

EXHIBIT

“N”

Law Office of Nathaniel B. Smith
100 Wall Street - 23rd Floor
New York, NY 10005

Invoice submitted to:
Schoolcraft

November 25, 2015

Invoice #10032

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2013 MB	Initial meeting with Peter Gleason and Jeremy Skehan.	2.00 150.00/hr	300.00
3/5/2013 MB	Meeting with Peter Gleason re: coming on board the Schoolcraft team.	3.00 150.00/hr	450.00
3/9/2013 MB	Meeting with Peter and Nat re briefing of the case.	3.00 150.00/hr	450.00
3/15/2013 MB	Started research on admissibility of demonstrative evidence story board project.	6.00 150.00/hr	900.00
3/27/2013 MB	Conference with Peter, Nat, and Artist re Story Board project.	3.00 150.00/hr	450.00
4/1/2013 MB	Memo to counsel re: research on prior restraint in respnse to motion for gag order.	6.00 150.00/hr	900.00
4/7/2013 MB	Meeting with Adrian and team in Saugerties (travel to and from meeting 4 hours).	8.00 150.00/hr	1,200.00
8/1/2013 MB	Meeting with Nat re: jury instructions project.	3.00 150.00/hr	450.00
8/2/2013 MB	Review Complaint, record, and prior case decisions.	7.00 150.00/hr	1,050.00

		<u>Hrs/Rate</u>	<u>Amount</u>
8/5/2013 MB	Jury instructions project: research fundamentals of 1983 litigation and federal causes of action; review commentary Bender and Schwartz; causation by multiple defendants; collect cases for authority.	5.00 150.00/hr	750.00
8/6/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
8/7/2013 MB	Prep for meeting with illustrator re demonstrative project; meeting with potential "dangerousness expert," Tom Litwack.	7.00 150.00/hr	1,050.00
8/12/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
8/13/2013 MB	Meeting with Nat at 3pm re update on projects	3.00 150.00/hr	450.00
8/14/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
8/19/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
8/20/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
8/21/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
8/23/2013 MB	Meeting with Nat at 5pm re state action research project	3.00 150.00/hr	450.00
8/26/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
8/27/2013 MB	Team meeting with Adrian in Saugerties. (Travel time 4.5 hours)	10.00 150.00/hr	1,500.00
8/29/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
9/1/2013 MB	Nat's office, listen to audios and review production.	3.00 150.00/hr	450.00
9/3/2013 MB	Jury instructions project.	5.00 150.00/hr	750.00
9/5/2013 MB	Preparing detailed timelines for case on plaintiff's entire work history; NYPD work history; hospital events and events of 10-31-09.	5.00 150.00/hr	750.00
9/6/2013 MB	Timeline Project.	5.00 150.00/hr	750.00

		<u>Hrs/Rate</u>	<u>Amount</u>
9/9/2013 MB	Timeline Project.	5.00 150.00/hr	750.00
9/11/2013 MB	Timeline Project.	5.00 150.00/hr	750.00
9/12/2013 MB	Timeline Project.	5.00 150.00/hr	750.00
9/13/2013 MB	Meeting with Nat 4:30pm re update of current projects	3.00 150.00/hr	450.00
9/18/2013 MB	Meeting with Nat and Adrian	2.00 150.00/hr	300.00
9/19/2013 MB	Inspection of 81st Precinct	6.00 150.00/hr	900.00
9/24/2013 MB	Meeting with Adrian to work on layout of Glendale apt.	3.00 150.00/hr	450.00
9/25/2013 MB	Oral Argument; team meeting	4.00 150.00/hr	600.00
9/26/2013 MB	Deposition of the plaintiff.	11.00 150.00/hr	NO CHARGE
9/27/2013 MB	Deposition of the plaintiff by the medical defendants.	12.00 150.00/hr	NO CHARGE
10/2/2013 MB	Jamaica Hospital inspection.	6.00 150.00/hr	900.00
10/3/2013 MB	Prepare Marino examination before trial; compile relevant discovery docs into searchable PDF; review record and prepare questions	5.00 150.00/hr	750.00
10/4/2013 MB	Prepare Marino examination before trial.	5.00 150.00/hr	750.00
10/7/2013 MB	Prepare Marino examination before trial.	5.00 150.00/hr	750.00
10/8/2013 MB	Deposition of Deputy Chief Michael Marino.	12.00 150.00/hr	NO CHARGE
10/10/2013 MB	Research caselaw on involuntary commitments involving private hospitals	5.00 150.00/hr	750.00
10/11/2013 MB	Research involuntary commitments and MHL 9.39.	5.00 150.00/hr	750.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/14/2013 MB	Prepare medical defendants examination before trial; review medical chart and record; review depositions of City defendants; review hospital policy and procedure; review MHL 9.39; draft deposition questions.	5.00 150.00/hr	750.00
10/15/2013 MB	Prepare medical defendants examination before trial.	5.00 150.00/hr	750.00
10/16/2013 MB	Judge Sweet's courtroom hearing.	3.00 150.00/hr	450.00
10/17/2013 MB	Prepare medical defendants examination before trial.	3.00 150.00/hr	450.00
10/18/2013 MB	Research involuntary commitments and due process violations; brief cases.	5.00 150.00/hr	750.00
10/21/2013 MB	Prepare medical defendants examination before trial.	6.00 150.00/hr	900.00
10/22/2013 MB	Prepare medical defendants examination before trial.	5.00 150.00/hr	750.00
10/23/2013 MB	Prepare medical defendants examination before trial.	5.00 150.00/hr	750.00
10/24/2013 MB	Meeting with Nat re status on projects	3.00 150.00/hr	450.00
10/25/2013 MB	Dr. Aldana-Berner; deposition was cancelled.	2.50 150.00/hr	375.00
10/28/2013 MB	Research re: defendant's objection to plaintiff's use of video at deposition; research Rule 30, Rule 28(c), CPLR 3313 (b).	5.00 150.00/hr	750.00
10/29/2013 MB	Research video deposition Rule 30.	5.00 150.00/hr	750.00
10/30/2013 MB	Research video deposition Rule 30.	5.00 150.00/hr	750.00
10/31/2013 MB	Memo to counsel re; research video deposition Rule 30.	5.00 150.00/hr	750.00
11/1/2013 MB	Prepare Lauterborn examination before trial; review record; listen to audios; compile discovery docs into searchable PDF; draft deposition questions.	5.00 150.00/hr	750.00
11/4/2013 MB	Prepare Lauterborn examination before trial.	5.00 150.00/hr	750.00

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11/5/2013 MB	Prepare Lauterborn examination before trial.	5.00 150.00/hr	750.00
11/6/2013 MB	Prepare Lauterborn examination before trial.	5.00 150.00/hr	750.00
11/7/2013 MB	Lauterborn deposition.	11.00 150.00/hr	NO CHARGE
11/8/2013 MB	Review discovery, catalog, and convert to searchable PDF files.	5.00 150.00/hr	750.00
11/9/2013 MB	Review discovery, organize, and convert to searchable files.	5.00 150.00/hr	750.00
11/11/2013 MB	Review discovery, catalog, and convert to searchable PDF files.	5.00 150.00/hr	750.00
11/12/2013 MB	Canvas Glendale neighborhood with Terry; interview Adrian's next door neighbor and current resident of Glendale apt.; take photos.	5.00 150.00/hr	750.00
11/13/2013 MB	Judge Sweet's courtroom hearing.	5.00 150.00/hr	750.00
11/14/2013 MB	Prepare Mauriello examination before trial; review record; listen to audios; compile discovery docs into searchable PDF; draft deposition questions.	5.00 150.00/hr	750.00
11/15/2013 MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
11/18/2013 MB	Interview with Carol Stretmoyer at Midtown location (w/Terry Skinner).	3.00 150.00/hr	450.00
11/20/2013 MB	Interview with Ted Stretmoyer at Glendale apt. (with Terry Skinner).	3.00 150.00/hr	450.00
11/21/2013 MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
11/22/2013 MB	Mauriello deposition cancelled; begin Prof Rule 4.2 no contact research.	4.50 150.00/hr	675.00
11/24/2013 MB	Prof Rule 4.2 no contact research; issues include: when gov. employees are considered "parties" under Rule 4.2 and when employees are considered "represented."	3.00 150.00/hr	450.00
11/25/2013 MB	Prof Rule 4.2 no contact research.	6.00 150.00/hr	900.00
11/26/2013 MB	Draft memo to counsel re: Prof Rule 4.2 no contact research.	6.00 150.00/hr	900.00

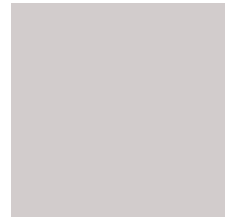
		<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2013 MB	Rule 30(c)(2) research; issues include: Rule 612; the production of documents relied on during deposition; attorney-client privilege; relevancy under Rule 26.	5.00 150.00/hr	750.00
11/30/2013 MB	Rule 30(c)(2) research re: discoverable disciplinary records; convictions; sanctions; applying state law privileges.	5.00 150.00/hr	750.00
12/2/2013 MB	Rule 30(c)(2) research.	5.00 150.00/hr	750.00
12/3/2013 MB	Draft memo to counsel re: Rule 30(c)(2) research.	5.00 150.00/hr	750.00
12/4/2013 MB	Draft memo to counsel re: Rule 30(c)(2) research.	5.00 150.00/hr	750.00
12/5/2013 MB	Write up on all deposition objection issues.	5.00 150.00/hr	750.00
12/6/2013 MB	Write up on all deposition objection issues.	5.00 150.00/hr	750.00
12/10/2013 MB	Prepare Larry Schoolcraft examination before trial.	5.00 150.00/hr	750.00
12/11/2013 MB	Larry Schoolcraft deposition in Albany, NY. (travel 6.5 hours).	16.00 150.00/hr	2,400.00
12/12/2013 MB	Review discovery, organize, and convert to searchable files.	5.00 150.00/hr	750.00
12/13/2013 MB	Review discovery, organize, and convert to searchable files; listen to audio.	5.00 150.00/hr	750.00
12/16/2013 MB	Prepare Mauriello examination before trial; review documents; create searchable PDF; review depositions and record; listen to audio.	5.00 150.00/hr	750.00
12/17/2013 MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
12/18/2013 MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
12/19/2013 MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
12/20/2013 MB	Mauriello deposition.	11.00 150.00/hr	NO CHARGE
12/22/2013 MB	Meeting with Adrian Schoolcraft re: demonstraive evidence project.	3.00 150.00/hr	450.00

		<u>Hrs/Rate</u>	<u>Amount</u>
12/24/2013 MB	Meeting with Team and Adrian Schoolcraft.	3.00 150.00/hr	450.00
12/26/2013 MB	Meeting with Adrian re demonstrative evidence project; joined by John Lenoir.	3.00 150.00/hr	450.00
12/27/2013 MB	Meeting with Adrian Schoolcraft re demonstrative evidence project.	3.00 150.00/hr	450.00
12/29/2013 MB	Meeting at Nat's office w/ Adrian; review audio and record.	4.00 150.00/hr	600.00
12/30/2013 MB	Meeting at Nat's office w/ Adrian; review audio and record.	3.00 150.00/hr	450.00
	For professional services rendered	<u>501.00</u>	<u>\$66,600.00</u>
	Balance due		<u><u>\$66,600.00</u></u>

Detailed report

2014-01-01 - 2014-12-31

Total 547 h 29 min Billable 461 h 28 min 69221.08 USD



Schoolcraft selected as clients

Date	Description	Duration	User
01-03	Prepare for Huffman and Boston Deposition; review discovery docs; draft questions.	4:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:02-14:32	675 USD
01-05	Prepare for Boston and Huffman Deposition.	6:02:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:07-16:09	905 USD
01-06	Boston Deposition.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-14:00	
01-06	Huffman Deposition.	4:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-18:15	
01-06	Team meeting re review of Boston and Huffman depositions.	1:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	19:15-21:00	262.5 USD
01-10	Review and catalog discovery production at Nat's office; listen to Hanlon audio.	6:59:18	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-18:00	1048.25 USD
01-12	Analyze NYPD emergency protocol; review NYPD Patrol guide.	2:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:46-16:00	335 USD
01-12	Prepare for Hanlon's deposition; review EMT emergency procedure and discovery documents.	4:08:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:37-21:45	620 USD
01-13	Hanlon's Deposition.	7:59:10	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-18:00	
01-15	Hearing with Judge Sweet re discovery issues; team meeting re status of case.	2:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-13:00	300 USD
01-28	Prepare for Lamstein deposition; review handwritten notes in discovery docs; draft questions.	3:44:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:15-20:59	560 USD
01-29	Meeting Nat's Office re: review and prep for Lamstein EBT.	4:00:01	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-18:00	600.04 USD
01-30	Lamstein Deposition.	10:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-20:00	1500 USD
02-03	Research inadvertent production and ethics on production obligation; search files and remove discovery documents in question.	6:05:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:12-18:17	912.5 USD
02-04	Research inadvertent production and ethics on production obligation; research Rule 502, Fed. R. Civ. P. 26(b)(5)(B) and caselaw.	6:30:01	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-16:00	975.04 USD
02-05	Draft memo to counsel re: inadvertent production research.	6:03:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:55-15:58	907.5 USD

02-07	Meeting with Nat re: inadvertent production redaction issues; begin prep for Medical Defendants EBTs.	5:00:06	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-16:00	750.25 USD
02-08	Prepare for Medical Defendant's EBTs; review medical chart, record, and deposition summaries; review Beiner's prior litigation testimony.	5:47:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:13-16:00	867.5 USD
02-10	Conference with Howard Suckle re deposition prep; prep for Medical Defendants depositions.	6:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-17:15	937.5 USD
02-11	Bernier Deposition.	9:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-19:00	
02-12	Isakov Deposition.	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:30	
02-20	Research state action under § 1983; draft memo to counsel arguing Dr. Isakov's liability in response to opposing counsel's request to release Isakov from case.	6:13:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:17-16:30	932.5 USD
02-20	Draft memo to counsel re: Dr. Isakov.	2:03:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	20:15-22:18	307.5 USD
03-04	Conference call with City defendants; team conference re trial prep status.	1:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:30-18:00	225 USD
03-07	Research issues re: City Defendants' March 7, 2014 letter; attorney-client privilege issue; research Fed. R. Evid. 612(b) and Fed. R. Civ Pro 26(b)(3).	5:41:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:17-21:58	852.5 USD
03-08	Research issues City Defendants' March 7, 2014 letter; ten-year limitation issue; unsubstantiated claims issue; objections at depositions generally; time to depose plaintiff (Rule 30(d)(1)).	4:39:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:17-16:56	697.5 USD
03-09	Draft Memo to counsel re: City Defendants deposition objection issues.	6:40:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:35-15:15	1000 USD
03-10	Research defendants assertion of privilege for grand jury subpoenas.	5:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:05-22:19	785 USD
03-11	Review and comment Letter to Judge Sweet; team meeting re discovery issues.	3:22:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:11-20:33	505 USD
03-12	Catalogue and review new discovery at Nat's office.	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-16:00	975 USD
03-12	Letter to counsel re: search for missing discovery files.	1:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:00-17:00	150 USD
03-14	Draft subject matter for NYPD 30(b)(6) notices.	5:40:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:35-16:15	850 USD
03-14	Revise proposed jury instructions for City defendants; research Monell custom and policy municipal liability; analyze Monell jury instructions from other jurisdictions; draft alternate instructions; review and collect cases for authority.	5:28:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:35-16:03	820 USD
03-15	Continue with research and drafting NYPD proposed jury instructions; draft charges for supervisor liability, First Amendment retaliation and prior restraint.	6:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:15-17:15	900 USD

03-16	Research and draft NYPD proposed jury instructions; draft conspiracy and state action charges.	5:53:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:12-16:05	882.5 USD
03-19	Draft NYPD proposed jury instructions; continue state action research re: Medical Defendants.	6:26:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:46-16:12	965 USD
03-21	Research state action re: City defendants section 1983 conspiracy liability.	7:48:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:15-18:03	1170 USD
03-27	Draft subject matter for JHMC 30(b)(6) notices.	5:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:44-14:59	787.5 USD
03-28	Meeting with Nat re: NYPD proposed jury instructions draft.	6:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-18:15	937.5 USD
04-02	Research re: possible medical experts.	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-16:00	975 USD
04-03	Memo to counsel re: possible medical expert Dr. Peter Stastny, MD.	5:32:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:35-15:07	830 USD
04-04	Research medical experts; review Roy Lubit's filings.	6:51:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:39-16:30	1027.5 USD
04-11	Draft proposed Jury Instructions Medical Defendants; research due process causes of action; dangerousness standard re: emergency civil commitment; statutory and common law procedural protections re: restraints; legal privilege under MHL 9.39.	3:39:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:22-19:01	547.5 USD
04-12	Continue proposed jury instructions for case against Medical Defendants; draft neg per say charges.	5:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-19:30	750 USD
04-13	Team meeting with potential expert, Roy Lubit.	4:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:45-18:00	637.5 USD
04-14	Team conference call with Adrian re status and settlement.	0:40:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-10:40	100 USD
04-14	Continue drafting proposed jury instructions Medical Defendants; draft medical malpractice and other state claims.	4:33:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:00-19:33	682.5 USD
04-16	Conference call with Adrian re trial issues and settlement; team conference to confer.	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-11:30	375 USD
04-17	Team conference call re progress on settlement issues.	1:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-13:15	187.5 USD
04-24	Research re: jury awards of damages.	4:10:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:08-13:18	625 USD
04-24	Research the various state action tests in the context of a private hospital; collect and analyze Second Circuit case law.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	18:00-22:00	600 USD
04-26	Draft memo to counsel re: state action research.	5:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:14	785 USD
05-13	Prepare EMT Jessica Marquez's deposition; research right to refuse medical attention; right to choice of hospital.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:15-14:15	600 USD

05-14	EMT Jessica Marquez Deposition.	7:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-17:15	
05-20	Trip to Johnstown to meet with Adrian (6.5 hours of travel time).	11:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	06:00-17:30	1725 USD
05-21	Research re: blue wall of silence police retaliation cases; the deliberative process privilege; the law enforcement privilege.	5:16:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:44-16:00	790 USD
05-23	Blue wall of silence research; analyze and review prior testimony of possible police procedures expert, Dr. Leinen.	6:37:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:26-16:03	992.5 USD
05-24	Review and catalog new discovery production.	3:59:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:46-15:45	597.5 USD
05-25	Analyze case law granting summary judgment on plaintiff's Monell claims connected to practices in Mollen report.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:30-15:30	600 USD
05-26	Draft writeup on blue wall of silence research.	6:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:45-15:59	935 USD
05-27	Create Medical defendants evaluation timeline in the ER, psyche ER, and psyche ward.	5:59:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:12-20:11	897.5 USD
05-28	Hearing with Judge Sweet oral arguments on motion.	2:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-13:00	300 USD
05-28	Prepare Weiss deposition; team conference call re Weiss deposition.	4:06:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:15-17:21	615 USD
05-29	Weiss Deposition.	9:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-19:00	
05-29	Draft summary of Weiss deposition send to counsel; prepare for JHMC 30(b)6 depositions on policy; review Beiner's depo transcript; draft questions.	6:42:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:15-17:57	1005 USD
05-30	Jamaica Hospital 30 (b)(6) Deposition Maffia.	3:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-13:30	
06-04	Prepare for Ferrara Deposition.	3:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-13:00	450 USD
06-05	Pre-ebt meeting with Ferrara; Ferrara Deposition.	7:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-17:15	
06-06	Draft summary of notes from Ferrara deposition send to counsel; team conference call with police practices experts, Eterno and Silverman re: expert report and testimony.	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-16:30	375 USD
06-09	Team conference call w/ Adrain re trial prep and update.	1:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-16:00	225 USD
06-13	Team conference call w/ Silverman and Eterno re expert testimony; conference with Nat re conflict of interest issue.	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-11:30	375 USD
06-27	Prep for Mauriello's deposition; review prior deposition; review City defendants depo summaries.	3:59:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:45-14:44	597.5 USD

07-01	Mauriello Deposition. Schoolcraft - Schoolcraft case	9:02:00 10:00-19:02	Magdalena Bauza
07-02	Prep for Lwin deposition; review Beiner deposition notes and hospital chart. Schoolcraft - Schoolcraft case	1:30:00 20:00-21:30	Magdalena Bauza 225 USD
07-03	Lwin Deposition. Schoolcraft - Schoolcraft case	1:45:00 11:00-12:45	Magdalena Bauza
07-07	Jamaica Hospital's 30(b)(6) witness deposition, Dhar. Schoolcraft - Schoolcraft case	5:30:00 10:00-15:30	Magdalena Bauza
07-13	Prep for City 30(b)(6) deposition topics; research anti-quota law, New York Labor Law § 215-a, and Operations Order No. 52. Schoolcraft - Schoolcraft case	6:00:00 10:00-16:00	Magdalena Bauza 900 USD
07-15	City 30 (b) (6)Lt. David Wittman Topic B deposition. Schoolcraft - Schoolcraft case	1:15:00 10:00-11:15	Magdalena Bauza
07-15	City 30 (b) (6) Lt. Bernard Whalen deposition. Schoolcraft - Schoolcraft case	0:45:00 13:30-14:15	Magdalena Bauza
07-18	Team conference call with expert Dr. Halpren. Schoolcraft - Schoolcraft case	2:00:00 10:00-12:00	Magdalena Bauza 300 USD
07-22	Research re City's application of subsequent remedial measure; team conference call re status. Schoolcraft - Schoolcraft case	3:39:00 16:14-19:53	Magdalena Bauza 547.5 USD
07-24	City 30(b)(6) witness deposition, Cooper. Schoolcraft - Schoolcraft case	5:30:00 11:30-17:00	Magdalena Bauza
07-24	Prep for Patel deposition. Schoolcraft - Schoolcraft case	1:00:00 20:00-21:00	Magdalena Bauza 150 USD
07-25	Patel deposition. Schoolcraft - Schoolcraft case	2:30:00 10:30-13:00	Magdalena Bauza
07-31	Analyze potential withdrawal of claims. Schoolcraft - Schoolcraft case	2:09:00 13:06-15:15	Magdalena Bauza 322.5 USD
07-31	Team conference call with experts, Halpern-Ruder and Dr. Lubit. Schoolcraft - Schoolcraft case	1:30:00 16:00-17:30	Magdalena Bauza 225 USD
08-04	Research re: 8/4/14 letter to Judge Sweet; analyze defendants' instruction to witness not to answer questions beyond scope of 30 (b)(6) subject matter issue. Schoolcraft - Schoolcraft case	3:05:00 15:11-18:16	Magdalena Bauza 462.5 USD
08-06	Conference call with Nat re: defendant's objection to video; new assignments. Schoolcraft - Schoolcraft case	0:30:00 12:30-13:00	Magdalena Bauza 75 USD
08-09	Review and analyze Dr. Lubit's expert report. Schoolcraft - Schoolcraft case	3:08:00 10:07-13:15	Magdalena Bauza 470 USD
08-10	Team conference call with Dr. Lubit re testimony. Schoolcraft - Schoolcraft case	1:15:00 11:00-12:15	Magdalena Bauza 187.5 USD
08-14	Draft response addressing 8.5.14 Letter re: Purpi's 30(b)(6) issues. Schoolcraft - Schoolcraft case	4:54:00 10:13-15:07	Magdalena Bauza 735 USD
09-04	Search for missing case citations for Dr. Lubit's prior expert testimony. Schoolcraft - Schoolcraft case	2:19:00 13:05-15:24	Magdalena Bauza 347.5 USD

09-12	Team Meeting weekend in Mayfield, NY (including travel time of 4 hours).	8:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-17:00	1200 USD
09-13	Team Meeting weekend in Mayfield, NY.	7:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-17:30	1125 USD
09-14	Team Meeting weekend in Mayfield, NY (including travel time of 4 hours).	8:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-17:00	1200 USD
09-20	Review Medical defendants expert reports; review expert Tancredo's deposition transcripts.	4:37:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:23-17:00	692.5 USD
09-21	Team meeting with Dr. Lubit re: deposition prep.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-15:00	600 USD
10-02	Team conference call re: trial prep.	0:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:00-13:45	112.5 USD
10-03	Team meeting Nat's office re upcoming motion papers; conference w/Adrian.	3:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:00-19:00	450 USD
10-18	Research Rule 68; review letter to Adrian re settlement offer.	3:58:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:14-12:12	595 USD
10-19	Conference call w/ team re Rule 68 Offer.	2:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-16:15	337.5 USD
10-23	Create claims "cheat sheet" from proposed jury instructions.	5:53:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:07-15:00	882.5 USD
10-23	Review/comment re: Letter Rejecting Rule 68 Offer.	1:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-15:30	150 USD
12-01	Review 2nd Amended Complaint track proposed changes.	4:41:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	18:15-22:56	702.5 USD
12-02	Review Third Amended Complaint; draft proposed addition of malicious abuse of process claim and violation of substantive and procedural due process claims.	4:40:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:32-14:12	700 USD
12-02	Memo of law in support of Motion to Amend; examine and analyze developing caselaw re: respondent superior liability for private corporations under § 1983 (Shields).	7:55:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-19:55	1187.5 USD
12-03	Review final draft memo of law in support of Motion to Amend; Begin research for summary judgment arguments; analyze Second Circuit summary judgment decisions re due process and dangerousness in context of civil commitment; false imprisonment claims.	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:30-15:00	975 USD
12-03	Review final draft Third Amended Complaint; review final draft Memo in Support.	5:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:45-21:00	787.5 USD
12-11	Meeting Nat's office re:NYPD and Medical Defendants summary judgment claims.	5:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:15-16:30	787.5 USD
12-16	Draft summary judgment issues; analyze Fourth Amendment search and seizure Second Circuit summary judgment decisions.	7:37:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-18:37	1142.5 USD

12-18	Mauriello's Counterclaim issue; analyze tortious interference w/prospective advantage summary judgment decisions.	8:50:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:10-19:00	1325 USD
12-19	Summary judgment Memo in Support; research and analyze Second Circuit decisions determining exigent circumstances; review NYPD Patrol Guide emergency protocol.	5:10:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:35-20:45	775 USD
12-20	Summary judgment motion; review MHL statute provisions, JHMC hospital chart and record.	5:23:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:52-16:15	807.5 USD
12-21	Summary judgment memo in support draft; track comments and caselaw support.	7:22:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:35-18:57	1105 USD
12-22	Review Summary judgment memo in support draft; track comments and changes.	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:30-15:00	975 USD
12-22	Review final draft Summary judgment Memo in Support.	3:43:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:45-20:28	557.5 USD

Detailed report

2015-01-01 - 2015-12-31

Total 472 h 11 min Billable 407 h 06 min 61067.11 USD

Schoolcraft selected as clients

Date	Description	Duration	User
01-04	Review City defendants summary judgment motions; research caselaw cited.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-13:00	600 USD
01-05	Review Medical defendants summary judgment motions; research cited caselaw; conference with Nat re: motions.	5:58:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-15:28	895 USD
01-07	Prepare for opposition papers; draft Medical Defendants' summary judgment issues; analyze cited caselaw.	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-21:00	975 USD
01-08	Meeting with Nat re: Medical Defendants summary judgment issues; conduct research on issues.	5:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:30	825 USD
01-09	Research City Defendants summary judgment issues; 4th amendment unlawful search and seizure; legal standard for exigent circumstances; objective reasonableness doctrine; research caselaw deciding summary judgment on qualified immunity grounds; team conference re motions.	6:04:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:46-16:50	910 USD
01-11	Research City Defendants summary judgment issues; probable cause; exculpatory evidence; review EMT emergency protocol ; review caselaw and statutory right to refuse medical treatment; right to hospital preference.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-14:00	600 USD
01-12	Research Medical Defendants summary judgment issues; draft the state action issue; analyze McGugan v. Aldana-Bernier and Doe.	5:33:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:33	832.5 USD
01-14	Research Medical Defendant's summary judgment motion issues; respondeat superior, vicarious liability; apparent authority.	5:23:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:37-16:00	807.5 USD
01-15	Research Medical Defendant's summary judgment issues; review Dr. Lubit's Report for establishing the standard of care.	7:05:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:19-16:24	1062.5 USD
01-16	Continue research on Medical Defendants summary judgment issues; research applicable standard of care; analyze "substantially below" legal standard; review defendants deposition summaries.	6:40:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-15:40	1000 USD
01-21	Continue research on defendants summary judgment issues; conspiracy/joint activity state action liability.	7:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-16:00	1050 USD
01-22	Research re: intracorporate conspiracy doctrine.	6:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:11-16:56	1012.5 USD
01-26	Research re: intracorporate doctrine; draft memo to counsel re: intra-Corporate doctrine.	6:25:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:15-16:40	962.5 USD
01-27	Draft memo to counsel re: intracorporate doctrine.	4:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-13:30	675 USD

01-27	Meeting with Nat re:opposition issues; 1st amendment issue.	4:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:00-17:30	675 USD
01-28	Research First Amendment issues; analyze recent development in the law limiting Garcetti (Lane, Griffin, Hagan).	7:01:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-16:01	1052.5 USD
01-29	Research intentional infliction of emotional distress claim.	4:43:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:17-14:00	707.5 USD
01-29	Continue IIED research; IIED claim not duplicative of the other claims issue.	3:25:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:35-19:00	512.5 USD
02-01	Memo to counsel re: IIED research.	6:50:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:50	1025 USD
02-02	Research First Amendment issues; Monell research.	8:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-18:00	1200 USD
02-03	Monell research; review and brief cases on police retaliation to establish policy under Monell; review and brief case law re establishing deliberate indifference under Monell.	6:03:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-15:03	907.5 USD
02-04	Memo to counsel re: Monell research.	6:04:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-15:04	910 USD
02-05	Continue to research Medical Defendants Memo in Opposition issues; research defendant's argument of legal justification to confine plaintiff under EMTALA.	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-16:00	975 USD
02-06	Draft opposition to Medical Defendants summary judgment arguments.	5:36:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:30-21:06	840 USD
02-07	Draft opposition to Medical Defendants summary judgment arguments.	7:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-22:00	1125 USD
02-08	Call with Nat discuss current status on JHMC opposition issues.	0:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-14:30	75 USD
02-09	Call with Nat re: progress on research Medical defendants issues.	0:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:15-13:45	75 USD
02-10	Draft opposition to JHMC summary judgment arguments.	4:34:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:26-16:00	685 USD
02-10	Draft opposition to JHMC summary judgment motions.	2:49:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:11-20:00	422.5 USD
02-11	Review and track proposed changes on first draft of Motion in Opposition.	5:39:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:21-15:00	847.5 USD
02-11	Review/edit second draft of Motion in Opposition.	3:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:15-21:00	562.5 USD
02-13	Review all defendants motions in opposition submissions; Meeting with Nat to discuss submissions.	6:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:30-16:30	900 USD
02-14	Draft issues re: reply to Mauriello opposition motion.	5:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:46-19:00	785 USD

02-15	Reply to Mauriello opp; research tortious interference with prospective relations claim; wrongful means constituting tortious conduct; malice intent as the "sole motivation" for plaintiff's alleged interference.	5:58:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:52-15:50	895 USD
02-16	Reply to Mauriello opposition motion; research defamation and damages.	4:18:22	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:23-19:41	645.92 USD
02-17	Draft portion of reply to Mauriello opposition motion.	6:13:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:13-16:26	932.5 USD
02-19	Draft reply to Mauriello opposition motion.	4:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:51-17:05	635 USD
02-20	Team meeting; meet with Norinsberg and new team.	4:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-14:30	675 USD
02-23	Draft issues re: reply to Medical defendants memo in opp.	7:00:05	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:01-21:01	1050.21 USD
02-24	reply to Medical defendants memo in opp.	7:11:49	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:29-22:40	1079.54 USD
02-25	Research sham affidavit doctrine.	3:49:05	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:29-16:18	572.71 USD
02-26	Memo to counsel re; sham affidavit doctrine research.	4:20:12	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:28-16:49	650.5 USD
02-27	Research re: inadmissibility of hearsay on summary judgment motions.	4:41:54	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:15-16:56	704.75 USD
02-28	Draft issues re: reply to City memo in opposition.	6:05:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	05:35-11:40	912.5 USD
03-02	Research re: collective knowledge doctrine.	3:56:19	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:34-12:30	590.79 USD
03-03	Memo to counsel re: collective knowledge doctrine research.	5:10:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:10	775 USD
03-05	Review and track proposed changes to Reply motion draft.	5:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:30-21:00	825 USD
03-06	Final review/edit of Reply papers.	4:02:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-13:02	605 USD
03-07	Prepare police expert Prof. Eterno deposition summary.	5:03:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-16:03	757.5 USD
03-08	Prepare police expert Prof. Eterno's deposition summary.	7:03:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-16:03	1057.5 USD
03-09	Draft Eterno Deposition Summary; team conference call.	6:55:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:55	1037.5 USD
03-10	Draft Prof. Eterno deposition summary.	5:55:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:05-22:00	887.5 USD
03-11	Prepare Prof. Eterno deposition summary.	6:06:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:06	915 USD

03-12	Prepare Prof. Eterno deposition summary.	4:50:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:00-12:50	725 USD
03-12	Meeting with Team re new issues on reply.	3:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:00-19:00	450 USD
03-12	Revise NYPD jury instructions; distribute revised charges to counsel.	1:44:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	20:00-21:44	260 USD
03-13	Meeting Nat's office with new team re division of upcoming work.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-18:00	600 USD
03-16	Review Defendants Reply memos.	3:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-12:00	450 USD
03-16	Draft Prof. Eterno's direct examination for trial.	2:06:57	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:22-16:28	317.37 USD
03-17	Review/comment March 17 Letter to the court.	1:12:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:02-12:14	180 USD
03-18	Draft Prof. Eterno's direct examination for trial.	6:28:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:33-16:01	970 USD
03-19	Draft Prof. Eterno's direct examination for trial.	4:15:54	Magdalena Bauza
	Schoolcraft - Schoolcraft case	22:44-03:00	639.75 USD
03-20	Draft Prof. Eterno's direct examination for trial.	3:37:19	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:17-16:54	543.29 USD
03-25	Conference call w/ Nat re: status and assignments moving forward.	0:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-14:30	75 USD
03-26	Team meeting at Nat's new office; review Prof. Eterno's direct examination outline.	5:00:54	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:29-17:30	752.25 USD
03-28	Draft proposed jury instructions for claims against Medical Defendants; draft charges for medical malpractice and other state claims.	6:35:58	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:16-21:51	989.92 USD
03-29	Draft proposed jury instructions for Medical Defendants; draft state false imprisonment charge.	5:39:57	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:36-19:16	849.87 USD
03-29	Make changes to diagram of the Glendale apt.	1:41:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	22:20-00:01	252.5 USD
03-30	Call with Nat re: Glendale diagram/jury charges.	0:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:30-16:00	75 USD
03-31	Draft proposed jury instructions Medical Defendants; draft corporate negligence charge.	5:33:39	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:18-19:52	834.12 USD
04-01	Draft proposed jury instructions for claims against Medical Defendants; draft charge re: the stigma of an involuntary commitment; charge instructing requirement of a sufficient investigation of dangerousness; damages	5:40:02	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:04-19:44	850.08 USD
04-02	Trial Team meeting re trial prep, jury instructions.	0:03:30	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-12:03	8.75 USD

04-03	Combine NYPD and Medical Defendants Jury Instructions.	3:56:54	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:15-15:12	592.25 USD
04-06	Combine NYPD and Medical Defendants Jury Instructions.	6:20:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:29-15:49	950 USD
04-08	Revise jury instructions Medical Defendants incorporating Nat's edits; conference w/ team.	5:47:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:33-14:20	867.5 USD
04-10	Call with Nat re: progress on current projects.	0:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-14:45	112.5 USD
04-13	Conference with Judge Sweet; team conference.	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-13:30	375 USD
05-05	Review of Court's Opinion re: summary judgment motions.	1:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	19:30-20:30	150 USD
05-12	Conference with Judge Sweet; Trial team meeting re status.	3:30:01	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:30-16:00	525.04 USD
05-27	Draft motion for reconsideration issues; research post-suspension First Amendment claim; review cross examination outlines for defendants.	6:09:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:36-15:45	922.5 USD
05-28	Analyze Second Circuit freedom-of-speech cases (Jackler, Gacetti, Walsh); conference call w/ Nat re reconsideration motion.	4:20:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:40-14:00	650 USD
05-31	Memo to counsel re: post-suspension retaliation claim.	4:47:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:43-14:30	717.5 USD
06-01	Review letter to Judge for reconsideration draft; track changes; research issue of qualified immunity in a First Amendment retaliation case.	6:55:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:50-15:45	1037.5 USD
06-02	Memo to counsel re: qualified immunity and "clearly established" law doctrine.	4:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:45-13:00	637.5 USD
09-15	Review cross examination of defendants outlines; review/comment on client memo.	4:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:30-22:00	675 USD
09-16	Research Rule 68 issue; research offset issue; general obligations law 15-108.	2:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-12:15	337.5 USD
10-07	Judge Sweet hearing; conference with Medical Defendants.	2:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-13:00	
10-08	Meeting at Nat's office; review Motion in Lim Opposition issues.	5:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-17:30	
10-09	Draft portion of Motion in Lim Opposition; research issues on admissibility of expert testimony.	6:58:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:17-17:15	
10-10	Draft portion of Motion in Lim Opp; research Daubert and reliability standards.	5:09:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:03-14:12	
10-10	Motion in Lim Opp; research expungement of medical records; research criminal liability under 18 USCS § 922(g)(4) for possession of gun by person who has been committed to mental institution.	3:23:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:30-19:53	

10-14	Meeting with Defendant's (motion in lim opp)/Hearing Judge Sweet.	1:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:30-13:00	
10-16	Meeting with Defendant's (settlement)/Judge Sweet Chambers settlement discussion.	3:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-14:00	
10-21	Hearing with Judge sweet; oral arguments for Motion in Lim opposition.	1:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-12:30	
10-21	Meeting Nat's office; discuss new issues.	2:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-16:00	
10-23	Meet with Nat's revised Jury Instructions.	3:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-17:00	
10-24	Final draft proposed jury Instructions.	6:34:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:26-16:00	
10-24	Final draft proposed jury Instructions.	6:06:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:54-16:00	
10-25	Final draft proposed jury Instructions.	2:55:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:45-13:40	
10-29	Hearing with Judge Sweet; settlement meeting with defendants.	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:30-16:00	
10-31	Work with Nat re prepping Lubit for trial.	3:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-17:30	
11-01	Prep Roy Lubit for trial.	5:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-17:30	
11-03	Settlement meeting with Judge Sweet and Adrian.	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:30-14:30	