.0%		\$	337.50	050/	\$	320.63
12/07/13	IIK	1.5	Э	225.00	Þ	337.30	Telephone conference w/opposing counsel;	100.0%		Э	337.30	95%	Þ	320.03
12/09/15	DDS	0.3	\$	400.00	\$	120.00	Exchange email with opposing attorney RE extension to file SJ motion response;	100.0%		\$	120.00	95%	\$	114.00
12/10/15	TTR	2	\$	225.00	\$	450.00	Review Defendant's SJ Motion; Conference w/DDS;	100.0%		\$	450.00	95%	\$	427.50
12/10/15	DDS	0.3	\$	400.00	\$	120.00	Conference w/Tad RE SJ motions	100.0%		\$	120.00	95%	\$	114.00
12/11/15	TTR	5	\$	225.00	\$	1,125.00	Conference w/law clerk; Prepare SJ Response;	100.0%		\$	1,125.00	95%	\$	1,068.75
12/13/15	TTR	6	\$	225.00	\$	1,350.00	Research Case law; Prepare SJ Response;	100.0%		\$	1,350.00	95%	\$	1,282.50
12/14/15	TTR	6	\$	225.00	\$		Research Case law; Prepare SJ Response;	100.0%		\$	1,350.00	95%	\$	1,282.50
12/15/15	TTR	2	\$	225.00	\$		Prepare SJ Response;	100.0%		\$	450.00	95%	\$	427.50
12/15/15	DDS	0.3	\$	400.00	\$		Review clerk's memo RE applicability of finding in Reliance case to Church's case;	100.0%		\$	120.00	95%	\$	114.00
12/16/15	TTR	0.3	\$	225.00	\$	67.50	Correspondence w/DDS;	100.0%		\$	67.50	95%	\$	64.13
12/17/15	TTR	2	\$	225.00	\$		Conference w/DDS; Review and revise SJ Response;	100.0%		\$	450.00	95%	\$	427.50
12/17/15	DDS	1.3	\$	400.00	\$	520.00	Review and revise response to Church's SJ motion; conference with Tad RE same;	100.0%		\$	520.00	95%	\$	494.00
12/18/15	TTR	1.5	\$	225.00	\$	337 50	Finalize and file SJ Response;	100.0%		\$	337.50	95%	\$	320.63
12/30/15	TTR	2	\$	225.00	\$		Review Defendant's Reply Brief;	100.0%		\$	450.00	95%	\$	427.50
12/30/13	111	_	Ψ	223.00	¥	120.00	Correspondence w/law clerk; Research Case law:	100.070		Ψ	120.00	3570	Ψ	127.50
01/04/16	TTR	0.5	\$	225.00	\$	112.50	Conference w/DDS;	100.0%		\$	112.50	95%	\$	106.88
01/04/16	DDS	0.5	\$	400.00	\$		Conference w/Tad RE SJ motions;	100.0%		\$	200.00		\$	190.00

							Allowed after			Allow	
Date	Attorney	Hours	Rate	Red	quested	Task	line reduction	Explanation	e-global eduction	ed after global	Final
01/05/16	TTR	1	\$ 225.00	\$	225.00	Correspondence w/DDS; Correspondence w/opposing counsel;	100.0%		\$ 225.00	95%	\$ 213.75
01/08/16	TTR	1	\$ 225.00	\$	225.00	Conference w/law clerk; Telephone conference w/client;	100.0%		\$ 225.00	95%	\$ 213.75
01/12/16	TTR	3	\$ 225.00	\$	675.00	Research Case law; Review law clerk memo; Conference w/DDS; Review opposing counsel correspondence;	100.0%		\$ 675.00	95%	\$ 641.25
01/12/16	DDS	0.3	\$ 400.00	\$	120.00	Conference with Tad RE settlement demand and related issues;	100.0%		\$ 120.00	95%	\$ 114.00
01/13/16	TTR	4	\$ 225.00	\$	900.00	Prepare Motion for Leave to File Surreply; Prepare Motion to Quash Subpoena;	100.0%		\$ 900.00	95%	\$ 855.00
01/14/16	TTR	2.5	\$ 225.00	\$	562.50	File Motion for Leave to File Surreply; Prepare Motion to Quash; Conference w/DDS;	100.0%		\$ 562.50	95%	\$ 534.38
01/14/16	DDS	0.3	\$ 400.00	\$	120.00	Conference w/Tad RE surreply brief;	100.0%		\$ 120.00	95%	\$ 114.00
01/15/16	TTR	4	225.00	\$		Prepare Motion to Quash; Prepare draft correspondence to opposing counsel; Conference w/DDS;	100.0%		\$ 900.00		\$ 855.00
01/15/16	DDS	0.3	\$ 400.00	\$	120.00	Conference with Tad RE litigation and settlement issues/strategy;	100.0%		\$ 120.00	95%	\$ 114.00
01/16/16	DDS	0.3	\$ 400.00	\$	120.00	Review and revise settlement proposal to opposing attorney;	100.0%		\$ 120.00	95%	\$ 114.00
01/17/16	TTR	3	\$ 225.00	\$	675.00	Prepare Surreply Brief;	100.0%		\$ 675.00	95%	\$ 641.25
01/20/16	TTR	3	\$ 225.00	\$	675.00	Prepare Surreply Brief; Research Case law;	100.0%		\$ 675.00	95%	\$ 641.25
01/22/16	TTR	1.5	\$ 225.00	\$	337.50	Revise, finalize and file surreply brief;	100.0%		\$ 337.50	95%	\$ 320.63
02/02/16	TTR	2	\$ 225.00	\$	450.00	Correspondence w/DDS; Correspondence w/opposing counsel; Review Church's Motion for Leave to File Surreply;	100.0%		\$ 450.00	95%	\$ 427.50
02/04/16	TTR	1	\$ 225.00	\$	225.00	Review Church's response to motion to quash; Correspondence w/DDS;	100.0%		\$ 225.00	95%	\$ 213.75
02/05/16	TTR	1.5	\$ 225.00	\$	337.50	Telephone conference w/client; Correspondence w/Dianne Fonseca; Correspondence w/DDS;	100.0%		\$ 337.50	95%	\$ 320.63
02/08/16	TTR	1	\$ 225.00	\$	225.00	Conference w/DDS; Correspondence w/opposing counsel; Research FRCP;	100.0%		\$ 225.00	95%	\$ 213.75
02/08/16	DDS	0.3	\$ 400.00	\$	120.00	Conference w/Tad RE response to motion to quash;	100.0%		\$ 120.00	95%	\$ 114.00

Date	Attorney	Hours	Rate	Requested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Fin	ıal
02/10/16	TTR	2.5	\$ 225.00	\$ 562.50	Review correspondence from Fonseca; Conference w/DDS; Review subpoenaed documents; Correspondence w/opposing counsel; Review Reliance underwriting standards; Telephone conference w/opposing counsel:	100.0%		\$ 562.50	95%	\$	534.38
02/11/16	DDS	0.5	\$ 400.00	\$ 200.00		100.0%		\$ 200.00	95%	\$	190.00
02/12/16	TTR	5	\$ 225.00	\$ 1,125.00	Conference w/DDS; Research Case law; Prepare and file Reply to Motion to Quash Subpoena;	100.0%		\$ 1,125.00	95%	\$ 1,0	068.75
02/12/16	DDS	0.3	\$ 400.00	\$ 120.00		100.0%		\$ 120.00	95%	\$	114.00
02/15/16	TTR	0.5	\$ 225.00	\$ 112.50	Correspondence w/opposing counsel;	100.0%		\$ 112.50	95%	\$	106.88
02/17/16	TTR	1	\$ 225.00	\$ 225.00	Review Order on Motion to Quash; Conference w/DDS; Correspondence w/client;	100.0%		\$ 225.00	95%	\$	213.75
02/17/16	DDS	0.3	\$ 400.00	\$ 120.00	Conference w/Tad RE pending motion and response;	100.0%		\$ 120.00	95%	\$	114.00
02/18/16	TTR	1.5	\$ 225.00	\$ 337.50	Correspondence w/client; Review subpoena documents; Conference w/DDS;	100.0%		\$ 337.50	95%	\$	320.63
02/18/16	DDS	0.3	\$ 400.00	\$ 120.00	Conference with Tad RE discovery issue and settlement negotiation emails;	100.0%		\$ 120.00	95%	\$	114.00
02/23/16	TTR	2	\$ 225.00	\$ 450.00	Correspondence w/DDS; Review Church's subpoenaed documents;	100.0%		\$ 450.00	95%	\$	427.50
02/24/16	TTR	0.5	\$ 225.00	\$ 112.50	Conference w/AMD re motion and cases binder; Review contents of binder;	100.0%		\$ 112.50	95%	\$	106.88
02/25/16	TTR	2	\$ 225.00	\$ 450.00	Prepare cases for SJ Motion; Review subpoenaed documents;	100.0%		\$ 450.00	95%	\$ 4	427.50
03/01/16	TTR	2	\$ 225.00	\$ 450.00	Conference w/DDS; Correspondence w/DDS; Review subpoena production; Conference w/AMD; Send subpoena production;	100.0%		\$ 450.00	95%	\$	427.50
03/01/16	DDS	4	\$ 400.00	\$ 1,600.00	Review file in preparation for SJ hearing;	100.0%		\$ 1,600.00	95%	\$ 1,	520.00

Date	Attorney	Hours	Rate	I	Requested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
03/02/16	DDS	7.5	\$ 400.00	\$		Complete review of file in preparation for SJ hearing; conference with Tad RE SJ issues; drive to and from Detroit; attend hearing;	100.0%		\$ 3,000.00	95%	\$ 2,850.00
03/02/16	TTR	2.5	\$ 225.00	\$	562.50	Conference w/DDS re hearing; Correspondence w/DDS; Prepare for hearing; Telephone conference w/DDS;	100.0%		\$ 562.50	95%	\$ 534.38
03/08/16	DDS	0.4	\$ 400.00	\$	160.00	Telephone conference with clients RE status update;	100.0%		\$ 160.00	95%	\$ 152.00
03/14/16	TTR	1	\$ 225.00	\$	225.00	Conference w/law clerk RE research assignment; Correspondence w/law clerk;	100.0%		\$ 225.00	95%	\$ 213.75
03/29/16	TTR	2	\$ 225.00	\$		Prepare Response to Defendant's Supplemental Brief;	100.0%		\$ 450.00	95%	\$ 427.50
03/30/16	TTR	4	\$ 225.00	\$	900.00	Prepare response to Defendant's supplemental brief; Conference w/DDS;	100.0%		\$ 900.00	95%	\$ 855.00
03/31/16	TTR	2.5	\$ 225.00	\$	562.50	Prepare Response to Defendant's Supplemental Brief;	100.0%		\$ 562.50	95%	\$ 534.38
04/01/16	TTR	1.5	\$ 225.00	\$	337.50	Research Case law; Prepare response to Defendant's supplemental SJ brief;	100.0%		\$ 337.50	95%	\$ 320.63
04/03/16	TTR	2.5	\$ 225.00	\$	562.50	Research Case law; Prepare resp to Defendant's supplemental brief;	100.0%		\$ 562.50	95%	\$ 534.38
04/04/16	TTR	1.5	\$ 225.00	\$	337.50	Prepare response to defendant's supplemental SJ brief; Correspondence w/DDS; Conference w/DDS;	100.0%		\$ 337.50	95%	\$ 320.63
04/05/16	TTR	3.5	\$ 225.00	\$	787.50	Revise, finalize, and file supplemental response; Conference w/DDS;	100.0%		\$ 787.50	95%	\$ 748.13
04/05/16	DDS	1.5	\$ 400.00	\$	600.00	Review and revise response brief;	100.0%		\$ 600.00	95%	\$ 570.00
06/06/16	DDS	1	\$ 400.00	\$	400.00	Review opinion; telephone conference with clients RE same; telephone conference with Tad RE strategy;	100.0%		\$ 400.00	95%	\$ 380.00
06/06/16	TTR	1	\$ 225.00	\$	225.00	Correspondence w/DDS; Review SJ Opinion;	100.0%		\$ 225.00	95%	\$ 213.75
06/06/16	DDS	0.3	\$ 400.00	\$	120.00	Conference w/Tad RE SJ opinion and future steps;	100.0%		\$ 120.00	95%	\$ 114.00
06/08/16	TTR	0.5	\$ 225.00	\$		Telephone conference w/DDS;	100.0%		\$ 112.50	95%	\$ 106.88
06/09/16	TTR	1.5	\$ 225.00	\$	337.50	Prepare Proposed Judgment; Correspondence w/DDS;	100.0%		\$ 337.50	95%	\$ 320.63

Date	Attorney	Hours	Rate	R	equested	Task	Allowed after line reduction	Explanation	e-global eduction	Allow ed after global	Final
06/10/16	DDS	0.5	\$ 400.00	\$	200.00	Telephone conference with Tad RE attorney fee petition;	100.0%		\$ 200.00	95%	\$ 190.00
06/10/16	DDS	0.3	\$ 400.00	\$	120.00	Rreview judgment;	100.0%		\$ 120.00	95%	\$ 114.00
06/13/16	DDS	0.3	\$ 400.00	\$	120.00	Review fees in preparation for motion;	100.0%		\$ 120.00	95%	\$ 114.00
06/13/16	DDS	0.5	\$ 400.00	\$	200.00	Telephone conference with opposing attorney RE settlement; conference with Tad RE attorney fees and costs;	100.0%		\$ 200.00	95%	\$ 190.00
06/16/16	DDS	0.3	\$ 400.00	\$	120.00	Review objections to judgment;	100.0%		\$ 120.00	95%	\$ 114.00
06/20/16	DDS	0.3	\$ 400.00	\$		Draft email to opposing atty RE settlement;	100.0%		\$ 120.00	95%	\$ 114.00
06/20/16	TTR	0.5	\$ 225.00	\$		Review DDS correspondence; Review court filing; Correspondence w/DDS;	100.0%		\$ 112.50	95%	\$ 106.88
06/21/16	TTR	0.3	\$ 225.00	\$		Telephone conference w/court;	100.0%		\$ 67.50	95%	\$ 64.13
06/23/16	DDS	0.6	\$ 400.00	\$	240.00	Conference with Tad RE entry of judgment process; review court rules RE same; review and revise notice for entry of judgment;	100.0%		\$ 240.00	95%	\$ 228.00
06/23/16	TTR	1	\$ 225.00	\$	225.00	Prepare notice for settlement of proposed judgment; Conference w/DDS; Revise and file notice;	100.0%		\$ 225.00	95%	\$ 213.75
06/23/16	DDS	0.3	\$ 400.00	\$	120.00	Conference w/Tad RE proposed judgment;	100.0%		\$ 120.00	95%	\$ 114.00
06/28/16	TTR	1.5	\$ 225.00	\$	337.50	Telephone conference w/DDS; Research bill of costs filing procedure;	100.0%		\$ 337.50	95%	\$ 320.63
06/28/16	DDS	3.5	\$ 400.00	\$	1,400.00	Complete preparation for hearing for entry of motion; drive to and from Detroit; attend hearing; draft email to client RE status update;	100.0%		\$ 1,400.00	95%	\$ 1,330.00
06/29/16	DDS	0.3	\$ 400.00	\$	120.00	Telephone conference with client RE entry of judgment and appeal;	100.0%		\$ 120.00	95%	\$ 114.00
07/05/16	DDS	0.3	\$ 400.00	\$	120.00	Conference with Tad RE fee petition;	100.0%		\$ 120.00	95%	\$ 114.00
07/05/16	TTR	3.5	\$ 225.00	\$		Prepare motion for attorney fees and costs;	100.0%		\$ 787.50	95%	\$ 748.13
07/06/16	DDS	0.8	\$ 400.00	\$		Review time records and revise in connection with fee petition; review notice of appeal and draft email to client RE same;	100.0%		\$	95%	\$ 304.00
07/06/16	TTR	2	\$ 225.00	\$	450.00	Review and revise work in process statement; Conference w/DDS; Conference w/accounting; Review notice of appeal;	100.0%		\$ 450.00	95%	\$ 427.50

Date	Attorney	Hours	Rate	Requested	Task	Allowed after line reduction	Explanation	Pre-global reduction	Allow ed after global	Final
07/08/16	DDS	1	\$ 400.00	\$ 400.00	Telephone conference with opposing attorney RE appeal bond; review and respond to email RE same; conference with Tad and Ramona RE appeal strategy;	100.0%		\$ 400.00	95%	\$ 380.00
07/08/16	TTR	0.5	\$ 225.00	\$ 112.50	Attend litigation strategy meeting;	100.0%		\$ 112.50	95%	\$ 106.88
07/11/16	DDS	1.5	\$ 400.00	\$ 600.00	Telephone conference with client RE appeal and mediation; draft letter to client RE appeal; review summary of attorney time and billings;	0.0%		\$ -	95%	\$ -
07/11/16	TTR	4	\$ 225.00	\$ 900.00	Prepare motion for attorney fees and costs;	100.0%		\$ 900.00	95%	\$ 855.00
07/12/16	TTR	3.5	\$ 225.00	\$ 787.50	Prepare motion for attorney fees and costs;	100.0%		\$ 787.50	95%	\$ 748.13
07/13/16	TTR	2.5	\$ 225.00	\$ 562.50	Prepare motion for attorney fees and costs;	100.0%		\$ 562.50	95%	\$ 534.38
07/14/16	TTR	3	\$ 225.00	\$ 675.00	Prepare motion for attorney fees and costs;	100.0%		\$ 675.00	95%	\$ 641.25
TOTAL				\$ 166,872.50		100.0%		\$ 134,340.06		\$ 127,623.06