

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2	1.0	11/26/12	Peter J. Gleason	Meeting with RG regarding obtaining and scheduling picking up Schoolcraft file from prior counsel.	0.250
3	2.0	12/02/12	Peter J. Gleason	Phone conv. with AS regarding status of investigations.	0.500
4	3.0	12/07/12	Peter J. Gleason	Phone conv. with AS re: NYPD employment issues	0.750
5	4.0	12/09/12	Peter J. Gleason	Phone conv. with FS, re: his overview of the matter and scheduling a time to meet to discuss same in person	0.250
6	5.0	12/12/12	Peter J. Gleason	Meeting with FS's attorney to discuss FS involvement in the Schoolcraft matter.	4.000
7	6.0	12/14/12	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft NYPD employment issues.	0.125
8	7.0	12/15/12	Peter J. Gleason	Legal research, re: prosecutorial misconduct as a bar to overcome immunity.	2.250
9	8.0	12/16/12	Peter J. Gleason	E-mail from FS's atty.	0.125
10	9.0	12/21/12	Peter J. Gleason	Organize and review case files.	2.500
11	10.0	12/27/12	Peter J. Gleason	Review of part of Schoolcraft file: Partial review of "Attorney's eyes only" File.	3.500
12	11.0	01/12/13	Peter J. Gleason	Phone conv. with NS re: updating him on veracity of matter.	0.750
13	12.0	01/13/13	Peter J. Gleason	Multiple e-mails from AS and follow up phone conv. with AS. Re: PBA, NYPD, employment status and investigation.	3.250
14	13.0	01/15/13	Peter J. Gleason	Phone conv. with AS re: Queens DA.	0.500
15	14.0	01/17/13	Peter J. Gleason	Meeting with VP, re: "Home Invasion," participants.	0.750
16	15.0	01/22/13	Peter J. Gleason	Phone conv. with AS, re, NYPD issues, sheduling his travel to meet with counsel in NYC, update on progress of investigation.	2.250
17	16.0	01/23/13	Peter J. Gleason	Phone conv. with RG, Re: NYPD letter	0.125
18	17.0	01/23/13	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft position on employment matter.	0.125
19	18.0	01/30/13	Peter J. Gleason	Phone conc. with AS, update.	0.250
20	19.0	02/04/13	Peter J. Gleason	Phone conv. with AS, re: travel to NYC on 2/7/13, e-mail AS, round trip Amtrak tickets for AS & LS.	0.500
21	20.0	02/07/13	Peter J. Gleason	Meeting with AS, NS, & JL, re: adding lawyers to the legal team.	2.500

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1	No.	Date	Timekeeper	Description	Hours
22	21.0	02/09/13	Peter J. Gleason	E-mail and phone conv. with AS re: upcoming deposition on 2/12/13, purchase train ticket	1.000
23	22.0	02/10/13	Peter J. Gleason	E-mail to NS, re: deposition	0.125
24	23.0	02/18/13	Peter J. Gleason	E-mail from JL, re: internet posting pertaining to AS, review of same.	0.500
25	24.0	02/20/13	Peter J. Gleason	Meeting with NS, JL. Re: Queens DA subpoena	0.750
26	25.0	02/21/13	Peter J. Gleason	E-mail from RG, re: evidence preservation.	0.250
27	26.0	02/22/13	Peter J. Gleason	Review of e-mails from JL & NS, re: DOJ. E-mail to NS & JL re: Agenda for Sunday's meeting.	0.750
28	27.0	02/24/13	Peter J. Gleason	meeting in Saugerties NY with NS, JL, AS, LS. Travel to and from Saugerties	3.500
29	28.0	02/26/13	Peter J. Gleason	E-mail from Magdalena Bauza (MB), re: resume and her interest in working on matter.	0.125
30	29.0	02/27/13	Peter J. Gleason	Phone conv. with NS, re: service upon 5 defendants. Travel to 1PP to serve summonses after law dept. refuses to accept.	2.250
31	30.0	02/28/13	Peter J. Gleason	Queens DA's office to serve subpoena. (travel)	2.000
32	31.0	03/04/13	Peter J. Gleason	E-mail from Brian Lee, Esq., re: scheduling order.	0.250
33	32.0	03/05/13	Peter J. Gleason	E-mails to and from AS re: trip to city, purchase train ticket.	0.500
34	33.0	03/07/13	Peter J. Gleason	Meeting with AS & NS	3.500
35	34.0	03/13/13	Peter J. Gleason	ECF notice and review of same. (letter to judge from City.)	0.500
36	35.0	03/14/13	Peter J. Gleason	(3) ECF notices and review of same. (Defendant's motion to Quash) and follow up discussion with NS	1.250
37	36.0	03/16/13	Peter J. Gleason	E-mail from JL, re: Letter to DOJ and strategy.	0.500
38	37.0	03/18/13	Peter J. Gleason	E-mail from JL, re: Schoolcraft media report.	0.250
39	38.0	03/19/13	Peter J. Gleason	E-mail from NS, re: Home invasion recording.	0.125
40	39.0	03/20/13	Peter J. Gleason	ECF notice, re: amended answer.	0.500
41	40.0	03/21/13	Peter J. Gleason	E-mail from JL, re: Schoolcraft tapes in WSJ.	0.125
42	41.0	03/23/13	Peter J. Gleason	E-mail from AS, re: recording of Lt. Mascol.	0.500

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1	No.	Date	Timekeeper	Description	Hours
43	42.0	03/26/13	Peter J. Gleason	Phone conv. with NS, re: motion.	0.500
44	43.0	03/27/13	Peter J. Gleason	ECF notice, re: Schoolcraft declaration	0.125
45	44.0	03/27/13	Peter J. Gleason	Meeting with NS, MB, re: demonstrative evidence to be used at trial.	3.500
46	45.0	03/28/13	Peter J. Gleason	E-mail from JL, re: next meeting upstate.	0.125
47	46.0	03/28/13	Peter J. Gleason	E-mail from JL, re: confirming meeting with AS	0.125
48	47.0	04/01/13	Peter J. Gleason	E-mail from sound engineer containing filtered home invasion tape, review of same.	0.750
49	48.0	04/02/13	Peter J. Gleason	ECF notice, re: Hospital letter to judge.	0.125
50	49.0	04/02/13	Peter J. Gleason	Monitor Floyd trial, re: Mauriello testimony.	3.500
51	50.0	04/04/13	Peter J. Gleason	(2) ECF notices, re: City's motion to quash	0.250
52	51.0	04/05/13	Peter J. Gleason	ECF notice, re: motion to quash.	0.125
53	52.0	04/13/13	Peter J. Gleason	Phone conv. with NS, re: status.	0.500
54	53.0	04/08/13	Peter J. Gleason	Meeting with AS & NS, re: trial prep.	1.500
55	54.0	11/20/12	Peter J. Gleason	Meeting with investigator Vincent Parco (VP) regarding working on this matter. Gave VP an over-view of the matter and the scope of work of which he would perform at a rate of \$150 per hr.	2.000
56	55.0	11/23/12	Peter J. Gleason	Travel	8.000
57	56.0	11/27/12	Peter J. Gleason	E-mail from RG and follow up phone conversation with RG regarding the Schoolcraft file.	0.250
58	57.0	11/28/12	Peter J. Gleason	Phone conv. with AS regarding Nov. 12, 2012 news report and possible sources of media leaks.	1.500
59	58.0	12/03/12	Peter J. Gleason	Phone conv. with RG regarding e-mail from AS's previous counsel.	0.250
60	59.0	12/09/12	Peter J. Gleason	Phone conv. with VP, re: update on investigation of named defendants.	0.125
61	60.0	12/22/12	Peter J. Gleason	E-mail to RG, re, amended complaint	0.125

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1	No.	Date	Timekeeper	Description	Hours
62	61.0	12/24/12	Peter J. Gleason	Draft and hand deliver a notice of appearance that NYPD Asst. Comm. Kearns demanded before she would communicate with my office regarding AS.	2.000
63	62.0	12/31/12	Peter J. Gleason	E-mail from and follow up conversation with JL, Re: his potential involvement in the Schoolcraft matter, Queens DA's investigation, scheduling a time we can meet.	1.500
64	63.0	01/02/13	Peter J. Gleason	Phone conv. with LS, re: Update on matter.	0.250
65	64.0	01/20/13	Peter J. Gleason	Continued review of Schoolcraft recordings, notes to file.	4.500
66	65.0	01/29/13	Peter J. Gleason	Meeting with RG, FS atty.	1.500
67	66.0	02/05/13	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns.	0.125
68	67.0	02/14/13	Peter J. Gleason	Transport file from Levin & Gilbert to Law office of Nat Smith. Meeting with NS to discuss how file is formatted. Meeting with AS and legal team.	3.500
69	68.0	02/15/13	Peter J. Gleason	Phone conv. with NS, re: NYS CPL & file	0.250
70	69.0	02/21/13	Peter J. Gleason	E-mail from AS, re: Sunday's meeting.	0.125
71	70.0	02/28/13	Peter J. Gleason	Review ECF notice.	0.125
72	71.0	03/01/13	Peter J. Gleason	ECF notices.	0.125
73	72.0	03/01/13	Peter J. Gleason	E-mail from and to Brian Lee, Esq.	0.250
74	73.0	03/04/13	Peter J. Gleason	E-mails back and forth with MB, to set up meeting later that day.	0.250
75	74.0	03/04/13	Peter J. Gleason	E-mail with enclosed letter from Suzanna Publicker, Esq., review of same.	0.250
76	75.0	03/05/13	Peter J. Gleason	Review e-mail from Suzanna Publicker, Esq.	0.125
77	76.0	03/06/13	Peter J. Gleason	E-mail from JL, re: DOJ	0.125
78	77.0	03/09/13	Peter J. Gleason	Meeting with NS at his office, re; strategy/status.	3.000
79	78.0	03/18/13	Peter J. Gleason	ECF notice, re: Order setting date for hearing.	0.125
80	79.0	03/18/13	Peter J. Gleason	E-mail from NS, re: edits to letter to DOJ.	0.250

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81	80.0	03/20/13	Peter J. Gleason	E-mail from NS, re: final draft of DOJ letter.	0.125
82	81.0	03/20/13	Peter J. Gleason	Phone conv. with NS, re: correspondence.	0.250
83	82.0	03/21/13	Peter J. Gleason	E-mail form JL, re: status update.	0.125
84	83.0	03/24/13	Peter J. Gleason	E-mail from NS, re: recording of Lt. Mascol	0.125
85	84.0	03/27/13	Peter J. Gleason	ECF notice, re: Plaintiff's Memo of Law.	0.125
86	85.0	04/03/13	Peter J. Gleason	E-mail from AS, re: NYPD employment issues.	0.125
87	86.0	04/04/13	Peter J. Gleason	E-mail to and from Rae Koshetz, Esq., re: NYPD employment issues.	0.250
88	87.0	04/07/13	Peter J. Gleason	Meeting in Saugerties with AS, LS and legal team. (Travel at 1/2 hr. rate)	6.000
89	88.0	04/09/13	Peter J. Gleason	Review Google alert, Re: AS	0.125
90	89.0	04/09/13	Peter J. Gleason	E-mail with invoice form sound engineer.	0.250
91	90.0	11/19/12	Peter J. Gleason	Meeting with RG to discuss news articles and our strategy to follow up with AS and LS.	1.500
92	91.0	11/30/12	Peter J. Gleason	Meeting with D2, to discuss Schoolcraft matter and backgrounds of named defendants.	2.500
93	92.0	12/01/12	Peter J. Gleason	Phone conv. with AS regarding update of the investigations.	0.750
94	93.0	12/02/12	Peter J. Gleason	Phone conv. with RG regarding correspondence to and conversation with AS's previous counsel.	0.500
95	94.0	12/03/12	Peter J. Gleason	Phone conv. with AS regarding e-mail from his previous counsel, investigation and setting up another meeting.	0.500
96	95.0	12/04/12	Peter J. Gleason	Phone conv. with AS regarding all aspects of his representation.	0.750
97	96.0	12/10/12	Peter J. Gleason	E-mail and follow up phone conv. with RG, re: follow up with AS's prior counsel.	0.500
98	97.0	12/13/12	Peter J. Gleason	Follow up e-mail to FS's attorney	0.125
99	97.5	12/13/12	Peter J. Gleason	Meeting with VP, RE; Investigation	1.500
100	98.0	12/14/12	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft NYPD employment issues.	0.125
101	99.0	12/17/12	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft NYPD employment issues.	0.125

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102	100.0	12/22/12	Peter J. Gleason	Phone conv. with FS, re: complaint	0.250
103	101.0	12/26/12	Peter J. Gleason	E-mail to and from NYPD Asst. Comm. Kearns.	0.250
104	102.0	01/03/13	Peter J. Gleason	Meeting with JL, Re: Queens DA, the amended complaint, and aspects of the Schoolcraft file.	2.500
105	103.0	05/05/13	Peter J. Gleason	E-mail to and from Rae Koshetz, Esq. re: scheduling meeting.	0.125
106	104.0	01/11/13	Peter J. Gleason	Meeting with VP, re: individuals presnt at, "Hone invasion."	0.750
107	105.0	01/14/13	Peter J. Gleason	Meeting with RG, re: Queens DA.	0.750
108	106.0	01/18/13	Peter J. Gleason	E-mail to PBA, re: their assistance in the matter.	0.125
109	107.0	01/25/13	Peter J. Gleason	E-mail from NYPD Asst. Comm. Kearns, outlining her position/demand that she will not accept e-mail correspondence regarding this matter.	0.125
110	108.0	01/25/13	Peter J. Gleason	Meeting with RG to discuss NYPD's refusal to acknowledge e-mail communications.	0.500
111	109.0	01/28/13	Peter J. Gleason	Edit and hand deliver letter to NYPD Asst. Comm. Kearns.	2.000
112	110.0	02/03/13	Peter J. Gleason	Phone conv. with NS, re: decision.	0.750
113	111.0	02/08/13	Peter J. Gleason	E-mail from, Elisha B. Barron Law Clerk to the Hon. Shira A. Scheindlin, re: Deposition.	0.125
114	112.0	02/11/13	Peter J. Gleason	E-mail from RG, re: deposition/conf.	0.125
115	113.0	02/17/13	Peter J. Gleason	E-mail correspondence between NS & JL, re: Queens DA.	0.250
116	114.0	03/05/13	Peter J. Gleason	E-mail from AS, with attachment outlining examples of NYPD retaliation.	0.250
117	115.0	03/11/13	Peter J. Gleason	E-mail from AS, review attachment (transcription) forward same to NS.	0.750
118	116.0	03/15/13	Peter J. Gleason	ECF notice, re: Plaintiff letter to judge.	0.125
119	117.0	03/20/13	Peter J. Gleason	Phone conv. with NS,	0.250
120	118.0	03/22/13	Peter J. Gleason	Monitor Floyd trial, re: named defendant's testimony.	4.000
121	119.0	03/25/13	Peter J. Gleason	E-mail from JL, re: Schoolcraft Google alert, review of links.	0.750
122	120.0	03/28/13	Peter J. Gleason	ECF notice, re: Memo of Law.	0.125

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1	No.	Date	Timekeeper	Description	Hours
123	121.0	03/28/13	Peter J. Gleason	E-mail from NS, re: Photos of Plaintiff's residence, print and review of same.	0.500
124	122.0	03/29/13	Peter J. Gleason	Phone conv. with NS, re: gag order.	0.500
125	123.0	03/30/13	Peter J. Gleason	Meeting with legal team at NS office, re: update investigation, Def. Ans. To amended complaint.	1.250
126	124.0	11/22/12	Peter J. Gleason	Multiple phone conversation with RG, AS, and LS regarding setting up a meeting the following day.	0.750
127	125.0	11/29/12	Peter J. Gleason	Phone conv. with AS regarding status of obtaining his file from previous counsel and strategy moving forward.	0.750
128	126.0	12/01/12	Peter J. Gleason	Phone conv. with VP regarding meeting of previous night.	0.500
129	127.0	12/03/12	Peter J. Gleason	Phone conv. with VP regarding investigation.	0.125
130	128.0	12/05/12	Peter J. Gleason	E-mail and phone conversation with AS regarding Frank Serpico (FS) and his assistance through support and institutional knowledge of the NYPD.	0.750
131	129.0	12/05/12	Peter J. Gleason	E-mail from AS regarding previous counsel, phone conv. with RG and AS	1.250
132	130.0	12/06/12	Peter J. Gleason	Legal research, re: Civil Service Law, NYPD employment rights.	2.250
133	131.0	12/14/12	Peter J. Gleason	9 Metro Tech re: FDNY EMS report for AS and (Travel at ½ hr. rate)	0.750
134	132.0	01/09/13	Peter J. Gleason	Meeting with RG Re: investigation strategy.	0.750
135	133.0	12/19/12	Peter J. Gleason	Albany meeting with D2 and AS. Updated AS as to status of his claims. Discussed with AS means for providing AS and LS the ability to communicate with his attorneys. (Travel at 1/2 hr. rate)	7.00 8.00
136	134.0	12/20/12	Peter J. Gleason	Phone conv. with John Lenoir, Esq. (JL) discussing his potential involvement in the Schoolcraft matter	0.750
137	135.0	12/23/12	Peter J. Gleason	Phone conv. with AS, re update on Queens DA	0.500
138	136.0	01/02/13	Peter J. Gleason	Meeting at law office of Levine & Gilbert and continued review of "Attorney's eyes Only," file.	3.250
139	137.0	01/07/13	Peter J. Gleason	Meeting with VP, Re: update on investigation.	1.500

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140	138.0	01/09/13	Peter J. Gleason	Phone conv. with LS, Re: status of case.	0.500
141	139.0	01/10/13	Peter J. Gleason	Multiple phone conv. and e-mails back and forth with AS, re: PBA and AS's recordings.	2.500
142	140.0	01/11/13	Peter J. Gleason	Meeting with RG, re: PBA matter.	0.750
143	141.0	01/12/13	Peter J. Gleason	Phone conv. with JL, re: viability of DOJ involvement.	0.500
144	142.0	01/14/13	Peter J. Gleason	E-mail from JL, Re: Schoolcraft matter.	0.125
145	143.0	01/16/13	Peter J. Gleason	Phone conv. with VP re: update, meeting to follow.	0.125
146	144.0	01/21/13	Peter J. Gleason	E-mail to and from RG, re: NYPD letter.	0.250
147	145.0	01/21/13	Peter J. Gleason	Phone conv. with FS, re: the status of Schoolcraft matter.	0.750
148	146.0	02/01/13	Peter J. Gleason	E-mail from RG, re: e-mail from CCR. scheduling a phone conv. this date.	0.125
149	147.0	02/01/13	Peter J. Gleason	Phone conv. with CCR, re: Schoolcraft affidavit.	0.750
150	148.0	02/02/13	Peter J. Gleason	E-mail from AS and review of documents attached, re: NYPD mediation.	0.750
151	149.0	02/20/13	Peter J. Gleason	E-mail to legal team, re: Sunday's meeting.	0.125
152	150.0	02/22/13	Peter J. Gleason	E-mail to Pub. Advocate, re: follow up meeting.	0.125
153	151.0	03/10/13	Peter J. Gleason	E-mail to Council Member Williams	0.250
154	152.0	03/25/13	Peter J. Gleason	E-mail from NS, re: Letter from Dept. Advocates Office dated April 5, 2011.	0.250
155	153.0	04/01/13	Peter J. Gleason	E-mails between City, Hosp. & Plaintiff, re: discovery issues.	0.500
156	154.0	04/05/13	Peter J. Gleason	E-mail from/to City/Hospital re: scheduled conference 4/10/13.	0.125
157	155.0	11/29/12	Peter J. Gleason	Phone conv. with RG for update on obtaining file.	0.250
158	156.0	12/07/12	Peter J. Gleason	Meeting with RG, re: strategy NYPD employment issue, disciplinary charges.	1.000
159	157.0	02/08/13	Peter J. Gleason	Phone conv. with NS, re: joining legal team.	0.500
160	158.0	12/05/12	Peter J. Gleason	Phone conv. with VP with an update on one of the targets of the investigation.	0.500
161	159.0	12/06/12	Peter J. Gleason	Phone conv. with RG with update regarding VP investigation, memo to file.	1.250

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162	160.0	12/10/12	Peter J. Gleason	Phone conv. with FS to set up the following days meeting with FS, AS, LS.	0.125
163	161.0	12/17/12	Peter J. Gleason	Phone conv. with FS, follow up on conv. 12/15/12	0.500
164	162.0	12/20/12	Peter J. Gleason	E-mail and phone conv. with Professor from John Jay College.	1.250
165	163.0	01/08/13	Peter J. Gleason	Meeting with RG to review and discuss the review of the parts of the file reviewed by Levine & Gilbert and by PG.	3.500
166	164.0	01/21/13	Peter J. Gleason	Phone conv. with NS, re: NYPD's handling of Schoolcraft matter.	0.750
167	165.0	01/29/13	Peter J. Gleason	E-mail from Center for Constitutional Rights (CCR) review of enclosed affidavit.	0.500
168	166.0	02/27/13	Peter J. Gleason	E-mail form MB, re: scheduling a meeting	0.125
169	167.0	03/14/13	Peter J. Gleason	E-mail from NS, re: Queens DA	0.125
170	168.0	03/29/13	Peter J. Gleason	Meeting with VP, re: photos and update.	1.500
171	169.0	11/19/12	Peter J. Gleason	Meeting with RG, and follow phone conversation with AS to discuss strategy of case, drafting of the retainer and setting up next meeting with AS.	1.500
172	170.0	11/19/12	Peter J. Gleason	Phone conv. with Nathaniel Smith, Esq. (NS) to discuss potentially working on this matter.	0.500
173	171.0	11/27/12	Peter J. Gleason	E-mail from AS regarding the preferred method of communications.	0.125
174	172.0	11/27/12	Peter J. Gleason	Meeting with VP regarding update on his investigation	1.500
175	173.0	12/11/12	Peter J. Gleason	Meeting in Albany with AS, LS, FS. Re: Status of investigations, NYPD employment issues, concerns regarding Queens DA, concerns regarding Jamaica Hospital and concerns regarding FDNY EMS Follow up conv. with RG upon return to NYC office, memo to file. (Travel at 1/2 hr. rate)	6.000
176	174.0	12/13/12	Peter J. Gleason	E-mail from AS containing review/discussion of 12/4/12 Press Release from QCDA with the conclusion that there was no criminality in the manner that Plaintiff was taken from his home and placed in a psychiatric facility. Extensive Follow up phone conv. with AS and RG.	4.500

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177	175.0	12/14/12	Peter J. Gleason	Phone conv. With RG, re: IPP's position on AS.	0.500
178	176.0	12/21/12	Peter J. Gleason	Phone conv. with AS regarding status, strategy, contents of file and investigation status.	0.750
179	177.0	12/23/12	Peter J. Gleason	E-mail correspondence and phone conv. with JL Re: Queens DA's investigation of the Schoolcraft matter.	0.750
180	178.0	12/28/12	Peter J. Gleason	Phone call from D2, re: Information on Schoolcraft matter.	0.125
181	179.0	01/06/13	Peter J. Gleason	Completion of review of file from previous counsel, Memo to file.	6.500
182	180.0	01/29/13	Peter J. Gleason	Meeting with VP, re: update on investigation.	1.250
183	181.0	02/28/13	Peter J. Gleason	Prepared and file notice of appearance.	0.250
184	182.0	03/29/13	Peter J. Gleason	E-mail from NS, re: enclosed letter from Hosp. Defendant to Judge concerning press, review of same	0.500
185	183.0	04/08/13	Peter J. Gleason	ECF notice, re: Hospital filing re motion to quash and letter motion re media.	0.250
186	184.0	12/17/12	Peter J. Gleason	Meeting with VP re: investigation update.	1.250
187	185.0	11/20/12	Peter J. Gleason	Phone conv. with D2, regarding his insight into one of the named defendants.	0.250
188	186.0	12/17/12	Peter J. Gleason	Legal research, re: NYS PL kidnapping.	1.750
189	187.0	12/23/12	Peter J. Gleason	Review of amended complaint, memo to file.	1.500
190	188.0	01/26/13	Peter J. Gleason	Phone conv. with LS, re: status update.	0.500
191	189.0	02/11/13	Peter J. Gleason	Phone conv. with NS, re: Floyd case.	0.500
192	190.0	02/28/13	Peter J. Gleason	Review Deposition.	1.500
193	191.0	12/06/12	Peter J. Gleason	Phone conv. with AS regarding investigation	0.750
194	192.0	12/15/12	Peter J. Gleason	Phone conv. With FS, re, his conversation with first hand witnesses to the manner in which the NYPD maintains crime stats and subsequent memo to file.	1.500
195	193.0	01/22/13	Peter J. Gleason	Meeting with RG, Re: NYPD letter.	1.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
196	194.0	02/27/13	Peter J. Gleason	Review of e-mail from Corp. Counsel containing additional "Attorney's eyes only" documents and discussion with RG & NS.	1.250
197	195.0	11/30/12	Peter J. Gleason	Phone conv. with RG discussing strategy and focus on the investigation of the named defendants	1.000
198	196.0	12/21/12	Peter J. Gleason	Meeting with VP regarding investigation on one of the named defendants.	1.500
199	197.0	01/03/13	Peter J. Gleason	Several phone calls with LS, Re: update	0.750
200	198.0	01/10/13	Peter J. Gleason	E-mail, fax and phone conv. with PBA legal counsel.	1.250
201	199.0	02/05/13	Peter J. Gleason	E-mail from AS re: Authorization, print out and distribute same.	0.250
202	200.0	03/08/13	Peter J. Gleason	ECF notice, re: Court order.	0.125
203	201.0	01/02/13	Peter J. Gleason	E-mails back and forth to JL re: meeting.	0.250
204	202.0	01/13/13	Peter J. Gleason	E-mail to Pat Lynch, PBA President.	0.125
205	203.0	12/26/12	Peter J. Gleason	E-mail and follow up phone conversation with Prof. from John Jay College.	0.500
206	204.0	01/08/13	Peter J. Gleason	Phone conv. with AS, Re; update as to complete review of file (excluding review of recordings) and discussion on need for investigator to verify identity of certain individuals who were present at the, "home invasion."	0.750
207	205.0	02/13/13	Peter J. Gleason	Meetings with AS, meeting with RG and NS. Meeting with VP, review of file with AS.	7.500
208	206.0	02/23/13	Peter J. Gleason	E-mails to JL & NS, re: update from JL.	0.125
209	207.0	03/06/13	Peter J. Gleason	Reivew fax from Suzanna Publicker, Esq.	0.250
210	208.0	03/27/13	Peter J. Gleason	E-mail from NS, re: final draft of reply.	0.250
211	209.0	04/02/13	Peter J. Gleason	Press inquiry, re: AS	0.125
212	210.0	04/10/13	Peter J. Gleason	Letter from NYPD Department Advocates Office, review of same.	0.250
213	211.0	11/23/12	Peter J. Gleason	Meeting with AS, LS, RG in Albany to discuss strategy scope of work, investigations needed. Travel to and from NYC. (Travel at 1/2 hr. rate)	4.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
214	212.0	12/12/12	Peter J. Gleason	1 Police Plaza, to discuss Schoolcraft matter with NYPD Department Advocate's Office.	1.500
215	213.0	03/22/13	Peter J. Gleason	E-mail from NS & JL, re: Notice to Produce.	0.250
216	214.0	01/04/13	Peter J. Gleason	E-mail and phone conv. with PBA counsel, Re: Union's position on Schoolcraft matter.	0.500
217	215.0	12/13/12	Peter J. Gleason	Phone conv. with FS re: Queens DA press release.	0.500
218	216.0	01/04/13	Peter J. Gleason	Meeting with RG and continued review of File.	4.250
219	217.0	01/19/13	Peter J. Gleason	Review of Schoolcraft audio regardings, notes to file.	4.750
220	218.0	01/19/13	Peter J. Gleason	Several e-mails back and forth with RG, re: draft letter to NYPD.	0.500
221	219.0	11/18/12	Peter J. Gleason	Internet review of news articles relating to AS.	5.500
222	220.0	11/16/12	Peter J. Gleason	Meeting with my colleague Richard Gilbert, Esq. (RG), Retired NYPD 2 nd grade Detective (D2) and Larry Schoolcraft (LS) to discuss Adrian Schoolcraft's (AS) claim against the City of New York.	6.000
223	221.0	12/10/12	Peter J. Gleason	Meeting with VP, re: update on named defendant's investigation.	1.250
224	222.0	12/17/12	Peter J. Gleason	Meeting with RG, Re: procuring file from previous counsel, NYPD employment issues, status of investigation.	2.000
225	223.0	01/05/13	Peter J. Gleason	Continued review of the file	4.500
226	224.0	02/12/13	Peter J. Gleason	Meetings throughout day with AS in NYC, brought him up to speed regarding aspects of his claims. Defended his deposition in the Floyd matter before MJ Freeman. Attended public meeting, to discuss matter with Public Advocate DeBlasio. Follow up meeting with AS. Review amended discovery plan.	12.000
227	225.0	12/14/12	Peter J. Gleason	Travel	0.750
228	226.0	11/16/12	Peter J. Gleason	Travel to and from NYC Office to Catskill, NY. Upon Return to NYC Office review of documents provided by LS. (Travel at 1/2 hr. rate)	8.000
229	227.0	04/10/13	Peter J. Gleason	Court Apearance, and subsq. Meeting with legal team.	3.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
230	228.0	12/11/12	Peter J. Gleason	Travel to Albany	8.000
231	229.0	02/11/13	Peter J. Gleason	Meeting with AS, review of case, discussion of strategy and updated AS in investigation, Purchase of business attire for AS.	4.500
232	230.0	2/24/2013	Peter J. Gleason	meeting in Saugerties NY with NS, JL, AS, LS. Travel to and from Saugerties	8.500
233	231.0	02/11/13	Peter J. Gleason	Conf. call with Elisha B. Barron Law Clerk to the Hon. Shira A. Scheindlin re: ground-rules for tomorrow's deposition and follow up call with NS, & RG	2.000
234	232.0	04/05/13	Peter J. Gleason	Review Plaintiff's Opposition to City's motion to Quash, e-mails between NS. JL re, edits.	0.750
235	233.0	12/18/12	Peter J. Gleason	Meeting with RG to facilitate picking up file from previous counsel, picked up file (6+ banker boxes) from previous counsel with RG and initial cursory review of once secured in office.	6.000
236	234.0	04/11/13	Peter J. Gleason	Consultation with AS, Meeting with legal team and Rae Kosheck, Esq., Follow up e-mail to Rae Kosheck, Esq., re: issues discussed at meeting. Draft response letter to NYPD re: letter received on 4/10/13. Discussed strategy with AS.	8.000
237	235.0	04/12/13	Peter J. Gleason	Consultation with AS discussing matter purchased return ticket to Albany, meeting with VP.	4.500
238	237.0		Peter J. Gleason	Expenses: Provided AS with Apple laptop, printer/scanner and two iPhones. Set up Verizon cell phone service for two iphones for 12 month contract at \$144.97 per line per month.	
239	238.0	11/20/12	Vincent Parco, PI	Meeting with Peter Gleason (Atty.) regarding being hired as investigator on the Schoolcraft case. Discussed scope of investigation which included Investigating named defendants and determining Identity of individuals at the Schoolcraft home the night he was removed to Jamaica Hospital.	2.000

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
240	239.0	11/21/12	Vincent Parco, PI	Reviewed Civil Complaint, Reviewed NY Magazine article, "Captain Midnight," and numerous other media reports on subject of NY Magazine article as well media reports on Schoolcraft. Contact with ret. NYPD Lieutenant who has knowledge of individuals present at the Schoolcraft home.	2.500
241	240.0	1/23/12	Vincent Parco, PI	Called a number of contacts that might have direct, secondary or tertiary knowledge of the subject matter of this investigation. I find this method conserves resources by "throwing out a net," to my various contacts and wait to see what it yields. This passive method of investigation is reactionary waiting for my, "contacts," to reach out to me should they encounter anything that might be relevant. Given the publicity of this matter there should be no problem initiating this type of investigation.	1.500
242	241.0	11/27/12	Vincent Parco, PI	Meeting with Atty., provided update as to information obtained from a contact.	1.500
243	242.0	12/1/12	Vincent Parco, PI	Phone call with Atty., update and strategy.	0.500
244	243.0	12/2/12	Vincent Parco, PI	Conversation with contact, discussed NYPD, Emergency Service Unit involvement in Schoolcraft incident.	0.500
245	244.0	12/3/12	Vincent Parco, PI	Phone call with Atty., informed him I was awaiting a call back from individual with knowledge.	0.125
246	245.0	12/5/12	Vincent Parco, PI	Spoke to contact with useful knowledge.	0.500
247	246.0	12/5/12	Vincent Parco, PI	Phone call with Atty., update as to intel obtained.	0.500
248	247.0	12/9/12	Vincent Parco, PI	Phone call with Atty., update.	0.125
249	248.0	12/10/12	Vincent Parco, PI	Meeting with Atty., update on individuals present at Schoolcraft incident. Atty. Satisfied of multiple sources confirming identity of individual(s) at scene.	1.250
250	249.0	12/13/12	Vincent Parco, PI	Meeting with Atty., provided Press Release from Queens DA's office, discussed same and follow up On other aspects of investigation.	1.500
251	250.0	12/16/12	Vincent Parco, PI	Spoke to contact discussed new information.	0.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
252	251.0	12/17/12	Vincent Parco, PI	Meeting with atty., updated as to new information on both Queens DA and steroid issue.	1.250
253	252.0	12/21/12	Vincent Parco, PI	Meeting with atty. Given instructions on issues to follow up on.	1.500
254	253.0	12/28/12	Vincent Parco, PI	Conversation with contact with source confirming outstanding issue.	0.500
255	254.0	1/7/13	Vincent Parco, PI	Meeting with atty. discussed investigation strategy moving forward.	1.500
256	255.0	1/11/13	Vincent Parco, PI	Meeting with atty. discussed credibility of potential witnesses.	0.750
257	256.0	1/14/13	Vincent Parco, PI	Interview of potential witness.	0.750
258	257.0	1/16/13	Vincent Parco, PI	Phone call with atty. update set up meeting	0.125
259	258.0	1/17/13	Vincent Parco, PI	Meeting with atty. Regarding Schoolcraft residence.	0.750
260	259.0	1/29/13	Vincent Parco, PI	Meeting with att., discussed entire investigation, home invasion, named defendants, Queens DA.	1.250
261	260.0	2/13/13	Vincent Parco, PI	Meeting with atty. Update on new development.	0.500
262	261.0	3/29/13	Vincent Parco, PI	Meeting with atty. Reviewed photographs from Schoolcraft apartment. Discussed possible use of a rebuttal witness, strategy.	1.500
263	261.5	4/12/13	Vincent Parco, PI	Meeting with atty. and Plaintiff, discussed overall investigation.	0.500
264	262.0	06/06/10	JLN	Discussions with Joshua Fitch ("JF") re Schoolcraft case	0.800
265	263.0	06/18/10	JLN	Meeting w/ Gerald Cohen ("GC") and JF re: Schoolcraft coming to our office for interview	0.800
266	264.0	06/20/10	JLN	Read Voice articles on Schoolcraft	2.100
267	265.0	06/21/10	JLN	Read articles sent by Schoolcraft on Gerald Nelson	0.800
268	266.0	06/22/10	JLN	Discussion with GC and JF re Schoolcraft case & causes of action	0.800
269	267.0	06/23/10	JLN	Meeting w/ GC and JF re: GC's upcoming meeting w/ Schoolcraft	0.750
270	268.0	06/24/10	JLN	Initial client meeting & interview with AS in Johnstown	7.400
271	269.0	06/24/10	JLN	Traveled to Johnstown to meet prospective Client Adrian Schoolcraft (3.6)	1.800
272	270.0	06/24/10	JLN	Travel back to NYC (3.2)	1.600
273	271.0	06/24/10	JLN	TC with GC re: meeting w/Schoolcraft	0.400

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
274	272.0	06/25/10	JLN	Meeting w/ GC and JF re: scope of Schoolcraft materials that need to be reviewed for complaint, overall strategy & next steps for moving forward	3.250
275	273.0	06/25/10	JLN	Read Schoolcraft's PBA contract; took notes re: same	2.500
276	274.0	06/25/10	JLN	Meeting with GC & JF re: possible discovery demands after suit is filed and general strategy	1.400
277	275.0	06/25/10	JLN	Reviewed transcript of Polanco tapes; took notes re: same	0.400
278	276.0	06/25/10	JLN	Sent GC information for retainer; forwarded retainer to AS; forwarded signed retainer back to GC	0.100
279	277.0	06/26/10	JLN	Reviewed Schoolcraft's records from Jamaica Hospital Medical Center; took notes re: same	3.250
280	278.0	06/28/10	JLN	Discussion with JF and GC re retainer & meeting with Schoolcrafts	1.250
281	279.0	06/28/10	JLN	Discussion with JF re meeting with P.O. Velasquez re policy of quotas	0.900
282	280.0	06/28/10	JLN	Discussion with JF & Adrian Schoolcraft (AS) re prior counsel Jonathan Moore	0.300
283	281.0	06/28/10	JLN	Memo re: Eddie Velasquez	0.300
284	282.0	06/28/10	JLN	Review of correspondence w/Jonathan Moore re: AS	0.100
285	283.0	06/29/10	JLN	Listened to "home invasion" recording from Oct. 31 multiple times; took notes re: same	2.600
286	284.0	06/29/10	JLN	Meeting w/ GC and JF re: PBA materials for use in Schoolcraft	1.250
287	285.0	06/29/10	JLN	Review of 75th Pct arbitration decision	0.900
288	286.0	06/29/10	JLN	Discussion with JF & GC re decision on PBA arbitration case	0.400
289	287.0	06/29/10	JLN	Drafted correspondence to Jonathan Moore	0.300
290	288.0	06/29/10	JLN	Correspondence w/ GC re: Jonathan Moore substitution	0.200
291	289.0	06/29/10	JLN	Discussion with JF & GC re substitution of counsel Moore	0.200
292	290.0	06/29/10	JLN	E-mail exchange GC re: Schoolcraft matter	0.200
293	291.0	06/29/10	JLN	E-mail exchange with AS re: 911 calls and getting copies of same	0.100
294	292.0	06/29/10	JLN	E-mail from GC re: Stop and Frisk case	0.100
295	293.0	06/29/10	JLN	E-mail to GC re: Stop and Frisk case	0.100
296	294.0	06/30/10	JLN	Listened multiple times to call from LS to Capt. Lauterborne re: "City wide" search for AS; took down best quotes from same for possible inclusion in complaint.	1.400

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
297	295.0	06/30/10	JLN	Listened to call from AS to IAB on Oct. 31; took notes re: same	0.700
298	296.0	06/30/10	JLN	Reviewed composite file of materials on Cmr. Julie Schwartz compiled by AS	0.600
299	297.0	06/30/10	JLN	Discussion with JF & GC re FOIL requests for 911 calls & how to proceed	0.500
300	298.0	06/30/10	JLN	Reviewed FOIL requests for 911 calls made by AS to NYPD and discussed with JF	0.300
301	299.0	06/30/10	JLN	Reviewed PBA quota affidavit	0.100
302	300.0	07/01/10	JLN	Started listening to day tour recording by AS made on Oct. 31, 09; took notes on same.	3.400
303	301.0	07/01/10	JLN	T/c w/AS re: specific details of events alleged in Aug. 20, 2009 UF 49 re: Caughey/Weiss	1.300
304	302.0	07/01/10	JLN	Listened to recording of conv. w/ PAA Monique Carter from Aug. 16, 09, (re: removal of personnell files from office by Caughey/Weiss); took notes re: same	0.700
305	303.0	07/01/10	JLN	Reviewed UF 49 dated Aug. 20, 2009 from AS to C. Campisi (Chief IAB)	0.200
306	304.0	07/01/10	JLN	Reviewed UF 49 from AS to Campisi dated Jan. 12, 2009 re: allegation of sexual misconduct by prisoner	0.200
307	305.0	07/02/10	JLN	Finished listening to day tour recording made by AS of Oct. 31, 2009; made notes re: same	4.200
308	306.0	07/02/10	JLN	Reviewed media stories & news articles provided by AS; notes re: same	4.200
309	307.0	07/02/10	JLN	Discussion with JF re AS' ability to pursue claim under Labor Law 215-a	0.600
310	308.0	07/04/10	JLN	Read e-mails from A. Schoolcraft re: articles on Mauriello and Palestro	0.250
311	309.0	07/05/10	JLN	Reviewed composite file on Paul Browne, incl. prior testimony in another action, as put together by AS; took notes re: same	2.400
312	310.0	07/05/10	JLN	Reviewed composite file on Ray Kelly prepared by AS; took notes re:same	1.600
313	311.0	07/05/10	JLN	T/c AS re: Palestro, Daily News Contact, trip to NYC and news interviews	1.200
314	312.0	07/05/10	JLN	Reviewed memo showing contact between Lt. Caughey & Lt. R. Lee at Early Intervention Unit ("EIU")	0.100
315	313.0	07/06/10	JLN	Meeting with JF/GC re: progress/developments on the case, meeting in NYC on Wednesday and filing of lawsuit;	1.750

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
316	314.0	07/06/10	JLN	Meeting w/ GC and JF re: new whistleblower who contacted GC re: Schoolcraft	1.300
317	315.0	07/06/10	JLN	T/c Len Levit re: his knowledge of NYPD & thoughts about case	0.500
318	316.0	07/06/10	JLN	T/c R.P. (Daily News reporter) re: AS case;	0.500
319	317.0	07/07/10	JLN	Listened multiple times to recording between AS & Capt. Lauterborne re: "devil you know", "Mr. Community" etc.; took notes re: same	3.400
320	318.0	07/07/10	JLN	Reviewed Schoolcraft documents, evals, memos, letters to PBA, letters to Mauriello	2.700
321	319.0	07/07/10	JLN	Meeting w/ AS, LS re: Rae Koshetz (Attorney for charges and specifications) and options for fighting NYPD	2.000
322	320.0	07/07/10	JLN	Meeting w/ AS prior to group meeting later today	1.500
323	321.0	07/07/10	JLN	Discussion with JF re Labor Law research	0.800
324	322.0	07/07/10	JLN	Meeting with AS, LS, JF & GC	0.750
325	323.0	07/07/10	JLN	Meeting with JF and GC re Schoolcraft Meeting and tapes;	0.500
326	324.0	07/07/10	JLN	T/c AS/LS and Hampton Inn re: authorization for cc; fax letter re same	0.250
327	325.0	07/08/10	JLN	Started review of CD Recordings (2008 roll calls) provided by AS; took notes re: same	3.700
328	326.0	07/08/10	JLN	Listened to Oct. 28, 2009 recording of conv. b/w AS and Sgt. Devino at PBBN regarding status of plaintiff's appeal; notes re: same	1.200
329	327.0	07/08/10	JLN	T/c with LS regarding status of move and discussions with landlord Stretmoyers (witnesses)	0.250
330	328.0	07/08/10	JLN	Read tribute to Mauriello praising effectiveness in crime reduction	0.100
331	329.0	07/08/10	JLN	Reviewed UF 49 from AS to DI Brower (former CO 81) re: forced overtime	0.100
332	330.0	07/09/10	JLN	Continued listening to 2008 Roll Call recordings; notes re: same.	6.400
333	331.0	07/09/10	JLN	Discussion with JF re timeline	1.100
334	332.0	07/09/10	JLN	Drafted bullet pt time line summarizing criT/cal events in Schoolcraft case	1.000
335	333.0	07/09/10	JLN	T/c AS re status of move, discussions with landlord (eyewitness) and additional docs located at apt.	0.750
336	334.0	07/09/10	JLN	Reviewed PG Guide 314-11- re: appeals of evaluation; took notes re: same	0.400

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
337	335.0	07/12/10	JLN	Listened to recording of appeal meeting on Feb. 25, 2009; replayed and took notes re: same	3.400
338	336.0	07/12/10	JLN	T/c AS re QAD interviews and PBA letter re: illegal quotas	0.750
339	337.0	07/12/10	JLN	Reviewed memo from Lt. Mascol re: TS operators not to speak with complainants	0.100
340	338.0	07/13/10	JLN	Review of additional Schoolcraft recordings; took notes re: same	4.200
341	339.0	07/13/10	JLN	Reviewed recording of conv. blw AS & Lt. Mascol on Feb. 20, 20September ; took notes re: same	0.600
342	340.0	07/13/10	JLN	Reviewed FDNY PCR for AS; took notes re: same	0.500
343	341.0	07/13/10	JLN	T/c Rae Koshets re: status of Schoolcraft matter & pending charges & speed	0.500
344	342.0	07/13/10	JLN	Listened to recording b/w AS & Det. Peterson on Sept. 13, 2009	0.400
345	343.0	07/13/10	JLN	T/c RP re: Frank Palestro	0.250
346	344.0	07/14/10	JLN	Reviewed multiple NYPD performance evaluation guides provided by pltf, including guides for Detectives & P.O.'s, for P.O. Det. Specialists; took notes re: same	3.800
347	345.0	07/14/10	JLN	Meeting w/ GC and JF re: Schoolcraft complaint & next steps for moving forward	1.250
348	346.0	07/14/10	JLN	T/c Eric Sanders, Esq., re: Frank Palestro & PO Minaya & possible joint participation in each others cases	0.250
349	347.0	07/14/10	JLN	Reviewed document re: conversation b/w Lt. Mascol & Schoolcraft on Jan. 14, 2009 re: need for more "activity"	0.200
350	348.0	07/15/10	JLN	Review of Schoolcraft recordings (2008 roll calls)	3.100
351	349.0	07/15/10	JLN	Discussion with GC and JF re tapes	1.100
352	350.0	07/15/10	JLN	Reviewed AS's evaluation for Sept. 2009 (by Sgt. Stukes & Mauriello) re: Pltfs' "poor activity" & how he was "counseled" re improvement; took notes re: same	0.500
353	351.0	07/15/10	JLN	Reviewed AS evaluation for April 2009 noting "poor activity" & AS's unwillingness to meet "performance standards" of NYPD	0.400
354	352.0	07/15/10	JLN	Reviewed Brown & Gropper letter to Mauriello re: appealing evaluation & numerical calculations of performance vs. actual rating, etc; took notes re: same	0.400

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
355	353.0	07/15/10	JLN	Reviewed PG 205-56 and PG 205-57 re: P.O.s' monthly/quaraterly perfmmance reviews; took notes re: same	0.300
356	354.0	07/15/10	JLN	Reviewed AS Meritorious Police Duty Medal	0.100
357	355.0	07/15/10	JLN	Reviewed ltr from AS to Senator Hugh Farley requesting assistance	0.100
358	356.0	07/15/10	JLN	Reviewed UF 49 from AS to Mauriello dated 9/2/09 re: appeal of his evaluation	0.100
359	357.0	07/16/10	JLN	Continued listening to recordings (appeal meeting; Mascol conversation; Lauterborn Duty Captain incident); took notes re same.	5.400
360	358.0	07/16/10	JLN	Continued review of Schoolcraft recordings (2008 roll calls)	3.400
361	359.0	07/16/10	JLN	Meeting with GC re: Schoolcraft issues and status of complaint & overall strategy	1.250
362	360.0	07/16/10	JLN	Reviewed composite file on Brandon Del Pozzo (former CO of 50 Pct);	1.200
363	361.0	07/16/10	JLN	T/c AS re: Eric Sanders conversation and status of hard drive retrieval	0.750
364	362.0	07/16/10	JLN	Rev'd Admin. Guide procedure 303-20 re: steps to be followed for an appeal; notes on same.	0.200
365	363.0	07/16/10	JLN	Rev'd pltf's ltr on July 31, 20September to PBA gen. counsel & summarizing events to date & seeking PBA representation	0.200
366	364.0	07/16/10	JLN	Reviewed PBA letter (Aug. 17, 09) in response to AS's request for legal representation from PBA	0.100
367	365.0	07/17/10	JLN	Listened to 3 different recordings of interviews by Lamstein (NYPD Psych); took notes re same:	3.400
368	366.0	07/17/10	JLN	Reviewed 81st Pct Chart regarding monthly self-inspections for 20September ; notes re: same	0.300
369	367.0	07/17/10	JLN	Reviewed photos of 81st precinct as provided by AS; flagged photos most relevant for case & created list of same.	0.300
370	368.0	07/17/10	JLN	E-mail exchange with AS re: UF 250's	0.100
371	369.0	07/19/10	JLN	Review of Schoolcraft roll calls (2009 roll calls); notes re: same	4.200
372	370.0	07/19/10	JLN	Listened to recording b/w LS & FBI Special agent on Nov. 9, 2009 requesting fed. Investigaiton into what happened to AS	0.300
373	371.0	07/20/10	JLN	Continued review of Schoolcraft roll calls (2009); took notes on same	3.900

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
374	372.0	07/20/10	JLN	T/c with AS regarding case status	0.500
375	373.0	07/21/10	JLN	T/c call b/w AS, JN&LS re: GR information and Del Pozzo "offer" & new officer fired b/c if quotas	2.100
376	374.0	07/21/10	JLN	Conference call b/w Graham Raymond ("GR") GR & AS & LS re call by NYPD to GR	1.200
377	375.0	07/21/10	JLN	T/c GR re NYPD contact by Brandon Del Pozzo re Schoolcraft employment issues	0.250
378	376.0	07/22/10	JLN	Continued review of Schoolcraft recordings (2009 roll calls)	3.100
379	377.0	07/22/10	JLN	T/c AS re Del Pozzo, GR & letters to Stuart London	1.100
380	378.0	07/22/10	JLN	T/c JFIGC re updates on Schoolcraft	0.500
381	379.0	07/22/10	JLN	E-mail exchange with AS re: council speaker wants CCRB to try its own cases	0.100
382	380.0	07/26/10	JLN	Meeting with JF & GC re case & updates on Brendan Del Pozo	2.100
383	381.0	07/26/10	JLN	Meeting JF/GC reissues for Schoolcraft complaint	1.000
384	382.0	07/26/10	JLN	Discussion with GC & JF re complaint draft next steps moving forward	0.600
385	383.0	07/26/10	JLN	T/c Larry Schoolcraft re: Del Pozzo e-mail GR & PBA letter to Stuart London	0.600
386	384.0	07/26/10	JLN	Discussion w/ GC re Brandon del Pozo	0.300
387	385.0	07/26/10	JLN	T/c w/ GR re: new rookie (PO Chris Bienz) fired b/c of quota	0.300
388	386.0	07/26/10	JLN	Sent E-mail to GC re: Del Pozo	0.100
389	387.0	07/27/10	JLN	Meeting w/AS, GC, JF to prep for discussion with US attorneys office EDNY	3.250
390	388.0	07/27/10	JLN	Meeting w GC and JF to discuss complaint	1.250
391	389.0	07/27/10	JLN	Mtg GC re draft of complaint and proposed revisions	0.750
392	390.0	07/28/10	JLN	Discussion with JF and GC re: Adhyl Polanco and other whistleblowers	0.500
393	391.0	07/28/10	JLN	Discussion with JF re complaint (proposed areas for improvement)	0.400
394	392.0	07/28/10	JLN	E-mail to JF re meeting with Polanco, Raymond & Rocco	0.100
395	393.0	07/28/10	JLN	Reviewed AS Certificate of Completion of Police Academy	0.100
396	394.0	07/28/10	JLN	Reviewed UF 49 from Sgt. Meyer (81) re: shooting in confines of 81 Sept. 2009	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
397	395.0	07/29/10	JLN	Reviewed NY AG's investigation into NYPD's Stop & Frisk Practices & Statistical Review of NYPD's UF 250 data, as provided by AS; took notes re: same	2.800
398	396.0	07/29/10	JLN	Meeting with JF and Rocco P - Daily News re Schoolcraft and evidence of quotas for Monell claim	1.500
399	397.0	07/30/10	JLN	Meeting with JF, GC, Polanco & Raymond re: Schoolcraft & Monell claim	3.250
400	398.0	07/30/10	JLN	Continued edits and revisions to complaint	3.200
401	399.0	07/30/10	JLN	Meeting with JF and GC re: changes & additions to complaint	1.200
402	400.0	07/30/10	JLN	Read Judge Beinstock's decision in PBA Velez arbitration; took notes re: same; extracted language for use in complaint	0.600
403	401.0	07/30/10	JLN	Reviewed docs re: NYC Safety Restraint Enforcement Program, from Sept. 11-14, 2009 for increased summons activity	0.300
404	402.0	07/30/10	JLN	Reviewed Boro Daily Impact OT Form	0.100
405	403.0	07/31/10	JLN	Cont'd review of Schoolcraft tapes and timeline chart	3.100
406	404.0	07/31/10	JLN	Continued edits/revisions of complaint	2.800
407	405.0	07/31/10	JLN	E-mail from JF re edited complaint	0.100
408	406.0	08/01/10	JLN	T/c w/AS & LS re: Fulton Cty decision & current status of public benefits & continued processing of Dec. 9, 2009 application for benefits	1.100
409	407.0	08/01/10	JLN	Reviewed Fulton County Decision after Hearing (6-9-10) reversing agency's decision that AS voluntarily ended NYPD employment; took notes re: same	0.800
410	408.0	08/02/10	JLN	Further edits revisions & additions to complaint	3.200
411	409.0	08/02/10	JLN	Reviewed original Notice of Claim filed by AS	0.100
412	410.0	08/03/10	JLN	Edited complaint and sent to JF for review	1.600
413	411.0	08/03/10	JLN	Meeting w/ GC re: Schoolcraft complaint and other whistleblower police officers to possibly include in complaint	0.500
414	412.0	08/03/10	JLN	Compose E-mail to JF with detailed edits for the revised Complaint	0.400
415	413.0	08/03/10	JLN	Discussion with JF re corrections	0.300
416	414.0	08/03/10	JLN	Reviewed memo from Lt. Ragnello (81Cdr. 3rd Platoon) re: creating Crime Reduction Unit at 81	0.300
417	415.0	08/03/10	JLN	Reviewed Schoolcraft UF 49 re: Lt Jones (filed in June 07)	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
418	416.0	08/03/10	JLN	Discussion with JF re corrections to complaint	0.250
419	417.0	08/03/10	JLN	E-mail exchange with JF re Revised complaint	0.100
420	418.0	08/04/10	JLN	Review of AS chronology for complaint; incorporated same	1.400
421	419.0	08/04/10	JLN	Further edits and revisions to complaint	1.200
422	420.0	08/04/10	JLN	Read AS memo re: Brandon Del Pozo	0.200
423	421.0	08/04/10	JLN	E-mail exchange JF re complaint edits	0.100
424	422.0	08/05/10	JLN	Review of AS's August and March September recordings transcribed from Legal Language; took notes re: same	3.500
425	423.0	08/05/10	JLN	E-mail exchange with JF re: clarification of some factual issues in the complaint	0.200
426	424.0	08/06/10	JLN	Reviewed June 2009 roll calls, Halloween night and visits to Johnstown recording transcripts and discussed same with JF	3.800
427	425.0	08/06/10	JLN	Review of revised complaint from JF: made edits and revisions to same	2.100
428	426.0	08/06/10	JLN	Continued review transcriptions of August 2009 logs	1.400
429	427.0	08/06/10	JLN	E-mail exchange with JF re community visits	0.200
430	428.0	08/06/10	JLN	E-mail from JF re: complaint revisions	0.100
431	429.0	08/07/10	JLN	Continued review transcriptions of March 2009 logs	1.800
432	430.0	08/07/10	JLN	E-mail exchange JF re explanation of community visits	0.250
433	431.0	08/08/10	JLN	Reviewed transcription of December 2008 logs of roll calls; notes re: same	3.600
434	432.0	08/08/10	JLN	Discussion with JF re: edits to complaint	0.400
435	433.0	08/08/10	JLN	E-mail to JF with additional allegations for complaint	0.100
436	434.0	08/08/10	JLN	Review of E-mail re: revision of Schoolcraft complaint	0.100
437	435.0	08/09/10	JLN	Meeting with AS to finalize complaint	2.700
438	436.0	08/09/10	JLN	Meeting w/GC and JF re: Schoolcraft website to support Monell theory	1.500
439	437.0	08/09/10	JLN	E-mail from JF re final draft of complaint; reviewed same	1.250
440	438.0	08/09/10	JLN	Review of final draft of AS complaint to be filed	0.500
441	439.0	08/09/10	JLN	Discussion with GC and JF re Adrian interview	0.300
442	440.0	08/09/10	JLN	E-mail to JF re negligent ret. claim	0.300
443	441.0	08/09/10	JLN	Review of legal issues re: Negligent hiring claim	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
444	442.0	08/09/10	JLN	Reviewed fax from anonymous PO re: Marino's quota system	0.100
445	443.0	08/10/10	JLN	Began review of new CD from Client w/ numerous additional recordings and docs	3.700
446	444.0	08/10/10	JLN	Listened to Brian Lehrer show (podcast) re: Schoolcraft allegations	0.500
447	445.0	08/10/10	JLN	Reviewed transcript of excerpts that refer to "Mauriello Specials", as provided by AS	0.500
448	446.0	08/10/10	JLN	Review of Articles about Schoolcraft complaint	0.400
449	447.0	08/10/10	JLN	Discussion with JF & GC re articles and possible typo in complaint	0.200
450	448.0	08/10/10	JLN	Reviewed GC draft of Schoolcraft website content	0.200
451	449.0	08/11/10	JLN	Meeting with PO Kevin Rodriguez 52nd Precinct	2.750
452	450.0	08/11/10	JLN	Discussion with GC re anonymous P.O. re: quota/retaliation	0.300
453	451.0	08/11/10	JLN	Review post of anonymous P.O. who contacted website re recording Mauriello	0.200
454	452.0	08/12/10	JLN	Reviewed transcription of Jan 2009 logs; notes re: same	2.900
455	453.0	08/12/10	JLN	Reviewed PBA by-laws and const.	0.900
456	454.0	08/12/10	JLN	Meeting w/JF and GC re: legal strategies on Monell and whistleblower cop contacts	0.800
457	455.0	08/12/10	JLN	Meeting w/GC and JF re: legal strategies & next steps for moving forward	0.500
458	456.0	08/13/10	JLN	Read Eterno & Silverman's article on Compstat ("Compare Statistics or Compose Statistics"); took notes re same	0.700
459	457.0	08/13/10	JLN	Discussion with GC & JF re Jonathan Moore Cease & Desist letter	0.400
460	458.0	08/14/10	JLN	Tc w/AS & LS re: Eterno & Silverman as possible expert witnesses and re: specific issues raised in their Compstat article	1.200
461	459.0	08/15/10	JLN	Internet research on Eterno/Silverman studies & articles & on Compstat	2.200
462	460.0	08/15/10	JLN	Meeting with JF and GC re NY Times story about quotas & Schoolcraft	0.600
463	461.0	08/16/10	JLN	Continued review of new CD from client	4.100
464	462.0	08/16/10	JLN	Interview of J. Ferrera (former Lt. at 81st Pct.)	3.400
465	463.0	08/16/10	JLN	Read CCRB Report on 75th & 81st Pcts, as provided by AS; took notes re: same	1.200
466	464.0	08/16/10	JLN	Travel back to NYC (1.40)	0.700

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
467	465.0	08/16/10	JLN	Travel to Long Island to meet Ferrara (1.2)	0.600
468	466.0	08/16/10	JLN	Read articles about NYPD's gun buy-back program provided by AS	0.300
469	467.0	08/17/10	JLN	Meeting with Eterno & Silverman	2.300
470	468.0	08/17/10	JLN	T/c w/AS & LS re: charges & specs, underlying facts relating to each charge, & best way to challenge charges in the NYPD trial room	1.400
471	469.0	08/17/10	JLN	Discussion with GC and JF re anonymous e-mails that we got as a result of the website	0.400
472	470.0	08/17/10	JLN	Travel back downtown (.80)	0.400
473	471.0	08/17/10	JLN	Travel uptown to meet Eterno & Silvennan in midtown (.80)	0.400
474	472.0	08/17/10	JLN	Reviewed NYPD Charges & Specs against AS; created bullet point summary of same	0.200
475	473.0	08/18/10	JLN	Reviewed Relevant PG Sections for Charges & Specs (PG 203-03,203-10, 203-18, 205-47); took notes re: same	1.750
476	474.0	08/18/10	JLN	Reviewed AS Quarterly Performance report from 08; took notes re: same	1.600
477	475.0	08/18/10	JLN	T/c w/AS & LS re: my reievew of PG sections relating to charges & specs, & best args. for challenging same	0.900
478	476.0	08/18/10	JLN	Discussion with JF re Rocco's story in Daily News	0.250
479	477.0	08/19/10	JLN	Finished review of new CD recordings and documents from client; took notes re: same	2.900
480	478.0	08/19/10	JLN	Discussion with JF and GC re: new recordings and documents provided by AS	1.250
481	479.0	08/19/10	JLN	T/c w/AS and LS re: chronology of events & questions relating to specific entries	1.100
482	480.0	08/19/10	JLN	Reviewed AS's chonology of chain of events leading up to Halloween night, starting with discussion w/Lt. Delafuente on Jan. 29, 2009 (AS should "work for ASPCA")	0.700
483	481.0	08/19/10	JLN	E-mail from P.O. Chris Whitehead worked under Marino in 75th Pct.	0.100
484	482.0	08/20/10	JLN	T/c w/Chris Whitehead re: quotas at 75th Pct. & retaliation	0.900
485	483.0	08/20/10	JLN	Interviewed Marc Johnson, Ph.D., re: possible use as expert for psych claims	0.600
486	484.0	08/22/10	JLN	Meeting with JF & GC re whistleblowers reaching out through the website	0.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
487	485.0	08/22/10	JLN	Reviewed notes from AS activity log from Jan. September to March September	0.700
488	486.0	08/22/10	JLN	Reviewed memorandum "Your Right to Know" provided by AS and released by NY State re: Public Officer Law & FOIL requests.	0.400
489	487.0	08/22/10	JLN	E-mail exchange with AS re: Internet search results on Dr. Lamstein and previous Cheroff case	0.200
490	488.0	08/23/10	JLN	Reviewed NYPD "Critical Objectives" & statistics re: index crimes, as	1.200
491	489.0	08/23/10	JLN	Reviewed Investigations Unit comment sheet provided by AS re: Sgt. Defabizio & contacts with Schoolcraft	0.200
492	490.0	08/24/10	JLN	Mtg. w/Chris Whitehead (P.O. 75 Pct.)	2.400
493	491.0	08/24/10	JLN	Reviewed AS videos & audio recordings & photos re: "Harassment & Stalking" by NYPD & Johnstown PD in upstate NY; took notes re: same	2.400
494	492.0	08/24/10	JLN	T/c w/AS & LS re: harassment by NYPD & Johnstown PD, interactions with NYPD during visits, and specific questions relating to what is shown on videos	1.300
495	493.0	08/24/10	JLN	Travel to L.I. to meet Chris Whitehead (1.20)	0.600
496	494.0	08/24/10	JLN	Travel back to NYC from meeting with C. Whitehead (1.40)	0.400
497	495.0	08/25/10	JLN	Meeting w/GC and JF re: ACC assigned, Schoolcraft Initial Disclosures	1.750
498	496.0	08/25/10	JLN	Reviewed Rand Report provided by AS re: "Analysis of Disparities" of NYPD's Stop, Question & Frisk practices; took notes re: same	1.200
499	497.0	08/25/10	JLN	Meeting with JF & GC re more whistleblower email & meeting with P.O. Fioranelli	0.900
500	498.0	08/25/10	JLN	Reviewed NYC Bar Ass'n Statement on NYC Stop & Frisk Practices; took notes re: same	0.800
501	499.0	08/25/10	JLN	Meeting with JF & GC re: Whitehead mtg.	0.750
502	500.0	08/26/10	JLN	Meeting with JF and GC re: interview of PO from 81st precinct "PF" re: corruption	1.500
503	501.0	08/26/10	JLN	Correspondence w/GC re: Frank Serpico	0.200
504	502.0	08/27/10	JLN	Read articles by Eterno & Silverman re: Compstat	1.500
505	503.0	08/27/10	JLN	Discussion with GC & JF re having Eterno & Silverman as experts	0.600

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
506	504.0	08/29/10	JLN	Discussion with GC re: Walter Lipscomb interview	0.500
507	505.0	08/30/10	JLN	Meeting with JF & GC re Garcia (cop from 81 who knows Schoolcraft & has info on quotas)	1.250
508	506.0	08/30/10	JLN	Meeting with JF & GC re Labor & Employment case & 12(b)(6) motion	0.500
509	507.0	08/30/10	JLN	E-mail correspondence w/GC re: MG (PO in 81st precinct)	0.100
510	508.0	08/30/10	JLN	E-mail w/ GC re: ACC Donna Canfield	0.100
511	509.0	08/30/10	JLN	Reviewed Notice of Appearance by Donna Canfield ("DC") on behalf of The City Of New York	0.100
512	510.0	08/31/10	JLN	Conversation with GC and JF re: topics to be discussed/disclosed with Mark Toor in Chief article	0.250
513	511.0	09/01/10	JLN	Meeting w/GC and JF re: discuss anonymous POs contacting us and how they can help Schoolcraft w/ <u>Monell</u> claim	1.800
514	512.0	09/03/10	JLN	Meeting with JF and GC to discuss information provided by DH, MG, EB (whistleblower cops) in furtherance of the <u>Monell</u> claim	1.400
515	513.0	09/03/10	JLN	Meeting w/ GC re: THEE RANT post to get officers to contact us on Schoolcraftjustice.com to support <u>Monell</u> claim	0.500
516	514.0	09/03/10	JLN	Discussion with JF re AS interview with This American Life	0.400
517	515.0	09/03/10	JLN	E-mail w/GC re: THEE RANT post	0.200
518	516.0	09/03/10	JLN	E-mail w/ GC re: This American Life Radio show	0.100
519	517.0	09/04/10	JLN	Reviewed PG section 216-05 (EDPS), notes re: same	0.400
520	518.0	09/05/10	JLN	Reviewed indictment of Sgt. Stukes (AS Supervisor) filed in Kings County	0.100
521	519.0	09/06/10	JLN	Discussion with JF re amended complaint	0.400
522	520.0	09/06/10	JLN	E-mail exchanges with Joseph Ferrara (former Lt. 81 pct)	0.200
523	521.0	09/07/10	JLN	Listened to recording of mtg b/w AS and Stuart London PBA Attorney re: appealing evaluation & options available	0.500
524	522.0	09/07/10	JLN	Reviewed Defendant Isakov's answer to complaint	0.300
525	523.0	09/07/10	JLN	E-mail exchange with Joseph Ferrara	0.100
526	524.0	09/07/10	JLN	Reviewed Aff of Service by defendants Jamaica Hospital Medical Center.	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
527	525.0	09/07/10	JLN	Reviewed defendant JHMC's corporate disclosure statement	0.100
528	526.0	09/07/10	JLN	Reviewed defendants answer to complaint filed by Jamaica Hospital Medical Center	0.100
529	527.0	09/10/10	JLN	Reviewed letter addressed to Judge Sweet from DC dated 9/1/2010 Requesting a sixty day extension	0.100
530	528.0	09/12/10	JLN	Reviewed "Crime, Police & the Community" report by Citizens Crime Commission, as provided by AS	0.800
531	529.0	09/12/10	JLN	Reviewed "Police & Public Safety in NYC" report from Citizens Crime	0.700
532	530.0	09/12/10	JLN	Reviewed Opinion/Order of Joan Lobis (JSC NY County) re: Ray Kelly under Article 78, as provided by AS	0.400
533	531.0	09/13/10	JLN	T/c w/AS re: salary with NYPD, benefits, and overall lost earnings claim	0.900
534	532.0	09/13/10	JLN	Reviewed NYC pay statements for AS from Nov. 13, 09; Oct. 30, 09; Feb. 5, 2010; June 4, 2010 (for "prior to separation" work)	0.300
535	533.0	09/13/10	JLN	Reviewed Notices of Claim filed by AS for "Property Loss" and "Salary Loss"	0.200
536	534.0	09/15/10	JLN	Reviewed Dep. of Eddie Valasquez (P.O. punished for not meeting quota); took notes re: same	1.200
537	535.0	09/15/10	JLN	Reviewed defendant Bernier's endorsed stipulation extending time to answer	0.100
538	536.0	09/16/10	JLN	Reviewed Floyd depositions from Floyd Proceedings, including Mauriello Dep., Donald McHugh Dep.; Angel Herran Dep, and Paul Browne dep.; took notes re same.	4.250
539	537.0	09/17/10	JLN	Meeting with JF and GC regarding information obtained from Floyd litigation and its impact on Schoolcrafts Monell and Retaliation claims	1.300
540	538.0	09/17/10	JLN	Started review of transcript from Velez proceedings; took notes re: same	0.600
541	539.0	09/18/10	JLN	Reviewed NYPD Admin guide provided by AS; took notes re: same	1.200
542	540.0	09/18/10	JLN	Conversation with GC & JF re new whistleblower cop	0.300
543	541.0	09/18/10	JLN	Correspondence w/ GC re: anonymous Schoolcraft post	0.200
544	542.0	09/19/10	JLN	E-mail exchange w/ J. Ferrara re: Browne's reaction to Quota Tapes	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
545	543.0	09/20/10	JLN	Discussion with JF re meeting with DOJ on AS case	0.400
546	544.0	09/20/10	JLN	Discussion with GC & JF re media upload to website	0.200
547	545.0	09/21/10	JLN	Meeting with DOJ EDNY regarding potential civil rights enforcement action and setting up meeting w/ AS	3.100
548	546.0	09/22/10	JLN	Meeting with JF to prepare for EDNY DOJ	1.100
549	547.0	09/23/10	JLN	Meeting with GC, JF and Center for Constitutional Rights (CCR) re Schoolcraft	2.250
550	548.0	09/23/10	JLN	Discussion with JF re new post for THEE Ranrt for more whistleblower Pos to support <u>Monell</u> claim	0.300
551	549.0	09/23/10	JLN	Reviewed insurance coverage for Def. Isakov	0.100
552	550.0	09/24/10	JLN	Discussion with JF and GC re: first meeting with the DOJ and upcoming meeting with the DOJ and AS	1.750
553	551.0	09/25/10	JLN	Meeting with GC & JF re: upcoming AS interview with feds	0.500
554	552.0	09/25/10	JLN	E-mail from JF re: upcoming fed meeting with AS	0.100
555	553.0	09/27/10	JLN	Meeting with AS and Feds re: potential fed civil rights violations	2.300
556	554.0	09/27/10	JLN	Discussion with JF re: location of witnesses from This American Life interview	0.500
557	555.0	09/28/10	JLN	Continued review of transcript of PBA (Velez) hearing re: quotas	1.700
558	556.0	09/28/10	JLN	E-mail from JF re article in Russian news	0.100
559	557.0	09/29/10	JLN	Finished review of PBA transcript	2.800
560	558.0	09/30/10	JLN	Meeting with GC and JF re: anonymous cop interviews (VM and EF)	1.100
561	559.0	09/30/10	JLN	Reviewed answer to complaint filed by Lillian Aldana-Bernier	0.500
562	560.0	09/30/10	JLN	Reviewed Bernier's corporate disclosure statement	0.100
563	561.0	10/02/10	JLN	E-mail exchanges w/ GC re: whistleblower cops	0.300
564	562.0	10/02/10	JLN	E-mail from JF re whistleblower cop	0.100
565	563.0	10/02/10	JLN	E-mail re whistleblower cop from JF	0.100
566	564.0	10/04/10	JLN	Meeting w/ GC and JF to discuss information from "JR" retired police officer re: quotas, downgrading, NYPD corruption	0.750
567	565.0	10/06/10	JLN	Reviewed answer to amended complaint filed by Jamaica Hospital	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
568	566.0	10/07/10	JLN	T/c w/ Colleen Long (AP wire) re: doing story on Schoolcraft	0.600
569	567.0	10/08/10	JLN	Review of AP story re: Schoolcraft case	0.200
570	568.0	10/10/10	JLN	Meeting with GC and JF re: information provided by MV, NB, EB whistleblower cops	1.400
571	569.0	10/11/10	JLN	E-mail from JF re Lewis whistleblower cop	0.900
572	570.0	10/11/10	JLN	E-mail correspondence w/ GC re: Posts	0.200
573	571.0	10/11/10	JLN	E-mail exchange with Chris Whitehead re Compstat videos and possibly obtaining copies of same	0.100
574	572.0	10/12/10	JLN	Reviewed memo of law in Support of defendants JHMC motion to Dismiss; ; took notes re: same; researched case law cited	2.800
575	573.0	10/12/10	JLN	Meeting w/GC re: Schoolcraftjustice.com calls from Pos	1.000
576	574.0	10/12/10	JLN	Discussion with JF re motion to Dismiss sched.	0.300
577	575.0	10/12/10	JLN	Reviewed Declaration of Gregory J. Radomisl in Support of defendant JHMC motion to Dismiss	0.300
578	576.0	10/13/10	JLN	Discussion with JF re: arguments to make in response to JHMC motion	1.250
579	577.0	10/13/10	JLN	Discussion with JF re agreement on briefing sched. w/ defendant Jamaica Hosp.	0.100
580	578.0	10/14/10	JLN	Meeting with GC re: information provided by PL and RL (whistleblower cops) to support <u>Monell</u> claim	0.750
581	579.0	10/15/10	JLN	Reviewed order re: defendant JHMC's motion to Dismiss	0.100
582	580.0	10/30/10	JLN	Meeting with GC & JF re: information provided by MR, MG RC (whistleblower cops) and movie and book publicist contacting AS for information	2.250
583	581.0	11/01/10	JLN	Meeting with GC and JF re: updating Schoolcraft website	0.300
584	582.0	11/01/10	JLN	Reviewed letter addressed to Judge Sweet from DC requesting ext. of time to answer	0.100
585	583.0	11/08/10	JLN	Read 1st Set of Rogs for plaintiff sent by Isakov	0.100
586	584.0	11/08/10	JLN	Reviewed defendant Isakov's dep notice for plaintiff Adrian Schoolcraft	0.100
587	585.0	11/08/10	JLN	Reviewed Defendant Isakov's request for Production of Documents	0.100
588	586.0	11/09/10	JLN	Meeting with GC about interviews with CW and MC whistleblower cops regarding <u>Monell</u> claim	0.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
589	587.0	11/09/10	JLN	Drafted letter to Judge Sweet requesting extension JHMC's motion to dismiss	0.300
590	588.0	11/09/10	JLN	Reviewed Dep notice for plaintiff from B. Lee	0.100
591	589.0	11/11/10	JLN	Reviewed defendant Bernier's 1st Set of Interrogatories	0.100
592	590.0	11/11/10	JLN	Reviewed defendant Bernier's answer to Second amended complaint	0.100
593	591.0	11/11/10	JLN	Reviewed defendant Isakov's corporate disclosure statement	0.100
594	592.0	11/12/10	JLN	Meeting with JF and GC re: issues on our opposition and GC's meeting with JW anonymous cop	0.300
595	593.0	11/14/10	JLN	Reviewed AS recordings w/ Kings County DA and Queens County Michelle Cort	0.400
596	594.0	11/15/10	JLN	Review AS application to NYPD	0.300
597	595.0	11/16/10	JLN	Review of affidavit Darius Charney wants Schoolcraft to sign Aff for <u>Floyd</u>	0.400
598	596.0	11/16/10	JLN	E-mailed GC re: changes to Schoolcraft <u>Floyd</u> affidavit	0.100
599	597.0	11/16/10	JLN	Reviewed memo from Lt. Brower (April 10, 2006) re: forced O.T.	0.100
600	598.0	11/29/10	JLN	Reviewed draft CCR Affidavit by AS	0.100
601	599.0	12/01/10	JLN	Discussion with GC & JF re affidavit from Schoolcraft	0.400
602	600.0	12/02/10	JLN	Reviewed AS proposed changes to Affidavit	0.200
603	601.0	12/02/10	JLN	Reviewed Defendant City of New York's answer to amended complaint	0.100
604	602.0	12/04/10	JLN	E-mail exchange w/ AS re: Detective accused of falsifying records and making bogus arrests	0.100
605	603.0	12/05/10	JLN	Reviewed JF's draft Opp to MTD; made edits to same	0.700
606	604.0	12/06/10	JLN	Discussion with GC & JF re final corrections	0.800
607	605.0	12/08/10	JLN	Reviewed NYPD memos regarding anti quota legislation	1.200
608	606.0	12/09/10	JLN	Discussion w/ JF & GC re discovery responses & timing	0.500
609	607.0	12/10/10	JLN	E-mail w/ GC re: HIPAAs for AS meds	0.100
610	608.0	12/11/10	JLN	E-mail exchange re: posting on Thee Rant relating to Mauriello	0.100
611	609.0	12/14/10	JLN	Reviewed Darius Charney correspondence re affidavit for AS	0.200
612	610.0	12/16/10	JLN	Reviewed final AS Affidavit for CCR	0.100
613	611.0	12/17/10	JLN	E-mail from JF re AS benefits	0.100
614	612.0	01/01/11	JLN	E-mail to JF re WSJ article about case	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
615	613.0	01/10/11	JLN	Meeting with GC & JF re interrogatories and demands & misc. discovery & strategy issues	1.500
616	614.0	01/20/11	JLN	Meeting with GC, JF to discuss JHMC's reply memo of law	0.400
617	615.0	01/20/11	JLN	Reviewed Defendant JHMC's reply memo of law in Support of their motion to Dismiss; additional research regardng issues raised in same	0.300
618	616.0	01/26/11	JLN	Discussion with GC & JF re oral arguments on MTP	0.600
619	617.0	01/31/11	JLN	Discussion w/ GC re: requesting Queens DA to investigate Halloween night	0.400
620	618.0	01/31/11	JLN	Meeting with JF & GC re sending documents & authorizations to Queens DA office	0.400
621	619.0	01/31/11	JLN	Review of materials sent to Queens DA to start investigation	0.200
622	620.0	02/08/11	JLN	Discussion w/ JF & GC re letter to court to schedule discovery	0.300
623	621.0	02/11/11	JLN	Researched issue of stay while MTD is pending	2.400
624	622.0	02/11/11	JLN	Reviewed JHMC request for stay while MTD is pending	0.100
625	623.0	02/12/11	JLN	Discussion with JF re; motion to stay and arguments in opposition	0.900
626	624.0	02/13/11	JLN	Drafted letter brief opposing stay	3.200
627	625.0	02/19/11	JLN	E-mail exchange the trial in Kings County involving quota allegations and testimony from Captain Perez (81)	0.200
628	626.0	02/19/11	JLN	E-mail correspondence w/ GC re: Seth Harris verdict finding quota in Carolyn Samuels case	0.100
629	627.0	02/23/11	JLN	E-mail exchange with Chris Whitehead :re Anti-Quota Bill and his failure to get promoted based on numbers	0.100
630	628.0	02/25/11	JLN	E-mail exchange with C. Whitehead re: Marino, Carolyn Samuels case and Capt. Alex Perez's testimony in that case	0.100
631	629.0	03/01/11	JLN	Meeting with anonymous cops from T34 w/ GC and JF- recordings of Lt. Janice Williams	1.250
632	630.0	03/01/11	JLN	Reviewed recordings of Sgt. Hans, and Lt. Williams provided by PO "Angel" Rosa	0.300
633	631.0	03/03/11	JLN	E-mail exchange with C. Whitehead re: Daily News article on quotas and pressure.	0.100
634	632.0	04/12/11	JLN	Conv w/ JF re AS suspension & our position with NYPD on same	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
635	633.0	04/13/11	JLN	E-mail exchange with C. Whitehead re: Marino steroids findings & punishment	0.100
636	634.0	04/13/11	JLN	E-mail exchange with C. Whitehead re: LAPD Officers Quota lawsuit and possible implications for quota claims in this case	0.100
637	635.0	04/18/11	JLN	Discussion w/ JF & GC re prep of letter re NYPD hearing & PBA representation	0.300
638	636.0	05/06/11	JLN	Read Judge Sweet's decision on defendants' MTD; notes re: same	0.300
639	637.0	05/06/11	JLN	E-mail exchange w/ GC and JF re: motion to dismiss decision	0.200
640	638.0	05/09/11	JLN	Drafted 1st Set of Rogs to Isakov	2.100
641	639.0	05/09/11	JLN	Meeting with GC and JF re: necessary disclosures under Rule 26 for plaintiff	1.750
642	640.0	05/09/11	JLN	Started drafting R.26 Initial Disclosures	0.400
643	641.0	05/10/11	JLN	Started drafting Requests For Admission ("RFA") from City	2.500
644	642.0	05/10/11	JLN	Finished Initial Disclosures.	1.400
645	643.0	05/10/11	JLN	Meeting with GC and JF re: edits to Initial disclosures and discussion regarding requests to admit	1.400
646	644.0	05/12/11	JLN	Discussion w/ GC & JF re agency agreement	0.400
647	645.0	05/14/11	JLN	Continued drafting RFA for City	2.200
648	646.0	05/15/11	JLN	Finished drafting RFA for City	2.400
649	647.0	05/15/11	JLN	Meeting with GC and JF re: edits to RFA's	1.000
650	648.0	05/16/11	JLN	Started drafting Rogs for City	1.900
651	649.0	05/17/11	JLN	Cont'd drafting Rogs for City	2.400
652	650.0	05/18/11	JLN	Started drafting 1st Doc Demands City	1.600
653	651.0	05/19/11	JLN	Continued drafting document demands for City	2.100
654	652.0	05/19/11	JLN	Discuss w/ JF & GC edits & topic areas that should be explored on interrogatories	1.250
655	653.0	05/19/11	JLN	Drafted Schoolcraft deposition notices.	0.400
656	654.0	05/19/11	JLN	Review of GC's draft document demands to include in our demands	0.300
657	655.0	05/19/11	JLN	E-mail from GC re: additional depositions to be served	0.100
658	656.0	05/19/11	JLN	Sent draft document demands to GC	0.100
659	657.0	05/20/11	JLN	Finished drafting Rogs for City	2.800
660	658.0	05/20/11	JLN	Finished drafting 1st Document Demands for City	2.700
661	659.0	05/20/11	JLN	Discussion w/ GC & JF re request to admit corrections/additions .	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
662	660.0	05/20/11	JLN	T/c AS & LS re: discovery demands/admissions & adding many more demands that they feel are important (vs. overbroad/irrelevant concerns)	1.400
663	661.0	05/20/11	JLN	Finalize interrogatories & discuss EBTs w/ JF & GC	1.300
664	662.0	05/20/11	JLN	E-mail exchange AS re: 1st Set of Interrogatories	0.200
665	663.0	05/20/11	JLN	E-mail exchange re: Plaintiffs' First Request for Admissions	0.200
666	664.0	05/20/11	JLN	Sent GC request for admissions for review	0.100
667	665.0	05/20/11	JLN	Sent GC revised draft document demands for review	0.100
668	666.0	05/21/11	JLN	Started drafting 1st Set of Document Demands for JHMC	2.300
669	667.0	05/22/11	JLN	Finished 1st Set of Doc Demands Jamaica	2.900
670	668.0	05/22/11	JLN	Started drafting Schoolcraft document demands for other defendants	1.700
671	669.0	05/23/11	JLN	Continued drafting Schoolcraft discovery demands and interrogatories against medical defendants	3.600
672	670.0	05/23/11	JLN	Drafted 1st Set of Rogs for JHMC	2.300
673	671.0	05/23/11	JLN	E-mail correspondence w/Brian Lee re: dep notices for Caughey & Weiss	0.100
674	672.0	05/23/11	JLN	Reviewed Notice of Deps for Isakov/Bemier	0.100
675	673.0	05/24/11	JLN	Finished drafting discovery demands/rogs for med defendants	3.700
676	674.0	05/24/11	JLN	Review of E-mail and correspondence w/ GC re anonymous P.O. from 81st precinct	0.300
677	675.0	05/25/11	JLN	Drafted NoT/ce of Inspection for JHMC	2.300
678	676.0	06/01/11	JLN	Reviewed initial disclosure from JHMC	0.100
679	677.0	06/03/11	JLN	Reviewed JHMC's Initial Disclosures	0.100
680	678.0	06/10/11	JLN	T/c w/Donna Canfield re: extending City defendants' time to answer from June/20 to July 20; e-mail f/u regarding same.	0.100
681	679.0	06/11/11	JLN	Ltr from B. Lee re: discovery responses and order of priority	0.100
682	680.0	06/13/11	JLN	E-mail exchange w/Jim Leander (Queens DA Office) re: setting up a meeting to discuss Schoolcraft investigation	0.100
683	681.0	06/16/11	JLN	E-mail exchange upcoming meeting with Queens DA & plaintiff desire to postpone meeting until we have discovery responses	0.200
684	682.0	06/16/11	JLN	E-mail exchange w/ team re: another NYPD Detective caught giving false testimony	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
685	683.0	07/17/11	JLN	Reviewed Isakov response to Document Demands	0.100
686	684.0	06/17/11	JLN	Reviewed Isakov response to Rogs	0.100
687	685.0	06/21/11	JLN	E-mail exchange re: 3 cases in EDNY with Mauriello as one of defendants	0.100
688	686.0	06/21/11	JLN	E-mail exchange re: Queens DA meeting & avoiding any contact w/ press/media	0.100
689	687.0	06/23/11	JLN	Review of answers to interrogatories by Isakov	0.900
690	688.0	06/23/11	JLN	Review of response to doc demands by Isakov; notes re: same	0.700
691	689.0	06/23/11	JLN	Discussion with GC & JF re responses & requests from Isakov	0.600
692	690.0	06/23/11	JLN	Review of requests for discovery from Isakov	0.300
693	691.0	06/23/11	JLN	Letter to Jim Leander re: authorizing release of med records to Queens DA	0.100
694	692.0	06/24/11	JLN	Reviewed Def. Isakov's 2nd Request for Docs	0.100
695	693.0	06/27/11	JLN	Discussion with JF and GC re City's failure to respond to discovery requests	0.300
696	694.0	06/27/11	JLN	E-mail exchanges with all counsel re: setting up R. 26 Conf. for scheduling of discovery	0.200
697	695.0	06/30/11	JLN	Rule 26 Conf. w/all counsel present	0.900
698	696.0	06/30/11	JLN	Reviewed Brian Lee's Proposed Discovery Plan in advance of mtg later today; notes re: same	0.200
699	697.0	07/01/11	JLN	E-mail from B.Brady re: need to modify plan re: setting deps only after receipt of records from City	0.100
700	698.0	07/01/11	JLN	Reviewed Brian Lee's Proposed Discovery Plan as agreed upon at yesterday's conference.	0.100
701	699.0	07/05/11	JLN	Review discovery plan w/ JF & GC	0.300
702	700.0	07/06/11	JLN	Mtg. w/ Jim Leander & AS re: Schoolcraft investigation	2.400
703	701.0	07/06/11	JLN	Discussion w/ JF & GC re changing case management plan	0.400
704	702.0	07/08/11	JLN	Discussion with GC and JF re: meeting with Jim Leander and AS about investigation	1.750
705	703.0	07/08/11	JLN	Reviewed Judge Sweet's order re: Oct. 5 conf	0.100
706	704.0	07/09/11	JLN	E-mail from City on relevancy redaction issue	0.100
707	705.0	07/09/11	JLN	E-mail to City re: redaction issue	0.100
708	706.0	07/11/11	JLN	Final review of discovery plan w/ JF & GC	0.250
709	707.0	07/15/11	JLN	Meeting with JF an GC re: discovery plan and issues to raise with defense counsel	0.500
710	708.0	07/15/11	JLN	sent GC E-mail re: objections to discovery plan	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
711	709.0	07/18/11	JLN	Review of changes to discovery plan made by B. Lee	0.200
712	710.0	07/18/11	JLN	Sent draft E-mail to DC re changes for review	0.100
713	711.0	07/23/11	JLN	E-mail w/Greg Radomisil re: extending time for inspection of JHMC	0.100
714	712.0	08/05/11	JLN	Reviewed JHMC guidelines re: Involuntary commitment, Psych ER guidelines and use of handcuffs	0.900
715	713.0	08/10/11	JLN	Review of GC comments to JHMC discovery responses	0.200
716	714.0	08/11/11	JLN	Review of responses to Isakov discovery demands	0.400
717	715.0	08/14/11	JLN	Review GC's draft responses to all discovery demands for medical defendants	0.400
718	716.0	08/15/11	JLN	Review of our responses to Bernier & Jamaica discovery demands; edits/revisions	0.800
719	717.0	08/15/11	JLN	Reviewed Rule 26 (a) Discovery plan filed by Isakov	0.100
720	718.0	08/16/11	JLN	Reviewed confidentiality stip from City	0.300
721	719.0	08/17/11	JLN	Discuss confidentiality stip w/ GC & JF b/c of plaintiff's objections	1.250
722	720.0	08/26/11	JLN	Read letter from B. Lee re: request for Suppl responses	0.400
723	721.0	09/01/11	JLN	Review of E-mail from Darius Charney enclosing <u>Floyd</u> decision; read SJ decision; took notes re: same	0.500
724	722.0	09/12/11	JLN	Drafted letter motion to compel City defendants to produce discovery	0.700
725	723.0	09/20/11	JLN	Reviewed Judge Sweet's order re: motion to compel and setting oral argument date	0.100
726	724.0	09/26/11	JLN	T/c w JHMC def. counsel re: extending time for hospital to respond and/or object to visiting JHMC and/or taking pies.	0.300
727	725.0	09/28/11	JLN	Discussion w/ JF re law enforcement privilege & motion to compel	1.250
728	726.0	09/28/11	JLN	Attend oral argument on motion to compel	1.000
729	727.0	09/28/11	JLN	Prepare for hearing before Judge Sweet regarding Plaintiff's letter motion to Compel	0.700
730	728.0	09/28/11	JLN	Travel to SDNY- motion to compel (.5)	0.250
731	729.0	09/28/11	JLN	E-mail from JF re law enforcement privilege	0.100
732	730.0	09/30/11	JLN	E-mail from all parties re: executed amended discovery plan	0.200
733	731.0	10/05/11	JLN	Reviewed Rule 26 Discovery Plan filed by B. Lee	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
734	732.0	10/07/11	JLN	Started Review of first set of docs exchanged by City, including Interim IAB Report, QAD Report, Personell folders, memobook entries etc.; took notes re: same	4.250
735	733.0	10/08/11	JLN	Cont'd review of City's 1st response to doc. Demands. Took notes re same	4.700
736	734.0	10/08/11	JLN	Review of operations order sent from client	0.400
737	735.0	10/17/11	JLN	order from Judge Sweet directing parties to appear for PTC	0.100
738	736.0	11/01/11	JLN	Reviewed Isakov 3rd request for docs	0.100
739	737.0	11/17/11	JLN	E-mail from D. Charney re: Polanco Recordings for use in Schoolcraft action; GC to pick up recording, later today.	0.100
740	738.0	11/18/11	JLN	Listened to Polanco recordings, including Heran, McHugh, Sgt. Bennett; took notes re: same.	1.400
741	739.0	11/18/11	JLN	Reviewed mise recordings re: "4 collars" Jones, Guillermo and Kamper	0.400
742	740.0	11/29/11	JLN	E-mail from B. Lee re: upcoming discovery conference and status of case	0.100
743	741.0	12/05/11	JLN	Started review disclosures from D. Canfield, including BNIU file and multiple CD Recordings	1.800
744	742.0	12/05/11	JLN	Reviewed City's first set of doc demands, City's response to Plaintiffs request for admissions, & City's Rule 26 disclosures	0.600
745	743.0	12/06/11	JLN	Con'td review of BNIU file and recordings; took notes re same	3.750
746	744.0	12/13/11	JLN	Drafted letter re: supplemental discovery responses for med. Defendants	0.100
747	745.0	12/19/11	JLN	Discussion w/ GC & JF re plaintiffs thoughts on discovery & next steps for moving forward	0.500
748	746.0	12/23/11	JLN	Reviewed recordings and documents from Frank Palestro	2.400
749	747.0	01/05/12	JLN	Reviewed ltr from def. counsel re: request for IRS releases	0.100
750	748.0	01/10/12	JLN	Meeting with AS, JF and GC re: multiples issues in use & general strategy for moving forward	4.900
751	749.0	01/20/12	JLN	Phone call with Adrian and Larry	0.700
752	750.0	01/24/12	JLN	Spoke to GC re: AS salary	0.200
753	751.0	02/07/12	JLN	Email from GC re: supplemental demands	0.100
754	752.0	02/07/12	JLN	Review Notice of Appearance for City Defendants	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
755	753.0	02/07/12	JLN	Reviewed Notice of Appearance by Max Leighton on behalf of City	0.100
756	754.0	02/08/12	JLN	Pre-trial conference before Judge Sweet	1.000
757	755.0	02/08/12	JLN	Discussion with JF and GC re: conference and discovery and strategy for moving forward	0.750
758	756.0	02/09/12	JLN	Started drafting Second Set of Document Demands for City	2.600
759	757.0	02/09/12	JLN	Reviewed Judge Sweet's order setting motion schedule and discovery deadlines	0.100
760	758.0	02/10/12	JLN	Started drafting 2nd Request for Docs from City	3.400
761	759.0	02/10/12	JLN	Revised, edited and finalized Second Set of Document Demands for City. Also drafted list of items needed for subpoenas and for supplemental disclosure from City.	2.200
762	760.0	02/10/12	JLN	Discussion w/ JF & GC re additional items of discovery	1.600
763	761.0	02/10/12	JLN	T/c with Adrian and Larry regarding update on correspondence and update on new discovery demands	0.700
764	762.0	02/10/12	JLN	Reviewed proposed supplemental demands for the City	0.400
765	763.0	02/10/12	JLN	Telephone Conversation with GC regarding discovery demands and additional demands	0.300
766	764.0	02/10/12	JLN	E-mail to GC re discovery we need to follow up with city	0.200
767	765.0	02/10/12	JLN	E-mail to JF re additional items of discovery from City & subpoenas for Johnstown records	0.200
768	766.0	02/10/12	JLN	E-mail to GC re: Cancellation of Adrian and Larry trip to NYC	0.100
769	767.0	02/10/12	JLN	Review of E-mail to Jeremy Steven (investigator) re: subpoena of Schoolcraft records	0.100
770	768.0	02/13/12	JLN	Review of final supplemental discovery demands for NYC	0.300
771	769.0	02/24/12	JLN	Review of E-mail correspondence w/Chris Dunn (NYCLU)	0.200
772	770.0	02/26/12	JLN	Reviewed Fulton County Records re: AS Produced pursuant to subpoena; took notes re: same.	2.400
773	771.0	02/26/12	JLN	Reviewed records from Fulton County Volume - I	0.700
774	772.0	02/27/12	JLN	Review of subpoena response from Johnstown PD	1.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
775	773.0	02/27/12	JLN	Reviewed records from Fulton County Volume - II	0.900
776	774.0	02/27/12	JLN	Meeting with JF and GC re: documents received from Johnstown PD for plaintiff's subpoena	0.750
777	775.0	02/28/12	JLN	E-mail exchange re: number of actual visits by Johnstown PD & dates times (vs. their dates/times)	0.200
778	776.0	03/06/12	JLN	Reviewed article re: Etemo/Silverman analyze flaws in NYPD terror effort	0.100
779	777.0	03/07/12	JLN	Discussed adding 1st Amendment claim with JF and GC	0.250
780	778.0	03/07/12	JLN	Reviewed Notice of Appearance by Suzanna Publicker on behalf of City	0.100
781	779.0	03/08/12	JLN	Discussion with JF & GC re Voice article and the confidential report	0.750
782	780.0	03/09/12	JLN	Began drafting responses to City's Documents Demands	1.700
783	781.0	03/09/12	JLN	Discussion with JF & GC re reinstating 1st Amendment claims in this case based on Garcetti & actions after the fact	1.250
784	782.0	03/09/12	JLN	Drafted letter to Lt. Gilbo Johnstown PD re: missing documents on visits to Schoolcraft	0.900
785	783.0	03/12/12	JLN	Continued drafting responses to City Documents Demands	2.800
786	784.0	03/12/12	JLN	Meeting with JF & GC re letter from City	0.600
787	785.0	03/12/12	JLN	Revised & edited response to City's letter re protective order	0.250
788	786.0	03/12/12	JLN	Read/review of letter from defendant City on breach of confidentiality stip	0.200
789	787.0	03/12/12	JLN	E-mail to JF re corrections to motion to reinstate	0.100
790	788.0	03/14/12	JLN	E-mail from JF with proposed amended complaint	0.100
791	789.0	03/14/12	JLN	Review of NY Times article on Schoolcraft	0.100
792	790.0	03/15/12	JLN	Meeting with JF and GC re proposed amended complaint	0.600
793	791.0	03/19/12	JLN	Discussions w/ JF re amended complaint	0.500
794	792.0	03/21/12	JLN	Read ltr motion from NYT seeking disclosure of Schoolcraft Materials.	0.200
795	793.0	03/22/12	JLN	Final edits on amended complaint w/ JF	0.250
796	794.0	03/25/12	JLN	Finished responses to City's document demands; forward same to GC & JF for review	2.400
797	795.0	03/26/12	JLN	City's response to NYT Ltr motion	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
798	796.0	03/26/12	JLN	E-mail exchange re Whistblowing Sgt. had role in crime spike in Queens Pct.	0.100
799	797.0	03/26/12	JLN	Reviewed order of Judge Sweet re: NYT motion	0.100
800	798.0	03/28/12	JLN	Oral Argument on City motion	1.000
801	799.0	03/28/12	JLN	Discussion with JF and GC re: court's order on City's motion for breach of confidentiality agreement	0.500
802	800.0	03/28/12	JLN	Meeting w/ JF & GC prior to upcoming conference to prep	0.400
803	801.0	03/28/12	JLN	Ltr from S. Publicker re: plaintiff's outstanding discovery	0.100
804	802.0	03/29/12	JLN	Revised and help draft proposed AEO stip w/ GC and JF for City	0.800
805	803.0	03/29/12	JLN	Review of AEO; Notes regarding same	0.600
806	804.0	03/30/12	JLN	Discussion with GC and JF re: filing motion to amend and discovery issues	0.600
807	805.0	03/30/12	JLN	Meeting w/ JF & GC re AEO changes	0.600
808	806.0	03/30/12	JLN	Final review of proposed AEO stip	0.300
809	807.0	03/30/12	JLN	E-mail from Eli Silverman re: ABC news story on under reported crime rates; watched same	0.200
810	808.0	03/30/12	JLN	E-mail from City re: IAB docs and extending time to produce	0.100
811	809.0	03/30/12	JLN	E-mailed proposed AEO stip to the City	0.100
812	810.0	04/02/12	JLN	E-mail from Bernier consenting to amendment	0.100
813	811.0	04/02/12	JLN	E-mail from Isakov consenting to amendment	0.100
814	812.0	04/04/12	JLN	E-mail from JHMC regarding change in amended language	0.100
815	813.0	04/05/12	JLN	Drafted response to Defendants 1st Set of Document Demands	2.800
816	814.0	04/05/12	JLN	Review & discuss w/ JF & GC plaintiff's responses to City demands	0.800
817	815.0	04/05/12	JLN	E-mail from City stating reasons why they oppose amendment to complaint	0.100
818	816.0	04/08/12	JLN	T/c w/ Kevin Rodriguez (PBA Delegate & PO in 52) re quotas in his precinct; sending materials for our review	0.700
819	817.0	04/09/12	JLN	E-mail correspondence w/GC re: discovery responses	0.100
820	818.0	04/10/12	JLN	Meeting w/ AS re: case status general strategy next steps for moving forward	4.600
821	819.0	04/10/12	JLN	E-mail re: Schoolcraft arrival to NYC	0.100
822	820.0	04/13/12	JLN	Discussion with GC and JF re: Matthews decision	0.600
823	821.0	04/13/12	JLN	Read Matthews decision; took notes re: same	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
824	822.0	04/13/12	JLN	E-mail from plaintiff re 1st Amendment claim	0.100
825	823.0	04/23/12	JLN	Reviewed draft letter from JF regarding motion to amend complaint; made edits to same	0.400
826	824.0	04/25/12	JLN	Discussion with re: edits/changes to 1st Amendment letter	0.750
827	825.0	04/25/12	JLN	Reviewed JF letter to Court requesting leave to amend to add Lt. Hanlon	0.100
828	826.0	04/30/12	JLN	Discussion w/ JF re NY Times alteration to protective order	0.300
829	827.0	04/30/12	JLN	E-mail from JF to City re additions to protective order	0.100
830	828.0	05/01/12	JLN	Discussions w/ JF re City's request for affidavits & deposition for confidentiality breach	0.400
831	829.0	05/02/12	JLN	E-mail to JF to City re confidentiality and discovery issues	0.100
832	830.0	05/03/12	JLN	Discussion w/ GC & JF re Affidavits and Conf. Stip AEO	0.750
833	831.0	05/08/12	JLN	Discussion w/ JF and GC re argument on 1st Amendment claim	0.600
834	832.0	05/08/12	JLN	Reviewed Notice of Appearance by William Fraenkel on behalf of City	0.100
835	833.0	05/09/12	JLN	Attended Argument on 1st Amendment claim	1.000
836	834.0	05/11/12	JLN	Read defendant's motion to quash and discussion w/ GC & JF re: same	2.100
837	835.0	05/12/12	JLN	Reviewed letter by S. Publicker regarding quashing Vallone subpoena	0.100
838	836.0	05/13/12	JLN	Reviewed docs from another quota case (Robinson v. City, 05cv9545) Reviewed dep transcripts from Robinson, including Emmanuel Bowser, Michael Ryan J. Robinson); took notes re: same	3.400
839	837.0	05/16/12	JLN	Legal research regarding City motion to Quash	3.400
840	838.0	05/16/12	JLN	Began drafting letter opposing City motion	1.600
841	839.0	05/16/12	JLN	Discussion w/ JF and GC re opp to defendant's motion to quash	0.600
842	840.0	05/17/12	JLN	Finished drafting Opposition to motion to Quash	3.200
843	841.0	05/17/12	JLN	Discussion w/GC and JF re: AS breach affidavit	0.700
844	842.0	05/17/12	JLN	Review and discuss City New York Times opp letter w/ JF & GC	0.400
845	843.0	05/22/12	JLN	Discussion w/ JF & GC re defendant's letter re Vallone subpoena	0.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
846	844.0	05/23/12	JLN	Prep for argument w/ JF & GC	1.000
847	845.0	05/24/12	JLN	Notice of Appearance by Walter Kretz, behalf of Mauriello; Google search re: Kretz	0.200
848	846.0	05/24/12	JLN	E-mail from S. Publicker re: proposed changes to Confidentiality Stip	0.100
849	847.0	05/30/12	JLN	E-mail exchange w/GC and JF re City stips and revisions	0.300
850	848.0	06/02/12	JLN	Reviewed discovery demands from JHMC	0.200
851	849.0	06/05/12	JLN	Review of E-mail correspondence between SP and Times	0.100
852	850.0	06/06/12	JLN	Reviewed Confidentiality stip and proposed changes made by GC; made additional edits/suggestions	0.300
853	851.0	06/06/12	JLN	Review of E-mail correspondence between SP and Times	0.100
854	852.0	06/07/12	JLN	Reviewed final AEO Stip	0.300
855	853.0	06/07/12	JLN	E-mail exchange w/GC re: changes to AEO stip	0.100
856	854.0	06/08/12	JLN	E-mail from GC to SP re: redlined changes to proposed Stip.	0.100
857	855.0	06/08/12	JLN	Read ltr from NYT counsel re: inventory of confidential materials for	0.100
858	856.0	06/14/12	JLN	Meet with GC and JF to discuss motion for reconsideration on 1st amendment claim	0.750
859	857.0	06/14/12	JLN	Reviewed background search by Warren Investigators of Marino, Lauterborn and Mauriello	0.300
860	858.0	06/14/12	JLN	Read Judge Sweet's Opinion on Plaintiff's motion to amend Councilman Vallone's motion to quash	0.200
861	859.0	06/18/12	JLN	Reviewed JF draft motion for reconsideration; made edits to same	0.400
862	860.0	06/19/12	JLN	Meeting with Schoolcraft in Johnstown	4.800
863	861.0	06/19/12	JLN	Travel back to NYC from Johnstown (3.5)	1.750
864	862.0	06/19/12	JLN	Travel to Johnstown (3.5)	1.750
865	863.0	06/21/12	JLN	E-mail correspondence w/GC and JF re Schoolcraft	0.200
866	864.0	06/26/12	JLN	Read Judge Sweet's order re: motion to reconsider	0.100
867	865.0	07/05/12	JLN	Reviewed Frankel letter opposing plaintiff motion for reconsideration of 1st Amend Claim	0.100
868	866.0	07/12/12	JLN	Review of Schoolcraft's recordings; prepared comprehensive timeline; sent to JF	3.800
869	867.0	07/13/12	JLN	E-mail from City regarding tax return authorizations	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
870	868.0	07/17/12	JLN	E-mail w/GC re: upcoming meeting in Albany with Schoolcrafts	0.100
871	869.0	07/20/12	JLN	Read Opinion of Judge Sweet denying Plaintiff's motion to reconsider	0.100
872	870.0	07/23/12	JLN	Discussion w/ GC & JF re: upcoming meeting w/ Schoolcrafts in Albany	0.300
873	871.0	07/23/12	JLN	E-mail exchange w/JF & GC re: visit to Schoolcrafts in Albany	0.100
874	872.0	07/24/12	JLN	E-mail from JF re Albany meeting w/ Schoolcrafts	0.100
875	873.0	07/28/12	JLN	Discussion w/ JF & GC re motion to amend to add prior restraint	0.600
876	874.0	07/31/12	JLN	Reviewed JF draft of letter seeking leave to amend; edits to same	0.200
877	875.0	08/03/12	JLN	E-mail from S. Publicker re: format of document production once stip is finalized	0.100
878	876.0	08/07/12	JLN	Read order re: plaintiffs motion to amend	0.100
879	877.0	08/08/12	JLN	Meeting w/ JF & GC re: upcoming meeting w/ AS in Albany for prep	1.300
880	878.0	08/08/12	JLN	Review of final stips	0.500
881	879.0	08/08/12	JLN	Printed out docs to go over with Adrian	0.200
882	880.0	08/09/12	JLN	Meeting w/AS in Albany	5.750
883	881.0	08/09/12	JLN	Meeting with Client in Albany with GC & JF	5.500
884	882.0	08/09/12	JLN	Traveled from Albany back to NYC (3.0)	1.500
885	883.0	08/09/12	JLN	Traveled to Albany to meet Client (3.0)	1.500
886	884.0	08/10/12	JLN	E-mail correspondence re: extension of discovery	0.200
887	885.0	08/10/12	JLN	E-mail from JF re extension of discovery	0.100
888	886.0	08/10/12	JLN	E-mail to JF re extension of discovery	0.100
889	887.0	08/10/12	JLN	E-mail to JF re plaintiff's dep	0.100
890	888.0	08/10/12	JLN	E-mail w/GC re Schoolcraft breach affidavit	0.100
891	889.0	08/10/12	JLN	Response E-mail regarding deposition from Greg R.	0.100
892	890.0	08/13/12	JLN	Reviewed City's supplemental disclosure of docs (non-confidential records from IAB file); took notes re: same	3.400
893	891.0	08/13/12	JLN	Continued review of discovery produced by NYC	2.800
894	892.0	08/13/12	JLN	E-mail from Brian Lee regarding deposition	0.100
895	893.0	08/13/12	JLN	Review of E-mail from SP re: scheduling AS depo	0.100
896	894.0	08/14/12	JLN	Continued review of doc production by city; highlighted & took notes re: same	3.600
897	895.0	08/14/12	JLN	Drafted letter to defense counsel re: Schoolcraft tax returns	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
898	896.0	08/14/12	JLN	E-mail from Brady re deps	0.100
899	897.0	08/14/12	JLN	E-mail from JF re letter to City w/ tax authorizations	0.100
900	898.0	08/14/12	JLN	E-mail from JF re plaintiff's dep	0.100
901	899.0	08/14/12	JLN	E-mail to JF re plaintiff's dep	0.100
902	900.0	08/14/12	JLN	Review of correspondence re Tax returns	0.100
903	901.0	08/15/12	JLN	Continued review of doc production by city; took notes re: most imp. Docs.	4.200
904	902.0	08/15/12	JLN	E-mail from B Brady re plaintiff's dep	0.100
905	903.0	08/15/12	JLN	E-mail from B. Lee re plaintiff's dep	0.100
906	904.0	08/15/12	JLN	E-mail from Brian Lee re subpoenaed docs	0.100
907	905.0	08/16/12	JLN	Discussion w/ JF & GC re City's suggestion on multiple deps of AS & best way to oppose same.	0.700
908	906.0	08/16/12	JLN	E-mail from City re plaintiff's dep	0.100
909	907.0	08/16/12	JLN	E-mail to JF re plaintiff's dep	0.100
910	908.0	08/20/12	JLN	Discussion w/ JF & GC re amendment of the complaint to add Lt. Hanlon	0.600
911	909.0	08/20/12	JLN	Discussion w/ JF re AS dep prep	0.400
912	910.0	08/20/12	JLN	Reviewed City's Second Request for Docs.	0.200
913	911.0	08/20/12	JLN	Review of E-mail from JF to City re amendment adding Lt. Hanlon	0.100
914	912.0	08/21/12	JLN	E-mail from Brady consenting to Amendment	0.100
915	913.0	08/21/12	JLN	E-mail from Brady re scheduling AS dep	0.100
916	914.0	08/21/12	JLN	E-mail from City requesting copy of complaint	0.100
917	915.0	08/22/12	JLN	Meeting w/ GC & JF re Kretz's request to have an additional day to depose plaintiff	0.400
918	916.0	08/22/12	JLN	E-mail from City re AS dep date	0.100
919	917.0	08/22/12	JLN	E-mail from GC re dep dates	0.100
920	918.0	08/23/12	JLN	Reviewed correspondence between AI Vann and Ray Kelly	0.100
921	919.0	08/27/12	JLN	Reviewed Supplemental Disclosures from City	0.100
922	920.0	08/28/12	JLN	Drafted letter to Court re: extension of discovery deadline	0.400
923	921.0	08/28/12	JLN	E-mail from GC re Chief article	0.100
924	922.0	08/28/12	JLN	E-mail from JF to defendants enclosing responses to discovery	0.100
925	923.0	08/29/12	JLN	Mtg. w/ JF & GC re: City's Suppl. Disclosure & the need for us to depose at least 5 of the 9 new witnesses identified by City & other gen.strategy issues for advancing discovery	0.800
926	924.0	08/29/12	JLN	Reviewed City's Suppl. R. 26 disclosures re: P.O. Rodriguez, P.O. Rudy (both at 81 when Pl. left) & P.O. Sadowski & EMT Villaverde & Det Yeager, etc	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
927	925.0	09/01/12	JLN	Multiple e-mails and attachments from PO Kevin Rodriguez re: quota activity at the 52 pct.	0.300
928	926.0	09/06/12	JLN	Reviewed grievance filed by Kevin Rodriguez	0.200
929	927.0	09/07/12	JLN	E-mail exchange w/K.Rodriguez re: monthly performance evaluations & evidence of quotas/pressure	0.200
930	928.0	09/10/12	JLN	Read Opinion & order from Judge Sweet on plaintiff's motion to amend	0.700
931	929.0	09/10/12	JLN	E-mail from GC re 120 day extension of discovery deadline	0.100
932	930.0	09/10/12	JLN	E-mail from JF re 120 extension of discovery deadline	0.100
933	931.0	09/10/12	JLN	E-mail to JF re 120 extension of discovery deadline	0.100
934	932.0	09/10/12	JLN	Response from City on Hanlon amend; notes re: same	0.100
935	933.0	09/11/12	JLN	Drafted letter seeking extension of discovery deadline until January 2013	0.400
936	934.0	09/12/12	JLN	Reviewed ltr and enclosures from ACC Publicker, including multiple CD's with recorded interviews made by IAB (non-confidential); began listening to CD interviews (3742-3748)	3.400
937	935.0	09/13/12	JLN	Cont'd listening to CD interviews from IAB (non-confidential) investigation	3.700
938	936.0	09/14/12	JLN	Cont'd listening to CD interviews from IAB (non-confidential) investigation	4.600
939	937.0	09/14/12	JLN	Reviewed materials sent by Kevin Rodriguez, including Sgt Summa statements re: "activity", various recordings; performance evaluations; numerous memoranda, posts and photos	3.700
940	938.0	09/14/12	JLN	Reviewed production by City	0.400
941	939.0	09/15/12	JLN	Listened to recordings of Capt. Thoms J. Kemper at Transit District 4; recording of Deputy Insp. Donna Jones (Employee Management Division); took notes re same.	1.200
942	940.0	09/16/12	JLN	Reviewed records from Councilman Vallone as provided by City on 9-12	0.300
943	941.0	09/17/12	JLN	Reviewed JF draft letter to Court regarding adding Lt. Hanlon as deft	0.100
944	942.0	09/18/12	JLN	Reviewed JF's proposed ltr to Court re: Request to Amend	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
945	943.0	09/18/12	JLN	Reviewed Judge Sweet's order granting plaintiff's request for an extension of discovery deadline until January 12, 2013	0.100
946	944.0	09/24/12	JLN	Meeting w/GC and JF to discuss City deficiency letter and AS dep prep	1.750
947	945.0	09/24/12	JLN	E-mail from City re: amended complaint	0.100
948	946.0	09/24/12	JLN	E-mail response from Kretz	0.100
949	947.0	09/24/12	JLN	E-mail response to Kretz & City	0.100
950	948.0	09/24/12	JLN	E-mail to defendants re service of amended complaint	0.100
951	949.0	09/25/12	JLN	Prep AS for his dep	3.500
952	950.0	09/25/12	JLN	Meeting w/ AS & GC & JF re dep prep	2.900
953	951.0	09/25/12	JLN	E-mail from Greg R re Lauterborn dep	0.100
954	952.0	09/26/12	JLN	Meeting w/ JF & GC & AS re adjourning dep due to father's medical emergency	0.600
955	953.0	09/26/12	JLN	Brady E-mail re: service of process	0.100
956	954.0	09/26/12	JLN	E-mail from JF adjourning dep of AS	0.100
957	955.0	09/26/12	JLN	E-mail from Kretz re Lauterborn dep	0.100
958	956.0	09/26/12	JLN	E-mail to JF adjourning dep of AS	0.100
959	957.0	09/26/12	JLN	Response from B Lee re: adj.	0.100
960	958.0	09/26/12	JLN	Response from Kretz re: adj.	0.100
961	959.0	09/26/12	JLN	Review of E-mail from GC adjourning AS dep	0.100
962	960.0	09/28/12	JLN	Drafted letter to all counsel re: responses from non-parties, including Albert Vann, Fulton County and Johnstown PD; reviewed enclosures	0.200
963	961.0	09/29/12	JLN	Reviewed revised amended complaint by JF; edits and revisions to same	0.700
964	962.0	10/02/12	JLN	Listened to entire QAD interview of AS	3.300
965	963.0	10/04/12	JLN	Reviewed stipulation and Protective order for Attorneys Eyes Only Signed by Judge Sweet	0.100
966	964.0	10/05/12	JLN	Replayed 2d hour of QAD interview of AS (re: downgrading based on index scime stats); took notes re sme.	1.800
967	965.0	10/08/12	JLN	Prepared AS for deposition	6.400
968	966.0	10/09/12	JLN	Continued prepping AS for upcoming dep on Oct. 11	7.200
969	967.0	10/09/12	JLN	Reviewed cover Jetter w/disclosures from City	0.100
970	968.0	10/10/12	JLN	Continued prepping AS for dep tomorrow	6.700
971	969.0	10/11/12	JLN	Defended AS at his deposition	7.100
972	970.0	10/11/12	JLN	Mtg. w/client to discuss his performance at today's deposition, and next steps for moving forward	1.800
973	971.0	10/11/12	JLN	Meeting with JF, GC, AS before depo	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
974	972.0	10/12/12	JLN	Reviewed City's disclosure of plaintiff's NYS Tax Returns 2004-2009; compared same w/tax records in file.	0.400
975	973.0	10/12/12	JLN	E-mail to JF re photos used at AS dep	0.100
976	974.0	10/12/12	JLN	Email to JF to City re allowing AS access to QAD report	0.100
977	975.0	10/13/12	JLN	Began listening to IAB interviews (Sgt. Duncan/Lt. Gough); took notes re same; created summary of most important points re: Halloween nt.	3.800
978	976.0	10/14/12	JLN	Listened to Chief Marino IAB interview; Side A and Side B; took notes re: same; prepared summary of most important points	3.200
979	977.0	10/15/12	JLN	Mtg w/GC & JF re: Marino's IAB interview & inconsistencies w/claims in UF 49 & Halloween Night recording	1.200
980	978.0	10/16/12	JLN	Created chart summarizing differences b/w Marino & Lauterborne in IAB interviews.	2.100
981	979.0	10/16/12	JLN	Listened to Caughey interview (Sides A & B); took notes re: same	1.600
982	980.0	10/16/12	JLN	Reviewed City's Priv. log (27 pgs); highlighted all claims that need to be challenged & the basis for doing so	1.600
983	981.0	10/16/12	JLN	Listened to IAB interview of Capt. Lauterborn; took notes re: same	1.400
984	982.0	10/17/12	JLN	Mtg w/JF & GC re: City's privilege claims and possible arguments/motions to defeat such claims highlights of Lauterborn interview & inconsistencies w/Marino & home invasion recording	3.300
985	983.0	10/17/12	JLN	Research re: City's "Deliberative Process" Privilege claim and best cases for defeating such a claim	3.200
986	984.0	10/17/12	JLN	Drafted letter re: opposing Mauriello's request for an additional 7 hrs to depose plaintiff.	2.400
987	985.0	10/17/12	JLN	Listened to interview w/Sgt. Hawkins; took notes re: same; compared & contrasted with Gough & Duncan.	2.100
988	986.0	10/17/12	JLN	Compiled list of all CD's from City Production - Still missing 3801/08	0.400
989	987.0	10/17/12	JLN	Discussion w/ GC & JF re City's refusal to allow AS to see QAD file	0.400
990	988.0	10/18/12	JLN	Drafted letter to Judge to modify AEO to allow AS access to confidential materials	3.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
991	989.0	10/18/12	JLN	Listened to interviews of Det. Yeager, Lt. Delafuente & Sgt. James; took notes re same.	3.200
992	990.0	10/18/12	JLN	Research re: City's Grand Jury privilege claim regarding ADA Jim Liander & Queens DA investigation into Schoolcraft matter	2.600
993	991.0	10/18/12	JLN	Mtg w/JF & GC re: City's Deliberative Process and Grand Jury privilege claims and best strategy for defeating same.	1.200
994	992.0	10/18/12	JLN	Listened to interview w/Assistant Chief Gerald Nelson; took notes re:same	0.700
995	993.0	10/18/12	JLN	Reviewed and edited motion permitting AS to review QAD material and opposing 3 days of depositions for AS	0.500
996	994.0	10/18/12	JLN	Read amended answer by City	0.100
997	995.0	10/19/12	JLN	Listened to IAB interviews for PO Mohabir, P.O. Gaspari, and P.O. Nowacki; took notes re same	2.900
998	996.0	10/19/12	JLN	Listened to IAB interviews of P.O. Reyes, P.O. Visconi; notes re same	1.800
999	997.0	10/19/12	JLN	Created chart summarizing differences b/w James & Yeager accounts of events at JHMC Med. ER.	1.700
1000	998.0	10/19/12	JLN	T/c w/ GC/JF re: Nelson, Caughey interviews	0.300
1001	999.0	10/19/12	JLN	Read answer filed by Isak Isakov	0.100
1002	1000.0	10/20/12	JLN	T/c w/GC & JF re: P.O. Nowacki acknowledging quota (15 c's per month) at 81 & possibly serving non-party subpoena on her for dep and discovering other possible w's at 81 re summons quota	0.900
1003	1001.0	10/21/12	JLN	listened to IAB interviews for Sgt. Scanlar, Lt. Crawford & Det. Barbara; took notes re same	1.800
1004	1002.0	10/22/12	JLN	Listened to IAB interview of Sgt. Glaudino (ESU), P.O. Sadowski and PAA Thomspen; took took notes re same	2.800
1005	1003.0	10/22/12	JLN	Listened to IAB CD of EMT Villaverde, Sgt. Conwell & P.O. Hurly; took notes re same	1.800
1006	1004.0	10/22/12	JLN	Listend to IAB interviews of DI Green (CO 104) & P.O. Deck; took notes re same.	1.600
1007	1005.0	10/22/12	JLN	Compared DI Green statements w/Mauriello's statements re: interaction with DI Green at scene and statements re: suspension	0.400
1008	1006.0	10/23/12	JLN	Listened to IAB CD interviews of Sgt Weber, P.O. Lewis and P.O. Reyes	2.300
1009	1007.0	10/23/12	JLN	Listened to IAB interviews of P.O.'s Astor & Santana; took notes re:	1.700

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1010	1008.0	10/23/12	JLN	Reviewed Ltr from S. Publicker responding to our letter to modify AEO to allow access by Plaintiff	0.100
1011	1009.0	10/24/12	JLN	Listened to IAB interview of E. Marshall, P.O. Louis, P.O. Miller and P.O. Itwaru; took notes re same	2.600
1012	1010.0	10/24/12	JLN	Listened to IAB interviews of Misty Schoolcraft (AS Sister); took notes re: same.	2.100
1013	1011.0	10/24/12	JLN	T/c w/AS & LS re their relationships with Misty Schoolcraft, her present location, last time of any contact; also gen. discussions about status of discovery and moving forward w/NYPD deps.	1.200
1014	1012.0	10/24/12	JLN	Motion to compel heard	0.500
1015	1013.0	10/24/12	JLN	Ltr from GC re: Plaintiff's Response to City's 2d Request for docs	0.100
1016	1014.0	10/25/12	JLN	Started review of IAB docs exchanged by City in latest production	1.700
1017	1015.0	10/25/12	JLN	Reviewed Judge Sweet's endorsement of letter filed Kretz, Jr	0.100
1018	1016.0	10/26/12	JLN	Continued reviewing IAB docs from latest City exchange; notes re same	4.250
1019	1017.0	10/26/12	JLN	Continued review of IAB documents; took notes of same.	3.800
1020	1018.0	10/27/12	JLN	Continued reviewing IAB docs exchanged by City	3.700
1021	1019.0	10/27/12	JLN	E-mail & follow up T/c w/ Eli Silverman re: case status and specific items for discovery	0.400
1022	1020.0	10/28/12	JLN	Further review of IAB docs; highlighted and took notes re: same	4.800
1023	1021.0	10/29/12	JLN	Finished review of IAB files; notes re same	4.400
1024	1022.0	10/29/12	JLN	Reviewed multiple Patrol Guide Procedures provided by City; highlighted and flagged most important provisions; took notes re: same	3.200
1025	1023.0	10/29/12	JLN	Reviewed City's production re: Vallone docs & correspondence from third parties, notes on same.	0.900
1026	1024.0	10/30/12	JLN	Reviewed Audio CDISprint Reports re: transmission made by NYPD on Oct. 31, 2009 -- 104 Pct; notes re same.	2.600
1027	1025.0	10/30/12	JLN	Reviewed Add'l Sprint Reports/Radio Transmissions from Nov. 1, 2009 from 104th Pct; notes re: same.	1.400
1028	1026.0	10/30/12	JLN	Reviewed Prop. Clerk Invoices & NYSPIN response message.	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1029	1027.0	10/31/12	JLN	Reviewed CD's re service attempts upstate; took notes re: same	1.800
1030	1028.0	10/31/12	JLN	T/c w/ AS re: CD's showing attempted service & radio transmissions & AS's guidance as to what info should be focused on in transmissions	1.200
1031	1029.0	11/02/12	JLN	Review of case law sent by Lee re: medical defendants' liability	0.400
1032	1030.0	11/02/12	JLN	E-mail to GC re: Schoolcraft phone numbers	0.100
1033	1031.0	11/07/12	JLN	E-mail w/ GC re: service of newly named defendants	0.100
1034	1032.0	11/11/12	JLN	Reviewed redacted responses to Schoolcraft justice website for inclusion in discovery responses	1.100
1035	1033.0	11/12/12	JLN	Drafted response to City 2nd request for documents	1.200
1036	1034.0	11/12/12	JLN	Phone call with LS and AS re: continuing atty client relationship	0.750
1037	1035.0	11/14/12	JLN	Tennation letter from AS	0.100
1038	1036.0	01/22/15	JLN	Call from LS re: reentering case as lead counsel	0.750
1039	1037.0	01/23/15	JLN	T/c with Adrian re: potentially taking over as lead counsel for trial	1.200
1040	1038.0	01/23/15	JLN	F/u call w/GC and JF about taking over case again	0.800
1041	1039.0	01/23/15	JLN	T/c w/GC re: potentially re-entering case & taking over for trial	0.700
1042	1040.0	01/23/15	JLN	Reviewed R. 68 from Oct. 2014	0.200
1043	1041.0	01/24/15	JLN	T/c w/AS and LS re: willingness to take over again and inclusion of C & F on our trial team	0.900
1044	1042.0	01/26/15	JLN	Discussion with AS & LS re my initial review of materials they sent me and the R. 68 offer, and the next steps for moving forward	1.400
1045	1043.0	01/27/15	JLN	Researched case law cited in City's Memo re: Unlawful entry section, 1st Amendment section and conspiracy section.	3.400
1046	1044.0	01/27/15	JLN	Researched case law re: MHL 9.39; 9.40; 9.41	2.800
1047	1045.0	01/27/15	JLN	Reviewed Plaintiff's Memo of law for Partial SJ; notes on same	0.750
1048	1046.0	01/27/15	JLN	Reviewed City Memo of Law for SJ; took notes re same	0.700
1049	1047.0	01/28/15	JLN	Legal research re: JHMC arg. for exclusion of emergency med. expert Dr. Halpren Ruder	1.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1050	1048.0	01/28/15	JLN	Reviewed all SMF ("Statement of Material Facts") exhibits in support of Mauriello's motion.	1.400
1051	1049.0	01/28/15	JLN	Reviewed JHMC motion for SJ	0.800
1052	1050.0	01/28/15	JLN	Reviewed Mauriello's motion for SJ	0.600
1053	1051.0	01/28/15	JLN	Reviewed plaintiff's motion to Amend Second complaint & Reply Mem. re: same	0.400
1054	1052.0	01/29/15	JLN	Reviewed Dr. Bernier's motion for summary judgment; notes on same.	0.600
1055	1053.0	01/29/15	JLN	Reviewed Isakov's motion for summary judgment; notes on same	0.500
1056	1054.0	01/30/15	JLN	Reviewed Callan Declaration & Exhibits in Support of Motion	1.600
1057	1055.0	01/30/15	JLN	Telecon w/ plaintiff and Larry Schoolcraft re: case status, summary of w/ deposition testimony and taking over for Nat Smith	0.750
1058	1056.0	01/31/15	JLN	Reviewed City's Revised Memo of Law for Partial SJ; reviewed City's Local R. 56.1 Statement	1.100
1059	1057.0	01/31/15	JLN	Reviewed revised Suppl Decl. of RS adding add'l docs in support of City SJ motion	0.200
1060	1058.0	02/01/15	JLN	Rev'd Plaintiff's exhibits in support of SJ motion; notes re: same	2.400
1061	1059.0	02/01/15	JLN	Reviewed Dep. of Sgt. James	1.900
1062	1060.0	02/01/15	JLN	Reviewed Dep. of Lt. Broschart.; notes on same	1.200
1063	1061.0	02/01/15	JLN	Read Curtis Boston Dep.; notes on same	0.600
1064	1062.0	02/01/15	JLN	Read Rasheena Huffman Dep.; took notes re: same	0.500
1065	1063.0	02/02/15	JLN	Reviewed Dep. of Sgt. Sawyer; notes on same	1.700
1066	1064.0	02/02/15	JLN	Further discussion w/ GC & JF rejoining team to represent AS for trial	1.300
1067	1065.0	02/02/15	JLN	Reviewed Dep. of Lt. Hanlon; cross-referenced PX 67 (IAB interview)	0.900
1068	1066.0	02/02/15	JLN	Reviewed Dep. of Dr. Halpren Rudit	0.600
1069	1067.0	02/04/15	JLN	Reviewed 1st 112 of Mauriello's dep; took notes re: same	1.700
1070	1068.0	02/04/15	JLN	T/c AS & LS re: case status, SJ motions and trial strategy and next steps for moving forward	1.100
1071	1069.0	02/04/15	JLN	T/c GC & JF re: pending trial strategy and misc.evidentiary issues, and setting up meeting to discuss same in greater detail	0.900
1072	1070.0	02/04/15	JLN	Review of E-mail from AS re: QAD memo from Sgt. Scott	0.400

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1073	1071.0	02/04/15	JLN	Reviewed docket sheet	0.300
1074	1072.0	02/04/15	JLN	Discussion w/ JF & GC re scheduling a meeting w/ Nat Smith ("NS") to discuss case status and trial prep	0.250
1075	1073.0	02/04/15	JLN	E-mail from AS to NS and entire team re: formally stating that we have been reinstated as lead trial counsel	0.100
1076	1074.0	02/04/15	JLN	E-mail from NS acknowledging Adrian Schoolcraft e-mail and suggesting mtg of entire team	0.100
1077	1075.0	02/05/15	JLN	T/c w. GC re: updates on discussion with Nat Smith, records and transcripts provided by Adrian and goal to streamline case for trial	0.500
1078	1076.0	02/06/15	JLN	Reviewed Eterno's deposition; took notes re: same	2.800
1079	1077.0	02/06/15	JLN	Reviewed 2nd amended complaint for refreshing mem. regarding core factual allegations, notes re: same	0.700
1080	1078.0	02/07/15	JLN	Reviewed all remaining Rule 56.1 Statements and Declarations; took notes re: same and prepared list of all potential exhibits all witnesses, all possible motions in limine based on said review	3.400
1081	1079.0	02/08/15	JLN	Cont'd review of 56.1 statements and supporting docs	3.700
1082	1080.0	02/08/15	JLN	Reviewed Silvennan's deposition; took notes re same	3.200
1083	1081.0	02/09/15	JLN	T/c AS & LS regarding negative articles in Daily News regarding AS last week and steps moving forward	0.500
1084	1082.0	02/09/15	JLN	T/c GC re: issues that came up in Adrian's Dep and Larry's Dep and possible motions <i>in limine</i>	0.400
1085	1083.0	02/09/15	JLN	E-mail exchange with NS regarding setting up meeting and getting Broschart Dep and Exhibits from Maurielloi Marino Dep	0.100
1086	1084.0	02/10/15	JLN	Meeting w/ GC & JF regarding global trial strategy, witnesses to be called (or not called), exhibits to use, Rule 68 offer and next steps for moving forward.	3.500
1087	1085.0	02/10/15	JLN	E-mail correspondence w/AS, GC re: Defendants request to adjourn trial	0.200
1088	1086.0	02/10/15	JLN	E-mail correspondence w/AS, GC re: Defendants request to adjourn trial	0.200

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1089	1087.0	02/11/15	JLN	Started review of deposition exhibits	3.400
1090	1088.0	02/11/15	JLN	T/c AS and LS regarding trial adjournment request by City, strategy for dealing with multiple issues raised by defendants in dep of plaintiff and overall approach to the case against NYPD	1.400
1091	1089.0	02/11/15	JLN	Review of witness/exhibit list from JF and discuss with GC	1.300
1092	1090.0	02/11/15	JLN	Reviewed JHMC memo in opp to SJ	0.300
1093	1091.0	02/11/15	JLN	Review of E-mail from AS regarding trial	0.100
1094	1092.0	02/12/15	JLN	Continued review of deposition exhibits	3.750
1095	1093.0	02/12/15	JLN	T/c NS and JL regarding scheduling motion practice, procedural history, and setting up meeting for next week to discuss exhibits, docs, and trial strategy	0.500
1096	1094.0	02/12/15	JLN	E-mail exchange with NS regarding schedule change for trial and clients consent.	0.100
1097	1095.0	02/12/15	JLN	T/c client regarding update on schedule, new materials he sent me, overall trial strategy	0.100
1098	1096.0	02/13/15	JLN	Meeting w/GC to discuss which witnesses I would be responsible for at trial; general trial strategy	1.300
1099	1097.0	02/13/15	JLN	Reviewed Bernier Opp to PH. SJ motion	0.500
1100	1098.0	02/13/15	JLN	Reviewed City Memo of Law in opp to Pl. Mot; took notes re same	0.400
1101	1099.0	02/13/15	JLN	Reviewd Mauriello Aff. In Opp; notes on same	0.300
1102	1100.0	02/13/15	JLN	Reviewed JHMC Mem. of Law in opp to Pl. mot for SJ	0.300
1103	1101.0	02/13/15	JLN	T/c NS regarding missing evidence (Appeal file, EIU file, locker contents & Digital recorder)	0.300
1104	1102.0	02/13/15	JLN	Review of letter by Ryan Shaffer requesting more time for reply and 2 week adjournment of trial	0.100
1105	1103.0	02/13/15	JLN	Review of order setting trial date to April 20, 2015	0.100
1106	1104.0	02/14/15	JLN	Reviewed exhibit books volumes 1-3; read and highlight Dept. Adv. Interviews or Marino and Mauriello	4.900
1107	1105.0	02/14/15	JLN	Began review of Pl. Combined Opposition memo to City's motion, Mauriello's motion; made bullet point summary of salient points/issues	2.600

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1108	1106.0	02/14/15	JLN	Finished review of Plaintiff omnibus response to all motions	1.800
1109	1107.0	02/15/15	JLN	Cont'd review of deposition exhibits	3.200
1110	1108.0	02/15/15	JLN	Reviewed and highlight Dr. Lamstein Dep; took notes re: same	3.100
1111	1109.0	02/15/15	JLN	Reviewed handwritten notes of Dr. Lamstein; took notes re: same	2.900
1112	1110.0	02/15/15	JLN	Reviewed Mauriello's Mem. in Opp. To Pl. Mot. For SJ	0.500
1113	1111.0	02/16/15	JLN	Began drafting case summary of all relevant and important facts for use at trial; began developing outline with bullet points for opening and closings, added citations for proof at trial	7.600
1114	1112.0	02/17/15	JLN	Finished review of deposition exhibits	1.800
1115	1113.0	02/17/15	JLN	T/c AS & LS regarding list of witnesses, JPTO, filing deadlines, meeting w/ NS this Friday and gen. trial strategy	0.800
1116	1114.0	02/17/15	JLN	E-mail AS regarding adjourned trial date and proposed meeting with NS and rest of trial than this Friday	0.100
1117	1115.0	02/17/15	JLN	E-mail GC & JF regarding new MIL for Queens DA findings and meeting with NS this Friday	0.100
1118	1116.0	02/18/15	JLN	Continued working on outline, inserting specific facts with citations to the record	2.100
1119	1117.0	02/18/15	JLN	T/c GC regarding meeting for Friday, important testimony from PAA Boston and issues to cover in the plaintiffs direct (re: downgrading and MIL regarding Johnstown Social Services)	0.600
1120	1118.0	02/19/15	JLN	Reviewed and tabbed w/ notes Mauriello Dep pp. 4/06/71	2.700
1121	1119.0	02/19/15	JLN	Reviewed IAB summary of witness statements; took notes regarding same	1.800
1122	1120.0	02/19/15	JLN	Reviewed Lt. Caughey's Dept Advocate testimony; took notes regarding same	1.400
1123	1121.0	02/19/15	JLN	T/c GC regarding best and worst pts from Huffman, Adrian's handling of downgrading issue at his deposition, fit for duty reports, and general issues that might come up at tomorrow's meeting	0.500
1124	1122.0	02/19/15	JLN	E-mailed GC summary of deposition section and noted it for prep of AS at trial	0.300
1125	1123.0	02/19/15	JLN	E-mail exchange with GC regarding points in Mauriello's motion papers	0.100

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1126	1124.0	02/20/15	JLN	Meeting w/ NS and JL regarding overall trial strategy and specific evidentiary issues and motions <i>in limine</i> , verdict sheet and <u>Monell</u> theories against JHMC and the City and allocation of trial responsibilities	3.500
1127	1125.0	02/20/15	JLN	Further revised and edited proposed list of exhibits and witnesses; E-mailed same to NS for today's meeting	1.600
1128	1126.0	02/20/15	JLN	Meeting with GC & JF prior to today's meeting with NS to go over legal issues to discuss	1.000
1129	1127.0	02/20/15	JLN	T/c with AS & LS re: overview of today's meeting and strategic issues that came up	0.750
1130	1128.0	02/20/15	JLN	T/c GC regarding summary of today's meeting	0.200
1131	1129.0	02/20/15	JLN	Read E-mail from AS regarding indemnification for Mauriello's counterclaim	0.100
1132	1130.0	02/21/15	JLN	Continued working on developing case summary of all most imp't facts for the case; incorporated facts into opening outline	3.700
1133	1131.0	02/21/15	JLN	Started outline of crosses for Lauterborn, Marino and Mauriello; moved relevant case facts into each cross outline; started adding relevant facts from recordings of home invasion and IAB interviews.	3.600
1134	1132.0	02/22/15	JLN	Started to develop specific points using documents for Lauterborn cross; continued cross reference Dept. Adv. tx and Dep tx	3.900
1135	1133.0	02/22/15	JLN	Continued developing opening outline and global case summary	2.600
1136	1134.0	02/22/15	JLN	Read and highlighted transcript of Lt. Joe Ferrara; took notes regarding same	1.600
1137	1135.0	02/22/15	JLN	E-mail exchange AS regarding client's request for indemnification from city for Mauriello's counterclaim	0.200
1138	1136.0	02/23/15	JLN	Continued working on global case summary; focused on client's background in Navy and employment with NYPD, then arrival of Mauriello and pressure for numbers	1.700
1139	1137.0	02/23/15	JLN	Reviewed second set of filings by all defendants (responses); took notes re: same	1.300
1140	1138.0	02/23/15	JLN	Follow up t/c with AS & LS re: summary of meeting with NS, points of agreement and disagreement, overall trial strategy	1.100
1141	1139.0	02/23/15	JLN	T/c GC regarding transcription of IAB tapes and obtaining remaining tapes from Smith today	0.100

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1142	1140.0	02/24/15	JLN	Continued adding critical facts to case summary and opening statement	2.700
1143	1141.0	02/24/15	JLN	Continued drafting preliminary stages of Mauriello cross, focusing on false statements in 1st and second affidavits	1.800
1144	1142.0	02/24/15	JLN	Review of Eterno's dep; took notes regarding same	1.600
1145	1143.0	02/24/15	JLN	Reviewed Mauriello's EBT tx in Floyd; took notes re: same	1.400
1146	1144.0	02/24/15	JLN	Continued working on opening and case summary, continued adding critical facts to case summary	1.100
1147	1145.0	02/24/15	JLN	E-mail to JF re motion <i>in limine</i> issues to be covered	0.200
1148	1146.0	02/24/15	JLN	E-mail exchange with GC & JF regarding MIL issues presented by Eterno's testimony (and hypos asked by City)	0.100
1149	1147.0	02/24/15	JLN	E-mail exchange with NS regarding additional discipl. Records for Mauriello and Marino	0.100
1150	1148.0	02/25/15	JLN	Reviewed Marino's Dept. Adv. Trial Tx; highlight same for extraction of excerpts onto my outline	1.100
1151	1149.0	02/25/15	JLN	Highlighted Mauriello's Dept Adv. testimony for incorporation into cross x outline	0.700
1152	1150.0	02/25/15	JLN	Reviewed dep of 30 (b) (6) witness Valenti, highlighted same	0.600
1153	1151.0	02/25/15	JLN	Reviewed Lauterborn excerpts from Dept. Adv. transcript; added to cross x outline	0.400
1154	1152.0	02/25/15	JLN	Reviewed timeline of events prepared by AS; cross-referenced with our own time line; made adjustments accordingly.	0.400
1155	1153.0	02/25/15	JLN	E-mail correspondence re: major points for Valenti w/GC	0.300
1156	1154.0	02/25/15	JLN	Reviewed AEO & confidentiality order, signed same for NS office	0.200
1157	1155.0	02/25/15	JLN	E-mail exchange with client regarding his mauriello/kress time line	0.100
1158	1156.0	02/25/15	JLN	E-mail exchange with GC regarding highlights from Valenti dep	0.100
1159	1157.0	02/26/15	JLN	Worked on developing additional points for Marino cross	1.300
1160	1158.0	02/26/15	JLN	Meeting w/GC and JF re: outstanding items we need from trial from NS	1.100

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1161	1159.0	02/26/15	JLN	Read e-mail from NS regarding new 2d Cir. 1st Amend. Decision (Matthews); read & highlighted decision	0.600
1162	1160.0	02/26/15	JLN	T/c GC regarding plaintiff's conversation with Huffinan, recording of same and making transcripts of other recordings.	0.400
1163	1161.0	02/26/15	JLN	Phone call w/GC and Merry Soeto re: IAB and DAO recording	0.300
1164	1162.0	02/26/15	JLN	E-mail conespodence w/NS and GC re: IAB recorded interviews	0.200
1165	1163.0	02/26/15	JLN	Sent client summary of new <u>Matthews</u> decision and its impact on our case	0.200
1166	1164.0	02/26/15	JLN	Sent GC Summary of most important pts in <u>Matthews</u> to ensure that those points are included in Adrian's direct	0.200
1167	1165.0	02/26/15	JLN	T/c with Meny (NS office) and follow up E-mail exchange regarding obtaining cd's from Sgt. Scott's IAB interview	0.200
1168	1166.0	02/27/15	JLN	T/c with JF regarding following up with NS, IAB v. DAT transcripts, calling additional witnesses like Nelson and Valenti and Yeager	0.600
1169	1167.0	02/27/15	JLN	E-mail conespodence with NS and GC re: dep summaries, index of all exhibits, potential trial exhibits	0.400
1170	1168.0	02/27/15	JLN	E-mail exchange to NS requesting review of our exhibit list (as compiled by JN & GC) re global "universe" of all exhibits needed for trial, and made additional requests for items that will facilitate trial prep.	0.200
1171	1169.0	02/27/15	JLN	Reviewed preliminary list of exhibits and Indexes provided by NS	0.200
1172	1170.0	02/27/15	JLN	E-mail exchange with NS regarding following up on Exhibit lists, Index of CD's, Index of exhibits and EBT summaries	0.100
1173	1171.0	02/28/15	JLN	Revised cross-x for Mauriello adding sections from Dept. Adv. Transcript	2.800
1174	1172.0	02/28/15	JLN	Revised Marino cross-x draft incorporating in testimony from Dept. Adv. Transcript	2.750
1175	1173.0	02/28/15	JLN	Revised Lauterbom cross-x draft, adding all sections and points from Dept. Adv. Transcript	2.600
1176	1174.0	03/01/15	JLN	Continued working on global case summary and opening statement outline	4.200
1177	1175.0	03/01/15	JLN	Reviewed and highlighted Mauriello EBT Volume I; took notes re: same	2.900

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1178	1176.0	03/01/15	JLN	Reviewed AS dep transcript Vol. I, took notes re: same	2.900
1179	1177.0	03/01/15	JLN	Reviewed and highlighted EBT of Captain Trainor; Cross referenced E-mails referred to in deposition	2.200
1180	1178.0	03/01/15	JLN	Reviewed NYPD patrol guidelines for AWOL procedures and EDP's; took notes regarding same	0.700
1181	1179.0	03/02/15	JLN	Reviewed AS dep Vol. II, took notes and prepared summary of most important issues raised	3.400
1182	1180.0	03/02/15	JLN	Continued adding to case summary and opening outline	3.200
1183	1181.0	03/03/15	JLN	Reviewed final volume of AS transcript; notes and bullet point summary of same	2.800
1184	1182.0	03/03/15	JLN	Worked on Mauriello cross-x incorporating sections from Volume II of deposition	1.100
1185	1183.0	03/03/15	JLN	T/c GC regarding IAB tapes, strategy for plaintiff direct and for use of home invasion audio in opening	0.500
1186	1184.0	03/04/15	JLN	Finished review of Bernier's dep; notes and prepared summary of most important points for use in opening.	3.200
1187	1185.0	03/04/15	JLN	Started reviewed of Bernier's dep. highlighted and took notes re same	2.100
1188	1186.0	03/04/15	JLN	Worked on adding deposition testimony into Lauterborn cross	1.600
1189	1187.0	03/04/15	JLN	Reviewed dep. of Dr. Patel	0.900
1190	1188.0	03/04/15	JLN	T/c with GC regarding Huffman cross-x points, and using Valenti deposition testimony to refute same and reassigning Sgt. James cross and obtaining a draft of direct for plaintiff from NS	0.500
1191	1189.0	03/04/15	JLN	Phone and E-mail w/GC re: witness list	0.300
1192	1190.0	03/04/15	JLN	E-mail to Scott Korenbaun ("SK") regarding jury charges, including 1 st amended complaint; subst. due process, malpractice and MH 9.39	0.200
1193	1191.0	03/04/15	JLN	E-mail exchange GC regarding Velez PBA transcript, copy of same	0.100
1194	1192.0	03/04/15	JLN	E-mail exchange with GC regarding identity of other IAB investigator	0.100
1195	1193.0	03/04/15	JLN	E-mail to GC with revised witness list	0.100
1196	1194.0	03/05/15	JLN	Continued working on cross of Lauterborn	3.750
1197	1195.0	03/05/15	JLN	Continued working on Lauerborn cross-x	3.600
1198	1196.0	03/05/15	JLN	Continued working on Lauterborn cross	2.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1199	1197.0	03/05/15	JLN	Reviewed veritext transcript for Lauterborn and LS	0.300
1200	1198.0	03/06/15	JLN	Continued working on Marino cross; all relevant text from deposition incorporated into cross	4.200
1201	1199.0	03/06/15	JLN	Continued working on Marino cross	3.700
1202	1200.0	03/06/15	JLN	Continued working on Marino cross	1.600
1203	1201.0	03/06/15	JLN	Discussion w/ JF & GC re proposed witnesses	0.600
1204	1202.0	03/06/15	JLN	E-mail exchange with client and LS regarding witness list and case update	0.100
1205	1203.0	03/07/15	JLN	Continued working on case summary and opening outline, incorporated all important facts for same	3.250
1206	1204.0	03/07/15	JLN	Reviewed veritext transcriptions of home invasion, Lauterborn call, IAB interview of Carter, Huffman and Det. Yeager; took notes re: same	2.600
1207	1205.0	03/08/15	JLN	Started review of Dr. Isakov's deposition; cross-referenced with his notes in the chart; made summary of salient points	2.900
1208	1206.0	03/08/15	JLN	Continued reviewing Dr. Isakov's dep and extracting important points for use in opening statement.	2.400
1209	1207.0	03/08/15	JLN	Reviewed transcripts of Dr. Dhar and Dr. Lwin; took notes re: same	1.900
1210	1208.0	03/09/15	JLN	Review of plaintiffs consolidated 56.1	1.000
1211	1209.0	03/09/15	JLN	T/c client regarding case strategy, witnesses who will be called, Queens DA findings and investigation, overall strategy for trial and next steps for moving forward	0.900
1212	1210.0	03/09/15	JLN	E-mails to NS regarding missing IAB tapes, Marino confidentiality section of deposition; adding exhibits to global trial list, and revising list of trial assignments for each member of team	0.400
1213	1211.0	03/09/15	JLN	T/c NS regarding R. 56 admissions; impressions of Lamstein; striking Lamstein affidavit; IAB recordings on Marino/Lauterborn, and meeting on Thursday	0.400
1214	1212.0	03/09/15	JLN	Compiled List of NYPD witnesses for trial and assigned all witnesses to team for trial; e-mailed copy of same to team	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1215	1213.0	03/09/15	JLN	T/c w. GC regarding E-mails sent to Smith and setting up meeting with him and his trial team	0.300
1216	1214.0	03/10/15	JLN	Continued working on Mauriello cross-x	1.800
1217	1215.0	03/10/15	JLN	Reviewed NS' Rule 56.1 Statement global summary of all facts admitted; took notes re: same	1.400
1218	1216.0	03/10/15	JLN	T/c with AS and LS regarding Lamstein, Seroquil, Velez PBA hearing and admissibility, ESU appearance and actions, Sawyer and James actions in ER	0.750
1219	1217.0	03/10/15	JLN	T/c LS follow up on call and issues that arose in Larry's deposition	0.400
1220	1218.0	03/11/15	JLN	Continued working on Mauriello cross-x	3.700
1221	1219.0	03/11/15	JLN	Continued working on Mauriello cross-x	2.600
1222	1220.0	03/11/15	JLN	E-mail exchange with NS regarding Mauriello meds & Marino steroid trial	0.100
1223	1221.0	03/11/15	JLN	E-mail w/NS and GC re: exhibits and meeting	0.100
1224	1222.0	03/12/15	JLN	Mauriello cross-x continued	3.500
1225	1223.0	03/12/15	JLN	Meeting w/ GC, JF, NS, and JL re trial, motions	2.400
1226	1224.0	03/12/15	JLN	Meeting w/ GC to follow up with specific issues discussed at today's meeting	0.750
1227	1225.0	03/13/15	JLN	Reviewed Marino Disc. file, Comp stat docs regarding Mauriello and Marino, amnesty program docs, crime reporting handbook	3.750
1228	1226.0	03/13/15	JLN	Review of proposed jury instructions from SK	0.500
1229	1227.0	03/13/15	JLN	E-mail to GC re: case theory	0.200
1230	1228.0	03/14/15	JLN	Added all relevant parts of home invasion into Lauterborn cross-x also added appeal meeting and March 2009 conversation into cross	2.750
1231	1229.0	03/14/15	JLN	Continued revising and editing Lauterborn cross	2.750
1232	1230.0	03/14/15	JLN	Added relevant quotes from home invasion into Marino cross-x; continued revising & editing Marino cross	2.400
1233	1231.0	03/15/15	JLN	Continued Revising and editing Lauterborn cross	3.900
1234	1232.0	03/15/15	JLN	Continued revising and editing Lauterborn cross	3.750
1235	1233.0	03/16/15	JLN	Continued revising and editing Mauriello cross	3.100
1236	1234.0	03/17/15	JLN	Reviewed appeal meeting and also IAB interview of Gough, Sawyer and Dunch	1.900
1237	1235.0	03/17/15	JLN	Continued working on Lauterborn cross	1.600
1238	1236.0	03/17/15	JLN	Review of interview memo of Stretmoyers	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1239	1237.0	03/18/15	JLN	Continued working on Lauterborn cross	1.700
1240	1238.0	03/18/15	JLN	Reviewed facts in SJ motions for use in opening outline; took notes regarding same	1.400
1241	1239.0	03/18/15	JLN	E-mail w/GC re Schoolcraft direct	0.200
1242	1240.0	03/18/15	JLN	E-mail exchange with NS regarding subpoenas and points for Lamstein cross	0.100
1243	1241.0	03/19/15	JLN	Continued reviewing PES records; reviewed file and handwritten notes of Dr. Lamstein; took notes re: same	3.700
1244	1242.0	03/19/15	JLN	Started review of NYPD Psychological Evaluation Section ("PES") file for AS; notes on same.	2.100
1245	1243.0	03/19/15	JLN	Continued work on Mauriello cross	1.700
1246	1244.0	03/19/15	JLN	Review of NS verdict sheet; made edits revisions to same	0.400
1247	1245.0	03/19/15	JLN	E-mail comments and feedback re: verdict sheet	0.300
1248	1246.0	03/19/15	JLN	E-mail exchange with GC regarding Jamaica	0.100
1249	1247.0	03/20/15	JLN	Continued working on Mauriello cross-x	4.600
1250	1248.0	03/20/15	JLN	Continued working on Mauriello cross	2.900
1251	1249.0	03/20/15	JLN	E-mail exchange with rest of team regarding city's proposed adjournment of trial and other misc issues	0.200
1252	1250.0	03/22/15	JLN	Continued working on Mauriello cross	3.700
1253	1251.0	03/22/15	JLN	Continued working on Mauriello cross	2.600
1254	1252.0	03/22/15	JLN	Mauriello cross-x continued	2.100
1255	1253.0	03/22/15	JLN	Review of NS letter re Lamstein and E-mailed comments	0.400
1256	1254.0	03/23/15	JLN	Continued working on Mauriello cross	3.900
1257	1255.0	03/23/15	JLN	Meeting with GC regarding important points of Sgt/ James and Sgt. Sawyer's testimony	0.400
1258	1256.0	03/23/15	JLN	Phone call w/GC re: James call to Lauterborn from hospital	0.400
1259	1257.0	03/23/15	JLN	Phone correspondence w/ GC re: AS discussion of Home Invasion	0.300
1260	1258.0	03/23/15	JLN	E-mail correspondence re: Schoolcraft film	0.200
1261	1259.0	03/23/15	JLN	E-mail exchange with NS regarding trial exhibit list and verdict sheet (uncluding JL's marshalling of facts)	0.200
1262	1260.0	03/23/15	JLN	Locate and send portions of AS deposition testimony to help with GC crosses	0.200
1263	1261.0	03/23/15	JLN	Review of Kretz supplemental interrogatories re Schoolcraft movie	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1264	1262.0	03/23/15	JLN	E-mail exchange with NS with NS regarding Kretz's new interrogatories for Adrian regarding Schoolcraft movie	0.100
1265	1263.0	03/23/15	JLN	E-mail to GC portion ofLauterbom cross re: Sgt. James	0.100
1266	1264.0	03/24/15	JLN	Continued working on Mauriello cross	3.900
1267	1265.0	03/24/15	JLN	Continued work on Mauriello cross	1.700
1268	1266.0	03/24/15	JLN	Meeting w/ GC discussing role of Sadowsky, Miller and Sawyer; Also, QAD Huffman interview and relation to Mauriello and general trial strategy	0.600
1269	1267.0	03/24/15	JLN	E-mail exchange with rest of team regarding exhibit list and concerns over IAB file and impeachment documents	0.200
1270	1268.0	03/24/15	JLN	E-mail exchange with SK regarding issues requiring special jury charges	0.200
1271	1269.0	03/25/15	JLN	Continued working on Mauriello cross-x (attack counterclaim)	3.750
1272	1270.0	03/25/15	JLN	Continued working on Mauriello cross-x (attack counterclaim)	2.900
1273	1271.0	03/25/15	JLN	Continued working on Mauriello cross-x	2.100
1274	1272.0	03/25/15	JLN	T/c with clients regarding strategy for trial and next steps for moving forward	0.900
1275	1273.0	03/25/15	JLN	E-mail correspondence w/GC and NS regarding regular meetings	0.200
1276	1274.0	03/25/15	JLN	E-mail exchange with team regarding Yeager (retired) and setting up meeting for Fridays	0.100
1277	1275.0	03/26/15	JLN	Finished cross-x outline of Mauriello (counterclaim)	4.600
1278	1276.0	03/26/15	JLN	Continued cross-x of Mauriello	3.900
1279	1277.0	03/26/15	JLN	Reviewed Forest Hill Hospital records and records from Dr. Sure; took notes regarding same; forwarded same to GC	1.400
1280	1278.0	03/26/15	JLN	E-mail correspondence w/AS re Kretz letter	0.100
1281	1279.0	03/26/15	JLN	E-mail to GC re: medical records	0.100
1282	1280.0	03/26/15	JLN	Review of Kretz letter re film	0.100
1283	1281.0	03/26/15	JLN	Reviewed letter from Kress regarding Supplemental Interrogatories on Schoolcraft movie and e-mail exchange regarding same	0.100
1284	1282.0	03/27/15	JLN	T/c with NS, JL and GC regarding multiple issues related to prepping for trial, including exhibits, experts, jury charges, voir dire, speaking to landlord, prepping client and comp stat clips	1.900
1285	1283.0	03/27/15	JLN	Reviewed and edited opening statements	1.700

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1286	1284.0	03/27/15	JLN	Phone conference with GC, NS, JL	1.000
1287	1285.0	03/27/15	JLN	Various E-mail correspondence GC and NS re: meeting and missing IAB Lauterborn recording	0.400
1288	1286.0	03/27/15	JLN	Review of Sgt. Chu and Scott memo	0.300
1289	1287.0	03/27/15	JLN	E-mail correspondence between GC and Merry Soete re: AS Audio Clips	0.100
1290	1288.0	03/27/15	JLN	E-mail to GC regarding conference call for assorted trial issues today	0.100
1291	1289.0	03/27/15	JLN	T/c GC regarding preparing for conference call with NS today and using Veritext software	0.100
1292	1290.0	03/28/15	JLN	Reviewed highlighted sections from Lamstein Dep.; cross-referenced with PES file and Lamstein notes on Schoolcraft	3.200
1293	1291.0	03/28/15	JLN	Reviewed GC's rough draft of AS direct	1.400
1294	1292.0	03/28/15	JLN	Reviewed narrative report and records of Dr. Steven Luell; cross referenced with JHMC findings re: mental health of AS.	0.600
1295	1293.0	03/28/15	JLN	Reviewed IAB Summary on Dr. Lamstein's interview; took notes re: same	0.400
1296	1294.0	03/29/15	JLN	Reviewed narrative reports of defense experts Dr. Levy, Dr. Tancredi, Dr. Dolger, & Dr. Dowling; prepared bullet point summary of key points from each report; cross-referenced with plaintiff expert, Dr. Lubit's report.	4.200
1297	1295.0	03/29/15	JLN	Reviewed Veritext transcripts and recordings from Home Invasion, began creating audio clips for trial	1.750
1298	1296.0	03/29/15	JLN	Further reviewed Dr. Sure's records and records from Forest Hills Hospital; cross referenced with notes in PESLamstein file.	1.400
1299	1297.0	03/29/15	JLN	Reviewed Dr. Halpren's Ruder's report; highlighted same	0.300
1300	1298.0	03/30/15	JLN	Reviewed, revised and edited Lauterborn cross-x	3.700
1301	1299.0	03/30/15	JLN	Added sections to opening statement	1.900
1302	1300.0	03/30/15	JLN	Phone call w/GC re: City's request to adjourn	0.300
1303	1301.0	03/30/15	JLN	T/c GC & JF regarding admissibility of tape recorded statements of persons interviewed by IAB	0.300
1304	1302.0	03/30/15	JLN	T/c JF regarding motion in limine issues and recent filings by NS regarding striking affidavit and request for conference	0.300
1305	1303.0	03/30/15	JLN	E-mail from city re amendment opposition	0.100
1306	1304.0	03/30/15	JLN	E-mail from GC w/AB report	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1307	1305.0	03/31/15	JLN	Continued working on various new sections on opening statement outline	3.400
1308	1306.0	03/31/15	JLN	Continued highlighting, revising and editing Lauterborn cross, integrated newly found info from 2nd IAB interview	2.800
1309	1307.0	03/31/15	JLN	E-mail correspondence w/NS and GC re trial witnesses and exhibits	0.200
1310	1308.0	03/31/15	JLN	E-mail exchanges with GC and NS regarding list of trial exhibits, list of trial assignments, verdict sheet from Marshall and handling Valenti	0.200
1311	1309.0	04/01/15	JLN	Continued working on opening statement	2.500
1312	1310.0	04/01/15	JLN	T/c with GC regarding important points from Valenti and Broschart and additional grounds for impeaching Huffman and difference between "administrative leave" and "lost time"	0.500
1313	1311.0	04/01/15	JLN	E-mail exchange regarding setting up meeting for tomorrow with trial team	0.100
1314	1312.0	04/01/15	JLN	E-mail re: meeting w/GC, and NS team	0.100
1315	1313.0	04/02/15	JLN	Working on revising and edits Marino's cross-x	3.700
1316	1314.0	04/02/15	JLN	Resumed working on Marino cross-x	2.600
1317	1315.0	04/02/15	JLN	Meeting with GC and NS team	1.900
1318	1316.0	04/02/15	JLN	Continued work on opening statement	1.700
1319	1317.0	04/02/15	JLN	Drafted and sent follow up E-mails w/NS team and GC after meeting re: exhibits	0.500
1320	1318.0	04/02/15	JLN	T/c with JF regarding several issues in motion <u>in limine</u> and admissibility of Marino's steroid investigation under R. 608 (b)	0.500
1321	1319.0	04/02/15	JLN	Follow up t/c with JF locating does relevant for motion <u>in limine</u> , including plaintiff IAB/CCRB transcripts, Affidavits for spoliation, and Eterno deposition testimony	0.300
1322	1320.0	04/02/15	JLN	Reviewed proposed exhibit list from NS in prep for today's meeting. Also compiled own list of subject for discussing	0.300
1323	1321.0	04/02/15	JLN	T/c with GC regarding Lauterborn's second PG in September 2010 and getting recordings of same	0.100
1324	1322.0	04/02/15	JLN	T/c with JF regarding area of expertise and scope of testimony for Eterno	0.100
1325	1323.0	04/03/15	JLN	E-mail rough draft from JF and reviewed	4.400
1326	1324.0	04/03/15	JLN	Continued working on Marino's cross-x outline	4.250
1327	1325.0	04/03/15	JLN	Worked on several more sections of opening statement	3.700

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1328	1326.0	04/03/15	JLN	Reviewed Final IAB report; took notes re: same	2.400
1329	1327.0	04/03/15	JLN	Worked on opening statement; adding new section on QAD findings	1.750
1330	1328.0	04/03/15	JLN	Reviewed plaintiff's monthly activity reports and created chart summarizing annual totals for all categories for use at trial	0.700
1331	1329.0	04/03/15	JLN	T/c GC regarding important point from Broschart testimony and real reason for entering apartment (illegal search and destroy evidence)	0.300
1332	1330.0	04/03/15	JLN	Review of revised SK jury instructions	0.200
1333	1331.0	04/03/15	JLN	T/c with JF regarding progress on motion <u>in limine</u> and clarification of certain factual issues	0.200
1334	1332.0	04/03/15	JLN	E-mail to GC including AS performance report	0.100
1335	1333.0	04/04/15	JLN	Reviewed revised verdict sheet and revised exhibit list sent by NS	0.400
1336	1334.0	04/05/15	JLN	Continued working on Marino cross	4.400
1337	1335.0	04/05/15	JLN	E-mail correspondence w/GC and NS re revised exhibit list	0.200
1338	1336.0	04/05/15	JLN	E-mail to JF re edits to motion	0.200
1339	1337.0	04/05/15	JLN	E-mail to GC including AS W2's	0.100
1340	1338.0	04/06/15	JLN	Continued working on Marino cross-x outline	3.800
1341	1339.0	04/06/15	JLN	Continued working on opening statement, trying to master parts of 1st A. Claim and AS stay in hospital	1.750
1342	1340.0	04/06/15	JLN	Reviewed JF MIL; edits to same	1.600
1343	1341.0	04/06/15	JLN	T/c with NS & GC regarding exhibit list, verdict sheet, important points for opening regarding Bernier and Isakov and failure of med departments to speak with IAB	1.000
1344	1342.0	04/06/15	JLN	Researched on Internet additional stories about Marino for potential use in cross-x (patrol o/s house and NYM Mag story); took notes re: same	0.700
1345	1343.0	04/06/15	JLN	Phone call w/GC and NS re: trial exhibits	0.500
1346	1344.0	04/06/15	JLN	Reviewed GC's draft direct of plaintiff, made notes on same	0.500
1347	1345.0	04/06/15	JLN	Read NS edits to MIL	0.300
1348	1346.0	04/06/15	JLN	E-mail to rest of team regarding specific comments and suggestions on verdict sheet	0.200
1349	1347.0	04/06/15	JLN	E-mail from JF re: draft Motion in Limine ("MIL")	0.100
1350	1348.0	04/06/15	JLN	E-mail to rest of team regarding additional exhibits that should be added to list	0.100

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1351	1349.0	04/06/15	JLN	E-mail with C.Whitehead re: obtaining copy of Sgt. Lurch memo for use at upcoming trial.	0.100
1352	1350.0	04/06/15	JLN	Read e-mail and letter from defense counsel regarding application for adjournment	0.100
1353	1351.0	04/06/15	JLN	Reviewed e-mail exchange between GC and NS regarding PBA letter from AS to Stu London	0.100
1354	1352.0	04/07/15	JLN	Finished cross-x outline of Chief Marino	4.250
1355	1353.0	04/07/15	JLN	Review and discuss NS's letter to court re: delay of trial and announcing our rehiring w/GC	0.300
1356	1354.0	04/07/15	JLN	Reviewed changes to verdict sheet; additional edits and revisions to same	0.200
1357	1355.0	04/07/15	JLN	T/c GC & NS regarding best strategy for handling City's request for adjournment	0.200
1358	1356.0	04/07/15	JLN	E-mail from JF re: receiving everyone's input on MIL and incorporating changes	0.100
1359	1357.0	04/07/15	JLN	E-mail from JF to NS re: edits to letter	0.100
1360	1358.0	04/07/15	JLN	E-mail from JL re: Halpren's dep testimony re: his daughter and need to add this to MIL	0.100
1361	1359.0	04/07/15	JLN	E-mail from SK detailing comments on JF's draft MIL	0.100
1362	1360.0	04/07/15	JLN	Read City reply letter regarding adjournment	0.100
1363	1361.0	04/07/15	JLN	Review of SK comments on JF MIL draft	0.100
1364	1362.0	04/07/15	JLN	Reviewed letter to Court opposing City application; t/c with GC regarding same	0.100
1365	1363.0	04/07/15	JLN	Reviewed NS draft letter to Court re: adjourning trial at City's request	0.100
1366	1364.0	04/08/15	JLN	Continued adding sections to opening, focusing on Mental Health Law & 9.39, as well as med mal claims against hospital	1.300
1367	1365.0	04/08/15	JLN	T/c with GC and JF regarding trial adjournment, proposed filings, various strategies for trying to make sure trial goes on April 20	0.750
1368	1366.0	04/08/15	JLN	T/c GC regarding points from Duncan deposition regarding ESU, meat cleaver and travelling to Johnstown	0.200
1369	1367.0	04/08/15	JLN	T/c NS and GC rewriting a supplemental letter to Court regarding trial date issues	0.200
1370	1368.0	04/08/15	JLN	E-mail exchanges amongst counsel re: availability for Comt conf. on 4/13	0.100
1371	1369.0	04/08/15	JLN	E-mail from GC to NS stressing need to ensure trial goes forward as planned & does not get delayed	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1372	1370.0	04/08/15	JLN	E-mail from GC to NS stressing need to ensure trial goes forward as planned and does not get delayed	0.100
1373	1371.0	04/08/15	JLN	E-mail from NS re: proposing team meeting for this Friday	0.100
1374	1372.0	04/08/15	JLN	E-mail from NS stressing importance of Duncan as a witness & his testimony re: trying to get AS to resign	0.100
1375	1373.0	04/08/15	JLN	E-mail NS Confirming Court conference for 4/13 and advising of his new address	0.100
1376	1374.0	04/08/15	JLN	E-mail response suggesting meeting take place after conference on Monday	0.100
1377	1375.0	04/09/15	JLN	Reviewed Dep. of William Gough; notes on same	2.100
1378	1376.0	04/09/15	JLN	Reviewed Dep. of Kurt Duncan; took notes re: same	1.800
1379	1377.0	04/09/15	JLN	Reviewed Dep. of Joe Ferrara; cross-referenced w/e mail exchanges b/w JLN and JF.	0.900
1380	1378.0	04/10/15	JLN	Reviewed Schoolcraft Graham Raymond materials made summary of most important points from clients' e-mail correspondence and chronological summary	1.400
1381	1379.0	04/10/15	JLN	E-mail exchange w/ NS and rest of team regarding developments on trial schedule (criminal trial adjourned to Fall)	0.100
1382	1380.0	04/10/15	JLN	E-mail from NS to GC re: mistakes in home invasion transcript that need to be fixed	0.100
1383	1381.0	04/10/15	JLN	E-mail NS to GC re: 2 other changes to transcript for home invasions	0.100
1384	1382.0	04/10/15	JLN	Reviewed e-mail exchange b/w NS & Court re: purpose of conf. on Monday is for scheduling & not for substantive issues	0.100
1385	1383.0	04/10/15	JLN	T/c w/ client regarding updates on trial status	0.100
1386	1384.0	04/11/15	JLN	Finished review of QAD Report; made summaries of most egregious examples of downgrading; made separate summary of two specific instances of misconduct of Mauriello re: manipulation of crime stats	4.250
1387	1385.0	04/11/15	JLN	Started to review final QAD Report and attachments; took notes re same	2.400
1388	1386.0	04/11/15	JLN	Continued to review final QAD Report	2.100
1389	1387.0	04/11/15	JLN	E-mail correspondence w/ GC and NS re: trial date and schedule	0.200
1390	1388.0	04/11/15	JLN	E-mail w/NS re Home Invasion Transcript	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1391	1389.0	04/12/15	JLN	Compiled list of all trial exhibits to be used on my section of trial.	0.700
1392	1390.0	04/13/15	JLN	T/c with plaintiff regarding today's conference and Judge's proposed dates and impact this will have and variety of trial issues	1.250
1393	1391.0	04/13/15	JLN	Conference before Judge Sweet regarding adjournment of trial and next steps for moving forward	1.000
1394	1392.0	04/13/15	JLN	Meeting w/ GC and JF re new trial date	0.500
1395	1393.0	04/13/15	JLN	E-mail w/ veritext re: changes to Home Invasion transcript	0.200
1396	1394.0	04/13/15	JLN	E-mail from NS to RS re: Lauterborn's PG & missing half of interview	0.100
1397	1395.0	04/14/15	JLN	Reviewed e-mails and attachments from SK regarding latest versions of jury charges	0.200
1398	1396.0	04/14/15	JLN	T/c w/ SK regarding adjournment of trial and status of jury charges	0.200
1399	1397.0	04/15/15	JLN	Reviewed Lamstein's new "draft" type written notes & compared w/ old type written notes; prepared list summarizing differences between them	0.400
1400	1398.0	04/15/15	JLN	Review of newly produced Lamstein notes	0.200
1401	1399.0	04/15/15	JLN	E-mail & attached letter re: illness to PO Boston & unavailability for trial	0.100
1402	1400.0	04/15/15	JLN	E-mail from NS relaying another call from Scheiner re: city agreeing to pay for mediator	0.100
1403	1401.0	04/15/15	JLN	E-mail from NS to team forwarding Lamstein's "newly discovered" draft notes	0.100
1404	1402.0	04/15/15	JLN	E-mail from NS to team recapping his call with Scheiner requesting adjournment to November date	0.100
1405	1403.0	04/15/15	JLN	E-mailed wiGC and NS re mediation offer from the City	0.100
1406	1404.0	04/15/15	JLN	Letter from Scheiner to NS re: draft document from Lamstein	0.100
1407	1405.0	04/15/15	JLN	Phone call w/ GC re Boston unavailability	0.100
1408	1406.0	04/15/15	JLN	Reviewed E-mail and letter regarding PAA Boston's medical condition	0.100
1409	1407.0	04/17/15	JLN	Telecon w/ rest of trial team regarding City's proposal for mediation and best strategy for responding to same	0.600
1410	1408.0	04/17/15	JLN	Conference call with team re: best strategy for responding to City latest "offer"	0.500
1411	1409.0	04/17/15	JLN	T/c with GC & JF following up on telecon and discussing settlement position vs. going to trial	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1412	1410.0	04/17/15	JLN	E-mail from NS explaining Scheiner's view that we cannot prepare for trial & negotiate at same time	0.100
1413	1411.0	04/17/15	JLN	E-mail from NS relating exact terms of last settlement demand	0.100
1414	1412.0	04/17/15	JLN	E-mail from Scheiner to NS re: locating complete copy of Lauterborn type	0.100
1415	1413.0	04/17/15	JLN	E-mail to NS responding to City's "offer" re: mediation & adjusting adjourning trial	0.100
1416	1414.0	04/17/15	JLN	Reviewed e-mail from NS describing City's "offer" to mediate and response to same	0.100
1417	1415.0	04/20/15	JLN	E-mail exchange with team regarding City's settlement position and request for mediation with out any counter offer	0.300
1418	1416.0	04/21/15	JLN	E-mail from NS to team re: City's letter to Court	0.100
1419	1417.0	04/21/15	JLN	Review of letter from City requesting more time for MIL	0.100
1420	1418.0	04/21/15	JLN	Reviewed City's letter to Judge Sweet seeking to ensure that trial does not go forth on May 4, 2015	0.100
1421	1419.0	04/22/15	JLN	E-mail exchanges re: NS letter response to City latest request to adjourn trial	0.100
1422	1420.0	04/23/15	JLN	T/c LS regarding status of case, Judge Sweet's decision on SJ and likely impact on case once it comes down & City's multiple settlement overtures in the past two weeks	0.750
1423	1421.0	04/27/15	JLN	E-mail from Scheiner re: City latest disclosures	0.100
1424	1422.0	04/28/15	JLN	Letter to NS from Scheiner re: AS employee evaluation & complete recording of Lauterborns 2nd Go - 15 Interview	0.100
1425	1423.0	04/29/15	JLN	E-mail exchanges with NS and GC regarding mock trial and bringing AS down to NYS to prepare	0.100
1426	1424.0	05/05/15	JLN	Read and review Ct's Opinion on SJ; took notes re: same; prepared list of claims which still must be tried & fact issues to be decided	1.600
1427	1425.0	05/05/15	JLN	Discussion w/GC and JF re SJ decision	0.500
1428	1426.0	05/05/15	JLN	E-mail w/GC re Judge Sweet's Summary Judgment opinion	0.100
1429	1427.0	05/08/15	JLN	Discussion w/ GC & JF re SJ decision and impact on trial and motion in limine	0.800
1430	1428.0	05/10/15	JLN	Listened to Lauterborn's 2nd GO interview; notes re: same	0.900
1431	1429.0	05/12/15	JLN	Meeting w/NS team GC and JF pre-conf	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1432	1430.0	05/12/15	JLN	Team meeting following conf.	1.250
1433	1431.0	05/12/15	JLN	Conference before Judge Sweet regarding setting new trial date and schedule for pre-trial filings	1.000
1434	1432.0	05/13/15	JLN	T/c client regarding updates on yesterday's status/pretrial conference with Judge Sweet	1.200
1435	1433.0	05/13/15	JLN	E-mail correspondence w/SK re conference	0.100
1436	1434.0	05/14/15	JLN	E-mail correspondence amongst all parties re: pretrial submissions schedule	0.100
1437	1435.0	05/14/15	JLN	E-mail from Alan Sheiner re: proposed briefing schedule for motions <i>in limine</i>	0.100
1438	1436.0	05/14/15	JLN	E-mail re: pretrial submissions schedule	0.100
1439	1437.0	05/15/15	JLN	Further e-mail w/ all parties re: pretrial submissions schedule	0.100
1440	1438.0	05/18/15	JLN	Review of letter motion filed by City re: JPTO dates	0.100
1441	1439.0	05/21/15	JLN	E-mail from NS re settlement offer from City	0.100
1442	1440.0	05/22/15	JLN	T/c with clients re: update on settlement	0.750
1443	1441.0	05/28/15	JLN	E-mail GC re Veritext bill	0.100
1444	1442.0	05/29/15	JLN	E-mail w/GC and NS re: City bifurcation request	0.200
1445	1443.0	05/29/15	JLN	E-mail exchange w/ all parties re: pretrial submissions schedule	0.100
1446	1444.0	06/01/15	JLN	Reviewed NS draft reconsideration	0.400
1447	1445.0	06/01/15	JLN	Reviewed draft of Plaintiffs motion for Reconsideration	0.200
1448	1446.0	06/02/15	JLN	Read City's motion to reconsider bifurcation on Monell claim	0.300
1449	1447.0	06/02/15	JLN	Read memo of law in Support of defendant Mauriello's motion for Reconsideration	0.300
1450	1448.0	06/02/15	JLN	Review of city's motion to bifurcate	0.200
1451	1449.0	06/03/15	JLN	Review of E-mail correspondence w/court re motions	0.200
1452	1450.0	06/03/15	JLN	Reviewed plaintiff's motion for reconsideration as filed	0.200
1453	1451.0	06/04/15	JLN	Reviewed Mauriello's motion for reconsideration	0.500
1454	1452.0	06/05/15	JLN	Reviewed Request for Extension	0.100
1455	1453.0	06/06/15	JLN	T/c with AS & LS re: case update, next Court filings & general strategy going forward	0.100
1456	1454.0	06/09/15	JLN	Order granting extension of time	0.100
1457	1455.0	06/10/15	JLN	Phone call with Schoolcrafts and GC re: Mauriello recon. and bifurcation	0.800
1458	1456.0	06/16/15	JLN	E-mail from NS requesting assistance in responding to City's reconsideration motion	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1459	1457.0	06/22/15	JLN	T/c w/ AS & LS re: case status, pending motion for reconsideration & impact on case if we cannot call Dr. Halpren as witness	0.900
1460	1458.0	06/22/15	JLN	Another e-mail from NS re: responding to City's Motion for Reconsideration	0.100
1461	1459.0	06/22/15	JLN	E-mail exchange between NS & W. Kretz re: respective dates to respond to motions	0.100
1462	1460.0	06/22/15	JLN	E-mail from NS to defense counsel seeking an additional week for opposition to reconsider	0.100
1463	1461.0	06/23/15	JLN	E-mail from NS to team regarding Scheiner's e-mail on bifurcation reconsideration	0.100
1464	1462.0	06/23/15	JLN	E-mail from Scheiner to NS re: putting Monell bifurcation & motions for reconsideration on two different tracks	0.100
1465	1463.0	06/24/15	JLN	E-mail & attached letter to Judge Sweet re: adjusting briefing schedule	0.100
1466	1464.0	06/24/15	JLN	Review of E-mail correspondence w SK re: motion schedules	0.100
1467	1465.0	06/25/15	JLN	E-mail exchanges w/ all counsel re: adjustment to briefing schedule	0.100
1468	1466.0	06/25/15	JLN	E-mail from NS enclosing letter to Court w/ agreed upon dates	0.100
1469	1467.0	06/29/15	JLN	E-mail & draft memo of law on bifurcation	0.200
1470	1468.0	06/29/15	JLN	E-mail from JF to team adding case law to oppose bifurcation	0.100
1471	1469.0	06/29/15	JLN	E-mail to NS /JL adding case law for opposing bifurcation	0.100
1472	1470.0	07/02/15	JLN	E-mail from Scheiner to all counsel re: City's latest doc production	0.100
1473	1471.0	07/02/15	JLN	Letter from Scheiner to NS re: latest City productions	0.100
1474	1472.0	07/02/15	JLN	Request to NS to put City's new materials on disc.	0.100
1475	1473.0	07/03/15	JLN	E-mail from NS forwarding City's latest production	0.100
1476	1474.0	07/03/15	JLN	E-mail to Scheiner from NS confirming that City new production consists of 511 pages	0.100
1477	1475.0	07/06/15	JLN	Review of opposition to defendants' reconsideration motions	0.700
1478	1476.0	07/06/15	JLN	E-mail exchange between JL & A. Scheiner re: providing City with all of the data expert relied on by Etemo & Silverman	0.100
1479	1477.0	07/06/15	JLN	E-mail exchanges re: writing to Court & clarifying correct due date	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1480	1478.0	07/06/15	JLN	E-mail from NS to Scheiner requesting explanation as to where new City docs came from	0.100
1481	1479.0	07/06/15	JLN	Letter from Scheiner re: correcting typo in previous Bates number correspondence	0.100
1482	1480.0	07/07/15	JLN	E-mail from Scheiner re: ECF filing errors	0.100
1483	1481.0	07/07/15	JLN	E-mail request from Scheiner seeking to adjourn City's Reply on Monell	0.100
1484	1482.0	07/07/15	JLN	Review of E-mail correspondence between NS team re Eterno & Silvennan	0.100
1485	1483.0	07/08/15	JLN	Reviewed City's latest disclosure of Schoolcraft med records, screening tests to become NYPD officer; LOD reports for AS & other docs related to AS's prior LOD claims; took notes re same.	1.800
1486	1484.0	07/10/15	JLN	Read Reply in Further Support of motion for Bifurcation filed by City	0.100
1487	1485.0	07/11/15	JLN	T/c w/ AS & LS re: NS opp to reconsider motions & summary of arguments re: same & likely outcome, as well as overall status of case and trial prep	1.100
1488	1486.0	07/13/15	JLN	Review of JHMC to NS motion for recon	0.300
1489	1487.0	07/13/15	JLN	Read opposition brief to Plaintiff's motion for Reconsideration filed by JHMC	0.100
1490	1488.0	07/13/15	JLN	Reviewed NS letter so ordered by Judge Sweet re: a modification to briefing schedule	0.100
1491	1489.0	07/15/15	JLN	Reviewed Dep of K. Finnegan (30(b)(6) --Topic C and reviewed primary dep exhibit (old performance guide); took notes re same	2.400
1492	1490.0	07/15/15	JLN	E-mail response from NS to all counsel re: adjourn filing dates but keep JPTO date	0.100
1493	1491.0	07/16/15	JLN	Read City's letter motion for more time on motions for Reconsideration	0.100
1494	1492.0	07/17/15	JLN	E-mail exchange between JL and NS re: John Eterno	0.200
1495	1493.0	07/17/15	JLN	Sent GC E-mail correspondence between myself and NS re: John Eterno	0.100
1496	1494.0	07/17/15	JLN	Reviewed Judge Sweet's order granting the City's motion	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1497	1495.0	07/18/15	JLN	T/c w/ AS & LS re: JHMC opp & City's bifurcation argument & anticipated reply arguments	1.200
1498	1496.0	07/18/15	JLN	Reviewed NS prior letter motion re: Weiss EIU file, Sgt. Purpi and cont'd dep of Dr. Patel	0.200
1499	1497.0	07/20/15	JLN	Sent GC E-mail correspondence between Myself and NS re: John Eterno	0.100
1500	1498.0	07/21/15	JLN	Started reading "NYPD Tapes" (book on Scholcraft case) for additional facts & evidence & themes to use at trial.	2.400
1501	1499.0	07/21/15	JLN	E-mail exchanges amongst team re: setting up next meeting for trial team	0.100
1502	1500.0	07/22/15	JLN	Watched new Schoolcraft documentary (Eterno appears)	0.300
1503	1501.0	07/22/15	JLN	E-mail re: new Schoolcraft "documentary"	0.100
1504	1502.0	07/23/15	JLN	Cont'd reading NYPD Tapes; took notes re: same	3.250
1505	1503.0	07/23/15	JLN	Review of reply memo for AS	0.700
1506	1504.0	07/23/15	JLN	Review of City Defendants' reply affirmations recon motions	0.500
1507	1505.0	07/23/15	JLN	Read City's Reply Memo of Law in Support of motion for Reconsideration	0.200
1508	1506.0	07/23/15	JLN	Read Kretz' reply affirmation for Reconsideration of Judge Sweet's Order	0.100
1509	1507.0	07/23/15	JLN	Reviewed AS letter requesting Extension of time	0.100
1510	1508.0	07/24/15	JLN	Meeting with rest of trial team regarding various strategic issues and timeline for pre-trial filings	2.900
1511	1509.0	07/24/15	JLN	T/c with JF & GC regarding issues to discuss at meeting today with rest of trial team	0.500
1512	1510.0	07/24/15	JLN	Reviewed reply memorandum from Mauriello; took notes re: same	0.400
1513	1511.0	07/24/15	JLN	Follow up e-mail to trial team retrieval docs	0.300
1514	1512.0	07/24/15	JLN	Reviewed reply memorandum from City in further support SJ; took notes re: same	0.300
1515	1513.0	07/24/15	JLN	Post meeting discussion with JF and GC regarding issues raised during today's meeting	0.250
1516	1514.0	07/24/15	JLN	Reviewed NS reply memo of law in Support of motion for Reconsideration	0.200
1517	1515.0	07/24/15	JLN	E-mail exchanges re: JPTO deadline	0.100

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1518	1516.0	07/25/15	JLN	T/c with AS & LS re: City's reply & Mauriello's reply & NS reply & overall sense of which arguments are strongest & most likely to prevail; updated them re: team's meeting yesterday	0.700
1519	1517.0	07/25/15	JLN	E-mail exchange from NS re: adding Polanco to JPTO	0.100
1520	1518.0	07/26/15	JLN	Cont'd reading NYPD Tapes; took notes re: same	2.100
1521	1519.0	07/27/15	JLN	E-mail w/ MS re: master exhibit list	1.750
1522	1520.0	07/27/15	JLN	E-mail GC re Polanco as witness	1.700
1523	1521.0	07/27/15	JLN	Read NS letter motion for extension on JPTO	0.100
1524	1522.0	07/28/15	JLN	Reviewed revised Jury Charges from SK; made notes re: same	0.600
1525	1523.0	07/28/15	JLN	Reviewed revised witness list; made edits/revisions to same	0.200
1526	1524.0	07/29/15	JLN	E-mails with Schoolcraft team re: settlement	0.100
1527	1525.0	07/30/15	JLN	Reviewed and highlighted first volume of Lt. Caughey's deposition for extraction and use in cross x outline; took notes re: same	2.300
1528	1526.0	07/30/15	JLN	Phone call w/GC and NS re settlement	0.400
1529	1527.0	07/30/15	JLN	T/c GC regarding settlement position & response to City's settlement overtures	0.400
1530	1528.0	07/30/15	JLN	Read City's joint letter to Coml re: striking plaintiff's reply memo of law	0.100
1531	1529.0	07/30/15	JLN	Read letter motion to strike reply by City	0.100
1532	1530.0	07/31/15	JLN	T/c conference with defense counsel	0.500
1533	1531.0	07/31/15	JLN	Reviewed Notice of Appearance by Kavin Thadani on behalf of City	0.100
1534	1532.0	08/01/15	JLN	Finished NYPD Tapes; incorporated notes of additional facts & salient themes into case summary	1.800
1535	1533.0	08/01/15	JLN	T/c w/ AS re: meeting together on Tuesday & preparing list of issues to discuss at our meeting	0.300
1536	1534.0	08/04/15	JLN	Meeting with AS to discuss case & best strategy for moving forward & preparing for trial	4.750
1537	1535.0	08/04/15	JLN	Travel back to NYC from Johnstown 3.40	1.750
1538	1536.0	08/04/15	JLN	Traveled to Johnstown to meet client 3.50	1.700
1539	1537.0	08/04/15	JLN	Phone call w/GC re: witness list and exhibit list	0.400
1540	1538.0	08/04/15	JLN	Review of NS revised witness and exhibit list	0.300
1541	1539.0	08/04/15	JLN	T/c GC regarding discussion with NS	0.200
1542	1540.0	08/05/15	JLN	Continued conversations with NS regarding exhibits & witnesses	1.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1543	1541.0	08/05/15	JLN	Multiple phone calls w/ GC & NS regarding JPTO exhibits and witnesses	0.900
1544	1542.0	08/05/15	JLN	Preliminary review of City's JPTO and hospital JPTO	0.300
1545	1543.0	08/05/15	JLN	E-mail from NS re: reaching him when he is out of town next week	0.100
1546	1544.0	08/06/15	JLN	Continued review of JPTO submissions by all parties; took notes re: same	0.600
1547	1545.0	08/07/15	JLN	T/c with GC, JL & NS regarding multiple issues in defendants' respective JPTO's	1.000
1548	1546.0	08/07/15	JLN	E-mail from NS enclosing Mauriello's production (Docs# 61-362); reviewed same	0.700
1549	1547.0	08/07/15	JLN	T/c w/ GC in which GC recapped latest settlement offer as relayed by Scheiner to NS	0.300
1550	1548.0	08/07/15	JLN	E-mail exchange with NS regarding City's latest "offer"	0.100
1551	1549.0	08/07/15	JLN	E-mail from NS re: Bernier & Isakov JPTO	0.100
1552	1550.0	08/07/15	JLN	E-mail from NS re: getting a response to City latest "offer"	0.100
1553	1551.0	08/07/15	JLN	E-mail to NS seeking confirmation of exact terms of City's new offer	0.100
1554	1552.0	08/07/15	JLN	NS e-mail explaining City's "new" back pay offer (extending it to Dec. 2015)	0.100
1555	1553.0	08/08/15	JLN	"offer"	0.900
1556	1554.0	08/08/15	JLN	Reviewed Mauriello's production; notes re: same	0.600
1557	1555.0	08/08/15	JLN	T/c w/ AS & LS re: City latest "offer" and what conditions would need to be met (monetary & otherwise) for case to settle	0.100
1558	1556.0	08/09/15	JLN	E-mail correspondence re: JPTO and motion deadlines	0.100
1559	1557.0	08/10/15	JLN	Highlighted and made edits and notes on Trainor's deposition outline for purposes of building cross-x outline	3.400
1560	1558.0	08/10/15	JLN	Reviewed cross-x outlines of Captain Lauterborn, DI Mauriello and Marino to make sure all documents on JPTO are accounted for	2.800
1561	1559.0	08/10/15	JLN	Continued highlighting Trainor's Dep for cross-x excerpts	1.200
1562	1560.0	08/10/15	JLN	E-mail correspondence re: JPTO and motion deadlines	0.100
1563	1561.0	08/10/15	JLN	E-mail response from NS re: my recap of conversation with AS	0.100
1564	1562.0	08/10/15	JLN	E-mail to NS recapping discussion w/ AS this past weekend	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1565	1563.0	08/11/15	JLN	Made revisions and edits to base cross-x outline for Sgt. Weiss	2.100
1566	1564.0	08/11/15	JLN	Review of City defendants JPTO	0.600
1567	1565.0	08/11/15	JLN	Review of new discovery served by City	0.200
1568	1566.0	08/11/15	JLN	E-mail from NS to all counsel w/ consolidated shell of JPTO; reviewed same	0.100
1569	1567.0	08/11/15	JLN	E-mail from Scheiner with two additional docs inadvertently omitted from previous disclosures	0.100
1570	1568.0	08/12/15	JLN	Reviewed portion of opening outline regarding treatment in ER & interactions with James & Sawyer and Yeager	0.700
1571	1569.0	08/12/15	JLN	Reviewed NYPD memo re: Amnendment to Quota bill	0.300
1572	1570.0	08/13/15	JLN	Reviewed portion of opening outline regarding MHL 9.39 and Bernier decision to involuntary commit; reviewed section relating to QAD; reviewed section regarding harrassment upstate	1.400
1573	1571.0	08/13/15	JLN	Reviewed NS letter to Court seeking 1 extra week for JPTO; also reviewed opposition e-mails by defense counsel to same; reviewed Mauriello's response to plaintiffs JPTO	0.400
1574	1572.0	08/13/15	JLN	E-mail from Scheiner w/ spreadsheet re: City JPTO objections	0.100
1575	1573.0	08/13/15	JLN	Read order of Judge Sweet granting plaintiffs extgension parties	0.100
1576	1574.0	08/13/15	JLN	Review of correspondence all parties re: JPTO	0.100
1577	1575.0	08/13/15	JLN	Reviewed Judge Sweet's order Defendants' motion to strike Plaintiffs reply	0.100
1578	1576.0	08/13/15	JLN	Reviewed NS letter motion to Court for extension	0.100
1579	1577.0	08/14/15	JLN	Reviewed consolidated JPTO; made notes re: same	0.700
1580	1578.0	08/14/15	JLN	Review of Lauterborn's transcribed audio interview; 2nd IAB interview took notes re: same	0.600
1581	1579.0	08/14/15	JLN	Reviewed multiple E-mail exchanges between NS and counsel regarding JPTO and best way to proceed	0.300
1582	1580.0	08/14/15	JLN	E-mail from NS asking team for input in responding to Scheiner's letter JPTO	0.100
1583	1581.0	08/14/15	JLN	E-mail re: City filing JPTO without our input	0.100
1584	1582.0	08/14/15	JLN	E-mails among team re: MIL due date	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1585	1583.0	08/14/15	JLN	Read City's letter reply to Court in further support of the City's motion to strike plaintiff's reply	0.100
1586	1584.0	08/14/15	JLN	Read City's letter to Court re: Defendants' JPTO	0.100
1587	1585.0	08/14/15	JLN	Review of letter to Court filed by Scheiner re: Defendants' JPTO (w/o plaintiff's portion)	0.100
1588	1586.0	08/15/15	JLN	Reviewed City's latest disclosures, incl. certified docs from Hertzler Sure, M.D., multiple photos and info relating to rifle found in Schoolcraft's apartment; LS's prior lawsuit against Montgom. Cty; QAD investigations that resulted in discipline for officers; additional PG guidelines and IAB Guidelines; forensic manual for Mental Hygiene Law	3.400
1589	1587.0	08/15/15	JLN	T/c w/ AS & LS re: City's JPTO filing & attorney's motion to strike reply & several updates on trial prep	0.900
1590	1588.0	08/16/15	JLN	Started work on Sgt. Weiss cross-x outline	4.600
1591	1589.0	08/16/15	JLN	Internet research re: rifle identified by City (9 MM Carines).	1.900
1592	1590.0	08/16/15	JLN	Reviewed defendants JPTO filing; took notes re: same	0.600
1593	1591.0	08/17/15	JLN	Continued Weiss cross-x outline	5.600
1594	1592.0	08/17/15	JLN	Continued working on Sgt. Weiss cross-x outline	4.250
1595	1593.0	08/17/15	JLN	Reviewed additional Patrol Guide sections disclosed by City (15147-15170); took notes re: same	1.400
1596	1594.0	08/17/15	JLN	Read City's letter to Court re: Opposition to Plaintiff's August 13th Request to Modify the JPTO Filing Deadline	0.100
1597	1595.0	08/18/15	JLN	Phone call and e-mail w/ GC re Huffman	0.300
1598	1596.0	08/18/15	JLN	T/c w/ Alan Sheiner & Cheryl Shammass regarding City's latest settlement offer and plaintiff's position regarding same	0.200
1599	1597.0	08/18/15	JLN	Read City's letter to Court re: opposition to plaintiff's request to modify the deadline of the filing of the JPTO	0.100
1600	1598.0	08/18/15	JLN	Read City's letter to Court re: requiring the plaintiff to identify a single police practices expert	0.100
1601	1599.0	08/18/15	JLN	Reviewed NS letter reply to motions for extension of time	0.100
1602	1600.0	08/18/15	JLN	Reviewed NS reply to City's letter JPTO	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1603	1601.0	08/19/15	JLN	T/c with plaintiff regarding City latest settlement offer and City's message that window to settle will close this week and will not re-open	0.400
1604	1602.0	08/20/15	JLN	Reviewed City's latest disclosure (Office of Mgt Analysis & Planning Reference Guide); took notes re same.	1.800
1605	1603.0	08/20/15	JLN	Read NS e-mail to Scheiner re: his misleading submission to Court	0.100
1606	1604.0	08/20/15	JLN	Reviewed NS letter to Court re: JPTO	0.100
1607	1605.0	08/20/15	JLN	Scheiner e-mail rejecting service by fax	0.100
1608	1606.0	08/20/15	JLN	Scheiner re: e-mail responding to NS "misleading submission"	0.100
1609	1607.0	08/21/15	JLN	T/c with NS regarding Larry's serious medical condition, discussion w/ Alan Sheiner & CS regarding City's latest settlement and regarding status of cross-x outlines and JPTO issues	0.800
1610	1608.0	08/21/15	JLN	T/c NS re: several trial prep issues & outstanding work that still needs to be done & update on LS medical condition	0.700
1611	1609.0	08/21/15	JLN	E-mail all parties re MIL due date	0.100
1612	1610.0	08/21/15	JLN	Read Alan Sheiner's letter to Court regarding striking plaintiff's JPTO	0.100
1613	1611.0	08/21/15	JLN	Read various e-mails amongst counsel regarding motion <i>in limine</i> schedule	0.100
1614	1612.0	08/21/15	JLN	Scheiner letter to Court attaching City's response to August 20th letter by NS	0.100
1615	1613.0	08/21/15	JLN	Sent NS summary exhibit that we created regarding Schoolcrafts performance in 2008	0.100
1616	1614.0	08/22/15	JLN	T/c w/ AS & LS re: City's letter seeking to limit us to one police expert & city opp. to our request to modify JPTO deadlines & general updates on status of cross examinations	0.700
1617	1615.0	08/24/15	JLN	Reviewed GC's cross-x outline on Gough; took notes re: same	0.700
1618	1616.0	08/24/15	JLN	Reviewed GS's cross outline on Yeager; took notes re: same	0.400
1619	1617.0	08/24/15	JLN	Review of NS e-mail re upstate visits to AS	0.200
1620	1618.0	08/24/15	JLN	NS e-mail re: receipt of my crosses & dates when he will exchange Bernier & Isakov crosses	0.100
1621	1619.0	08/24/15	JLN	Sent GC cross outlines for review	0.100
1622	1620.0	08/25/15	JLN	Reviewed JPTO; edits and revisions to same	0.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1623	1621.0	08/25/15	JLN	NS e-mail & letter to Court respond to Scheiner August 18 & August 21 letters re: # of police experts	0.100
1624	1622.0	08/25/15	JLN	Reviewed filing by NS responding to various arguments by defendants on JPTO exhibits and witnesses	0.100
1625	1623.0	08/26/15	JLN	Began work on Trainor Cross-x outline using JM preliminary outline	2.700
1626	1624.0	08/26/15	JLN	Reviewed GC draft cross of Det. Yeager & Boston; highlighted & made edits to same	1.400
1627	1625.0	08/26/15	JLN	Drafted points to discuss w/GC re: trial strategy	0.700
1628	1626.0	08/26/15	JLN	Sent GC more cross outlines for review	0.100
1629	1627.0	08/27/15	JLN	Continued working on Trainor cross-x	6.400
1630	1628.0	08/27/15	JLN	Continued working on Trainor cross-x	4.800
1631	1629.0	08/28/15	JLN	Reviewed GC draft cross x of Sgt. Huffman; extracted section re: Mauriello ordering Pl. back after Huffman approved (worked into Mauriello cross-x as new section); made edits/revisions.	1.800
1632	1630.0	08/28/15	JLN	Reviewed GC draft of Duncan cross; edits & revisions to same	1.800
1633	1631.0	08/28/15	JLN	Reviewed GC draft cross of Sgt. Sawyer; highlights, edits, revisions to same	1.300
1634	1632.0	08/28/15	JLN	Sent GC cross outlines for review	0.100
1635	1633.0	08/29/15	JLN	Reviewed GC draft cross of Lt. Broschart; edits/revisions to same	1.900
1636	1634.0	08/29/15	JLN	Reviewed GC's draft Valenti cross; edits/revisions to same	0.600
1637	1635.0	08/30/15	JLN	Contined working on cross-x of Capt. Trainor; cross-referenced BNIU file for several additional points	6.750
1638	1636.0	08/30/15	JLN	Started working on Lt. Caughey cross-x	4.250
1639	1637.0	08/30/15	JLN	Reviewed GC draft of Gough cross; edits/revisions to same	1.900
1640	1638.0	08/31/15	JLN	Contined working on cross-x of Lt. Caughey	6.400
1641	1639.0	08/31/15	JLN	Reviewed GC draft of Sgt. James cross; edits to same & extracted relevant points for opening statement	2.400
1642	1640.0	08/31/15	JLN	F/u telecon with NS re: schedule	0.400
1643	1641.0	08/31/15	JLN	Conference call w/ all counsel to clerk re: pending motions	0.300
1644	1642.0	09/01/15	JLN	Continued working on Caughey cross-x	8.200
1645	1643.0	09/01/15	JLN	Sent GC cross outlines for review	0.100
1646	1644.0	09/02/15	JLN	Cross outline of Lt. Caughey	7.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1647	1645.0	09/02/15	JLN	Continued working on Trainor cross-x	1.400
1648	1646.0	09/03/15	JLN	Review of City letter re: JPTO schedule	0.200
1649	1647.0	09/03/15	JLN	NS response to Scheiner re: request for telecon	0.100
1650	1648.0	09/03/15	JLN	Request from Scheiner to have telecon re: settlement	0.100
1651	1649.0	09/04/15	JLN	Continued working on Caughey cross-x	4.600
1652	1650.0	09/04/15	JLN	Continued working on Trainor cross-x	4.600
1653	1651.0	09/04/15	JLN	T/c w/ NS regarding his conversation with Alan Scheiner regarding City's latest settlement offer; spoke to GC regarding same	0.600
1654	1652.0	09/04/15	JLN	E-mail from NS re: City letter to Court treating 9-17-15 as new date for MIL's	0.100
1655	1653.0	09/04/15	JLN	Reviewed City letter to Court re: Court's failure to decide pending motions	0.100
1656	1654.0	09/05/15	JLN	t/c with AS and LS regarding City's latest settlement offer	0.700
1657	1655.0	09/06/15	JLN	Finished Trainor cross-x	7.100
1658	1656.0	09/06/15	JLN	T/c w/ LS regarding City's settlement offer and requirements for resolving matter	0.750
1659	1657.0	09/07/15	JLN	Continued working on Caughey cross-x	6.250
1660	1658.0	09/08/15	JLN	T/c with JF & GC recapping discussion with defense counsel and clients over the weekend	0.600
1661	1659.0	09/08/15	JLN	T/c with NS, GC and JF regarding best strategy for handling settlement discussions with the City	0.600
1662	1660.0	09/08/15	JLN	T/c with AS and NS regarding City's latest settlement offer and plaintiff's response to same	0.400
1663	1661.0	09/08/15	JLN	T/c with NS & Alan Scheiner following up on City's offer and discussions earlier today	0.400
1664	1662.0	09/08/15	JLN	Phone call w/GC re Schoolcrafts	0.300
1665	1663.0	09/08/15	JLN	Flu conversation with NS to discuss last conversation with defense counsel regarding City's 3/4 disability analysis	0.200
1666	1664.0	09/08/15	JLN	E-mail from Scheiner re: getting back to him on City's settlement proposal	0.100
1667	1665.0	09/08/15	JLN	E-mail from Scheiner seeking plaintiff's response to latest City offer	0.100
1668	1666.0	09/09/15	JLN	Started work on cross-x Lamstein	1.700
1669	1667.0	09/09/15	JLN	E-mail from Scheiner to NS & JN re: following up on settlement	0.100
1670	1668.0	09/10/15	JLN	Reviewed Lamstein's PES file & her handwritten notes for incorporation into cross	2.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1671	1669.0	09/10/15	JLN	Reviewed Lamstein Declaration Lamstein dep corrections & Lamstein original typed notes vs. "draft" notes exchanged this summer compared with dep testimony for use in cross-x	2.400
1672	1670.0	09/10/15	JLN	Reviewed Lamstein's IAB interview compared w/ dep testimony for developing grounds to explore in cross	1.800
1673	1671.0	09/10/15	JLN	Reviewed Lamstein VM to AS on 10-31-09 to incorporate into cross	0.300
1674	1672.0	09/10/15	JLN	E-mail from GC recapping his conversation with AS yesterday re: clients position re: lack of 3/4 pension	0.100
1675	1673.0	09/10/15	JLN	NS e-mail describing disability options	0.100
1676	1674.0	09/10/15	JLN	NS response to GC's e-mail re: summary plan	0.100
1677	1675.0	09/10/15	JLN	Reviewed Court's endorsement of plaintiffs letters dated August 18, 2015 and August 21, 2015	0.100
1678	1676.0	09/11/15	JLN	Continued working on Lamstein cross-x	3.200
1679	1677.0	09/11/15	JLN	T/c w/ AS & LS re: City latest offer & pros and cons of same	0.900
1680	1678.0	09/11/15	JLN	Phone calls with NS and GC re City settlement offer	0.800
1681	1679.0	09/11/15	JLN	Telecon with NS & Scheiner City is willing to increase offer for P&S	0.800
1682	1680.0	09/11/15	JLN	E-mail from NS & Scheiner re: our availability to speak later this a.m.	0.100
1683	1681.0	09/11/15	JLN	E-mail from NS to Scheiner re: conference call for today at 11:00 am	0.100
1684	1682.0	09/11/15	JLN	E-mail to GC re Schoolcraft timeline	0.100
1685	1683.0	09/12/15	JLN	Continued working on Lamstein cross-x	4.250
1686	1684.0	09/12/15	JLN	T/c w/ AS & LS re: pros and cons of settlement, risks of verdict, impact on disability pension & ability to still have trial against medical defendants	1.400
1687	1685.0	09/13/15	JLN	Continued working on Lamstein cross-x	2.800
1688	1686.0	09/14/15	JLN	E-mail from Scheiner cannot speak today - but can tomorrow	0.100
1689	1687.0	09/14/15	JLN	E-mail to Scheiner from NS re: setting up time to speak	0.100
1690	1688.0	09/15/15	JLN	Continued working on Lamstein cross-x	3.200
1691	1689.0	09/15/15	JLN	T/c with NS re: conversation w/ Scheiner	0.400
1692	1690.0	09/15/15	JLN	Reviewed NS settlement memo to client	0.200
1693	1691.0	09/15/15	JLN	E-mail from NS re: Draft version of JPTO & extending dates to respond to MIL's	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1694	1692.0	09/15/15	JLN	E-mail from Scheiner to NS & JN re: setting time to speak re: settlement	0.100
1695	1693.0	09/15/15	JLN	Sent GC more cross outlines for review	0.100
1696	1694.0	09/16/15	JLN	Review of NS cross examination outlines; notes re: same	1.400
1697	1695.0	09/16/15	JLN	T/c with GC & NS re: settlement status	0.700
1698	1696.0	09/16/15	JLN	Review of new Rule 68 offer	0.500
1699	1697.0	09/16/15	JLN	Review of NS memo to Schoolcraft re settlement	0.300
1700	1698.0	09/16/15	JLN	E-mail w/ NS re memo and settlement	0.200
1701	1699.0	09/16/15	JLN	Review of NS e-mail to Schoolcraft resettlement	0.100
1702	1700.0	08/03/15	JJM	Mtg. w/ Jon L. Norinsberg re: new role in schoolcraft case	0.500
1703	1701.0	08/03/15	JJM	Watch documentary on Schoolcraft case to get feel for case & issues	0.300
1704	1702.0	08/03/15	JJM	Begin prelim cross outline of Sgt. Weiss	1.400
1705	1703.0	08/04/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 1)	3.200
1706	1704.0	08/04/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 2)	3.400
1707	1705.0	08/05/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 3)	5.600
1708	1706.0	08/06/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 4)	2.600
1709	1707.0	08/06/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 5)	4.800
1710	1708.0	08/10/15	JJM	Start Caughey prelim cross outline	1.600
1711	1709.0	08/10/15	JJM	Start MS OneNote Tab - reorganize dep highlights on Caughey prelim cross outline	3.500
1712	1710.0	08/10/15	JJM	Continue reorganizing dep nighlights	1.100
1713	1711.0	08/11/15	JJM	continue prelim cross outline of Caughey (Pt. 2)	1.400
1714	1712.0	08/11/15	JJM	Add allegations to prelim cross outline of Caughey	4.300
1715	1713.0	08/12/15	JJM	Continue prelim cross outline of Caughey (Pt. 3)	3.300
1716	1714.0	08/12/15	JJM	Meeting with Jln re: Caughey signing memobooks	0.500
1717	1715.0	08/12/15	JJM	Add memobook impeachment to Caughey prelim cross outline	1.250
1718	1716.0	08/12/15	JJM	Conlinue prelim cross outline of Caughey	2.100
1719	1717.0	08/13/15	JJM	Reviewed additional transcript for Caughey; highlighted same	1.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1720	1718.0	08/13/15	JJM	Add new dep highlights into existing prelim cross outline	2.900
1721	1719.0	08/13/15	JJM	Re-organize prelim cross outline to account for additional transcript	2.250
1722	1720.0	08/13/15	JJM	Continue to add new deposition highlights into existing prelim cross outline	2.700
1723	1721.0	08/14/15	JJM	Continue Caughey prelim cross outline (Pt 5)	3.200
1724	1722.0	08/14/15	JJM	Continue Caughey prelim cross outline (Pt 6)	3.100
1725	1723.0	08/17/15	JJM	Continue Caughey prelim cross outline (incorporate part 1 of IAB transcript into cross) (Pt 7)	2.400
1726	1724.0	08/17/15	JJM	Continue Caughey prelim cross outline (incorporate part 2 of IAB transcript into cross) (Pt 8)	1.800
1727	1725.0	08/17/15	JJM	Continue Caughey prelim cross outline (incorporate part 3 of IAB transcript into cross) (Pt 9)	2.300
1728	1726.0	08/17/15	JJM	Continue Caughey prelim cross outline (incorporate part 4 of IAB transcript into cross) (Pt 10)	2.100
1729	1727.0	08/18/15	JJM	Finished Caughey prelim cross outline, reorganized and edited same	2.700
1730	1728.0	08/18/15	JJM	Added part headings to Caughey prelim cross outline	2.400
1731	1729.0	08/18/15	JJM	Finish Caughey prelim cross outline	0.900
1732	1730.0	08/19/15	JJM	Begin Trainor prelim cross outline (part 1)	2.900
1733	1731.0	08/19/15	JJM	Continue Trainor prelim cross outline (part 2)	2.300
1734	1732.0	08/19/15	JJM	Continue Trainor prelim cross outline (part 3)	1.700
1735	1733.0	08/20/15	JJM	Continue Trainor prelim cross outline (part 4)	3.700
1736	1734.0	08/20/15	JJM	Finish Trainor prelim cross outline (part 4)	2.600
1737	1735.0	08/21/15	JJM	Continue Trainor prelim cross outline (part 5)	3.300
1738	1736.0	08/21/15	JJM	Continue Trainor prelim cross outline (part 6)	4.700
1739	1737.0	08/24/15	JJM	Continue Trainor prelim cross outline (part 7)	3.100
1740	1738.0	08/24/15	JJM	Continue Trainor prelim cross outline (part 8)	3.700
1741	1739.0	08/25/15	JJM	Add part hearings to parts 1 - 4 and reorganize Trainor prelim cross outline	2.600
1742	1740.0	08/25/15	JJM	Add part hearings to parts 5 - 8 and reorganize Trainor prelim cross outline	3.100
1743	1741.0	08/25/15	JJM	Begin prelim cross outline of Lamstein (Part 1)	3.700
1744	1742.0	08/26/15	JJM	Continue prelim cross outline of Lamstein (Part 2)	3.200
1745	1743.0	08/26/15	JJM	Continue prelim cross outline of Lamstein (Part 3)	3.400
1746	1744.0	08/27/15	JJM	Continue prelim cross outline of Lamstein (Part 4)	2.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1747	1745.0	08/27/15	JJM	Continue prelim cross outline of Lamstein (Part 5)	2.200
1748	1746.0	08/28/15	JJM	Discussion with JLN about format of prelim cross outline of Lamstein	0.300
1749	1747.0	09/02/15	JJM	Continue lamstein prelim cross outline (Part 6)	3.700
1750	1748.0	09/02/15	JJM	Continue lamstein prelim cross outline (Part 7)	2.300
1751	1749.0	09/08/15	JJM	Continue lamstein prelim cross outline (Part 8)	2.900
1752	1750.0	09/08/15	JJM	Continue lamstein prelim cross outline (Part 9)	2.300
1753	1751.0	09/09/15	JJM	Add part headings and reorganize Lamstein prelim cross outline	3.700
1754	1752.0	09/09/15	JJM	Continued to reorganize lamstein prelim cross outline	2.800
1755	1753.0	06/25/10	NB	Saved retainer signed by client to file	0.100
1756	1754.0	06/25/10	NB	Prepared Substitution of Attorney for taking case over from JM	0.200
1757	1755.0	06/28/10	NB	Downloaded documents from new client Adrian Schoolcraft from CD to computer file	0.200
1758	1756.0	06/28/10	NB	Faxed Substitution of Attorney to Jonathon Moore; mailed same via regular mail	0.200
1759	1757.0	06/28/10	NB	Saved Witness Summary of Eddie Valasquez to client file	0.100
1760	1758.0	06/28/10	NB	E-mailed Substitution of Attorney and Signed retainer Agreement to JLN	0.100
1761	1759.0	06/28/10	NB	Saved additional witness information to client file	0.100
1762	1760.0	07/01/10	NB	Calendared JLN meeting with Justice Dept. re: Schoolcraft	0.100
1763	1761.0	07/12/10	NB	Went through documents from CD Schoolcraft's provided; watched videos & recordings & prepared digest of same	4.100
1764	1762.0	07/13/10	NB	Listened to recording b/w AS & Det. Peterson on Sept. 13, 2009 and made notes regarding same	0.400
1765	1763.0	07/13/10	NB	Continued review of Schoolcraft recordings; prepared digest of same	4.200
1766	1764.0	07/13/10	NB	Examined FDNY PCR for AS; prepared summary of same	0.500
1767	1765.0	07/13/10	NB	Reviewed recording of conversations b/w AS & Lt. Mascol on Feb. 20, 2009; prepared digest of	0.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1768	1766.0	07/14/10	NB	Continued reviewing CD recordings (2008 roll calls) and prepared digest of same	3.600
1769	1767.0	07/15/10	NB	Continued reviewing Schoolcraft roll calls (2009 roll calls); prepared digest of same	3.100
1770	1768.0	08/10/10	NB	Filed Summons and Complaint; sent s&c to as Aetna Judicial for service	0.600
1771	1769.0	08/11/10	NB	Saved witness information to client file	0.100
1772	1770.0	08/11/10	NB	Began review of new CD from Client w/ numerous additional recordings and docs	3.900
1773	1771.0	08/18/10	NB	E-mailed JLN schoolcraft audio files	0.100
1774	1772.0	08/19/10	NB	Filed Affidavit of Service as to Frederick Sawyer	0.100
1775	1773.0	08/30/10	NB	Filed Affidavit of Service as to Jamaica Hospital Medical Center	0.100
1776	1774.0	08/30/10	NB	Filed Affidavit of Service as to Steven Mauriello	0.100
1777	1775.0	08/30/10	NB	Filed Affidavit of Service as to Christopher Broschart	0.100
1778	1776.0	08/30/10	NB	Filed Affidavit of Service as to Timothy Caughey	0.100
1779	1777.0	08/30/10	NB	Filed Affidavit of Service as to Michael Marino	0.100
1780	1778.0	08/30/10	NB	Filed Affidavit of Service as to Shantel James	0.100
1781	1779.0	08/30/10	NB	Filed Affidavit of Service as to Theodore Lauterborn	0.100
1782	1780.0	08/30/10	NB	Filed Affidavit of Service as to Lillian Aldana-Bernier	0.100
1783	1781.0	08/30/10	NB	Filed Affidavit of Service as to Isak Isakov	0.100
1784	1782.0	08/30/10	NB	Filed Affidavit of Service as to defendant Gerald Nelson	0.100
1785	1783.0	08/31/10	NB	Saved AS personal information to file	0.100
1786	1784.0	09/13/10	NB	Filed Amended Complaint	0.300
1787	1785.0	09/16/10	NB	Reviewed AS hospital records to locate discharge summary; sent JLN same	0.200
1788	1786.0	09/17/10	NB	Printed Judge Weinslock opinion re: Velez proceedings for JLN review	0.100
1789	1787.0	09/18/10	NB	Printed NYPD Admin Guide provided by AS for JLN review	0.150
1790	1788.0	10/08/10	NB	Email correspondence w/ GC re: more recordings	0.100
1791	1789.0	10/12/10	NB	Printed JHMC MTD for JLN: bound same	0.150
1792	1790.0	10/20/10	NB	Viewed AS hospital records to find ER notes for JLN: sent JLN same	0.200
1793	1791.0	10/27/10	NB	Filed Affidavit of Service as to defendant The City of New York	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1794	1792.0	10/27/10	NB	Filed Affidavit of Service as to defendant Theodore Lauterborn	0.100
1795	1793.0	10/27/10	NB	Filed Affidavit of Service as to defendant Christopher Broschart	0.100
1796	1794.0	10/27/10	NB	Filed Affidavit of Service as to defendant Steven Mauriello	0.100
1797	1795.0	10/27/10	NB	Filed Affidavit of Service as to defendant Timothy Caughey	0.100
1798	1796.0	10/27/10	NB	printed and saved answer into computer file and hard file	0.100
1799	1797.0	10/27/10	NB	Filed Affidavit of Service as to defendant Isakov	0.100
1800	1798.0	10/27/10	NB	Filed Affidavit of Service as to defendant Jamaica Hospital Medical Center	0.100
1801	1799.0	11/16/10	NB	Sent AS e-mail enclosing Affidavit	0.100
1802	1800.0	11/17/10	NB	Formatted First Request for Admissions, request for discovery demands, request for interrogatories and sent same to JLN for review	1.200
1803	1801.0	12/09/10	NB	Drafted letter to all counsel enclosing, opposition to MTD	0.250
1804	1802.0	12/10/10	NB	Prepared AS authorizations for Jamaica Hospital and sent same to all counsel	0.700
1805	1803.0	12/10/10	NB	Filed Affidavit of Service for Gough and Duncan	0.100
1806	1804.0	12/10/10	NB	Prepared attorney list of all defense counsel in case and saved to file	0.200
1807	1805.0	12/15/10	NB	Filed Affidavit of Service as to defendant Kurt Duncan	0.100
1808	1806.0	02/09/11	NB	Formatted Ltr. Opposing Defendants' Request Stay pending MTD; made multiple edits and filed same with Court	0.600
1809	1807.0	03/04/11	NB	Prepared authorization and letter enclosing authorization to ACC	0.250
1810	1808.0	05/06/11	NB	Printed Judge Sweet's decision on defendants' MTD for JLN review	0.200
1811	1809.0	05/09/11	NB	Drafted Deposition notices for all defendants	0.100
1812	1810.0	05/10/11	NB	E-mailed JLN Opinion of Judge Sweet	0.100
1813	1811.0	05/10/11	NB	Formatted initial disclosures for City of New York; created litigation backs; prepared documents to sent with disclosures; copied same to for all parties; prepared letter enclosing said documents; sent to all parties via regular mail	1.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1814	1812.0	05/13/11	NB	Prepared and sent authorization for NYC employment records to Martin Clearwater and Bell	0.500
1815	1813.0	05/15/11	NB	Formatted final draft RFA for City of New York; copied same for courtesy copy to all parties; prepared letter enclosing, said documents; sent to all parties via regular mail	1.200
1816	1814.0	05/20/11	NB	Formatted final draft of 1st Document Demands for City; copied same for courtesy copy to all parties; prepared letter enclosing said document sent to all parties via regular mail	0.800
1817	1815.0	05/20/11	NB	Formatted final draft of Rogs for City; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	0.700
1818	1816.0	05/20/11	NB	Formatted final draft of Deposition Notices for City Defendants; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	0.400
1819	1817.0	05/24/11	NB	Formatted final draft of discovery demands/ Rogs for JHMC; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	1.700
1820	1818.0	05/25/11	NB	Formatted final draft of Deposition JHMC Defendants; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	0.500
1821	1819.0	06/16/11	NB	Sent AS authorization to Queens DA	0.200
1822	1820.0	06/23/11	NB	Prepared authorization and letter enclosing authorization to Queens DA	0.250
1823	1821.0	07/08/11	NB	Drafted letter to all counsel notifying them of pre-trial conference; made edits and sent out same	0.250
1824	1822.0	08/08/11	NB	Downloaded and printed research received from JLN	0.100
1825	1823.0	12/13/11	NB	Sent AS Authorization to James Liander (Queens DA)	0.200
1826	1824.0	12/13/11	NB	Letter to defense counsel enclosing responses to discovery requests (authorizations)	0.200
1827	1825.0	12/13/11	NB	Letter to Callon enclosing Luell and IRS Authorization	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1828	1826.0	01/05/12	NB	Made reservation for Schoolcrafts for Cosmopolitan Hotel	0.100
1829	1827.0	01/11/12	NB	Sent Callan kletter and AS authorization via regular mail and e-mail	0.100
1830	1828.0	01/23/12	NB	Letter to Greg Radomisli enclsoing auths for medicaid records and disclosing lost earnings	0.250
1831	1829.0	02/10/12	NB	E-mail exchange to Jeremy Stephens regarding serving subpoenas on Johnstown PD, FCSD and FCDSS	0.200
1832	1830.0	03/09/12	NB	Formatted to Lt. Gilbo regarding the documents that were sent in response to subpoena and sent same	0.250
1833	1831.0	03/13/12	NB	Formatted letter and made edits to letter to Court re: leaks to media	0.300
1834	1832.0	03/14/12	NB	Pulled and email GC various documents from Schoolcraft file	0.200
1835	1833.0	04/16/12	NB	E-mail exchange to Jeremy Stephens (investigator) regarding serving subpoenas on Vallone and Kelly	0.200
1836	1834.0	04/23/12	NB	Sent package to all counsel enclosing transcripts of Browne, Pichardo, McHugh, Polanco, Mauriello, Herran, Gianelli, Esposito	0.800
1837	1835.0	05/11/12	NB	Prepared follow up letter to Gilbo subpoenaing records for JPD; sent same via regular mail	0.250
1838	1836.0	05/17/12	NB	Sent Schoolcraft Affidavit of GS as per JLN	0.100
1839	1837.0	08/14/12	NB	Prepared letter and authorization for the release of tax records to Publicker; sent same via mail and e-mail	0.250
1840	1838.0	08/28/12	NB	Email to all counsel enclsoing documents received in response to various non-party subpoenas	0.150
1841	1839.0	08/28/12	NB	Copied, sorted and catalogued various non party subpoenas (County of Fulton, Johnstown PD for each defendant); drafted and sent letter to all counsel enclosing same via mail	0.450
1842	1840.0	09/11/12	NB	Formatted and made edits to JLN letter to Court requesting 120 day extension of time; filed same with Court	0.600
1843	1841.0	10/01/12	NB	Multiple phone calls to Hotel Albany regarding setting up conference room for rreeting with AS	0.600
1844	1842.0	10/02/12	NB	Forwarded schoolcraft justice website to JJM	0.100
1845	1843.0	10/12/12	NB	Drafted and sent letter to City requesting color copies of photographs shown at plaintiff's deposition	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1846	1844.0	10/12/12	NB	email exchange with S. Publicker regarding City's consent	0.200
1847	1845.0	10/16/12	NB	Emailed Mauriello letter to Judge to JLN	0.100
1848	1846.0	10/18/12	NB	Drafted letter regarding additional day of testimony for AS deposition and sent to GC and JF for review	0.200
1849	1847.0	10/21/12	NB	Filed Second Amended Complaint	0.600
1850	1848.0	11/13/12	NB	newly identified defendants; emailed JLN regarding same	0.200
1851	1849.0	11/14/12	NB	Scanned and e-mailed AS Letter of Termination in file; filed same in computer file and hard file	0.250
1852	1850.0	11/15/12	NB	Made changes and formating edits to letter to Judge Sweet regarding being relieved as counsel and filed same with Court	0.600
1853	1851.0	01/29/15	NB	Read deposition transcript of Mauriello; digested same	2.400
1854	1852.0	02/03/15	NB	Printed Amended Compaint and Docket sheet for JLN review	0.100
1855	1853.0	02/03/15	NB	Downloaded and printed all memorandums of law filed by defendants	0.600
1856	1854.0	02/05/15	NB	Read deposition transcript of Bernier; digested same	1.900
1857	1855.0	02/06/15	NB	Read deposition transcript of Cooper; digested same	1.300
1858	1856.0	02/09/15	NB	Read deposition transcript of Finnegan; digested same	1.100
1859	1857.0	02/11/15	NB	Read deposition transcript of Caughey; digested same	1.700
1860	1858.0	02/12/15	NB	Read deposition transcript of Duncan; digested same	0.600
1861	1859.0	02/13/15	NB	Printed various exhibits from Plaintiff's deposition	0.200
1862	1860.0	02/18/15	NB	Printed and bound deps of Mauriello and Valenti	0.200
1863	1861.0	02/19/15	NB	Read deposition transcript of Dhar; digested same	0.600
1864	1862.0	02/19/15	NB	same	1.600
1865	1863.0	02/19/15	NB	Printed various exhibts from deps of Mauriello Lauterborn and Floyd	0.200
1866	1864.0	02/25/15	NB	Read deposition transcript of Ferrara; digested same	1.200
1867	1865.0	02/25/15	NB	same	0.400
1868	1866.0	02/25/15	NB	Reade deposition transcript of Hanlon; digested same	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1869	1867.0	03/03/15	NB	E-mail Marino deposition to JLN	0.100
1870	1868.0	03/09/15	NB	Printed Plaintiff's Rule 56.1 Statement for JLN to review	0.100
1871	1869.0	03/11/15	NB	same	1.800
1872	1870.0	03/12/15	NB	Read deposition transcript of James; digested same	0.750
1873	1871.0	03/12/15	NB	Printed and bound documents from City of New York from City of New York and Mauriello medical documents	0.200
1874	1872.0	03/18/15	NB	Read deposition transcript of Lamstein; digested same	1.600
1875	1873.0	03/20/15	NB	Read deposition transcript of Lauterborn; digested same	2.100
1876	1874.0	03/23/15	NB	Downloaded, printed and bound second set of filings by all defendants for JLN to review	0.400
1877	1875.0	03/23/15	NB	Printed Huffman QAD for JLN	0.100
1878	1876.0	03/25/15	NB	Read deposition transcript of Silverman; digested same	0.600
1879	1877.0	03/25/15	NB	Printed, reviewed and signed confidentiality agreement for myself; had JLN review and sign same	0.200
1880	1878.0	03/25/15	NB	E-mailed Confidentiality agreement to Merry Soelanto signed by JLN and myself	0.100
1881	1879.0	03/27/15	NB	Converted Schoolcraft opening statement to MS Word	0.100
1882	1880.0	03/30/15	NB	Printed IAB Documents for JLN; bound & collated same	0.400
1883	1881.0	03/31/15	NB	Printed and bound Caughey and Weiss Interviews	0.200
1884	1882.0	04/01/15	NB	Printed and bound exhibit list and witness list for Court	0.200
1885	1883.0	04/01/15	NB	Printed depositions of Huffman, James, Hanlon, Halpren, Gough, Ferrara, Duncan, Caughey, Broschart, Bernier and bound	0.700
1886	1884.0	04/01/15	NB	Compiled, sorted, copied and collated multiple trial exhibits	0.600
1887	1885.0	04/02/15	NB	Printed, collated and bound AS direct outline	0.200
1888	1886.0	04/08/15	NB	Read deposition transcript of Lwin; digested same	1.600
1889	1887.0	04/09/15	NB	Read deposition transcript of Marino; digested same	1.800
1890	1888.0	04/13/15	NB	Printed crime reporting review documents	0.200
1891	1889.0	04/14/15	NB	Read deposition transcript of Patel; digested same	1.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1892	1890.0	04/15/15	NB	Read deposition transcript of Sangenti; digested same	0.600
1893	1891.0	04/16/15	NB	Read deposition transcript of AS; digested same	3.100
1894	1892.0	04/16/15	NB	Read deposition transcript of AS (Volume II); digested same	2.900
1895	1893.0	04/16/15	NB	Read deposition transcript of AS (Volume III); digested same	2.500
1896	1894.0	04/17/15	NB	Read deposition transcript of LS; digested same	1.400
1897	1895.0	04/27/15	NB	Read deposition transcript of Trainor; digested same	0.400
1898	1896.0	04/27/15	NB	Read deposition transcript of Valenti; digested same	1.100
1899	1897.0	04/28/15	NB	Read deposition transcript of Weiss; digested same	1.300
1900	1898.0	05/01/15	NB	Read deposition transcript of Broschart; digested same	2.100
1901	1899.0	05/04/15	NB	Read deposition transcript of Duncan; digested same	0.700
1902	1900.0	05/05/15	NB	Read deposition transcript of Sawyer; digested same	0.800
1903	1901.0	05/06/15	NB	Read deposition transcript of Marquez; digested same	0.600
1904	1902.0	05/13/15	NB	Read deposition transcript of Purpi; digested same	0.750
1905	1903.0	05/13/15	NB	Calendared dates for JPTO, MIL, Jury Charge, Voir Dire,	0.100
1906	1904.0	06/02/15	NB	Read deposition transcript of Milone; digested same	0.750
1907	1905.0	06/02/15	NB	Read deposition transcript of Carrasco; digested same	0.900
1908	1906.0	06/04/15	NB	same	0.600
1909	1907.0	06/05/15	NB	Read deposition transcript of Halpren-Ruder; digested same	0.800
1910	1908.0	06/05/15	NB	Read deposition transcript of Lubit; digested same	1.100
1911	1909.0	06/17/15	NB	Printed and emailed defendants memoranda of law for reconsideration for JLN	0.200
1912	1910.0	06/17/15	NB	emailed defendants memoranda of law for reconsideration of AS	0.100
1913	1911.0	08/05/15	NB	Printed City's draft JPTO	0.100
1914	1912.0	08/06/15	NB	JPTO	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1915	1913.0	08/10/15	NB	Made multiple formatting changes to final S&C; prepared civil cover sheet and summons for same	0.700
1916	1914.0	08/11/15	NB	Printed, collated and stapled multiple discovery documents from City sent to JLN via email	0.200
1917	1915.0	08/13/15	NB	Printed spreadsheet from A. Scheiner with City's objections to plaintiffs JPTO	0.100
1918	1916.0	08/25/15	NB	Printed JPTO for JLN review	0.100
1919	1917.0	08/25/15	NB	Printed filing by NS responding to various arguments by defendants on JPTO exhibits and witnesses for JLN Review	0.100
1920	1918.0	08/25/15	NB	Printed, bound, sorted and tabbed Lauterborn Cross	0.600
1921	1919.0	08/25/15	NB	Printed, bound, sorted and tabbed Marino Cross	0.800
1922	1920.0	08/25/15	NB	Printed, bound, sorted and tabbed Carter Cross	0.500
1923	1921.0	08/25/15	NB	Printed, bound, sorted and tabbed Weiss Cross	0.600
1924	1922.0	08/25/15	NB	Printed, bound, sorted and tabbed Mauriello Cross	0.800
1925	1923.0	08/31/15	NB	Printed Amended Complaint and emailed to JLN	0.100
1926	1924.0	09/03/15	NB	Printed City letter re: JPTO schedule for JLN review	0.100
1927	1925.0	09/05/15	NB	Prepared Schoolcraft Trial Folder	0.200
1928	1926.0	09/05/15	NB	Gathered and Prepared Folder of Supplies for Schoolcraft Trial	0.250
1929	1928.0	02/03/13	NBS	Telephone conference with Peter Gleason; review of docket complaint and decision by J. Sweet.	2.500
1930	1929.0	02/07/13	NBS	Meeting with Adrian Schoolcraft; Peter Gleason and John Lenoir re possible representation.	2.500
1931	1930.0	02/08/13	NBS	Telephone conference with Peter Gleason re taking on new case	0.300
1932	1931.0	2/11/2013	NBS	Telephone conference with co-counsel; review of Floyd case.	0.500
1933	1932.0	2/12/2013	NBS	Appear for examination before trial of client in Floyd case and defend same (3.5) (before MJ Freeman); meeting with co-counsel and client in re going forward; review of emails re status.	5.500
1934	1933.0	2/13/2013	NBS	Telephone conference with Peter Gleason; telephone to Richard Guilbert re status.	0.500
1935	1934.0	2/14/2013	NBS	Telephone conference with client; review of Floyd decision; meeting with client and team.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1936	1935.0	2/15/2013	NBS	Review of files from counsel; review of pleadings; telephone call to co-counsel twice; review of penal code.	2.200
1937	1936.0	2/17/2013	NBS	Review of boxes from client and Guilbert.	2.500
1938	1937.0	2/18/2013	NBS	Review of decisions of file; review of production.	3.500
1939	1938.0	2/20/2013	NBS	Meeting with co-counsel; prepare subpoenas	0.800
1940	1939.0	2/22/2013	NBS	Review of emails; telephone call to co-counsel; telephone Graham Raymond (Village Voice).	0.700
1941	1940.0	2/24/2013	NBS	Travel with Peter Gleason to meet defendant and his father in Saugerties, NY.	5.200
1942	1941.0	2/27/2013	NBS	Review of file; prepare summons fo amended cmplt; file Summons with SDNY clerk; tc attempt service of same on Law Dept; telephone call to Peter Gleason re status of serving 5 remaining defendants.	2.800
1943	1942.0	2/28/2013	NBS	Review of examination before trial; prepare subpoena; prepare Notice of Appearance.	3.500
1944	1943.0	3/1/2013	NBS	Telephone conference with potential medical expert (.5); review of discovery; file Affirmation of Service; review of medical and hospital records.	3.200
1945	1944.0	3/2/2013	NBS	Review of Section 1983 and 242 issues and jury instructions for various theories of the case.	5.000
1946	1945.0	3/3/2013	NBS	Review of discovery; review of discovery plan; review of draft letter to Justice Department.	2.500
1947	1946.0	3/5/2013	NBS	Telephone conference with client re Justice letter and Chris Dunn three times; review of discovery record.	2.500
1948	1947.0	3/6/2013	NBS	Review of discovery records; telephone call to Chris Dunn (NYCLU); meeting with City CM Williams; Peter Gleason and Adrian Schoolcraft (2.1).	3.500
1949	1948.0	3/7/2013	NBS	Review of file; meeting with client and Peter Gleason; review of new matter.	3.800
1950	1949.0	3/9/2013	NBS	Meeting with co-counsel and intern in reference to status.	2.500
1951	1950.0	3/14/2013	NBS	Emails to opposing counsel; letter to Judge Sweet in reference to motion schedule.	0.700
1952	1951.0	3/20/2013	NBS	Review of Magistrate Judge letter; telephone call to Peter Gleason; letter to court re two motions; review of discovery file.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1953	1952.0	3/22/2013	NBS	Appearance in court on Floyd case to see Marino testify (2.5); telephone call to client (.3); call to Peter Gleason(.4); prepare Rule 34 demand for property.	4.200
1954	1953.0	3/23/2013	NBS	Review of motion and motion letter; research on taking high-level government employee's deposition.	3.500
1955	1954.0	3/25/2013	NBS	Working on opp to motions to quash and compel; telephone call with client and review of materials with client (1.5); telephone conference with Jon Norinsberg re Queens DA; suit and sharing information (0.5).	8.500
1956	1955.0	3/26/2013	NBS	Telephone conference with client (.5); call to Peter Gleason (.3); drafting memo of law in opposition to motion.	6.500
1957	1956.0	3/27/2013	NBS	Revising Memo of Law in Opposition (4.5); telephone call to client; meeting with Peter Gleason; mag and artist re demonstratives.	5.800
1958	1957.0	3/28/2013	NBS	Draft supplemental memo of law.	1.500
1959	1958.0	3/29/2013	NBS	Review of discovery; review of letter re gag order; telephone call to client; email team; call to Peter Gleason; telephone G. Rayma.	7.500
1960	1959.0	3/30/2013	NBS	Review of gag order cases (1.5); conference with team (1.0).	2.500
1961	1960.0	3/31/2013	NBS	Review of cases on gag order.	3.500
1962	1961.0	4/1/2013	NBS	Review of discovery; email reference discovery plea.	3.500
1963	1962.0	4/2/2013	NBS	Appearance at Floyd trial to hear Mauriello testify.	3.500
1964	1963.0	4/3/2013	NBS	Appearance at Floyd trial to hear part of Dr. Fagan direct.	2.500
1965	1964.0	4/4/2013	NBS	Drafting memo of law on prior restraint.	7.500
1966	1965.0	4/5/2013	NBS	Revise memo of law on prior restraint.	3.800
1967	1966.0	4/7/2013	NBS	Meeting at upstate with' team.	8.600
1968	1967.0	4/8/2013	NBS	Meeting with client all day re prep for case and ebt	7.500
1969	1968.0	4/9/2013	NBS	Continued review of discovery)(4.0); MHL on emergency hospitalization; meeting with potential expert re: medical malpractice issues (1.5); meeting with John re: motion; telephone call to Walker re: same.	6.500
1970	1969.0	4/10/2013	NBS	Meeting with team after court appearance.	1.500
1971	1970.0	4/11/2013	NBS	Meeting with team and Rae Koscheck re: NYPD re adm trial issues.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1972	1971.0	4/14/2013	NBS	Telephone conference with Peter Gleason re: status.	0.500
1973	1972.0	4/15/2013	NBS	Review of production.	2.000
1974	1973.0	4/16/2013	NBS	Review of production	2.500
1975	1974.0	4/22/2013	NBS	Review of testimony in discovery	3.000
1976	1975.0	4/23/2013	NBS	Review of PG on Marino, Mauriello, and Lauterborn; review of reports of PG by IAB.	4.500
1977	1976.0	4/24/2013	NBS	Review of AEO files.	3.500
1978	1977.0	4/25/2013	NBS	Appearance at 1 Police Plaza for conference; telephone call to client re: status; review of interviews by QAD.	2.500
1979	1978.0	4/26/2013	NBS	Meeting with client re: background and chronological with John Lenoir.	6.500
1980	1979.0	4/27/2013	NBS	Meeting with client re: background with John Lenoir.	7.500
1981	1980.0	4/28/2013	NBS	Telephone conference with John Lenoir re: upcoming trial with NYPD.	0.200
1982	1981.0	4/29/2013	NBS	Telephone conference with with client (1.0) re: trial; research on collateral estoppel issue.	2.800
1983	1982.0	4/30/2013	NBS	Telephone conference with client; research on collateral estoppel issue.	2.800
1984	1983.0	5/1/2013	NBS	Telephone conference with Peter Gleason re: status; emails with clients re: same.	0.500
1985	1984.0	5/2/2013	NBS	Draft letter to Publicker re: collateral estoppel issue; email all counsel re: discovery deadlines; email court re: same.	1.500
1986	1985.0	5/3/2013	NBS	Review of cases; email letter to opposing counsel re: collateral examination before trial issue.	0.700
1987	1986.0	5/7/2013	NBS	Listening to day-long recording of 10/31/09; taking notes thereof (7.0); review of discovery requests; prepare same.	9.500
1988	1987.0	5/8/2013	NBS	Review of recordings; prepare discovery responses.	5.500
1989	1988.0	5/9/2013	NBS	Meeting with J. Lenoir re: case and status; review of internal memos by IAB; review of recordings.	3.200
1990	1989.0	5/10/2013	NBS	Continued review of discovery.	3.500
1991	1990.0	5/13/2013	NBS	Meeting with John and Melissa re: NYPP; telephone call with client.	2.500
1992	1991.0	5/14/2013	NBS	Telephone conference with client re: status; review of discovery files; outline of production.	3.800
1993	1992.0	5/15/2013	NBS	Continued review of production; email opposing counsel re: status of IPP trial and Queens DA document.	2.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1994	1993.0	5/16/2013	NBS	Review of files; telephone call to co-counsel; telephone client; call to Lisa Bland.	5.500
1995	1994.0	5/17/2013	NBS	Continued review of discovery; telephone call to client (2 times); call to John Lenoir; email re: same.	3.500
1996	1995.0	5/18/2013	NBS	Telephone conference with client and co-counsel.	1.200
1997	1996.0	5/20/2013	NBS	Review of personal file on defendants; sick report and duty status at 10/31/09; research on Judge Sweet letter; telephone call to John Lenoir re: Jimmy McCutkin re: telephone to Lisa Bland.	3.500
1998	1997.0	5/21/2013	NBS	Meeting with Jon Lenoir; telephone conference with co-counsel and Jim McCutcheon; telephone conference office of Lisa Bland; review of civil commitment articles and decision on dangerousness predictions; review of discovery record; prepare responses to objections to City Defendants demands; listening to recording of IAB interview.	5.800
1999	1998.0	5/22/2013	NBS	Telephone conference re: status; telephone call Lisa Bland re: possible deal (demand of back pay in consideration of resignation); review and revised responses to discovery demands.	1.800
2000	1999.0	5/23/2013	NBS	Telephone conference with client; call to co-counsel; review of decisions; email re: status.	0.800
2001	2000.0	5/24/2013	NBS	Telephone conference with client re: status; review of emails from co-counsel re Eli Silverman.	0.400
2002	2001.0	5/30/2013	NBS	Telephone conference with client; telephone call to Lisa Bland's office.	0.500
2003	2002.0	6/3/2013	NBS	Telephone conference with co-counsel; letter to Judge Sweet on discovery; telephone call to Lisa Bland re: now want demand from us and will not agree to stay.	3.500
2004	2003.0	6/4/2013	NBS	Telephone conference with client; telephone call co-counsel; draft letters to Judge Sweet re: stay and re: alleged discovery deficiencies.	3.500
2005	2004.0	6/5/2013	NBS	Appearance in court at conference before Judge Sweet handled by John Lenoir; conference with John re: same.	1.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2006	2005.0	6/6/2013	NBS	Review of emails; review of proposed order; review of notes on defendant's examination before trial; email co-counsel; prepare for meeting with experts.	1.800
2007	2006.0	6/7/2013	NBS	Review of Queens D.A. files (20); meeting with John Lenoir and potential experts on NYPD and dangerousness (2.0); telephone client re: motion for stay of NYPD	4.500
2008	2007.0	6/9/2013	NBS	Preparing proposed Order to Show Cause on stay of adm proceedings	3.500
2009	2008.0	6/10/2013	NBS	Revised Order to Show Cause; filed same; emails with counsel; telephone call to co-counsel; telephone call to client re: status; 2nd appearance at court.	5.500
2010	2009.0	6/11/2013	NBS	Research on Younger abstention issues for stay motion.	5.500
2011	2010.0	6/12/2013	NBS	Review of Younger case law.	1.500
2012	2011.0	6/13/2013	NBS	Review of Younger et al decisions on stay motion.	3.500
2013	2012.0	6/14/2013	NBS	Email regarding press contracts; telephone call to client; further research on Younger issue.	3.500
2014	2013.0	6/18/2013	NBS	Drafting reply on stay; research on issues re: same.	8.500
2015	2014.0	6/19/2013	NBS	Drafting reply; telephone call to client re: reply transcript of 10/31/09; call from Village Voice; telephone G. Rayman re: status of case.	5.500
2016	2015.0	6/20/2013	NBS	Telephone conference with co-counsel; review of Floyd submissions.	2.500
2017	2016.0	6/25/2013	NBS	Telephone conference with client; telephone co-counsel re: travel to upstate; review of issues regardig: litigation with indigent client; prepare for same.	2.800
2018	2017.0	6/26/2013	NBS	Travel to Johnstown for meeting with client [8 hours of travel].	9.000
2019	2018.0	6/27/2013	NBS	Review of tapes for the purpose of responding to discovery demands by the City for requests for admissions and providing additional information to the defendants about the recordings.	7.500
2020	2019.0	6/29/2013	NBS	Review of stay decision on NYPD trial.	0.500
2021	2020.0	6/30/2013	NBS	Review of tapes and drafting response to Court Order re: complication of Plaintiff's deposition testimony and requests to admit.	5.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2022	2021.0	7/1/2013	NBS	Telephone conference with client twice (1.5); review of various tapes; review of transcripts; prepare Response to the Court Order re: discovery.	3.800
2023	2022.0	7/10/2013	NBS	Travel to Albany and meet with the client at John Garber's office (194 Washington Avenue); return to NYC { 8 hours travel time }	8.500
2024	2023.0	7/11/2013	NBS	Telephone conference with R. Gilbert; telephone conference with client re decision; telephone call to client; telephone Gilbert	0.900
2025	2024.0	7/18/2013	NBS	Telephone conference with client re Judge Sweet and re: discovery status; email opposing counsel re: same and schedule of examination before trial.	0.700
2026	2025.0	7/22/2013	NBS	Telephone conference with client; re: status; review of to do list; memo to file.	1.500
2027	2026.0	7/23/2013	NBS	Telephone conference with co-counsel re: status.	0.400
2028	2027.0	7/24/2013	NBS	Telephone conference with Magdalena re: status	0.300
2029	2028.0	7/25/2013	NBS	Prepare for all counsel conference call; telephone co-counsel; telephone call client.	3.500
2030	2029.0	7/26/2013	NBS	Preparing documents for client.	0.900
2031	2030.0	7/27/2013	NBS	Meeting with T. Skinner re: case.	0.800
2032	2031.0	7/30/2013	NBS	Revising documents (sub of counsel; memo of understanding; discovery demands) (1.5); telephone call H. Suckle re: possible involvement; telephone co-counsel re: status; review of Section 1983 case law (1.5).	3.500
2033	2032.0	7/31/2013	NBS	Meeting with H. Suckle re: hospital; draft memo to client; revise sub of counsel; memo of goals; document demand; emails re: discovery plan with co-counsel and opposing counsel; telephone call to client re: status.	6.500
2034	2033.0	8/1/2013	NBS	Meeting with Magdalen re: status and case; review of case law in jury instructions.	2.800
2035	2034.0	8/6/2013	NBS	Telephone conference with co-counsel; review of emails and press coverage; call from G. Rayman re: book out.	0.800
2036	2035.0	8/13/2013	NBS	Read recent book by G. Raymond called NYPD Tapes	4.500
2037	2036.0	8/14/2013	NBS	Travel to Mayfield, NY (4.5); review of recent decision in Floyd case	4.750
2038	2037.0	8/15/2013	NBS	Meeting with client re: examination before trial preparation	6.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2039	2038.0	8/16/2013	NBS	Meeting with client to discuss case and deposition (7.5); travel back to NY (4.5).	9.750
2040	2039.0	8/20/2013	NBS	Telephone conference with client; revised letter to court.	1.500
2041	2040.0	8/21/2013	NBS	Telephone conference with co-counsel; emails with opposing counsel re: discovery schedule.	1.200
2042	2041.0	8/22/2013	NBS	Telephone conference with Jon Lenoir re: status; telephone Greg Radomisle re: hospital inspection; review of emails re: schedule; conference with all counsel re: schedule; draft objections (2.5); conference with Adrian Schoolcraft re: same.	4.200
2043	2042.0	8/23/2013	NBS	Meeting with Magdalena re legal research on state action; telephone call with Jon Lenoir re: status.	1.500
2044	2043.0	8/24/2013	NBS	Meeting with investigator (1.0); telephone conference with Jon Lenoir re: Paul Brown (0.3).	1.300
2045	2044.0	8/25/2013	NBS	Review of production for AEO issue (5.0); telephone call to J. Smith (photography of inspection).	5.500
2046	2045.0	8/26/2013	NBS	Continued review of production.	3.500
2047	2046.0	8/27/2013	NBS	Travel to Saugerties to meet client (4.5); meeting with client re: status (3.5).	5.750
2048	2047.0	8/28/2013	NBS	Review of decision on jury order; telephone Pete Gleason re: suits and apartment; review of counsel; review of conference orders; review of production.	3.500
2049	2048.0	8/29/2013	NBS	Review of productions; telephone call to client (0.5)	3.800
2050	2049.0	8/30/2013	NBS	Continued review of production	3.500
2051	2050.0	9/3/2013	NBS	Telephone conference with client re: status.	1.500
2052	2051.0	9/4/2013	NBS	Email to client re: status; review of status report; review of letter motion by city.	0.700
2053	2052.0	9/6/2013	NBS	Review of correspondence on discovery; drafting AEO letter motion; telephone call to client re: status and AEO letter issues (1.0)	3.500
2054	2053.0	9/8/2013	NBS	Drafting letter motion on AEO.	2.500
2055	2054.0	9/9/2013	NBS	Revising letter motion; emails on same.	0.800
2056	2055.0	9/10/2013	NBS	Telephone conference with client.	0.200
2057	2056.0	9/16/2013	NBS	Email regarding status; telephone call to client.	0.500
2058	2057.0	9/18/2013	NBS	Telephone call and emails reference 81 inspection	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2059	2058.0	9/19/2013	NBS	Inspection at 81 with defendants, client, and Mag.	5.500
2060	2059.0	9/21/2013	NBS	Meeting with client.	3.500
2061	2060.0	9/22/2013	NBS	Review of motion letter re: AEO and personal property motion.	2.500
2062	2061.0	9/23/2013	NBS	Draft reply letter on AEO and personal property motion telephone conference with client; telephone call with Mag; telephone call to John Lenoir re: status; review of 81 inspection photos; review of AEO designations.	2.500
2063	2062.0	9/25/2013	NBS	Appearance in court on motions (2.0); meeting with team re: case and examination before trial (2.0); prepare for examinations before trial of plaintiff	7.500
2064	2063.0	9/26/2013	NBS	Appearance for client; examination before trial and prepare for same.	9.000
2065	2064.0	9/27/2013	NBS	Appearance for examination before trial of defendant and prepare for same.	9.000
2066	2065.0	9/29/2013	NBS	Meeting with client re: case and next Steps.	1.500
2067	2066.0	9/30/2013	NBS	Telephone conference with co-counsel; review of emails; review of productions.	2.500
2068	2067.0	10/1/2013	NBS	Meeting with client re: examination before trial and inspection preparation.	3.500
2069	2068.0	10/2/2013	NBS	Inspection at Jamaica Hospital; visit Queen's location; Meeting with client; reviewing tapes re: examination before, trial.	7.500
2070	2069.0	10/4/2013	NBS	Preparing for Marino and Mauriello examination before trial (5.0); telephone conference with co-counsel; emails with opposing counsel re: adjournment for Mauriello; review of PG & Floyd trial transcripts.	5.500
2071	2070.0	10/7/2013	NBS	Prepared for examination before trial; conference call with co-counsel; conference with client.	5.500
2072	2071.0	10/8/2013	NBS	Preparing for and taking Marino's examination before trial; calls to Court on status of various motions.	9.500
2073	2072.0	10/9/2013	NBS	Telephone conference with John Lenoir re: status.	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2074	2073.0	10/9/2013	NBS	Meeting with co-counsel; review and revise status report; review of motions and filing on case re: discovery; telephone conference with G. Raymond re: Mauriello counterclaims (will comment in opposing papers).	4.500
2075	2074.0	10/10/2013	NBS	Review of email; conference with co-counsel; review of law on tortious interference claim; email opposing counsel re: motion to amend Mauriello answer.	1.800
2076	2075.0	10/11/2013	NBS	Drafting letter to Court; research on motion to amend.	3.500
2077	2076.0	10/13/2013	NBS	Telephone conference with client re: status re: NYCLU and Dunn and going forward; telephone call to John Lenoir re: same	2.300
2078	2077.0	10/14/2013	NBS	Telephone conference with L. Dunn; telephone call to John Lenoir re: case; drafting and research on motion to strike Mauriello answer; discovery matters (AEO personal property) and opposing to motion to amend pleadings (7.5).	8.500
2079	2078.0	10/15/2013	NBS	Revised motion and memo; emails re: same; letter to court; conference with client re: status.	3.500
2080	2079.0	10/16/2013	NBS	Prepare for court appearance; appear before Judge Sweet on various motions (3.2); conference with trial team; telephone call with Howard Suckle re: status and medical defendant's examination before trial; email to client.	4.500
2081	2080.0	10/17/2013	NBS	Telephone conference with client; emails re: status; email prior counsel re: discovery matters.	0.800
2082	2081.0	10/18/2013	NBS	Telephone conference with client; review of medical documents responses; email opposing counsel re: status of production.	1.800
2083	2082.0	10/22/2013	NBS	Meeting with H. Suckle re: medical examination before trial preparation.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2084	2083.0	10/23/2013	NBS	Telephone conference with court re: oral argument date; telephone call with Walter Kretz re: same; conference with co-counsel; telephone call and email to client; telephone J. Eterno re: status and Monell issues (alleged conflict of interest issue raised by Law Dept in the past); review of Jamaica Hospital records; email with prior counsel re: substitution and document search.	3.500
2085	2084.0	10/24/2013	NBS	Prepared for examination before trial of Dr. Bernier	5.500
2086	2085.0	10/25/2013	NBS	Appearance for Bernier examination before trial; wait for response from Court on video objection; meeting with team.	3.200
2087	2086.0	10/27/2013	NBS	Research on dangerous assessment.	3.000
2088	2087.0	10/28/2013	NBS	Telephone conference with client re: status; emails re: schedule and video objections.	0.800
2089	2088.0	10/29/2013	NBS	Preparation for examination before trial of Mauriello; review of research on video use conference with 10-10.	5.800
2090	2089.0	10/30/2013	NBS	Telephone conference with client (1.0); email opposing counsel re: adjournment on Mauriello; review of emails; review of Mauriello testimony in Floyd case; review of AS personnel file records for examination before trial (2.0)	4.500
2091	2090.0	11/1/2013	NBS	Telephone conference with client; telephone call to John Lenoir re: Stop and Frisk; status.	0.500
2092	2091.0	11/3/2013	NBS	Review of Lauterborn recordings and preparation for his examination before trial.	4.200
2093	2092.0	11/4/2013	NBS	Prepare for examination before trial.	2.500
2094	2093.0	11/5/2013	NBS	Review of record; prepare for Lauterborn examination before trial	4.500
2095	2094.0	11/7/2013	NBS	Prepare for and take examination before trial of Lauterborn; conference with team; telephone call with client re: status.	9.500
2096	2095.0	11/8/2013	NBS	Meeting with investigator (1.0); telephone call same and Mag (0.5); review of research and emails.	3.500
2097	2096.0	11/14/2013	NBS	Email in reference to Daily News Article; telephone call to Mag Bauza re: interview with Carol Street.	1.200
2098	2097.0	11/15/2013	NBS	Prepare for Mauriello.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2099	2098.0	11/19/2013	NBS	Telephone conference with B. Shaffer re: Larry Schoolcraft examination before trial re: examination before trial of Larry Schoolcraft; prep for ebts of polce defendants	2.200
2100	2099.0	11/20/2013	NBS	Prepare for Marino examination before trial.	2.500
2101	2100.0	11/21/2013	NBS	Prepare for Marino examination before trial.	2.500
2102	2101.0	11/22/2013	NBS	Prepare for and appear at Mauriello examination before trial (busted by defendant).	3.500
2103	2102.0	11/26/2013	NBS	Drafting notices for depositions ; review of email.	1.000
2104	2103.0	12/1/2013	NBS	Review of Caughey, Weiss and Hanlon recordings; prepare for Caughey examination before trial; telephone conference, re: status (left message).	2.800
2105	2104.0	12/2/2013	NBS	Telephone conference with W. Krétz re: Mauriello; telephone emails with counsel re: status and discovery deadline.	2.500
2106	2105.0	12/4/2013	NBS	Letter to opposing counsel; email to opposing counsel re numerous discovery disputes.	1.500
2107	2106.0	12/6/2013	NBS	Emails re: status; prepare opposition to motion for reconsideration.	3.500
2108	2107.0	12/7/2013	NBS	Telephone conference with client and John Lenoir; prepare for Caughey examination before trial; prepare for opposition to Mauriello reconsideration.	2.800
2109	2108.0	12/8/2013	NBS	Prepare for Caughey examination before trial.	2.500
2110	2109.0	12/9/2013	NBS	Take examination before trial of Caughey.	7.500
2111	2110.0	12/17/2013	NBS	Prepare for examination before trial of Mauriello; review of recent correspondence.	3.500
2112	2111.0	12/18/2013	NBS	Prepare for Mauriello; conference with co-counsel, telephone call to client re: status.	4.500
2113	2112.0	12/19/2013	NBS	Prepare for Mauriello.	3.500
2114	2113.0	12/20/2013	NBS	Take examination before trial of Mauriello.	8.500
2115	2114.0	12/24/2013	NBS	Meeting with client and John Lenoir re: status and possible settlement demand.	3.200
2116	2115.0	12/29/2013	NBS	Meeting with client to review various tape recording.	4.500
2117	2116.0	12/30/2013	NBS	Meeting with client and review various tape recordings (4.3); obtain tape recorder from NYPD and send to specialist for enhancement	4.500
2118	2117.0	12/31/2013	NBS	Review of production; research on compstat.	1.800
2119	2118.0	1/1/2014	NBS	Review of Silverman and Eterno book	4.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2120	2119.0	1/2/2014	NBS	Meeting with client re: review of tapes; telephone conference with co-counsel; emails re: schedule; letter to Court re: schedule	1.800
2121	2120.0	1/3/2014	NBS	Prepare for Boston and Huffman examination before trial	4.500
2122	2121.0	1/5/2014	NBS	Prepare for Boston and Huffman examination before trial.	3.700
2123	2122.0	1/6/2014	NBS	Prepare for and take examination before trial of Boston and Huffman; meeting with team re: status and going forward	10.500
2124	2123.0	1/8/2014	NBS	Letter to Court; email re: scheduling	0.200
2125	2124.0	1/12/2014	NBS	Prepare for Hanlon examination before trial	3.500
2126	2125.0	1/13/2014	NBS	Prepare for and take Hanlon examination before trial; conference with team re: examination before trial and case	8.500
2127	2126.0	1/15/2014	NBS	Appearance in court; conference with co-counsel; email re: status	2.300
2128	2127.0	1/16/2014	NBS	Review of production; review of report on crime reporting; emails re: status of examination before trial	3.500
2129	2128.0	1/17/2014	NBS	Review of documents produced; review of report of crime reporting; review of prior discovery demands	3.500
2130	2129.0	1/23/2014	NBS	Prepare documents for supplemental production; long status conference with client re: need for AEO production and status of case (1.3)	1.900
2131	2130.0	1/24/2014	NBS	Produce documents	0.400
2132	2131.0	1/27/2014	NBS	Revising letter to website responders; sending Out same; letter to City Defendants re: examination before trial	1.200
2133	2132.0	1/28/2014	NBS	Prepare for Dr. Lamstein	3.500
2134	2133.0	1/29/2014	NBS	Prepare for Dr. Lamstein	2.300
2135	2134.0	1/30/2014	NBS	Prep for and take Dr. Lamstein examination before trial	9.500
2136	2135.0	2/3/2014	NBS	Telephone conference with co-counsel; email reference examination before trial.	0.500
2137	2136.0	2/5/2014	NBS	Telephone conference with client; emails reference examination before trial; and letter to Judge Sweet.	0.800
2138	2137.0	2/7/2014	NBS	Email regarding status with client; meeting with Mag in reference to redaction issues; letter to Law Department reference redaction; drafting and revising discovery demands.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2139	2138.0	2/10/2014	NBS	Telephone conference with the court clerk reference submission on February 10, 2014; letter to court; prepare for doctor's examination before trial (2.8)	3.800
2140	2139.0	2/11/2014	NBS	Prepare for and attend Dr. Bernier examination before trial.	8.500
2141	2140.0	2/12/2014	NBS	Prepare for and attend Dr. Isakov examination before trial.	9.500
2142	2141.0	2/16/2014	NBS	Telephone conference with John Lenoir and client reference status; review of privilege issues.	1.700
2143	2142.0	2/18/2014	NBS	Review of examination before trial for discovery letter; emails reference defendant's examination before trial and Norinsberg termination letter; request JHMC provide and produce the two EMT's.	3.800
2144	2143.0	2/19/2014	NBS	Telephone conference with co-counsel (HS) reference medical case; state action; pro and sub due process; review of emails reference discovery status; telephone call to John Lenoir reference same.	2.500
2145	2144.0	2/20/2014	NBS	Email co-counsel; client review of examination before trial for motion.	2.800
2146	2145.0	2/21/2014	NBS	Review of cited psychiatric journals.	2.500
2147	2146.0	2/23/2014	NBS	Review of examination before trial; telephone co-counsel; telephone conference with client reference status.	3.500
2148	2147.0	2/24/2014	NBS	Review of examination before trial; email reference recording.	0.400
2149	2148.0	2/25/2014	NBS	Review of examination before trial; transcripts for discovery issues; telephone call to Walter Kretz (two times) regarding possible work out.	5.000
2150	2149.0	2/27/2014	NBS	Drafting letters to court re outstanding discovery disputes by plaintiff and by defendants	3.500
2151	2150.0	2/28/2014	NBS	Letter motion regarding discovery issue.	6.500
2152	2151.0	3/3/2014	NBS	Review of emails and letters	0.500
2153	2152.0	3/4/2014	NBS	Prepare for and attend meeting to confer; emails reference status same.	1.500
2154	2153.0	3/8/2014	NBS	Review of letters on discovery motions; email to team reference response.	1.200
2155	2154.0	3/11/2014	NBS	Meeting with team John Lenoir and Mag Bauza; drafting letter to court.	2.300
2156	2155.0	3/24/2014	NBS	Meeting with team; telephone call with client.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2157	2156.0	3/26/2014	NBS	Review of drafts 30(b)(6); appear in court on discovery status (2.2); telephone call client; review of document demands; meet and confer with opposing counsel (1.0).	3.800
2158	2157.0	3/27/2014	NBS	Telephone conference with client (twice) re subject matters of numerous 30(b)(6) notices; revising same.	3.500
2159	2158.0	3/28/2014	NBS	Meeting with Mag reference jury instructions; telephone call with client reference 30(b)(6); revising same and serving same.	4.500
2160	2159.0	3/31/2014	NBS	Telephone conference with client; review of discovery; emails reference settlement.	1.800
2161	2160.0	4/1/2014	NBS	Telephone conference with City re: settlement; telephone conference with client; conference with team re: same.	1.500
2162	2161.0	4/4/2014	NBS	Review of medical expert decisions and affidavit; prepare for Trainor examination before trial.	2.500
2163	2162.0	4/7/2014	NBS	Prepare motion to strike paragraph six of Mauriello's counterclaim (1.3); prepare outline of discovery issues; telephone call to D. Beekman (Daily News); telephone conference Graham Raymond; telephone MJ Freeman's chambers; email all counsel.	2.500
2164	2163.0	4/8/2014	NBS	Prepare for Trainor examination before trial.	2.800
2165	2164.0	4/9/2014	NBS	Preparing for hearing on Raymond motion to compel; appearance in court on motion (2.2); prepare for Trainor and Gough examination before trial.	2.800
2166	2165.0	4/10/2014	NBS	Prepare for and take deposition of Trainor; prepare for Gough examination before trial.	8.900
2167	2166.0	4/11/2014	NBS	Prepare for and take Gough examination before trial	7.800
2168	2167.0	4/13/2014	NBS	Prepare for and meet with potential expert (Roy Lubit).	4.500
2169	2168.0	4/14/2014	NBS	Telephone conference with co-counsel re: status; conference with client; emails with opposing counsel re: new dates for settlement demands/offers/conference; draft letter to MJ Freeman re: same; email Hearn.	1.800
2170	2169.0	4/15/2014	NBS	Telephone conference with H. Suckle re: status and settlement.	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2171	2170.0	4/16/2014	NBS	Telephone conference with team (1.0); conference with client re: settlement demands (1.2); research on commitment cases; state action and Section 1983; review of Plaintiffs demands.	5.800
2172	2171.0	4/17/2014	NBS	Telephone conference with team; review of decisions; telephone Mag; telephone Howard; telephone John; letter to all defendants counsel re: Norinsberg termination letter; telephone call to S. Mettham re: settlement.	2.900
2173	2172.0	4/18/2014	NBS	Various telephone calls with John Lenoir; telephone client; review of decisions on involuntary hospital and damages.	3.500
2174	2173.0	4/22/2014	NBS	Telephone conference with Joe Ferrero.	0.500
2175	2174.0	4/23/2014	NBS	Drafting opposition to Jamaica Hospital motion for protective order; prepare for and attend examination before trial of Bernier	8.500
2176	2175.0	4/24/2014	NBS	Prepare for Sawyer examination before trial (3.0); revise opposition to Jamaica Hospital protective order motion.	3.500
2177	2176.0	4/25/2014	NBS	Prepare for and take deposition of Sawyer.	6.500
2178	2177.0	4/27/2014	NBS	Preparing reply to Mauriello opposition	2.800
2179	2178.0	4/28/2014	NBS	Prepare for and take Duncan examination before trial and conference with all counsel and MJ Freeman re: settlement discussion.	7.800
2180	2179.0	4/29/2014	NBS	Review of state motion cases; meeting with co-counsel; call to client.	2.500
2181	2180.0	4/30/2014	NBS	Appearance in court on JHMC motion for protective order and Adrian's motion to stifle Mauriello counterclaims reference (2.2); prepare for same; lunch meeting with team and colleague of John's re: case.	3.800
2182	2181.0	5/2/2014	NBS	Telephone conference with Gregory Radomsile reference examination before trial; emails to opposing counsel' re: same.	0.800
2183	2182.0	5/5/2014	NBS	Telephone conference with Sheri; telephone call to John Lenoir; prepare letter to Judge Sweet re: Plaintiff's motion to compel; telephone to John Cohen re: fees; review of Gleason fees.	2.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2184	2183.0	5/8/2014	NBS	Prepare for conference; attend to conference with Magistrate Freeman re: settlement; hospital defendant have no pay status and City willing to continue discussions, email client re: status; revising letter to Judge; review of opinion on Mauriello counterclaim/motion to strike Plaintiff (0.5); research on law enforcement privileged (1.0).	4.500
2185	2184.0	5/11/2014	NBS	Prepare for James examination before trial.	3.500
2186	2185.0	5/12/2014	NBS	Prepare for and take James examination before trial.	6.800
2187	2186.0	5/13/2014	NBS	Travel to Holbrook and meet with Ferrara and his wife.	4.500
2188	2187.0	5/14/2014	NBS	Prepare and take examination before trial of Marquez.	8.400
2189	2188.0	5/15/2014	NBS	Prepare for and take examination before trial of Sangetti (4.5); emails with client re: status and settlement (0.5).	5.000
2190	2189.0	5/19/2014	NBS	Review of production; prepare for meeting with client; telephone call with co-counsel; research on discovery issues (law enforcement privilege).	3.800
2191	2190.0	5/20/2014	NBS	Travel to and from Johnstown, NY meeting with client; conference with Magistrate Freeman; ex-parte conference with Magistrate Freeman.	8.250
2192	2191.0	5/22/2014	NBS	Drafting opposition to City motion for protective order and cross-motion for documents, research on same.	8.500
2193	2192.0	5/23/2014	NBS	Research on blue wall silence (2.5); telephone call to potential witness (Stephen Lerner); telephone to Lubit; email team; email client; review of document production; telephone conference with Jon Norinsberg re: 81 locker photos.	4.500
2194	2193.0	5/28/2014	NBS	Prepare for conference of motion; appear on motion before Judge Sweet (2.8); telephone call to Dr. Lubit; telephone call to the office of Eterno; conference with all counsel re: schedule and need 30-45 days; prepare for Weiss examination before trial; conference with team re: Weiss; telephone Jon Norinsberg re: locker photos.	8.500
2195	2194.0	5/29/2014	NBS	Prepare for Weiss: take Weiss examination before trial; prepare for JHMC.	9.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2196	2195.0	5/30/2014	NBS	Prepare for and take examination before trial of Jamaica Hospital (Maffia)	4.500
2197	2196.0	6/2/2014	NBS	Telephone conference with client; emails with opposing counsel re: discovery; reviewing production for index.	1.800
2198	2197.0	6/3/2014	NBS	Email regarding plan for discovery; production of Aetna documents and docket photos; telephone call to J. Ferrara re: examination before trial for 6/5/14.	1.500
2199	2198.0	6/4/2014	NBS	Prepare for Ferrara examination before trial; telephone conference with co-counsel re: same.	3.200
2200	2199.0	6/5/2014	NBS	Meeting with team and J. Ferrara; attend deposition of J. Ferrara at Law Department; drafting discovery demands for Mauriello.	9.500
2201	2200.0	6/6/2014	NBS	Prepare discovery demands re: Mauriello (1.5); conference call with John Eterno; Eli Silverman and team re: expert issues (compstat, blue wall, and digital recorder); review of New York City conflict of interest issue, law, decision (1.2)	3.200
2202	2201.0	6/8/2014	NBS	Revising discovery demand for Mauriello counterclaim.	1.200
2203	2202.0	6/9/2014	NBS	Telephone conference with client re: status of case.	2.000
2204	2203.0	6/10/2014	NBS	Drafting demands on Mauriello; drafting letter to court re: amended discovery schedules.	0.800
2205	2204.0	6/11/2014	NBS	Travel to Rhode Island and meet with Dr. Dan re: ER expert.	6.500
2206	2205.0	6/12/2014	NBS	Continue meeting with Dr. Dan re: ER expert; review parts of PX69 and home invasion recording with expert; revised and drafted discovery demand; travel back to New York.	5.500
2207	2206.0	6/13/2014	NBS	Telephone conference with Eli Silverman and John Eterno re: expert discovery schedule (1.0); review of conflict laws; telephone call to Mag Bauza; telephone to John Lenoir; memo to file on ER expert (.5)	4.500
2208	2207.0	6/16/2014	NBS	Review of city letter re: supplemental discovery; conference with co-counsel.	0.800
2209	2208.0	6/17/2014	NBS	Prepare for Broschart.	3.500
2210	2209.0	6/18/2014	NBS	Prepare for and take Broschart re: examination before trial.	7.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2211	2210.0	6/19/2014	NBS	Review of scheduling order; email with team re: schedule; email Dr Lubit; review of Patrol Guide; prepare for Duncan examination before trial (3.0)	4.500
2212	2211.0	6/20/2014	NBS	Draft opposition to reconsider; review of Duncan examination before trial; prepare for Duncan.	4.500
2213	2212.0	6/23/2014	NBS	Telephone conference with client (log) re: status; prepare for and take examination of Duncan; emails with opposing counsel re: schedule; telephone call to Dr. Patel.	7.500
2214	2213.0	6/26/2014	NBS	Emails with opposing counsel re: schedule; conference with co-counsel re: same.	0.500
2215	2214.0	6/27/2014	NBS	Review of Mauriello examination before trial; telephone call to Dr. Roy Lubit; and prepare for Mauriello examination before trial.	3.500
2216	2215.0	6/28/2014	NBS	Review of Mauriello examination before trial; review of Lubit affirmation in Monaco.	4.500
2217	2216.0	6/29/2014	NBS	Review of Mauriello examination before trial; prepare for continued examination before trial of Mauriello (4.5); conference with client re: status; email Dr. Lubit; email John Lenoir.	7.500
2218	2217.0	7/1/2014	NBS	Prepare and take Mauriello examination before trial.	9.500
2219	2218.0	7/3/2014	NBS	Prepare and take Dr. Lwin examination before trial; meeting with team re: expert report; lunch with team.	3.800
2220	2219.0	7/6/2014	NBS	Prepare for Jamaica Hospital ebt (Dhar) on policy issue.	3.800
2221	2220.0	7/7/2014	NBS	Take and prepare for Jamaica Hospital examination before trial.	7.500
2222	2221.0	7/9/2014	NBS	Telephone conference with police experts.	0.800
2223	2222.0	7/14/2014	NBS	Prepare for examination before trial of City 30(b)(6) witnesses.	1.500
2224	2223.0	7/15/2014	NBS	Prepare for 30(b)(6) of witnesses on appeal; review and quatoa issues; prepare for City examination before trial on training; disciplines and crime reporting.	3.200
2225	2224.0	7/16/2014	NBS	Take deposition 30(b)(6) witnesses of City in the morning and afternoon; prepare for same; conference with co-counsel; conference with court clerk; prepare for examination before trial next day.	9.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2226	2225.0	7/17/2014	NBS	Prepare for and take examination before trial of City 30(b)(6) witnesses on performance evaluation of supervisors and of police officers.	6.500
2227	2226.0	7/18/2014	NBS	Review of prior arguments and submissions discussions outstanding; conference with Dr. Halpern and team.	3.500
2228	2227.0	7/21/2014	NBS	Drafting letter to Court; review of transcript of prior hearing; research on legal issues raised by objections and Purpi examination before trial.	3.400
2229	2228.0	7/22/2014	NBS	Telephone conference with client and team; prepare letter.	2.500
2230	2229.0	7/23/2014	NBS	Prepare for examination before trial on Thursday; review of recent City production, emails with opposing counsel re: examination before trial.	4.500
2231	2230.0	7/24/2014	NBS	Prepare for and attend City 30(b)(6) (cooper); prepare for examination before trial for Dr. Patel; conference with client.	7.500
2232	2231.0	7/25/2014	NBS	Prepare and take examination of trial of Dr. Patel; draft letter to Court on application re: Dr. Patel.	3.500
2233	2232.0	7/28/2014	NBS	Review of Dr. Lwin examination before trial; review letter from Jamaica Hospital.	1.200
2234	2233.0	7/29/2014	NBS	Emails and telephone conference with client and re: experts; review of letters to Court.	1.200
2235	2234.0	7/30/2014	NBS	Telephone conference with John and Eli re: expert report.	0.800
2236	2235.0	7/31/2014	NBS	Review of earlier Silverman book on NYPD (2.8); drafting letter to Judge Sweet; review of letter re: outstanding; telephone conference with trial team and Dr. Lubit and Dr. Halpern.	5.500
2237	2236.0	8/1/2014	NBS	Review of letters on numerous discovery disputes; review of videos of Dr. Patel's examination before trial; drafting letter on three motion letter.	7.500
2238	2237.0	8/3/2014	NBS	Review and revise letter to Court; research on deposition conduct re: definition of harassment.	5.800
2239	2238.0	8/4/2014	NBS	Drafting letter re: 3 discovery motions; long conference call with experts Silverman and Eterno (1.5); preparing letter for experts on police issues and transmitting documents to experts (2.5)	7.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2240	2239.0	8/5/2014	NBS	Revise letter to Court on 3 motions; draft second letter re: video objection.	3.200
2241	2240.0	8/6/2014	NBS	Telephone conference with Mag Bauza to do list; meeting with John Lenoir re: same; revise letter to Court re: video objection.	1.500
2242	2241.0	8/7/2014	NBS	Review of report; telephone call to John Eterno re: same	1.200
2243	2242.0	8/8/2014	NBS	Review of reports of experts (police and ER); review of record from psychiatric experts.	3.500
2244	2243.0	9/2/2014	NBS	Meeting with co-counsel; review of decisions on discovery; emails re: scheduling with experts; telephone call with Roy Lubit re: same.	1.500
2245	2244.0	9/3/2014	NBS	Email to all counsel re: schedule; telephone call with Eli Silverman.	0.700
2246	2245.0	9/5/2014	NBS	Review of time limitation issues for examination before trials.	1.500
2247	2246.0	9/10/2014	NBS	Telephone conference with all counsel.	0.500
2248	2247.0	9/11/2014	NBS	Reply to Defendants' letter motion on experts; letter to all counsel re: expert fees to be paid; review of cases on same.	3.500
2249	2248.0	9/12/2014	NBS	Travel to Upstate, NY to meet with client; meeting with client	4.500
2250	2249.0	9/12/2014	NBS	Prepare for meeting with client; outline summary judgment motions; causes of action.	2.500
2251	2250.0	9/13/2014	NBS	Meeting all day with client, John Lenoir and Magdalena Bauza re summary judgment motions; motion to amend; wages/damages issues; trial plans; expert discovery and reports	7.500
2252	2251.0	9/14/2014	NBS	Meeting with client; return travel to New York	5.500
2253	2252.0	9/16/2014	NBS	Telephone conference with experts; conference with co-counsel; emails re: schedule with all counsel.	1.800
2254	2253.0	9/17/2014	NBS	Prepare for and take Purpi examination before trial.	3.500
2255	2254.0	9/18/2014	NBS	Prepare for examination before trial; telephone call with Walter Kretz; telephone conference with Roy Lubit; review of expert reports served today and with co-counsel.	3.500
2256	2255.0	9/19/2014	NBS	Prepare for and attend Carrasco ebt	5.500
2257	2256.0	9/20/2014	NBS	Review of medical expert reports by Jamaica Hospital Medical Center; Bernier and Isakov.	2.200
2258	2257.0	9/21/2014	NBS	Meeting with John Lenoir and Mag Bauza; meeting with Lubit re: examination before trial preparation.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2259	2258.0	9/22/2014	NBS	Email regarding schedule; telephone call with John Eterno.	0.400
2260	2259.0	9/23/2014	NBS	Prep for and attend examination before trial of Roy Lubit; call to court re: schedule.	8.000
2261	2260.0	9/24/2014	NBS	Telephone conference with Roy Lubit; telephone call with John Lenoir; review of emails; letter to court re: motion by city.	1.700
2262	2261.0	9/25/2014	NBS	Drafting opposition to discover motion.	3.500
2263	2262.0	9/26/2014	NBS	Review of production for motion to compel; telephone call with co-counsel; message from Dr. Lubit.	2.200
2264	2263.0	9/29/2014	NBS	Meeting with Dr. Halpern Ruder and John Lenoir; prepare for examination before trial; review of CompSTAT notes.	5.800
2265	2264.0	9/30/2014	NBS	Appear for and defendant Ruder examination before trial; prepare for conference the following day; review of CompSTAT notes.	8.900
2266	2265.0	10/2/2014	NBS	Email re: scheduling Silverman and Lubit; conference call with John Lenoir and Mag Bauza re: trial prep review of CompStat notes.	4.500
2267	2266.0	10/3/2014	NBS	Legal research on Monell issues (1.8) meeting with Mag and John Lenoir; emails re: trial date; conference with client re: status and trial date; review of Nelson discover records (1.5); review of Patrol Guide; review of CompStat notes (2.0); prep motion for discovery.	6.500
2268	2267.0	10/6/2014	NBS	Drafting motion for discovery; drafting letter re: opposition to adjourn for trial date; emails with opposing counsel; scheduling Patel examination before trial; telephone call to the clerk for Patel's attorney.	5.500
2269	2268.0	10/7/2014	NBS	Draft motion on discovery.	4.500
2270	2269.0	10/8/2014	NBS	Review of Floyd record; research on witness list issues; telephone call with Dr. Dan Halpern; email correspondences Silverman and Eterno.	7.500
2271	2270.0	10/9/2014	NBS	Telephone conference with client; review of Eterno production; email re: same; review of Floyd trial.	4.500
2272	2271.0	10/10/2014	NBS	Review of Floyd transcripts and decision.	4.500
2273	2272.0	10/14/2014	NBS	Meeting with Eterno (2.5); travel to Hempstead (2.0); review of Rule 68 offer (.5); review of Floyd trial transcripts and decision	7.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2274	2273.0	10/15/2014	NBS	Telephone conference with Walter Kretz re: Mauriello; wants a small compensation from Adrian to settle (.3); telephone call to Suzanna Mettham and Ryan Shaffer re: Rule 68 offer (.4); drafting reply letter on discovery motion (3.8); briefing schedule and witness lists.	5.500
2275	2274.0	10/16/2014	NBS	Telephone conference with John Lenoir; drafting letter to court on discovery motions/issue (2.8); research on Rule 68 issues (2.5); email re: discovery schedule.	6.500
2276	2275.0	10/17/2014	NBS	Appear for and defend Eterno examination before trial; revise and file letter with court re: outstanding discovery issues.	9.500
2277	2276.0	10/18/2014	NBS	Research on Rule 68; draft and send memo to client re: Rule 68 offer; telephone client re: same; telephone call to John Lenoir re: same.	3.500
2278	2277.0	10/19/2014	NBS	Review of 2nd Amended Complaint for purpose of motion to amend; conference call with team re: Rule 68 offer; email exchange with Howard Suckle re: same.	4.500
2279	2278.0	10/20/2014	NBS	Telephone conference with with John Eterno (1.5) re: examination before trial and case; telephone call with chambers re: next conference; emails re: same; revising pleading for purpose of motion; review of case law on right to refuse, medical treatment (1.5).	3.800
2280	2279.0	10/21/2014	NBS	Review of right to refuse medical treatment cases; emails re: schedule; telephone to Eli Silverman re: his examination before trial.	3.700
2281	2280.0	10/22/2014	NBS	Meeting with Eli Silverman to prepare for examination before trial.	3.500
2282	2281.0	10/23/2014	NBS	Prepare for Silverman; telephone call to Silverman (2 times); review of report; draft letter rejecting Rule 68 offer.	6.500
2283	2282.0	10/24/2014	NBS	Defend Silverman's examination before trial.	7.500
2284	2283.0	10/25/2014	NBS	Research on criminal standard for exigent circumstances.	3.000
2285	2284.0	10/26/2014	NBS	Revise letter re: rejection of Rule 68 offer.	1.000
2286	2285.0	10/27/2014	NBS	Meeting with John Lenoir re: amended complaint; review of emails; telephone call to Investigator Skinner; email with Silverman review of discovery record on complaint; review of tapes re: Amended Complaint.	5.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2287	2286.0	10/28/2014	NBS	Prepare revisions to 2nd Amended Complaint for motion to arrest; research on issues relating to motion to amend.	6.800
2288	2287.0	10/29/2014	NBS	Prepare for court; appear in court; conference with client and John Lenoir re: status.	4.500
2289	2288.0	10/30/2014	NBS	Prepare for Patel examination before trial; research warrantless entry and search.	3.500
2290	2289.0	10/31/2014	NBS	Prepare for and take 2nd examination before trial of Dr. Patel (3.2); research on causes of action for motions to amend and summary judgment.	5.500
2291	2290.0	11/1/2014	NBS	Research on exigent circumstances case law.	3.500
2292	2291.0	11/3/2014	NBS	Research an existing cir. case law (3.0); telephone conference with Roy Lubit; emails with opposing counsel; revised 2nd Amended Complaint for motion to amend.	3.800
2293	2292.0	11/4/2014	NBS	Drafting motion to amend; letter to court re: page limit; email client re: status.	3.500
2294	2293.0	11/5/2014	NBS	Drafting motion to amend.	3.500
2295	2294.0	11/6/2014	NBS	Telephone conference with client re: amending complaint.	2.500
2296	2295.0	11/7/2014	NBS	Meeting with S. Korenbaum; emails re: status; telephone call with Dr. Lubit.	2.200
2297	2296.0	11/10/2014	NBS	Telephone conference with Dr. Lubit; attend and defend examination before trial of Dr. Lubit at Martin Clearwater; review of draft Amended Complaint; research, on 4th Amendment warrantless entry (1.5)	5.200
2298	2297.0	11/11/2014	NBS	Telephone conference with paralegal (JS) re: case; review of ebt summaries.	1.500
2299	2298.0	11/13/2014	NBS	Appear and defend Dr. Lubit; conference re: examination before trial with witness.	5.500
2300	2299.0	11/14/2014	NBS	Review of examination before trial summaries and indexes.	1.500
2301	2300.0	11/16/2014	NBS	Revise complaint; email re: same.	1.000
2302	2301.0	11/19/2014	NBS	Review of examination before trial of Lauterborn and Mauriello on questions about evaluations; email client re: same.	0.800
2303	2302.0	11/20/2014	NBS	Review of file in Azira case on Blue Wall.	1.500
2304	2303.0	11/21/2014	NBS	Emails re: Lubit; review of Azira files	2.500
2305	2304.0	12/1/2014	NBS	Revising motion to amend	2.500
2306	2305.0	12/2/2014	NBS	Revise memo re: motion to amend.	3.500
2307	2306.0	12/3/2014	NBS	Revising 3rd Amended Complaint and Memo Of Law In Support Of Motion To Amend.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2308	2307.0	12/4/2014	NBS	Revising Amended Complaint and Memo on motion to amend; began review of depositions for summary judgment motion.	4.500
2309	2308.0	12/5/2014	NBS	Review of letters; review of Duncan transcripts, emails with team re: status.	1.800
2310	2309.0	12/7/2014	NBS	Review of examination before trial record.	5.500
2311	2310.0	12/8/2014	NBS	Drafting letter to Court re: motion to amend; review of examinations before trial for motion for summary judgment.	3.500
2312	2311.0	12/9/2014	NBS	Drafting letter to Court re: defendants' motion to adjourn trial and summary judgment; review of examinations before trial for summary judgment motion; review of Compstat video.	5.500
2313	2312.0	12/10/2014	NBS	Review of examination before trial for preparation of motions meeting with John Lenoir re: motions.	8.500
2314	2313.0	12/11/2014	NBS	Review of examination before trial for summary judgment motion; conference with M. Bauza re: JHMC claims; review of cases.	5.500
2315	2314.0	12/12/2014	NBS	Review of record for summary judgment motion.	3.500
2316	2315.0	12/13/2014	NBS	Research on exig. cir. exception.	3.500
2317	2316.0	12/14/2014	NBS	Review of examination for summary judgment facts; review of exig. cir. cases; review of prima facie tort and tortious interference case.	5.500
2318	2317.0	12/15/2014	NBS	Research on Mauriello counterclaims.	3.800
2319	2318.0	12/16/2014	NBS	Drafting summary judgment motion.	7.500
2320	2319.0	12/17/2014	NBS	Drafting summary judgment motion.	10.500
2321	2320.0	12/18/2014	NBS	Drafting summary judgment motion.	12.000
2322	2321.0	12/19/2014	NBS	Drafting motion for summary judgment.	10.500
2323	2322.0	12/20/2014	NBS	Drafting summary judgment memo.	9.500
2324	2323.0	12/21/2014	NBS	Drafting summary judgment motion.	7.500
2325	2324.0	12/22/2014	NBS	Draft motions; memo; Rule 56.1 Statement; conference with client re: sealing and objection to it; letters (2x) Court.	12.500
2326	2325.0	12/23/2014	NBS	Revising and filing paper; review of paper.	7.500
2327	2326.0	12/24/2014	NBS	Preparing motion papers	3.500
2328	2327.0	12/29/2014	NBS	Drafting Reply Memo on motion to amend.	5.500
2329	2328.0	12/30/2014	NBS	Researching motion for summary judgment.	2.500
2330	2329.0	12/30/2014	NBS	Telephone conference with John Lenoir; telephone call to client re: Norinsberg; drafting summary judgment; review of new material.	9.500
2331	2330.0	12/31/2014	NBS	Draft opposition to summary judgment.	7.500
2332	2331.0	1/1/2015	NBS	Review of motions by defendants.	5.500
2333	2332.0	1/3/2015	NBS	Reading City motion and case law.	5.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2334	2333.0	1/4/2015	NBS	Reading Mauriello and JHMC motions and case law.	8.200
2335	2334.0	1/5/2015	NBS	Review of motions; review of recent production by City (videos and EIU file); conference with John Lenoir and Mag Bauza re: motions.	5.500
2336	2335.0	1/7/2015	NBS	Reviewing motions; meeting with John Lenoir; J. Mck; J.S re: Compstat videos.	4.500
2337	2336.0	1/8/2015	NBS	Telephone conference with Howard Suckle (.3); meeting with Mag (.1.5); telephone call to Ryan Shaffer; Paul Callan; Gregory Radmosili re: summary judgment schedule; review of Lauterborn examination before trial (4:5)	7.800
2338	2337.0	1/9/2015	NBS	Emails re: status; conference with team; conference call with client.	1.500
2339	2338.0	1/10/2015	NBS	Review of examinations before trial and Compstat videos.	7.500
2340	2339.0	1/11/2015	NBS	Review of examination before trial and Compstat videos; conference with group on Compstat videos.	7.500
2341	2340.0	1/13/2015	NBS	Compstat vide review	5.500
2342	2341.0	1/14/2015	NBS	Conference with client and John Lenoir; review of examination before trial and motions.	7.500
2343	2342.0	1/15/2015	NBS	Review of Hanlon examination before trial; review of Marino examination before trial; review of cases in summary judgment motion discussion re: Compstat videos.	4.500
2344	2343.0	1/16/2015	NBS	Review of Hanlon examination before trial; review of cases; review of Compstat video.	7.500
2345	2344.0	1/17/2015	NBS	Review of examination before trial; prepare summary judgment oppositions.	7.500
2346	2345.0	1/18/2015	NBS	Prepare summary judgment opposition; review of Hanlon, Sangianetti, and Marquez examination before trial; review of Compstat videos.	8.500
2347	2346.0	1/19/2015	NBS	Review of Compstat videos; review of cases cited in various motions; research on standard of objective/subjective good faith and qualified immunity.	7.500
2348	2347.0	1/20/2015	NBS	Review of decision on motion to amend; review of cases on conspiracy; review of examination before trial for motion.	5.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2349	2348.0	1/21/2015	NBS	Drafting summary judgment motion papers (memo of law; rule 56.1 statement); telephone Ryan Shaffer; call Norinsberg re: wants co-counsel to get access to Adrian Schoolcraft's records (medical) in IAB file.	8.500
2350	2349.0	1/22/2015	NBS	Drafting memo in opposition; telephone call to Walter Kretz; emails re: schedule.	7.500
2351	2350.0	1/23/2015	NBS	Research and draft Response to Mauriello summary judgment motion.	9.000
2352	2351.0	1/24/2015	NBS	Review of record; research on cases cited by defendants summary judgment motion.	6.500
2353	2352.0	1/25/2015	NBS	Review of record for summary judgment motion opposition.	7.500
2354	2353.0	1/26/2015	NBS	Drafting opposition papers; research on probable cause.	7.500
2355	2354.0	1/27/2015	NBS	Meeting with John and Mag re: summary judgment motion; draft opposition; research on St amendment issues.	9.500
2356	2355.0	2/1/2015	NBS	Drafting opposition to motions.	5.500
2357	2356.0	2/2/2015	NBS	Telephone conference with Jon Norinsberg (.5); meeting with John Lenoir re to do list for trial(1.2); conference with client and John Lenoir re: trial team; drafting opposition to motion (5.0); telephone call to client re: same; letter to court re: schedule adjustment.	7.800
2358	2357.0	2/3/2015	NBS	Review of Monell case law for motion; review of supplemental papers filed by all defendants.	3.500
2359	2358.0	2/4/2015	NBS	Email with client; review of cases on Monell liability; review of record (ebt's) on Monell issues.	1.800
2360	2359.0	2/5/2015	NBS	Drafting opposition brief.	7.500
2361	2360.0	2/6/2015	NBS	Drafting opposition papers.	9.500
2362	2361.0	2/7/2015	NBS	Drafting opposition to Jamaica Hospital and doctor motion.	7.800
2363	2362.0	2/8/2015	NBS	Drafting opposition to Dr. Bernier and Dr. Isakov's motions; conference with John Lenoir; telephone call with Mag Bauza.	9.500
2364	2363.0	2/9/2015	NBS	Drafting opposition motion; conference with John Lenoir (.5) telephone call with Mag Bauza; drafting 56.1 opposition; telephone conference with Brian Lee re: Isakov claims (0.2).	10.500
2365	2364.0	2/10/2015	NBS	Opposition motion ; telephone conference with Ryan Shaffer; telephone call with Jon Norinsberg, email client.	12.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2366	2365.0	2/12/2015	NBS	Telephone conference with client; call with Jon Norinsberg and John Lenoir; emails; telephone call with new city lawyer; review of files under seal; review of opposition motion.	7.500
2367	2366.0	2/13/2015	NBS	Review of 5 oppositions to summary judgment motion & meeting with John Lenoir and Mag Bauza re: issues to address (3.5), telephone call to client (2 times); emails re: trial date; telephone to Jon Norinsberf re: meeting and status.	4.500
2368	2367.0	2/17/2015	NBS	Review of files on summary judgment papers.	2.500
2369	2368.0	2/20/2015	NBS	Meeting with John Lenoir and Mag Bauza; meeting with Jon Norinsberg and his group (Gerald Cohen and Joshua Fitch).	4.800
2370	2369.0	2/23/2015	NBS	Meeting with John Lenoir re: reply to Mauriello.	2.500
2371	2370.0	2/27/2015	NBS	Preparing reply papers.	5.500
2372	2371.0	3/3/2015	NBS	Drafting reply.	7.500
2373	2372.0	3/4/2015	NBS	Drafting reply.	10.500
2374	2373.0	3/5/2015	NBS	Drafting reply.	10.500
2375	2374.0	3/6/2015	NBS	Drafting reply.	9.500
2376	2375.0	3/9/2015	NBS	Research on new evidence issue; telephone conference with team; revising letter to Court on Matthews.	4.500
2377	2376.0	3/10/2015	NBS	Review of cases on s/i; review of reply submission.	3.500
2378	2377.0	3/12/2015	NBS	Research on new evidence and new arguments on reply; meeting with team.	6.500
2379	2378.0	3/13/2015	NBS	Meeting with team re: trial preparation; drafting letter to Court.	2.800
2380	2379.0	3/15/2015	NBS	Research on motion to strike.	4.500
2381	2380.0	3/16/2015	NBS	Drafting motion to strike.	7.500
2382	2381.0	3/17/2015	NBS	Drafting motion to strike Lamstein Declaration.	5.500
2383	2382.0	3/18/2015	NBS	Review of JPTO requirement; telephone to Walter Kretz re: status; drafting verdict sheet; prepare for trial; review of subpoenas; meeting with John Lenoir re: trial lists of witnesses and exhibits.	6.500
2384	2383.0	3/20/2015	NBS	Telephone conference with Walter Kretz re: Kickstarter movie; email with trial team re; inquiry.	0.500
2385	2384.0	3/21/2015	NBS	Drafting letter re: Lamstein; Q/F issue and adjournment request; review of exhibit lists for JPTO.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2386	2385.0	3/22/2015	NBS	Review of exhibits for JPTO; revise letter to Court.	3.500
2387	2386.0	3/23/2015	NBS	Prepare witness and exhibit list; rewrite letter to Court.	4.500
2388	2387.0	3/25/2015	NBS	Emails re: status; conference with Scott Korenbaum re: instructions; telephone conference with John Lenoir and Mag Bauza re: instructions and to do.	3.500
2389	2388.0	3/26/2015	NBS	Review of production (discs & cd's) for plaintiff's trial exhibit.	5.500
2390	2389.0	3/27/2015	NBS	Review of production for JPTO; emails to opposing counsel; emails to co-counsel re: status.	5.500
2391	2390.0	3/29/2015	NBS	Review of discovery record for JPTO and witness cross.	7.500
2392	2391.0	3/30/2015	NBS	Review of discovery record for JPTO - exhibits and witness; telephone call to John Lenoir re: witness responsibilities; telephone to Mag Bauza re: jury instructions and diagram.	7.500
2393	2392.0	3/31/2015	NBS	Review of discovery for witness list, exhibit list, and JPTO; emails with opposing counsel re: service of subpoenas.	5.500
2394	2393.0	4/1/2015	NBS	Email team; telephone call Brown (Daily News) re: status; study of hospital chart; review of Bernier examination of trial and prepare cross.	6.500
2395	2394.0	4/2/2015	NBS	Meeting with team; review of trial exhibits; conference call with John Lenoir re: Compstat; call with Mag re: jury instruction; prepare for cross of Bernier.	8.500
2396	2395.0	4/3/2015	NBS	Prepare for cross of Bernier; review of chart and examination before trial.	5.500
2397	2396.0	4/4/2015	NBS	Prepare cross of Bernier; review of trial exhibits; review of draft jury instructions.	6.500
2398	2397.0	4/5/2015	NBS	Prepare of Isakov cross; review of examination before trial and chart.	4.500
2399	2398.0	4/6/2015	NBS	Email team; telephone call to Scott Korenbaum re: jury change; prepare Isakov cross.	2.500
2400	2399.0	4/7/2015	NBS	Review of and revise motion in limine; review of and revise jury instructions (medical); draft letter to Court re: extension; continued preparation on Isakov cross.	4.500
2401	2400.0	4/8/2015	NBS	Drafting cross - outlines; letter to court; conference with trial team.	5.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2402	2401.0	4/9/2015	NBS	Prepare for trial - jury verdict sheets and cross examination outlines of witnesses	7.500
2403	2402.0	4/10/2015	NBS	Prepare for Harlon cross; emails re: status; telephone call to Mag Bauza re: to do; telephone conference with John Lenoir re: witnesses; review of witness list.	7.500
2404	2403.0	4/12/2015	NBS	Prepare for Harlon cross (3.0); review of Lauterborn transcript.	4.000
2405	2404.0	4/13/2015	NBS	Prepare for oral argument; appear in court for conference with court (2.0); conference with team thereafter; email opposing counsel re: Lauterborn CD and Boston illness.	3.200
2406	2405.0	4/15/2015	NBS	Telephone conference with Alan Scheiner re: settlement and trial date; emails re: discovery and Boston.	1.500
2407	2406.0	4/17/2015	NBS	Telephone conference with Alan Scheiner and team re: settlement demand email.	1.200
2408	2407.0	4/29/2015	NBS	Review of new recording from City on Lauterborn PG; email trial team restatus; telephone call G. Radomisli re: status of trial.	1.800
2409	2408.0	5/5/2015	NBS	Review of review of decision on summary judgment motion.	0.700
2410	2409.0	5/7/2015	NBS	Review of decision; telephone call with opposing counsel (Brian Lee) re: state medical malpractice sliding scale issues and status.	1.300
2411	2410.0	5/8/2015	NBS	Telephone conference with trial team re: status.	0.300
2412	2411.0	05/08/15	NBS	Review of decision; email team	1.800
2413	2412.0	5/11/2015	NBS	Review of decision on summary judgment; prepare for conference with court.	1.500
2414	2413.0	5/12/2015	NBS	Prepare for conference meeting with team; conference with court on case re: schedule for trial and pre-trial.	3.500
2415	2414.0	5/13/2015	NBS	Telephone conference with Dr. Lubit re: status and trial date; telephone call to Dr. Eterno re: status and trial date.	0.700
2416	2415.0	5/15/2015	NBS	Emails re: schedule on motions in limine; review of recent EDP decision.	0.700
2417	2416.0	5/21/2015	NBS	Telephone conference with A. Schiener; email team re: settlement.	0.800
2418	2417.0	5/22/2015	NBS	Review of recent EDP decision.	0.500
2419	2418.0	5/28/2015	NBS	Review of memo re: reconsideration; telephone call with John Lenoir and email with MG re: same.	0.500
2420	2419.0	5/29/2015	NBS	Prepare reconsideration letter.	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2421	2420.0	6/1/2015	NBS	Drafting letter to court on reconsideration motion.	3.500
2422	2421.0	6/2/2015	NBS	Revising and drafting reconsideration motion.	3.000
2423	2422.0	6/15/2015	NBS	Review of calendar; telephone call to John Lenoir re: status.	0.300
2424	2423.0	6/19/2015	NBS	Review of motion by City and authorities.	1.500
2425	2424.0	6/22/2015	NBS	Emails re: motions; review of City memo; telephone conference with City; call to W. Kretz; review of Mauriello memo; emails with team re: schedule.	3.200
2426	2425.0	6/23/2015	NBS	Email team re: schedule; telephone call to city counsel re: same; email all counsel re: same.	0.600
2427	2426.0	6/24/2015	NBS	Telephone conference with John Lenoir; telephone S.K. re: opposition to bifurcation; emails to counsel re: schedule; letter to Judge Sweet re: schedule; review of motion on bifurcation.	1.300
2428	2427.0	6/25/2015	NBS	Emails with counsel re: status; letter to court re: schedule; review of trial exhibit folder.	0.300
2429	2428.0	6/26/2015	NBS	Review of draft portion of opposition to bifurcation	0.500
2430	2429.0	6/28/2015	NBS	Review of draft memo; revise same.	1.200
2431	2430.0	6/29/2015	NBS	Review memo in opposition to bifurcation motion; telephone call to Scott Korenbaum; call to John Lenoir re: same.	2.800
2432	2431.0	6/30/2015	NBS	Review of motions, memo, and case law on reconsideration motions by City and Mauriello.	3.500
2433	2432.0	7/1/2015	NBS	Review of reconsideration motion.	1.800
2434	2433.0	7/3/2015	NBS	Review of recent production from City Defendants; review of reconsideration motions.	3.500
2435	2434.0	7/4/2015	NBS	Drafting opposition to reconsideration motions.	3.800
2436	2435.0	7/5/2015	NBS	Drafting opposition to reconsideration motions.	4.000
2437	2436.0	7/6/2015	NBS	Revising opposition papers; email co-counsel; emails to opposing counsel.	2.500
2438	2437.0	7/7/2015	NBS	Review of schedule; review of emails.	0.500
2439	2438.0	7/8/2015	NBS	Review of recent and prior productions by the City	7.500
2440	2439.0	7/15/2015	NBS	Review of emails; telephone call to John Lenoir re: expert discovery; review of opposition to reconsideration motions; review of prior record for reply; review of motion in limine and schedule for trial preparation.	3.500
2441	2440.0	7/17/2015	NBS	Telephone conference with John Lenoir; review of CompStat clips; review of emails.	1.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2442	2441.0	7/21/2015	NBS	Preparing memo in reply on reconsideration.	1.500
2443	2442.0	7/22/2015	NBS	Drafting reply on reconsideration; review of documentary on Schoolcraft; emails with team; review of tape and transcript of the home invasion; review of witness list and trial exhibits.	5.500
2444	2443.0	7/23/2015	NBS	Drafting reply; review of witness list and exhibit trial list for JPTO	5.500
2445	2444.0	8/4/2015	NBS	Preparing JPTO draft section.	4.500
2446	2445.0	8/5/2015	NBS	Preparing JPTO section; telephone call with team re: same.	5.500
2447	2446.0	8/7/2015	NBS	Review of JPTO sections from defendants; telephone call with Brian Osterman; conference call with Plaintiff's team re: JPTO objections; letter to Judge Sweet opposing motion to strike reply.	3.200
2448	2447.0	8/9/2015	NBS	Review of JPTO submissions and interrogation of sections; email team; email opposing counsel re: schedule; review of trial assignments.	3.500
2449	2448.0	8/10/2015	NBS	Revised JPTO; letter to court re: schedule; emails with co-counsel; emails with opposing counsel re: JPTO.	3.500
2450	2449.0	8/11/2015	NBS	Revising JPTO; review defendant's depositions; objections to exhibits.	3.500
2451	2450.0	8/13/2015	NBS	Prepare letter motion to court re: JPTO deadlines; review of recent production and emails re: status with defense counsel.	2.800
2452	2451.0	8/14/2015	NBS	Revising section of JPTO; review and inclusion in sections from defendants; emails with opposing counsel and co-counsel re: JPTO; conference with John Lenoir re: rifle issues for trial.	3.500
2453	2452.0	8/16/2015	NBS	Review of Plaintiff's Trial Exhibits; review of objections.	2.800
2454	2453.0	8/17/2015	NBS	Review of JPTO; telephone call with Kretz; review of letter to court from city.	2.500
2455	2454.0	8/18/2015	NBS	Letter to court in reply on JPTO adjournment.	1.500
2456	2455.0	8/19/2015	NBS	Preparing JPTO; review of emails; preparing witness focus sheets; review of all defendants exhibits for purposes of asserting objections.	8.500
2457	2456.0	8/20/2015	NBS	Review of exhibits and serve photos on defendants by email and fax; letter to court re: filing JPTO; revise and file plaintiffs draft of pre-trial order.	3.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2458	2457.0	8/21/2015	NBS	Preparing witness focus sheets; email opposing counsel re status and motion in limine deadline; and to do (Larry Schoolcraft very sick and in hospital).	4.300
2459	2458.0	8/24/2015	NBS	Preparing focus sheets; email co-counsel re: mental patient gun rights.	1.300
2460	2459.0	8/25/2015	NBS	Review of various recordings listed on JPTO; letter to court in opposition to motions.	5.000
2461	2460.0	8/31/2015	NBS	Telephone conference with clerk and parties; telephone call with John Norinsberg re status; review of draft motion.	1.300
2462	2461.0	9/2/2015	NBS	Telephone conference with W. Kretz re status	0.300
2463	2462.0	9/4/2015	NBS	Review of and drafting JPTO; long tc with A Scheinder (3x) with J Norinsberg re settlement; tc JL re settlement; email team re same	4.500
2464	2463.0	9/6/2015	NBS	Review of caselaw and statutory provisions for obtaining disability pension; review of summary plan description for pension benefits	3.800
2465	2464.0	9/7/2015	NBS	Preparing for trial; preparing cross examination outlines and focus sheets for witnesses set to testify or likely to testify for various witness assignments for trial team	4.500
2466	2465.0	9/8/2015	NBS	Telephone conference with JN; tc A Schiener (several times) re settlement; email all counsel re JPTO and new exhibits added; tc B Osterman re request to discontinue against JHMC (less than 6 figures)	3.500
2467	2466.0	9/9/2015	NBS	Telephone conference with A Schiener and with co-counsel re settlement (JN: PG; Harvey Levine; Rick Guilbert) re issues pertaining to additional pension benefits.; review of caselaw cited by the City on pension issues	3.200
2468	2467.0	9/11/2015	NBS	Telephone conference with A Schiener and JN re settlement and willing to increase offer of cash some	0.700
2469	2468.0	9/12/2015	NBS	Preparing for trial; drafting cross outlines and witness focus sheets for trial witnesses and their key points	5.500
2470	2469.0	9/15/2015	NBS	Telephone conference with A Scheiner re no deal w/o pension benefit; tc JN re status; drafting detailed settlement memo to client on settlement	3.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2471	2470.0	9/16/2015	NBS	Telephone conference with A Scheiner; conf call with JN and GC re settlement; revised detailed memo to client re settlement; tc JL re same; email cleint re settlement	2.800
2472	2471.0	12/31/2014	JM	Office meeting	1.500
2473	2472.0	1/10/2015	JM	Review of CompStat videos	4.000
2474	2473.0	1/11/2015	JM	Review of CompStat videos	2.000
2475	2474.0	1/11/2015	JM	Discussions of Compstat and Schoolcraft materials.	0.750
2476	2475.0	1/14/2015	JM	Review of CompStat videos.	3.000
2477	2476.0	1/16/2015	JM	Review of CompStat videos.	11.000
2478	2477.0	1/19/2015	JM	Telephone conference discussing Schoolcraft and CompStat.	0.590
2479	2478.0	1/31/2015	JM	Email communication of summary judgment City response.	0.090
2480	2479.0	2/1/2015	JM	Email of summary judgment City response.	0.090
2481	2480.0	2/3/2015	JM	Email correspondence of City response	0.090
2482	2481.0	2/5/2015	JM	Email of summary judgment on City reponse	0.090
2483	2482.0	2/6/2015	JM	Email regarding summary judgment to City reponse	0.090
2484	2483.0	2/12/2015	JM	Email exchange for summary judgment for City response.	0.090
2485	2484.0	9/7/2014	JLL	Read Schoolcraft deposition.	2.000
2486	2485.0	9/8/2014	JLL	Read Schoolcraft deposition	2.000
2487	2486.0	9/9/2014	JLL	Read Schoolcraft deposition	2.000
2488	2487.0	9/10/2014	JLL	Read Schoolcraft deposition.	2.000
2489	2488.0	9/16/2014	JLL	Ferrara summary deposition	2.000
2490	2489.0	9/17/2014	JLL	Ferrara summary deposition.	2.000
2491	2490.0	9/23/2014	JLL	Ferrara summary deposition	8.000
2492	2491.0	9/24/2014	JLL	Ferrara and Broschart summary deposition.	8.000
2493	2492.0	9/25/2014	JLL	Broschart summary deposition	8.000
2494	2493.0	9/30/2014	JS	Reading, taking notes and discussing the Schoolcraft depositions	5.500
2495	2494.0	9/30/2014	JS	Reading, taking notes and discussing the Schoolcraft depositions.	5.500
2496	2495.0	10/1/2014	JS	Reading and taking notes on "NYPD Tapes."	1.500
2497	2496.0	10/1/2014	JS	Reading and taking notes on NYPD tapes	3.500
2498	2497.0	10/2/2014	JS	Reading and taking notes on Schoolcraft Depositions; listening to and discussing Schoolcraft tapes from October 31, 2009.	4.430
2499	2498.0	10/2/2014	JS	Reading and taking notes on the Schoolcraft depositions; listening to and discussing the Schoolcraft tapes from October 31, 2009.	5.000
2500	2499.0	10/3/2014	ls	Trainor summary deposition.	5.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2501	2500.0	10/6/2014	JS	Reading, taking notes, and discussing the Schoolcraft depositions.	1.000
2502	2501.0	10/7/2014	JS	Reading and taking notes and discussing the Schoolcraft depositions.	2.500
2503	2502.0	10/8/2014	LS	Trainor summary deposition	5.000
2504	2503.0	10/8/2014	JLL	Mauriello deposition summary - session 2 with errata sheet.	3.000
2505	2504.0	10/9/2014	JS	Reading, taking notes and discussing the Schoolcraft depositions.	2.000
2506	2505.0	10/9/2014	JS	Reading, taking notes, and discussing the Schoolcraft depositions	1.750
2507	2506.0	10/8/2014	LS	Trainor summary deposition.	5.000
2508	2507.0	10/9/2014	JLL	Drafting deposition summary - session 2 with errata sheet.	2.000
2509	2508.0	10/10/2014	JS	Reading, taking notes and discussing the Schoolcraft depositions	1.000
2510	2509.0	10/9/2014	LS	Trainor summary deposition.	2.000
2511	2510.0	10/14/2014	JS	Reading and taking notes.	3.000
2512	2511.0	10/14/2014	JS	Reading and taking notes on the Schoolcraft depositions.	3.000
2513	2512.0	10/15/2014	JS	Reading and discussing the Schoolcraft depositions.	2.000
2514	2513.0	10/16/2014	JLL	Mauriello deposition summary - session 2 with errata sheet.	8.000
2515	2514.0	10/17/2014	JLL	Mauriello deposition summary - session 2 with errata sheet.	4.000
2516	2515.0	10/19/2014	JLL	Shantel James deposition summary.	3.000
2517	2516.0	10/20/2014	JLL	Shantel James deposition summary.	2.000
2518	2517.0	10/21/2014	LS	Gough deposition summary.	4.000
2519	2518.0	10/22/2014	JLL	Kurt Duncan deposition summary.	5.000
2520	2519.0	10/21/2014	LS	Gough deposition summary.	4.000
2521	2520.0	10/23/2014	JLL	Kurt Duncan deposition summary.	3.000
2522	2521.0	10/23/2014	JS	Listening to radio police calls on disc 10, 22 and Schoolcraft surveillance videos.	4.000
2523	2522.0	10/24/2014	LS	Sawyer deposition summary	4.000
2524	2523.0	10/27/2014	LS	Sawyer deposition summary.	4.000
2525	2524.0	10/28/2014	LS	Sawyer deposition summary.	4.000
2526	2525.0	10/29/2014	JS	Reviewing surveillance videos of Adrian's house and writing summaries of these videos along with other documents on the CD's from the Schoolcraft file.	2.000
2527	2526.0	10/30/2014	LS	Sawyer deposition summary.	3.000
2528	2527.0	10/31/2014	LS	Gough deposition summary	4.000
2529	2528.0	11/3/2014	LS	Summarize Gough deposition transcript.	3.000
2530	2529.0	11/7/2014	LS	Summarize Marquez deposition transcript.	4.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2531	2530.0	11/10/2014	LS	Summarize Marquez deposition transcript.	4.500
2532	2531.0	11/12/2014	LS	Summarize Marquez deposition transcript.	5.000
2533	2532.0	11/13/2014	LS	Summarize deposition of Sangetti.	4.000
2534	2533.0	11/14/2014	LS	Summarized deposition of Larry Schoolcraft.	2.000
2535	2534.0	11/14/2014	LS	Summarize deposition of Sangetti	4.000
2536	2535.0	11/16/2014	LS	Summarize deposition of Sangetti	2.000
2537	2536.0	11/17/2014	LS	Summarize deposition of Sangetti	4.000
2538	2537.0	11/20/2014	JLL	Summarized deposition of Larry Schoolcraft.	5.000
2539	2538.0	11/23/2014	JLL	Summarize deposition of Larry Schoolcraft.	5.000
2540	2539.0	11/24/2014	LS	Summarize deposition of Dr. Patel	4.000
2541	2540.0	11/25/2014	JLL	Summarize deposition of Larry Schoolcraft.	5.000
2542	2541.0	11/24/2014	LS	Summarize deposition of Dr. Patel.	3.000
2543	2542.0	11/26/2014	JLL	Summarize deposition of Larry Schoolcraft.	5.000
2544	2543.0	11/28/2014	LS	Summarize deposition of Purpi	3.500
2545	2544.0	11/28/2014	JLL	Summarize deposition of Steven Mauriello.	2.000
2546	2545.0	11/29/2014	JLL	Summarize deposition Steven Mauriello	1.000
2547	2546.0	11/30/2014	JLL	Summarize deposition of Steven Mauriello.	2.000
2548	2547.0	11/28/2014	LS	Summarize deposition of Purpi.	3.500
2549	2548.0	12/1/2014	LS	Summarize deposition of Dr. Patel	2.000
2550	2549.0	12/1/2014	LS	Summarize deposition of Purpi.	1.000
2551	2550.0	12/1/2014	JLL	Summarize deposition of Steven Mauriello,	4.000
2552	2551.0	12/2/2014	JLL	Summarize deposition of Steven Mauriello.	6.000
2553	2552.0	12/4/2014	JLL	Summarize deposition of Steven Mauriello.	4.000
2554	2553.0	12/5/2014	LS	Summarize deposition of Dr. Lwin.	3.000
2555	2554.0	12/6/2014	LS	Summarize deposition of Dhar.	4.000
2556	2555.0	12/6/2014	LS	Summarize deposition of Dr. Lwin.	1.000
2557	2556.0	12/8/2014	LS	Summarize deposition of Dhar.	4.000
2558	2557.0	12/9/2014	LS	Summarize deposition of Dhar.	4.000
2559	2558.0	12/9/2014	JLL	Summarize deposition of Dominick Valenti.	1.000
2560	2559.0	12/10/2014	LS	Summarize deposition of Carrasco.	4.000
2561	2560.0	12/10/2014	JLL	Summarize deposition of Dominick Valenti	8.000
2562	2561.0	12/11/2014	LS	Summarize deposition of Dhar.	2.000
2563	2562.0	12/11/2014	JLL	Summarize deposition of Kevin Finnegan.	3.000
2564	2563.0	12/12/2014	JLL	Summarize deposition of Kevin Finnegan.	3.000
2565	2564.0	12/13/2014	JLL	Summarize deposition of Bernard Whalen.	2.500
2566	2565.0	12/15/2014	LS	Summarize deposition of Cooper.	3.000
2567	2566.0	12/16/2014	LS	Summarize deposition of Cooper	4.000
2568	2567.0	12/17/2014	LS	Summarize deposition of Cooper.	3.000
2569	2568.0	12/18/2014	LS	Summarize deposition of Cooper	2.000
2570	2569.0	12/21/2014	LS	Summarize deposition of Maffia.	3.000
2571	2570.0	12/22/2014	LS	Summarize deposition of Maffia.	3.000
2572	2571.0	12/24/2014	LS	Summarized Lubit deposition.	4.000
2573	2572.0	12/26/2014	LS	Summarized Lubit deposition.	3.000
2574	2573.0	12/27/2014	LS	Summarized Lubit deposition	4.000
2575	2574.0	12/28/2014	LS	Summarized Lubit deposition	4.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2576	2575.0	12/29/2014	LS	Summarized Lubit deposition.	4.000
2577	2576.0	12/30/2014	LS	Summarize Halpren-Ruder deposition.	3.500
2578	2577.0	1/1/2015	LS	Summarize Halpren-Ruder deposition.	3.500
2579	2578.0	1/2/2015	LS	Summarize Halpren-Ruder deposition.	4.000
2580	2579.0	1/3/2015	LS	Summarize Lauterborn deposition.	3.000
2581	2580.0	1/3/2015	LS	Summarize Halpren-Ruder deposition	1.000
2582	2581.0	1/5/2015	LS	Summarize Lauterborn deposition.	3.000
2583	2582.0	1/7/2015	LS	Summarize Marino deposition transcript.	3.000
2584	2583.0	1/8/2015	LS	Summarize Marino deposition transcript.	3.000
2585	2584.0	1/9/2015	LS	Summarize Marino deposition transcript.	2.000
2586	2585.0	1/12/2015	LS	Summarized Lubit deposition	4.000
2587	2586.0	1/13/2015	LS	Summarized Lubit deposition	4.000
2588	2587.0	1/14/2015	LS	Summarized Lubit deposition	2.000
2589	2588.0	1/22/2015	LS	Summarized Lubit deposition.	1.000
2590	2589.0	1/29/2015	LS	Silverman deposition summary for expert witness.	5.000
2591	2590.0	1/29/2015	JS	Reviewing and taking notes on CompStat meeting videos.	6.000
2592	2591.0	1/30/2015	LS	Silverman deposition summary for expert witness.	4.000
2593	2592.0	2/2/2015	LS	Silverman deposition summary for expert witness.	4.000
2594	2593.0	2/3/2015	JS	Reviewing and taking notes on CompStat meeting videos.	6.000
2595	2594.0	2/2/2015	LS	Silverman deposition summary for expert witness.	5.000
2596	2595.0	2/4/2015	LS	Silverman deposition summary for expert witness.	2.000
2597	2596.0	2/4/2015	JS	Reviewing and taking notes on CompStat meeting videos	2.000
2598	2597.0	2/5/2015	JS	Reviewing and taking notes on CompStat meeting videos	6.000
2599	2598.0	2/5/2015	LS	Summarized Adrian Schoolcraft deposition transcript.	4.000
2600	2599.0	2/6/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
2601	2600.0	2/9/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
2602	2601.0	2/10/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
2603	2602.0	2/10/2015	JLL	Summary of Whittman deposition transcript.	1.000
2604	2603.0	2/11/2015	JLL	Summarize Whittman deposition transcript.	2.000
2605	2604.0	2/11/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2606	2605.0	2/12/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
2607	2606.0	2/13/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
2608	2607.0	2/16/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	3.000
2609	2608.0	2/16/2015	JLL	Summarize Milone deposition transcript.	1.500
2610	2609.0	2/17/2015	JLL	Summarize Milone deposition transcript.	3.500
2611	2610.0	2/17/2015	LS	Summarize Adrian Schoolcraft in Floyd deposition transcript.	3.000
2612	2611.0	03/08/15	JPF	Review of Deposition of AS with Exhibits	6.250
2613	2612.0	08/09/12	JPF	Meeting w/ AS in Albany	5.750
2614	2613.0	11/23/10	JPF	Draft of Argument	5.600
2615	2614.0	02/21/15	JPF	Review of Schoolcraft discovery/deps - Caughey	5.600
2616	2615.0	03/01/15	JPF	Review of Schoolcraft discovery/deps - Broschart/Sawyer	5.500
2617	2616.0	04/02/15	JPF	Draft motion in lim	5.250
2618	2617.0	12/05/10	JPF	Edit and Incorporate changes on argument	5.250
2619	2618.0	02/19/15	JPF	Review of deposition exhibits & depositions - Lauderborn	5.250
2620	2619.0	11/18/10	JPF	Draft of argument	4.900
2621	2620.0	01/10/12	JPF	Meeting with AS, JN and GC	4.900
2622	2621.0	06/19/12	JPF	Meeting w/ Schoolcraft in Johnstown	4.800
2623	2622.0	12/06/10	JPF	Review and edit argument	4.800
2624	2623.0	02/16/15	JPF	Review of deposition exhibits & depositions	4.800
2625	2624.0	02/22/15	JPF	Review of Schoolcraft discovery/deps - Gough	4.800
2626	2625.0	11/22/10	JPF	Draft of Argument	4.750
2627	2626.0	12/03/10	JPF	Draft of argument	4.750
2628	2627.0	04/24/12	JPF	Research on 1st Amendment claims for motion	4.750
2629	2628.0	03/04/15	JPF	Review of Schoolcraft discovery/deps - Duncan	4.750
2630	2629.0	07/21/10	JPF	Review of Schoolcraft documents & tapes	4.750
2631	2630.0	09/15/12	JPF	Reviewed/listened to IAB recordings provided by the City re: investigation into Schoolcraft matter	4.750
2632	2631.0	03/27/15	JPF	Draft motion in lim	4.600
2633	2632.0	04/10/12	JPF	Meeting w/ AS	4.600
2634	2633.0	02/18/15	JPF	Review of deposition exhibits & depositions - Marino	4.500
2635	2634.0	03/30/15	JPF	Draft motion in lim	4.400
2636	2635.0	11/26/10	JPF	Draft of Argument	4.400
2637	2636.0	12/04/10	JPF	Review and edit argument for brief	4.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2638	2637.0	04/03/15	JPF	Review and edit motion in lim	4.400
2639	2638.0	07/12/10	JPF	Review of Schoolcraft tapes	4.400
2640	2639.0	02/25/15	JPF	Review of Schoolcraft discovery/deps - Lamstein/Sanganetti/Marquez	4.300
2641	2640.0	03/17/15	JPF	Draft motion in lim	4.250
2642	2641.0	11/10/10	JPF	Research on hospital confinement constituting state action under any of the three tests	4.250
2643	2642.0	02/24/15	JPF	Review of Schoolcraft discovery/deps - Huffman	4.250
2644	2643.0	07/03/10	JPF	Review of Schoolcraft recordings	4.250
2645	2644.0	07/17/10	JPF	Review of Schoolcraft tapes	4.250
2646	2645.0	03/14/15	JPF	Draft motion in lim	4.200
2647	2646.0	11/18/10	JPF	Research on joint action w/ private parties and police in the context of false arrest claims	4.100
2648	2647.0	11/20/10	JPF	Research on state action - use of private facilities to imprison	4.100
2649	2648.0	03/11/15	JPF	Review of Discovery and Depositions - Weiss	4.100
2650	2649.0	10/10/12	JPF	Review of IAB recordings	4.100
2651	2650.0	03/31/15	JPF	Draft motion in lim	3.900
2652	2651.0	12/04/10	JPF	Draft of argument	3.900
2653	2652.0	11/19/10	JPF	Research on joint action w/ private parties and police in the context of false arrest claims	3.900
2654	2653.0	02/15/15	JPF	Review of deposition exhibits & depositions	3.900
2655	2654.0	07/18/10	JPF	Review of Schoolcraft tapes	3.900
2656	2655.0	11/24/10	JPF	Draft of Argument	3.800
2657	2656.0	11/21/10	JPF	Research on joint action where state coerces private action	3.800
2658	2657.0	02/23/15	JPF	Review of Schoolcraft discovery/deps - Larry Schoolcraft	3.800
2659	2658.0	04/01/15	JPF	Draft motion in lim	3.750
2660	2659.0	07/02/10	JPF	Research of Labor Law 215-a for potential claim	3.750
2661	2660.0	11/11/10	JPF	Research on state action standard for private parties - joint action test	3.750
2662	2661.0	02/17/15	JPF	Review of deposition exhibits & depositions - Mauriello	3.750
2663	2662.0	08/01/10	JPF	Review of new documents and recording CD from AS	3.750
2664	2663.0	02/28/15	JPF	Review of Schoolcraft discovery/deps - Boston	3.750
2665	2664.0	03/02/15	JPF	Review of Schoolcraft discovery/deps - Sawyer/Duncan	3.750
2666	2665.0	03/14/15	JPF	Draft motion in lim	3.600
2667	2666.0	04/22/12	JPF	Research on 1st Amendment claim	3.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2668	2667.0	11/08/10	JPF	Research on involuntary confinement & state action	3.600
2669	2668.0	03/09/15	JPF	Review of reply memo & supporting docs filed by all defendants	3.600
2670	2669.0	07/14/10	JPF	Review of Schoolcraft tapes	3.600
2671	2670.0	06/17/12	JPF	Draft motion for reconsideration	3.500
2672	2671.0	02/10/15	JPF	Meeting w/ GC & JN regarding global trial strategy, witnesses to be called (or not called), exhibits to use, Rule 68 offer and next steps for moving forward.	3.500
2673	2672.0	02/20/15	JPF	Meeting w/ TEAM to discuss trial strategy, division of labor, motions	3.500
2674	2673.0	11/15/10	JPF	Research on conspiracy under §1983 versus state action	3.500
2675	2674.0	11/19/10	JPF	Draft argument	3.400
2676	2675.0	02/07/12	JPF	Read and review of JHMC medicals (full set from hospital)	3.400
2677	2676.0	11/20/10	JPF	Research on joint action where state coerces private action	3.400
2678	2677.0	02/26/15	JPF	Review of Schoolcraft discovery/deps - James	3.400
2679	2678.0	07/15/10	JPF	Review of Schoolcraft tapes	3.400
2680	2679.0	08/01/10	JPF	Review of Schoolcraft tapes & timeline	3.400
2681	2680.0	03/19/15	JPF	Draft motion in lim	3.300
2682	2681.0	10/17/12	JPF	Meeting w/JN & GC re: City's privilege claims and possible arguments/motions to defeat such claims highlights of Lauterborn interview & inconsistencies w/ Marino & home invasion recording	3.300
2683	2682.0	03/27/15	JPF	Research on motion in lim re IAB doc admission & opinions in them	3.300
2684	2683.0	04/04/15	JPF	Review and edit motion in lim	3.300
2685	2684.0	09/20/10	JPF	Review of deposition of Mauriello from Floyd case	3.300
2686	2685.0	02/12/15	JPF	Review of Memo of Law in Opp to plaintiff's motion for SJ	3.300
2687	2686.0	03/28/15	JPF	Draft motion in lim	3.250
2688	2687.0	04/24/12	JPF	Draft of motion to Amend 1st Amendment claim	3.250
2689	2688.0	08/31/10	JPF	Interview with GC of "DH" and "EB" former NYPD, reviewed materials, recordings re: quotas, downgrading	3.250
2690	2689.0	08/27/10	JPF	Interview with GC of Walter Cipscomb, former PO confirms quotas - wants to help Schoolcraft	3.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2691	2690.0	09/27/10	JPF	Meeting w/AS withr JN, GC to prep for discussion with US attorneys office EDNY	3.250
2692	2691.0	06/25/10	JPF	Meeting w/JN and GC re: scope of Schoolcraft materials that need to be reviewed for complaint	3.250
2693	2692.0	07/30/10	JPF	Meeting with JN, GC, Polanco & Raymond re: Schoolcraft & Monell claim	3.250
2694	2693.0	05/05/15	JPF	Read and review Ct's Opinion on SJ	3.250
2695	2694.0	11/15/10	JPF	Research on close nexus test and private parties	3.250
2696	2695.0	03/07/15	JPF	Research on press & statements made by counsel	3.250
2697	2696.0	07/23/12	JPF	Research on prior restrain, retaliation, and protected speech/law enforcement under Tachler	3.250
2698	2697.0	03/10/15	JPF	Research on ultimate issue, bolstering w/ prior litigation for Bernier	3.250
2699	2698.0	02/25/15	JPF	Review of Schoolcraft discovery/deps - Valenti	3.250
2700	2699.0	07/31/10	JPF	Meeting with Polanco, Raymond, JN, GC re: quotas and Monell Claim	3.200
2701	2700.0	09/22/10	JPF	Meeting with DOJ EDNY	3.100
2702	2701.0	10/26/10	JPF	Meeting with GC and "RC" to discuss experience with quotas in a Brooklyn North precinct	3.100
2703	2702.0	06/14/12	JPF	Research on 1st Amendment cases cited in Judge's opinion	3.100
2704	2703.0	11/21/10	JPF	Research on hospital state action where EDPs are involved	3.100
2705	2704.0	03/05/15	JPF	Research on prior litigiousness exclusion	3.100
2706	2705.0	06/18/12	JPF	Review and edit and incorporate additions suggested by JN and GC on Motion for Reconsideration	3.100
2707	2706.0	12/05/10	JPF	Review of argument	3.100
2708	2707.0	12/02/10	JPF	Review of Memo of Law argument	3.100
2709	2708.0	07/22/10	JPF	Review of Schoolcraft documents & tapes	3.100
2710	2709.0	07/31/10	JPF	Review of Schoolcraft tapes & timeline	3.100
2711	2710.0	06/26/10	JPF	Review of Schoolcraft's medical records	3.100
2712	2711.0	09/27/10	JPF	Schoolcraft interview with Civil Rights Division JN, GC, DOJ	3.100
2713	2712.0	04/23/12	JPF	Draft of letter on 1st Amendment claims	2.900
2714	2713.0	09/25/12	JPF	Meeting w/ AS & GC & JN re dep prep	2.900
2715	2714.0	10/08/12	JPF	Prep w/ AS for dep	2.900
2716	2715.0	07/06/10	JPF	Research Labor Law issue	2.900
2717	2716.0	07/24/15	JPF	Schoolcraft team meeting	2.900

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2718	2717.0	06/18/12	JPF	Draft motion for reconsideration	2.800
2719	2718.0	07/28/12	JPF	Draft of motion to amend	2.800
2720	2719.0	06/17/12	JPF	Research on prior restraint	2.800
2721	2720.0	07/31/10	JPF	Revision of Complaint	2.800
2722	2721.0	06/15/12	JPF	Draft motion for reconsideration	2.750
2723	2722.0	07/09/12	JPF	Draft reply motion for reconsideration	2.750
2724	2723.0	05/14/11	JPF	Meeting with GC reviewing Requests For Admission's (RFA's)	2.750
2725	2724.0	09/03/10	JPF	Meeting with GC with PO from 81st precinct "MG" re: corruption	2.750
2726	2725.0	08/25/10	JPF	Meeting with GC, PO from 81st precinct "PF" re: corruption	2.750
2727	2726.0	03/09/15	JPF	Research on IAB conclusions & admissibility	2.750
2728	2727.0	07/22/12	JPF	Research on prior restrain	2.750
2729	2728.0	07/20/12	JPF	Research on retaliation and protected speech issue	2.750
2730	2729.0	11/11/10	JPF	Research on traditional function state action test "hospital used as jail"	2.750
2731	2730.0	08/23/12	JPF	Review of disocvery provided by City defendants	2.750
2732	2731.0	08/05/10	JPF	Review of transcribed tape recording from August & March 2009 from Legal Language	2.750
2733	2732.0	08/06/10	JPF	Review of transcripts from Legal Language re June 2009 roll calls, Halloween Night, & visits to Johnston	2.750
2734	2733.0	09/27/11	JPF	Research re law enforcement privilege	2.600
2735	2734.0	04/06/15	JPF	Review and edit motion in lim	2.600
2736	2735.0	07/30/12	JPF	Review and edit motion to amend	2.600
2737	2736.0	05/08/12	JPF	Review and prep response to defendant's 1st Amendment letter	2.600
2738	2737.0	07/30/10	JPF	Revision of Complaint	2.600
2739	2738.0	09/20/10	JPF	Meeting with GC with PO "JB" re: NYPD quotas and downgrading	2.500
2740	2739.0	06/25/10	JPF	Review of Schoolcraft 's Patrolmens Benevolent Assocation ("PBA") contract	2.500
2741	2740.0	08/28/15	JPF	Draft additional sections to motions in lim re rifle pictues, Queens DA & prior complaints made by AS	2.400
2742	2741.0	03/12/15	JPF	Meting w/ GC, JN, NS, and Jon Lenoir ("JL") re trial, motions	2.400
2743	2742.0	10/07/12	JPF	QAD interview review	2.400
2744	2743.0	06/15/12	JPF	Research on prior restraint and Carcetti progeny	2.400
2745	2744.0	05/23/11	JPF	Review and Edit discovery demands and rogs against all defendants	2.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2746	2745.0	08/17/11	JPF	Review of responses to requests & discovery demands from hospital defendants	2.400
2747	2746.0	09/17/10	JPF	Reviewed documents and depositions from the Floyd litigation for purposes of Monell claim	2.400
2748	2747.0	04/25/12	JPF	Final review & edit 1st Amendment letter	2.300
2749	2748.0	11/04/10	JPF	Meeting with GC and police officer "BP" re: quotas, downgrading, and NYPD corruption	2.300
2750	2749.0	09/24/12	JPF	Prep AS fro his dep	2.300
2751	2750.0	01/26/11	JPF	Prep for oral argument	2.300
2752	2751.0	03/04/15	JPF	Research of racial comments & exclusion for motion in lim	2.300
2753	2752.0	03/09/12	JPF	Research on 1st Amendment claims	2.300
2754	2753.0	02/12/15	JPF	Review of 56.1 counter statements from JHMC, City, Mauriello, & Isacov	2.300
2755	2754.0	09/21/10	JPF	Review of Angel Heran depo from Floyd	2.300
2756	2755.0	08/03/10	JPF	Review of Complaint edits by JN	2.300
2757	2756.0	11/20/10	JPF	Draft of Argument	2.250
2758	2757.0	10/30/10	JPF	Meeting with GC & JN re: information provided by MR, MG RC whistleblower cops and movie and book publicist contacting AS for information	2.250
2759	2758.0	09/23/10	JPF	Meeting with GC, JN and Center for Constitutional Rights (CCR) re Schoolcraft	2.250
2760	2759.0	06/14/12	JPF	Read and review Opinion and Order on 1st Amendment and Motion to Quash and notes on same	2.250
2761	2760.0	06/16/12	JPF	Research on prior restraint	2.250
2762	2761.0	02/13/11	JPF	Review and Edit letter brief opposing stay	2.250
2763	2762.0	03/27/15	JPF	Review of Draft Direct Examination of AS from GC	2.250
2764	2763.0	08/15/11	JPF	Review of responses to Bernier & Jamaica discovery demands	2.250
2765	2764.0	07/09/10	JPF	Review of Schoolcraft timeline prepared by JN	2.250
2766	2765.0	07/23/12	JPF	Draft motion to amend	2.100
2767	2766.0	07/29/12	JPF	Draft of motion to amend	2.100
2768	2767.0	07/26/10	JPF	Meeting with JN & GC re case & updates on Brendan Delpozo	2.100
2769	2768.0	05/11/12	JPF	Read and review of defendant's letter to quash and discussion w/ GC & JN	2.100
2770	2769.0	06/20/10	JPF	Reading Village Voice articles on; Schoolcraft and Halloween night	2.100
2771	2770.0	07/08/12	JPF	Research cases cited in defendant's brief in opp in preparation of reply	2.100
2772	2771.0	03/06/15	JPF	Research on limitations of witness examinations	2.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2773	2772.0	03/28/15	JPF	Research on motion in lim conclusions re credibility admissibility	2.100
2774	2773.0	05/08/12	JPF	Review caselaw in defendant's letter	2.100
2775	2774.0	08/05/10	JPF	Review of Complaint with client's chain of events & correction	2.100
2776	2775.0	03/19/15	JPF	Review of James Cross outline	2.100
2777	2776.0	08/31/10	JPF	Drafting Amended Complaint	1.900
2778	2777.0	04/02/15	JPF	Meeting with JN and NS team	1.900
2779	2778.0	11/21/10	JPF	Research on joint action	1.900
2780	2779.0	09/21/10	JPF	Review of Donald McHugh depo from Floyd	1.900
2781	2780.0	10/04/10	JPF	Meeting w/ GC and "JR" retired police officer re: quotas, downgrading, NYPD corruption	1.800
2782	2781.0	09/01/10	JPF	Meeting w/JN and GC re: discuss anonymous POs contacting and how they can help Schoolcraft	1.800
2783	2782.0	10/07/10	JPF	Meeting with GC and "EB" retired police officer re: quotas, downgrading, NYPD corruption	1.800
2784	2783.0	05/09/12	JPF	Review of cases & letter in prep of argument	1.800
2785	2784.0	08/04/10	JPF	Review of client's chain of events for Complaint	1.800
2786	2785.0	08/03/10	JPF	Revise and edit of Complaint	1.800
2787	2786.0	07/08/11	JPF	Discussion with GC and JN re: meeting with Jim Leander and AS about investigation	1.750
2788	2787.0	09/24/10	JPF	Discussion with JN and GC re: first meeting with the DOJ and upcoming meeting with the DOJ and AS	1.750
2789	2788.0	12/01/10	JPF	Draft factual section of opp	1.750
2790	2789.0	06/16/12	JPF	Draft motion for reconsideration	1.750
2791	2790.0	08/25/10	JPF	Meeting w/JN and GC re: ACC assigned, Schoolcraft initial disclosures	1.750
2792	2791.0	09/24/12	JPF	Meeting w/JN and GC to discuss City deficiency letter and AS dep prep	1.750
2793	2792.0	05/09/11	JPF	Meeting with JN and GC re: necessary disclosures under Rule 26 for plaitniff	1.750
2794	2793.0	07/06/10	JPF	Meeting w/JN and JF re: new whistleblower contacted JN re: Schoolcraft	1.300
2795	2794.0	12/06/10	JPF	Review and edit brief	1.750
2796	2795.0	06/18/12	JPF	Review and edit Motion for Reconsideration	1.750
2797	2796.0	03/16/15	JPF	Review of Direct Examinaiton Outline for AS	1.750
2798	2797.0	06/19/12	JPF	Travel back to NYC from Johnstown (3.5)	1.750
2799	2798.0	06/19/12	JPF	Travel to Johnstown (3.5)	1.750
2800	2799.0	02/10/12	JPF	Discussion w/ JN & GC re additional items of discovery	1.600
2801	2800.0	08/09/10	JPF	Edit/Revise Complaint	1.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2802	2801.0	03/14/12	JPF	Editing Amended Complaint to add 1st Amendment facts & law	1.600
2803	2802.0	08/08/10	JPF	Editing Complaint with additional allegations	1.600
2804	2803.0	11/11/10	JPF	Meeting with GC and "JW" cop to discuss quotas/retaliation	1.600
2805	2804.0	01/20/12	JPF	Phone call with Larry Schoolcraft re discovery & EBTs	1.600
2806	2805.0	05/19/11	JPF	Review & edit demands & interrogatories	1.600
2807	2806.0	05/20/11	JPF	Discussion w/ GC & JN re request to admit corrections/additions	1.500
2808	2807.0	03/10/15	JPF	Discussion with GC to help outline AS direct examination	1.500
2809	2808.0	07/07/10	JPF	Meeting w/ only with AS	1.500
2810	2809.0	08/09/10	JPF	Meeting w/JN and GC re: Schoolcraft website to support Monell theory	1.500
2811	2810.0	05/12/15	JPF	Meeting w/NS team JN and GC pre-conf	1.500
2812	2811.0	01/10/11	JPF	Meeting with GC & JN re interrogatories and demands	1.500
2813	2812.0	08/26/10	JPF	Meeting with GC and JN re: interview of PO from 81st precinct "PF" re: corruption	1.500
2814	2813.0	07/29/10	JPF	Meeting with JN and Rocco P - Daily News re Schoolcraft and evidence of quotas for Monell claim	1.500
2815	2814.0	10/12/10	JPF	Review of Motion to Dismiss by Jamaica Hosp.	1.500
2816	2815.0	08/09/12	JPF	Traveled from Albany back to NYC (3.0)	1.500
2817	2816.0	08/09/12	JPF	Traveled to Albany to meet Client (3.0)	1.500
2818	2817.0	07/22/10	JPF	Discussed causes of action w/GC	1.400
2819	2818.0	09/04/10	JPF	Drafting Amended Complaint	1.400
2820	2819.0	06/25/10	JPF	Meeting with GC & JN re: possible discovery demands after suit is filed	1.400
2821	2820.0	10/27/10	JPF	Meeting with GC and David Velez re: arbitration, quotas, Michael Marino	1.400
2822	2821.0	05/10/11	JPF	Meeting with JN and GC re: edits to Intial disclosures and discussion regarding requests to admit	1.400
2823	2822.0	10/10/10	JPF	Meeting with JN and GC re: information provided by MV, NB, EB whistleblower cops	1.400
2824	2823.0	09/03/10	JPF	Meeting with JN and GC to discuss information provided by DH, MG, EB whistleblower cops in furtherance of the Monell claim	1.400
2825	2824.0	11/21/10	JPF	Research on supplement jurisdiction	1.400
2826	2825.0	04/05/12	JPF	Review & edit response to City's interogs	1.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2827	2826.0	06/23/11	JPF	Review of answers to interrogatories by Isacov	1.400
2828	2827.0	02/11/15	JPF	Review of declarations from City, Berniers, Isacov, & JHMC w/ accompanying exhibits	1.400
2829	2828.0	07/26/10	JPF	Review of draft of Complaint prepared by GC	1.400
2830	2829.0	03/23/15	JPF	Review of Sawyer cross examaintion outline	1.400
2831	2830.0	08/04/10	JPF	Revise and edit Complaint	1.400
2832	2831.0	02/02/15	JPF	Discussion w/ GC & JN re representing AS again for trial	1.300
2833	2832.0	03/16/15	JPF	Discussion with GC re: AS direct examination and points to cover, strategy	1.300
2834	2833.0	05/10/12	JPF	Draft letter providing supplemental authority in response to defendant's opp	1.300
2835	2834.0	07/09/12	JPF	Edit reply	1.300
2836	2835.0	12/07/10	JPF	Final review & edit of brief	1.300
2837	2836.0	05/20/11	JPF	Finalize interrogatories & discuss EBTs w/ JN & GC	1.300
2838	2837.0	07/06/10	JPF	Meeting w/JN and GC re: new whistleblower contacted JN re: Schoolcraft	1.300
2839	2838.0	08/08/12	JPF	Meeting w/ JN & GC re meeting w/ AS in Albany for prep	1.300
2840	2839.0	09/17/10	JPF	Meeting with JN and GC regarding infromation obtained from Floyd litigation and its impact on Schoolcrafts Monell and Retaliation claims	1.300
2841	2840.0	07/05/12	JPF	Read and review of defendant's opp to plaintiff's motion for reconsideration	1.300
2842	2841.0	07/22/12	JPF	Review of complaint for allegations conforming to plaintiff's 2nd motion to amend	1.300
2843	2842.0	12/01/10	JPF	Review of Complaint for facts	1.300
2844	2843.0	12/08/10	JPF	Review of NYPD Memos re anti quota legislation	1.300
2845	2844.0	02/11/15	JPF	Review of witness/exhibit list from JN and discuss with GC	1.300
2846	2845.0	08/17/11	JPF	Discuss confidentiality stip w/ GC & JN b/c of plaintiff's objections	1.250
2847	2846.0	05/19/11	JPF	Discuss w/ JN & GC edits & topic areas that should be explored on interrogatories	1.250
2848	2847.0	09/28/11	JPF	Discussion w/ JN and GC re law enforcement privilege & motion to compel	1.250
2849	2848.0	04/23/12	JPF	Discussion w/ Larry Schoolcraft re amendments to complaint	1.250
2850	2849.0	08/19/10	JPF	Discussion with GC and JN re: new recordings and documents provided by AS	1.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2851	2850.0	03/09/12	JPF	Discussion with JN & GC re reinstating 1st Amendment claims in this case based on Carcetti & actions after the fact	1.250
2852	2851.0	06/28/10	JPF	Discussion with JN and GC re retainer & meeting with Schoolcrafts	1.250
2853	2852.0	10/13/10	JPF	Discussion with JN re: arguments to make in response to JHMC motion	1.250
2854	2853.0	12/04/10	JPF	Draft section on supplement jurisdiction	1.250
2855	2854.0	07/10/12	JPF	Edit reply final	1.250
2856	2855.0	06/20/12	JPF	Final edit and review of Motion for Reconsideration	1.250
2857	2856.0	04/08/15	JPF	Final edits and corrections to motion in Lim	1.250
2858	2857.0	07/30/10	JPF	Meet with GC and JN re: changes and additions to complaint	1.250
2859	2858.0	07/14/10	JPF	Meeting w/JN and GC re: Schoolcraft complaint	1.250
2860	2859.0	07/27/10	JPF	Meeting w/JN and GC to discuss Complaint	1.250
2861	2860.0	03/01/11	JPF	Meeting with anonymous cops from T34 w/ GC and JN - provided recordings of Lt. Janice Williams	1.250
2862	2861.0	08/30/10	JPF	Meeting with JN & GC re Garcia cop from 81 who knows Schoolcraft & has info on quotas	1.250
2863	2862.0	07/22/12	JPF	Phone call w/ Larry Schoolcraft re meeting and outstanding discovery issues and depositions	1.250
2864	2863.0	09/10/15	JPF	Phone Call with AS re: settlement	1.250
2865	2864.0	03/08/12	JPF	Phone call with client re article and whether confidential info had been disclosed	1.250
2866	2865.0	04/11/11	JPF	Phone convo w/ AS, re representation on his suspension & internal hearing	1.250
2867	2866.0	01/25/11	JPF	Prep for oral argument on JHMC motion	1.250
2868	2867.0	07/20/12	JPF	Read and review judge's decision denying reconsideration	1.250
2869	2868.0	09/10/12	JPF	Read and review Opinion & Order from Sweet on plaintiff's motion to amend	1.250
2870	2869.0	06/29/10	JPF	Receipt & review of Weinstein arbitration decision in PBA case	1.250
2871	2870.0	03/20/12	JPF	Research on 1st Amendment Second Circuit decisions following Carcetti	1.250
2872	2871.0	08/06/10	JPF	Review and edit Complaint after clarification	1.250
2873	2872.0	12/02/10	JPF	Review of Amended Answer filed by City	1.250
2874	2873.0	12/03/10	JPF	Review of argument	1.250
2875	2874.0	08/16/11	JPF	Review of confidentiality stip from City	1.250
2876	2875.0	02/24/15	JPF	Review of Huffman cross examination outline	1.250
2877	2876.0	06/26/10	JPF	Review of PBA contract	1.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2878	2877.0	08/06/10	JPF	Review of revised Complaint from JN	1.250
2879	2878.0	02/26/15	JPF	Review of Valenti exmanination	1.250
2880	2879.0	05/12/15	JPF	Team meeting following conf.	1.250
2881	2880.0	10/18/12	JPF	Meeting w/JN & GC re: City's Deliberative Process and Grand Jury privilege claims and best strategy for defeating same.	1.200
2882	2881.0	10/15/12	JPF	Meeting w/JN & GC re: Marino's IAB interview & inconsistencies w/claims in UF 49 & Halloween Night recording	1.200
2883	2882.0	07/15/10	JPF	Discussion with GC and JN re tapes	1.100
2884	2883.0	07/09/10	JPF	Discussion with JN re timeline	1.100
2885	2884.0	02/26/15	JPF	Meeting w/JN and GC re: outstanding items we need from trial from NS	1.100
2886	2885.0	09/30/10	JPF	Meeting with GC and JN re: anonymous cop interviews VM and EF	1.100
2887	2886.0	05/18/11	JPF	Meeting with GC to discuss documents that must be requested in our demands	1.100
2888	2887.0	09/22/10	JPF	Meeting with JN to prepare for EDNY DOJ	1.100
2889	2888.0	10/09/12	JPF	Prep w/ AS for AS dep	1.100
2890	2889.0	05/20/11	JPF	Review & edits request for admissions	1.100
2891	2890.0	08/30/15	JPF	Review and edit motion in lim	1.100
2892	2891.0	02/13/12	JPF	Review and edit revised demands for City	1.100
2893	2892.0	03/13/15	JPF	Review jury instructions from NS team	1.100
2894	2893.0	04/07/15	JPF	Review motion in lim based on comments	1.100
2895	2894.0	07/24/15	JPF	Review of draft witness list from NS: notes taken	1.100
2896	2895.0	04/06/15	JPF	Review of NS comments	1.100
2897	2896.0	01/26/11	JPF	Appearance for motion to dismiss in Schoolcraft	1.000
2898	2897.0	03/28/12	JPF	Attend oral Argument on City motion	1.000
2899	2898.0	09/28/11	JPF	Attend oral argumqnt on motion to compel	1.000
2900	2899.0	05/09/12	JPF	Attended Argument on 1st Amendment claim	1.000
2901	2900.0	04/13/15	JPF	Conf. on trial date - case adj ourned	1.000
2902	2901.0	05/12/15	JPF	Conf. trial adjourned to Oct. 19	1.000
2903	2902.0	09/05/10	JPF	Editing Amended Complaint	1.000
2904	2903.0	07/26/10	JPF	Meeting GC and JN re issues for Schoolcraft complaint	1.000
2905	2904.0	10/12/10	JPF	Meeting w/ GC and JN re: Schoolcraftjustice.com calls from Pos	1.000
2906	2905.0	02/20/15	JPF	Meeting w/ JN and GC before meeting with Nat Smith to dicuss how we are going to proceed at meeting	1.000
2907	2906.0	05/15/11	JPF	Meeting with JN and GC re: edits to RFA's	1.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2908	2907.0	11/12/10	JPF	Meeting with JN and GC re: issues on our motion opposition and GC's meeting with JW anonymous cop	1.000
2909	2908.0	03/27/15	JPF	Phone conference with JN, GC, NS, JL	1.000
2910	2909.0	05/23/12	JPF	Prep for argument w/ GC & JN	1.000
2911	2910.0	02/08/12	JPF	Pre-trial conference before Judge Sweet	1.000
2912	2911.0	06/23/11	JPF	Review of response to doc demands Isacov	1.000
2913	2912.0	09/12/15	JPF	Adding a new section on Bernier's naval yard disaster testimony	0.900
2914	2913.0	12/19/11	JPF	Convo w/ Larry Schoolcraft re discovery issues, avenues to pursue with defendants	0.900
2915	2914.0	06/28/10	JPF	Discussion with JN re meeting with P.O. Velasquez re policy of quotas	0.900
2916	2915.0	02/12/11	JPF	Discussion with JN re; motion to stay and arguments in opposition	0.900
2917	2916.0	08/01/12	JPF	Final review of motion to amend	0.900
2918	2917.0	05/31/12	JPF	Meeting w/JN and GC re: City conf. Stips	0.900
2919	2918.0	08/25/10	JPF	Meeting with JN & GC re more whistleblower email & meeting with P.O Fioranelli	0.900
2920	2919.0	02/04/15	JPF	Phone call w JN and GC re: pending trial strategy and misc. evidentiary issues, and setting up meeting to discuss same in greater detail	0.900
2921	2920.0	10/06/10	JPF	Review of Answer to Complaint by Jamaica	0.900
2922	2921.0	09/11/11	JPF	Review of plaintiff's motion to compel discovery	0.900
2923	2922.0	08/11/11	JPF	Review of responses to Isacov discovery demands	0.900
2924	2923.0	04/06/15	JPF	Review of revised SK jury instructions	0.900
2925	2924.0	02/11/15	JPF	Berniers counter 56.1 statement	0.800
2926	2925.0	01/23/15	JPF	Call w/GC and JN about taking over case again	0.800
2927	2926.0	03/28/12	JPF	Conf. re confidentiality stip & Village Voice article	0.800
2928	2927.0	04/04/12	JPF	Conf. re NY Times letter to undo the confidentiality stip	0.800
2929	2928.0	07/02/12	JPF	Discussion w/ AS and Larry Schoolcraft re financial issues and possibly locating donors	0.800
2930	2929.0	05/08/15	JPF	Discussion w/ GC & JN re decision and impact on trial and motion in lim	0.800
2931	2930.0	12/06/10	JPF	Discussion with GC & JN re final corrections	0.800
2932	2931.0	06/22/10	JPF	Discussion with Gerald Cohen (GC) and JN re Schoolcraft case & causes of action	0.800
2933	2932.0	07/07/10	JPF	Discussion with JN re Labor Law research	0.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2934	2933.0	06/06/10	JPF	Meeting w/ Gerald Cohen ("GC") and JN re: Schoolcraft coming to our office for interview	0.800
2935	2934.0	06/20/10	JPF	Discussions with Jon Norinsberg (JN) re Schoolcraft case	0.800
2936	2935.0	11/18/10	JPF	Draft of prelim statement in opp to Motion to Dimiss	0.800
2937	2936.0	09/20/10	JPF	Listening to This American Life interview with client	0.800
2938	2937.0	06/18/10	JPF	Meeting w/JN and Gerald Cohen ("GC") re: Schoolcraft coming to our office and retaining for lawsuit	0.800
2939	2938.0	08/12/10	JPF	Meeting w/JN and GC re: legal strategies on Monell and whistleblower cop contacts	0.800
2940	2939.0	08/22/10	JPF	Meeting with JN & GC re whistleblowers reaching out through the website	0.800
2941	2940.0	08/29/12	JPF	Meeting. w/ JN & GC re: City's Suppl. Disclosure & the need for us to depose at least 5 of the 9 new witnesses identified by City & other gen.strategy issues for advancing discovery	0.800
2942	2941.0	11/08/10	JPF	Met with GC and police officer "MC" re: quotas	0.800
2943	2942.0	07/25/12	JPF	Phone call w/ Larry Schoolcraft	0.800
2944	2943.0	05/22/12	JPF	Phone call w/ Larry Schoolcraft re Vallone and 1st Amendment	0.800
2945	2944.0	08/27/10	JPF	Reading articles written by Eterno & Silverman re Compstat & numbers game	0.800
2946	2945.0	04/05/12	JPF	Review and discuss w/ JN & GC plaintiff's responses to City demands	0.800
2947	2946.0	09/30/10	JPF	Review of Answer to Complaint by Bernier	0.800
2948	2947.0	11/08/10	JPF	Review of Doc Demands/Interrogatories by Isacov	0.800
2949	2948.0	03/06/15	JPF	Review of email from AS w/ witness suggestions	0.800
2950	2949.0	11/11/10	JPF	Review of Interrogatoiiies & Demands Bernier	0.800
2951	2950.0	06/30/10	JPF	Review of PBA website internal access for P.O.s with AS	0.800
2952	2951.0	03/29/12	JPF	Revised and help draft prqposed AEO stip w/JN and GC for City	0.800
2953	2952.0	02/12/15	JPF	Affidavit of Mauriello	0.750
2954	2953.0	05/03/12	JPF	Discussion w/ GC & JN re Affidavits and conf. stip AEO	0.750
2955	2954.0	08/16/12	JPF	Discussion w/ JN & GC re City's suggestion on multiple dates for deps	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2956	2955.0	05/17/12	JPF	Discussion w/JN and GC re: AS breach affidavit	0.750
2957	2956.0	02/08/12	JPF	Discussion with GC and JN re: conference and discovery and strategy moving forward	0.750
2958	2957.0	02/24/15	JPF	Discussion with GC re: Huffman cross	0.750
2959	2958.0	03/19/15	JPF	Discussion with GC re: James cross examination	0.750
2960	2959.0	03/08/12	JPF	Discussion with JN & GC re VV article and the confidential report	0.750
2961	2960.0	04/25/12	JPF	Discussion with JN re: edits/changes to 1st Amendment letter	0.750
2962	2961.0	06/14/12	JPF	Meet with JN and GC to discuss motion for reconsideration on 1st amendment claim	0.750
2963	2962.0	10/04/10	JPF	Meeting w GC and JN to discuss information from "JR" retired police officer re: quotas, downgrading, NYPD corruption	0.750
2964	2963.0	06/23/10	JPF	Meeting w/JN and GC re: JN's upcoming meeting w/ district attorney	0.750
2965	2964.0	07/07/10	JPF	Meeting with AS, LS, GC & JN	0.750
2966	2965.0	02/27/12	JPF	Meeting with GC and JN re: documents received from Johnstown PD for plaintiff's subpoena	0.750
2967	2966.0	08/25/10	JPF	Meeting with JN & GC re: Whitehead Meeting.	0.750
2968	2967.0	04/08/15	JPF	Phone call with GC and JN regarding trial adjournment, proposed filings, various strategies for trying to make sure trial goes on April 20	0.750
2969	2968.0	01/23/12	JPF	Phone call with Larry Schoolcraft re plaintiff salary and benefits and work suspension status	0.750
2970	2969.0	04/20/12	JPF	Phone discussion w/ AS	0.750
2971	2970.0	05/03/12	JPF	Receipt and review of email from City re: revised confidentiality AEO and Affidavits	0.750
2972	2971.0	10/18/12	JPF	Review and edit letter to Ct. re ASO issue & AS ability to see the QAD report	0.750
2973	2972.0	10/19/12	JPF	Review of Answer to Amended Complaint from Isacov	0.750
2974	2973.0	09/07/10	JPF	Review of Answer to Complaint from Jamaica Hosp.	0.750
2975	2974.0	05/10/11	JPF	Review of Initial disclosures and discussion with GC	0.750
2976	2975.0	10/28/11	JPF	Review of operations order 10/17/11 sent from client	0.750
2977	2976.0	08/13/10	JPF	Review of PBA regulations	0.750
2978	2977.0	06/23/11	JPF	Review of requests for discovery from Isacov	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2979	2978.0	07/28/15	JPF	Review of updated jury instructions	0.750
2980	2979.0	09/28/10	JPF	"Rich" anonymous cop discussion with GC	0.600
2981	2980.0	08/20/12	JPF	Discussion w/ JN & GC re additional amendment of the complaint to add Hanlon	0.600
2982	2981.0	05/23/12	JPF	Discussion w/ JN & GC re: defendant's letter re subpoena	0.600
2983	2982.0	05/22/12	JPF	Discussion w/ JN & GC re defendant's letter re Vallone subpoena	0.600
2984	2983.0	07/28/12	JPF	Discussion w/ JN & GC re motion to amend to add prior restraint	0.600
2985	2984.0	03/06/15	JPF	Discussion w/ JN & GC re proposed witnesses	0.600
2986	2985.0	05/08/12	JPF	Discussion w/ JN and GC re argument on 1st Amendment claim	0.600
2987	2986.0	05/16/12	JPF	Discussion w/ JN and GC re opp to defendant's motion to quash	0.600
2988	2987.0	07/26/10	JPF	Discussion with GC & JN re Complaint & drafts going forward	0.600
2989	2988.0	08/27/10	JPF	Discussion with GC & JN re having Eterno & Silverman as experts	0.600
2990	2989.0	01/26/11	JPF	Discussion with GC & JN re oral arguments	0.600
2991	2990.0	06/23/11	JPF	Discussion with GC & JN re responses & requests from Isacov	0.600
2992	2991.0	03/23/15	JPF	Discussion with GC re: Sawyer points for cross examination	0.600
2993	2992.0	04/13/12	JPF	Discussion with JN and GC re: Matthews decision	0.600
2994	2993.0	07/02/10	JPF	Discussion with JN re AS' ability to pursue claim under Labor Law 215-a	0.600
2995	2994.0	03/16/12	JPF	Draft of opp that defendants request plaintiff be ordered to appear @ 3 /28/12 conf.	0.600
2996	2995.0	03/20/12	JPF	Incorporating language into Amended Complaint	0.600
2997	2996.0	09/26/12	JPF	Meeting w/ JN & GC & AS re adjorning dep due to father's medical emergency	0.600
2998	2997.0	03/30/12	JPF	Meeting w/ JN & GC re AEO changes	0.600
2999	2998.0	02/19/11	JPF	Meeting with GC re: getting transcript for Bryant v. City verdict finding quotas existed	0.600
3000	2999.0	03/12/12	JPF	Meeting with JN & GC re letter from City	0.600
3001	3000.0	08/15/10	JPF	Meeting with JN and GC re NYTimes story about quotas & Schoolcraft	0.600
3002	3001.0	03/15/12	JPF	Meeting with JN and GC re proposed Amended Complaint	0.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3003	3002.0	04/17/15	JPF	Phone call w/ rest of trial team regarding City' proposal for mediation and best strategy for responding	0.600
3004	3003.0	09/08/15	JPF	Phone call with JN & GC recapping discussion with defense counsel and clients over the weekend	0.600
3005	3004.0	02/27/15	JPF	Phone call with JN regarding following up with Smith, IAB v. DAT transcripts, calling additional witness's like Nelson and Valenti and Yeager	0.600
3006	3005.0	09/08/15	JPF	Phone call with NS, GC and JN regarding best strategy for handling settlement discussions with the City	0.600
3007	3006.0	05/06/11	JPF	Read & review the decision & order written disposing of the motion to dismiss	0.600
3008	3007.0	10/18/12	JPF	Review and edit letter to Ct opposing an additional day for AS dep for Mauriello lawyer	0.600
3009	3008.0	05/17/12	JPF	Review and edit plaintiffs opp to defendant's motion to quash	0.600
3010	3009.0	05/12/11	JPF	Review of agency agreement for client on book/movie deals he does	0.600
3011	3010.0	10/22/12	JPF	Review of Amended Complaint by Bernier	0.600
3012	3011.0	10/27/10	JPF	Review of Answer to Amended Complaint Isacov	0.600
3013	3012.0	06/21/10	JPF	Review of articles sent by Schoolcraft on Gerald Nelson	0.600
3014	3013.0	09/01/11	JPF	Review of decision in Floyd on summary judgment & its relevance to Schoolcraft tapes and Monell claim	0.600
3015	3014.0	04/13/12	JPF	Review of Decision in Matthews 1st Amendment case from Judge Jones	0.600
3016	3015.0	01/20/11	JPF	Review of defendants' reply memo of law	0.600
3017	3016.0	05/10/12	JPF	Review, edit & submit supplemental letter	0.600
3018	3017.0	04/17/15	JPF	Conference call with team re: best strategy for responding to City latest "offer"	0.500
3019	3018.0	12/19/11	JPF	Discussion w/ GC & JN re plaintiff's thoughts on discovery	0.500
3020	3019.0	12/09/10	JPF	Discussion wi JN & GC re discovery responses & timing	0.500
3021	3020.0	03/25/15	JPF	Discussion w/ SK re motions in lim	0.500
3022	3021.0	05/05/15	JPF	Discussion WJN and GC re SMJ	0.500
3023	3022.0	07/28/10	JPF	Discussion with GC and JN re: Adhyl Polanco and other whistl blowers	0.500
3024	3023.0	02/26/15	JPF	Discussion with GC re: Valenti examination	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3025	3024.0	06/30/10	JPF	Discussion with JN & GC re FOIL requests for 911's & how to proceed	0.500
3026	3025.0	03/28/12	JPF	Discussion with JN and GC re: court's order on City's motion for breach of confidentiality agreement	0.500
3027	3026.0	03/30/12	JPF	Discussion with JN and GC re: filing motion to amend and discovery issues	0.500
3028	3027.0	09/27/10	JPF	Discussion with JN re location & witnesses from This American Life interview	0.500
3029	3028.0	03/19/12	JPF	Discussion w/ JN re corrections Amended Complaint	0.500
3030	3029.0	08/21/12	JPF	Draft Amended Complaint adding Hanlon	0.500
3031	3030.0	09/17/12	JPF	Draft of letter to amend to add Hanlon to complaint	0.500
3032	3031.0	03/12/15	JPF	Email from AS re additional witnesses for trial	0.500
3033	3032.0	09/24/12	JPF	Email from City re service of amended complaint, Lauderborn dep, & discovery deficiencies	0.500
3034	3033.0	08/12/10	JPF	Meeting w/GC and JN re: legal strategies + next steps for moving forward	0.500
3035	3034.0	04/13/15	JPF	Meeting w/JN and GC re new trial date	0.500
3036	3035.0	09/25/10	JPF	Meeting with GC & JN re AS interview with feds	0.500
3037	3036.0	07/15/11	JPF	Meeting with GC and JN re: discovery plan and issues to raise	0.500
3038	3037.0	10/11/12	JPF	Meeting with JN, GC, AS before depo	0.500
3039	3038.0	07/24/15	JPF	Phone call with JN & GC regarding issues to discuss at meeting today with rest of trial team	0.500
3040	3039.0	04/02/15	JPF	Phone call with JN regarding several issues in motion in limine and admissibility of Marino's steroid investigation under R. 608 (b)	0.500
3041	3040.0	09/25/12	JPF	Phone call with Larry Schoolcraft re AS dep	0.500
3042	3041.0	05/22/12	JPF	Read and review of defendant's letter re Vallone subpoena	0.500
3043	3042.0	03/29/12	JPF	Review of AEO	0.500
3044	3043.0	07/19/11	JPF	Review of agency agreement for AS book deals	0.500
3045	3044.0	11/11/10	JPF	Review of Answer to Amended Complaint Bernier	0.500
3046	3045.0	02/27/12	JPF	Review of docs from Johnstown PD re plaintiff's subpoena	0.500
3047	3046.0	10/12/10	JPF	Review of JHMC Dec. for motion to dismiss	0.500
3048	3047.0	10/17/12	JPF	Discussion w/ GC & JN re City's refusal to allow AS to see QAD file	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3049	3048.0	05/12/11	JPF	Discussion w/ GC & JN re agency agreement	0.400
3050	3049.0	07/06/11	JPF	Discussion w/ JN & GC re changing to case management plan	0.400
3051	3050.0	08/20/12	JPF	Discussion w/ JN re AS dep prep	0.400
3052	3051.0	12/01/10	JPF	Discussion with GC & JN re affidavit from Schoolcraft	0.400
3053	3052.0	08/13/10	JPF	Discussion with GC & JN re Jonathan Moore issue - cease & desist letter	0.400
3054	3053.0	08/17/10	JPF	Discussion with GC and JN re anonymous e-mails that we got as a result of the email	0.400
3055	3054.0	08/09/10	JPF	Discussion with GC re website content	0.400
3056	3055.0	06/29/10	JPF	Discussion with JN & GC re decision on PBA arbitration case	0.400
3057	3056.0	09/06/10	JPF	Discussion with JN re Amended Complaint	0.400
3058	3057.0	09/03/10	JPF	Discussion with JN re AS interview with This American Life	0.400
3059	3058.0	07/28/10	JPF	Discussion with JN re Complaint	0.400
3060	3059.0	08/08/10	JPF	Discussion with JN re edits to Complaint	0.400
3061	3060.0	09/20/10	JPF	Discussion with JN re meeting with Department of Justice ("DOJ") on AS case	0.400
3062	3061.0	09/07/10	JPF	Discussion with Mark Toor re article in Chief about Amended Complaint	0.400
3063	3062.0	08/03/10	JPF	Discussion with Rocco re Schoolcraft recordings	0.400
3064	3063.0	05/01/12	JPF	Discussions w/ JN and GC re City's request for affidavits & deposition for confidentiality breach	0.400
3065	3064.0	08/06/10	JPF	Discussions with JN about quotes to add to complaint from transcribed recordings	0.400
3066	3065.0	03/12/12	JPF	Diaft Response to defendants letter re: breach of protective order	0.400
3067	3066.0	02/25/15	JPF	Email from AS re counterclaim	0.400
3068	3067.0	08/03/10	JPF	E-mail from JN re Revised Complaint	0.400
3069	3068.0	03/15/12	JPF	Incorporating corrections from JN to Amended Complaint	0.400
3070	3069.0	08/22/12	JPF	Meeting w/ GC & JN re Kretz's request to have an additional day to depose plaintiff	0.400
3071	3070.0	03/28/12	JPF	Meeting w/ JN & GC prior to conference to prep	0.400
3072	3071.0	08/30/10	JPF	Meeting with JN & GC re Labor & Employment case & 12(b)(6) motion	0.400
3073	3072.0	01/31/11	JPF	Meeting with JN & GC re send documents & authorizations to Queens DA office	0.400
3074	3073.0	01/20/11	JPF	Meeting with JN, GC to discuss JHMC's reply memo of law	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3075	3074.0	04/07/15	JPF	Phone call w/ SK re final corrections to motion in limine	0.400
3076	3075.0	04/17/15	JPF	Phone call with GC & JN following up on phone call and discussing settlement position vs. going to trial	0.400
3077	3076.0	03/08/12	JPF	Read Voice article on QAD report	0.400
3078	3077.0	03/12/12	JPF	Read/review of letter from defendant City on breach of confidentiality stip	0.400
3079	3078.0	03/23/15	JPF	Receipt and review of Kretz's demands re: the student "movie" about AS	0.400
3080	3079.0	04/07/15	JPF	Response email to team re comments on motion in lim	0.400
3081	3080.0	03/12/12	JPF	Review & edit response to City's letter re protective order	0.400
3082	3081.0	05/17/12	JPF	Review and discuss City New York Times opp letter w/ JN & GC	0.400
3083	3082.0	04/07/15	JPF	Review of JL's comments	0.400
3084	3083.0	03/21/12	JPF	Review of NY Times letter to court re confidentiality	0.400
3085	3084.0	04/07/15	JPF	Review of SK's comments	0.400
3086	3085.0	09/03/10	JPF	Composing post to get more cops to talk to us about Schoolcraft & Monell claim	0.300
3087	3086.0	11/13/12	JPF	Confirming with GC w/ AS on the phone that he is terminating representation	0.300
3088	3087.0	09/18/10	JPF	Conversation with GC & JN re new whistleblower cop	0.300
3089	3088.0	04/06/12	JPF	Corresponderice w/ NY Times about amendments to Schoolcraft protective order	0.300
3090	3089.0	07/23/12	JPF	Discussion w/ GC & JN re meeting w/ Schoolcrafts in Albany	0.300
3091	3090.0	02/08/11	JPF	Discussion w/ JN & GC re letter to court to schedule discovery	0.300
3092	3091.0	04/18/11	JPF	Discussion w/ JN & GC re prep of letter re NYPD hearing & PBA representation	0.300
3093	3092.0	04/30/12	JPF	Discussion w/ JN and GC re NY Times alteration to protective order	0.300
3094	3093.0	08/09/10	JPF	Discussion with GC and JN re Adrian interview	0.300
3095	3094.0	08/11/10	JPF	Discussion with GC re JN re anonymous P.O.	0.300
3096	3095.0	06/27/11	JPF	Discussion with JN and GC re City's failure to response to discovery requests	0.300
3097	3096.0	08/03/10	JPF	Discussion with JN re corrections to complaint	0.300
3098	3097.0	10/12/10	JPF	Discussion with JN re Motion to Dismiss schedule	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3099	3098.0	09/23/10	JPF	Discussion with JN re new post for RANT for more whistleblower Pos	0.300
3100	3099.0	06/28/10	JPF	Discussion with JN, GC & Adrian Schoolcraft ("AS") re: prior counsel Jonathan Moore	0.300
3101	3100.0	03/11/12	JPF	Draft email to defendants re amending complaint to add 1st Amendment claims	0.300
3102	3101.0	08/16/10	JPF	E-mail article from "Gman" re downgrading stats & PBA admission about quotas from 1994	0.300
3103	3102.0	05/29/12	JPF	Email, from GC w/ proposed confidentiality stips	0.300
3104	3103.0	08/09/10	JPF	E-mail from JN re negligent ret. claim	0.300
3105	3104.0	08/08/10	JPF	E-mail from JN with additional allegations for Complaint	0.300
3106	3105.0	07/06/12	JPF	Email to City re relevancy redaction portion of AEO & stip	0.300
3107	3106.0	09/12/11	JPF	Final review & edit motion to compel	0.300
3108	3107.0	04/02/15	JPF	Follow up phone call with JN locating does relevant for motion in Limine, including plaintiff IAB/CCRB transcripts, Affidavits for spoliation, and Eterno deposition testimony	0.300
3109	3108.0	04/30/12	JPF	Letter from City requesting affidavits & dep of client re confidentiality breach	0.300
3110	3109.0	03/03/15	JPF	Letter to Ct. from Kretz correcting 56.1 statement errors	0.300
3111	3110.0	04/07/15	JPF	Making corrections to motion in lim	0.300
3112	3111.0	11/01/10	JPF	Meeting with JN and GC re: updating Schoolcraft website	0.300
3113	3112.0	06/25/12	JPF	Phone call w/ Frank Serpico re meeting w/ Schoolcrafts	0.300
3114	3113.0	03/30/15	JPF	Phone call with JN & GC regarding admissibility of tape recorded statements of persons interviewed by IAB	0.300
3115	3114.0	03/30/15	JPF	Phone call with JN regarding motion limine issues and recent filings by NS regarding striking affidavit and request for conference	0.300
3116	3115.0	08/11/10	JPF	Phone call with Mark Toor re article in Chief	0.300
3117	3116.0	08/31/10	JPF	Phone call with Mark Toor re new article	0.300
3118	3117.0	04/12/11	JPF	Phone convo w/JN re suspension issue & our response to the NYPD	0.300
3119	3118.0	10/18/12	JPF	Read and review Answer to Amended Complaint from City	0.300
3120	3119.0	05/11/12	JPF	Read and review NY Times letter re confidentiality stip	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3121	3120.0	05/11/12	JPF	Read and review of defendant's response to plaintiff's supplemental letter	0.300
3122	3121.0	02/09/11	JPF	Review & edit letter to court re discover schedule	0.300
3123	3122.0	09/18/12	JPF	Review and edit amended complaint	0.300
3124	3123.0	07/05/11	JPF	Review discovery plan w/ JN & GC	0.300
3125	3124.0	05/24/12	JPF	Review letter by GC in response to Vallone subpoena issue	0.300
3126	3125.0	11/16/10	JPF	Review of affidavit for AS for CCR case	0.300
3127	3126.0	12/11/10	JPF	Review of article from Eterno & Silverman re manipulation of crime stats	0.300
3128	3127.0	08/10/10	JPF	Review of articles about Schoolcraft Complaint	0.300
3129	3128.0	06/30/10	JPF	Review of FOIL requests for 911 calls made by AS to NYPD and discuss with JN	0.300
3130	3129.0	03/22/15	JPF	Review of plaintiff's response letter to defendants opp to plaintiff's motion to strike & re adjourning trial	0.300
3131	3130.0	09/06/11	JPF	Review, edit, discuss confidentiality stip language re related matters	0.300
3132	3131.0	08/17/10	JPF	Conversation with Adhyl Polanco re article, website, status of the case	0.250
3133	3132.0	08/31/10	JPF	Conversation with JN and GC re: topics to be discussed/disclosed with Mark Toor in Chief article	0.250
3134	3133.0	09/02/15	JPF	Corrections from SK	0.250
3135	3134.0	09/01/10	JPF	Correspondence from Donna Canfield re extension of time to response	0.250
3136	3135.0	12/14/10	JPF	Correspondence with Darius Charney affidavit for AS	0.250
3137	3136.0	03/07/12	JPF	Discussed adding 1st amendment claim with JN and GC	0.250
3138	3137.0	09/20/10	JPF	Discussion & review with GC & JN re media to upload to website	0.250
3139	3138.0	07/15/11	JPF	Discussion of time limit for plaintiff's EBT as part of discovery plan	0.250
3140	3139.0	02/04/15	JPF	Discussion w/ JN & GC re scheduling a meeting w/ Nat Smith ("NS") to discuss case status and trial prep	0.250
3141	3140.0	08/10/10	JPF	Discussion with JN & GC re articles and possible typo in Complaint	0.250
3142	3141.0	06/29/10	JPF	Discussion with JN & GC re substitution of counsel Moore	0.250
3143	3142.0	08/03/10	JPF	Discussion with JN re corrections	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3144	3143.0	08/18/10	JPF	Discussion with JN re Rocco's story in Daily News	0.250
3145	3144.0	02/20/15	JPF	Email from AS re indemnification issue w/ Mauriello	0.250
3146	3145.0	01/03/11	JPF	E-mail from Chris Whitehead re Compstate DVDs & NYPD summons quota	0.250
3147	3146.0	03/30/12	JPF	Email from City re IAB docs & extending time to produce	0.250
3148	3147.0	04/05/12	JPF	Email from City stating reasons why they oppose amendment to Complaint	0.250
3149	3148.0	05/20/11	JPF	Email from client re article on "Collars for Dollars"	0.250
3150	3149.0	12/15/10	JPF	E-mail from GC re article involving Marino	0.250
3151	3150.0	01/05/11	JPF	E-mail from GC re NBC news coverage on Schoolcraft	0.250
3152	3151.0	08/04/11	JPF	Email from GC re Polanco charges and specs for retaliation for whistleblowing	0.250
3153	3152.0	07/09/12	JPF	Email from GC w/ draft for Schoolcraft donation page	0.250
3154	3153.0	03/20/12	JPF	Email from hospital defendant & City re proposed Amended Complaint	0.250
3155	3154.0	02/10/12	JPF	E-mail from JN re additional items of discovery from City & subpoenas for Johnstown records	0.250
3156	3155.0	04/05/15	JPF	Email from JN re edits to motion	0.250
3157	3156.0	02/24/15	JPF	Email from JN re motion in lim issues to be covered	0.250
3158	3157.0	03/07/12	JPF	Email from John Eterno re QAD report	0.250
3159	3158.0	02/07/12	JPF	Email from Lee re outstanding authorizations	0.250
3160	3159.0	08/17/10	JPF	E-mail from Mark Toor re Chief article	0.250
3161	3160.0	05/21/15	JPF	Email from NS re City's overture on discussing settlement	0.250
3162	3161.0	09/16/10	JPF	E-mail from other hospital defendant re Amended Complaint	0.250
3163	3162.0	06/08/12	JPF	Email to AS re discovery VV affidavit and 1st Amendment issues	0.250
3164	3163.0	09/22/10	JPF	E-mail to DOJ with medical records	0.250
3165	3164.0	04/24/12	JPF	Email, to hospital defendants re amendment Gough issue	0.250
3166	3165.0	08/06/10	JPF	E-mail to JN & from JN re community visits	0.250
3167	3166.0	08/07/10	JPF	E-mail to JN & from re explanation of community visits	0.250
3168	3167.0	08/05/10	JPF	E-mail to JN re clarification of some factual issues in the Complaint	0.250
3169	3168.0	09/28/11	JPF	Email to JN re law enforcement privilege	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3170	3169.0	12/07/10	JPF	File final brief	0.250
3171	3170.0	03/22/12	JPF	Final edits on Amended Complaint w/ JN	0.250
3172	3171.0	07/11/11	JPF	Final review of discovery plan w/ JN & GC	0.250
3173	3172.0	07/18/11	JPF	Final/final review of discovery plan w/ time limits	0.250
3174	3173.0	02/10/12	JPF	Phone call with client cancelling meeting because of eviction issues	0.250
3175	3174.0	05/17/12	JPF	Read and review letter from City re NY Times response	0.250
3176	3175.0	05/25/12	JPF	Read and review NY Times response to Pubichas letter	0.250
3177	3176.0	03/20/15	JPF	Research on the "movie" project referenced in Kretz's email	0.250
3178	3177.0	04/25/12	JPF	Response emails	0.250
3179	3178.0	05/22/12	JPF	Review and sign Affidavit re VV article	0.250
3180	3179.0	04/07/15	JPF	Review edit NS to Ct. re our opp to defendant's letter	0.250
3181	3180.0	10/08/10	JPF	Review of article from Associate Press on Schoolcraft	0.250
3182	3181.0	09/28/11	JPF	Review of changes to confidentiality stip & disc. plan	0.250
3183	3182.0	09/07/10	JPF	Review of Chief article on AS	0.250
3184	3183.0	10/18/10	JPF	Review of letter to court re briefing sched.	0.250
3185	3184.0	06/25/10	JPF	Review of Schoolcraft retainer	0.250
3186	3185.0	03/12/12	JPF	Review of So Ordered Protective Order re doc produced by City	0.250
3187	3186.0	09/10/10	JPF	Review of Times article points with GC	0.250
3188	3187.0	08/11/10	JPF	Review post of anonymous P.O. who contacted website re recording Mauriello	0.250
3189	3188.0	09/28/11	JPF	Travel from SDNY - motion to compel (.5)	0.250
3190	3189.0	02/08/12	JPF	Travel from SDNY - motion to compel (.5)	0.250
3191	3190.0	01/26/11	JPF	Travel from SDNY for appearance for motion to dismiss in Schoolcraft (.5)	0.250
3192	3191.0	05/09/12	JPF	Travel from SDNY for Argument on 1st Amendment claim (.5)	0.250
3193	3192.0	09/12/15	JPF	Travel from SDNY for conf. (.5)	0.250
3194	3193.0	04/13/15	JPF	Travel from SDNY for conference re: trial date (.5)	0.250
3195	3194.0	03/28/12	JPF	Travel from SDNY for Oral Argument on City motion (.5)	0.250
3196	3195.0	09/28/11	JPF	Travel to SDNY - motion to compel (.5)	0.250
3197	3196.0	02/08/12	JPF	Travel to SDNY - motion to compel (.5)	0.250
3198	3197.0	01/26/11	JPF	Travel to SDNY for appearance for motion to dismiss in Schoolcraft (.5)	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3199	3198.0	05/09/12	JPF	Travel to SDNY for Argument on 1st Amendment claim (.5)	0.250
3200	3199.0	05/12/15	JPF	Travel to SDNY for conf. (.5)	0.250
3201	3200.0	04/13/15	JPF	Travel to SDNY for conference re: trial date (.5)	0.250
3202	3201.0	03/28/12	JPF	Travel to SDNY for Oral Argument on City motion (.5)	0.250
3203	3202.0	04/03/15	JPF	Phone call with JN regarding progress on motion in limine and clarification of certain factual issues	0.200
3204	3203.0	02/11/15	JPF	2nd confirmation email from AS that we have been officially retained again to represent AS in this case	0.100
3205	3204.0	10/24/10	JPF	Article from the "L" re Schoolcraft	0.100
3206	3205.0	04/30/12	JPF	City e-mail request to adjourn amendment conf.	0.100
3207	3206.0	05/07/12	JPF	City's response keeping the 5/9 date	0.100
3208	3207.0	12/01/10	JPF	Correspondence from CCR re affidavit	0.100
3209	3208.0	11/13/12	JPF	Correspondence from City re rep of AS	0.100
3210	3209.0	01/10/12	JPF	Correspondence mail from medical defendant Isacov re plaintiff EBT	0.100
3211	3210.0	04/04/12	JPF	Correspondence to JHMC re Amended Complaint	0.100
3212	3211.0	06/19/12	JPF	Correspondence w/ Adhyl Folanco	0.100
3213	3212.0	10/13/10	JPF	Discussion with JN re agreement on briefing sched. w/ defendant Jamaica Hosp	0.100
3214	3213.0	08/29/12	JPF	Email 2 & 3 from JN re discovery to defendants	0.100
3215	3214.0	04/11/12	JPF	Email Amended Complaint to defendants	0.100
3216	3215.0	12/29/10	JPF	E-mail article from GC by Len Levitt re AS case	0.100
3217	3216.0	02/04/15	JPF	Email AS confirming our rep w/ current counsel	0.100
3218	3217.0	04/19/12	JPF	Email correspondence to City correcting Lt. Gough for Amended complaint	0.100
3219	3218.0	08/31/15	JPF	Email final motion to team	0.100
3220	3219.0	11/29/10	JPF	E-mail from AS re CCR affidavit	0.100
3221	3220.0	02/10/15	JPF	Email from AS re thoughts on adjournment	0.100
3222	3221.0	08/15/12	JPF	Email from B Brady re plaintiff's dep	0.100
3223	3222.0	12/09/10	JPF	E-mail from B. Lee defendants re late responses to interrogatories	0.100
3224	3223.0	08/15/12	JPF	Email from B: Lee re plaintiff's dep	0.100
3225	3224.0	04/02/12	JPF	Email from Bernier consenting to amendment	0.100
3226	3225.0	08/21/12	JPF	Email from Brady consenting to Amendment	0.100
3227	3226.0	08/14/12	JPF	Email from Brady re depts	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3228	3227.0	08/23/12	JPF	Email from Brady re plaintiff's dep date	0.100
3229	3228.0	08/21/12	JPF	Email from Brady re scheduling AS dep	0.100
3230	3229.0	08/13/12	JPF	Email from Brian Lee re deposition	0.100
3231	3230.0	08/15/12	JPF	Email from Brian Lee re subpoenaed docs	0.100
3232	3231.0	04/20/12	JPF	Email from City	0.100
3233	3232.0	09/24/12	JPF	Email from City	0.100
3234	3233.0	02/10/15	JPF	Email from City defendants re moving the trial date back two weeks	0.100
3235	3234.0	07/09/12	JPF	Email from City on relevancy redaction issue	0.100
3236	3235.0	04/25/12	JPF	Email from City on Vallone subpoena extension	0.100
3237	3236.0	03/30/12	JPF	Email from City re: Amendment opposition	0.100
3238	3237.0	08/22/12	JPF	Email from City re AS dep date	0.100
3239	3238.0	08/03/12	JPF	Email from City re confidentiality stip	0.100
3240	3239.0	09/13/12	JPF	Email from City re fax # confirmation	0.100
3241	3240.0	08/01/12	JPF	Email from City re motion to amend	0.100
3242	3241.0	05/18/12	JPF	Email from City re moving argument	0.100
3243	3242.0	08/16/12	JPF	Email from City re plaintiff's dep	0.100
3244	3243.0	07/13/12	JPF	Email from City regarding tax return authorizations	0.100
3245	3244.0	08/21/12	JPF	Email from City requesting copy of complaint	0.100
3246	3245.0	06/05/12	JPF	Email from Ct. re inventory on NY Times issue	0.100
3247	3246.0	11/16/10	JPF	E-mail from Darius Charney re Schoolcraft affidavit	0.100
3248	3247.0	06/06/12	JPF	Email from defendants re inventory	0.100
3249	3248.0	11/19/10	JPF	E-mail from French journalist Marie Brunerie re documentary on whistle blowing and Schoolcraft case	0.100
3250	3249.0	02/23/15	JPF	Email from GC & NS re IAB file	0.100
3251	3250.0	05/06/11	JPF	E-mail from GC on Cts decision on motion	0.100
3252	3251.0	05/24/11	JPF	E-mail from GC on new cop whistleblower from the 75th precinct	0.100
3253	3252.0	02/10/12	JPF	E-mail from GC re additional discovery items to seek	0.100
3254	3253.0	10/20/12	JPF	E-mail from GC re another article AMNY	0.100
3255	3254.0	09/28/10	JPF	E-mail from GC re article on AS	0.100
3256	3255.0	02/24/11	JPF	Email from GC re article re Marino misconduct	0.100
3257	3256.0	12/16/10	JPF	E-mail from GC re AS affidavit	0.100
3258	3257.0	02/19/11	JPF	E-mail from GC re Bryant v. City verdict finding quotas existed	0.100
3259	3258.0	08/28/12	JPF	Email from GC re Chief article	0.100
3260	3259.0	03/08/11	JPF	Email from GC re medical defendants' article	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3261	3260.0	12/02/10	JPF	E-mail from GC re new whistleblower cop on the website	0.100
3262	3261.0	10/22/10	JPF	E-mail from GC re NY Times article	0.100
3263	3262.0	02/23/12	JPF	E-mail from GC re NYCLU lawsuit for POs faced with quotas	0.100
3264	3263.0	08/15/10	JPF	E-mail from GC re NYPD blog picking up case	0.100
3265	3264.0	05/03/11	JPF	Email from GC re P.O. Hicks, Bronx quota cop	0.100
3266	3265.0	11/03/10	JPF	Email from GC re plaintiff's financials	0.100
3267	3266.0	01/25/11	JPF	Email from GC re statements from Jamaica Hospital to Village Voice	0.100
3268	3267.0	09/24/10	JPF	E-mail from GC re The RANT	0.100
3269	3268.0	08/10/12	JPF	Email from GC re VV affidavit	0.100
3270	3269.0	11/21/10	JPF	Email from GC re Wall Street Times article	0.100
3271	3270.0	08/16/10	JPF	E-mail from GC re website update for articles on case	0.100
3272	3271.0	11/15/10	JPF	E-mail from GC re whistleblower cop	0.100
3273	3272.0	03/07/12	JPF	Email from GC re: conversation with Larry and Adrian	0.100
3274	3273.0	09/25/12	JPF	Email from Greg R re Lauderborn dep	0.100
3275	3274.0	08/22/12	JPF	Email from Greg Rad re AS dep	0.100
3276	3275.0	12/08/10	JPF	E-mail from Hospital defendants re docketing error on ECF	0.100
3277	3276.0	03/03/11	JPF	Email from HV re article re Lt. Williams	0.100
3278	3277.0	04/02/12	JPF	Email from Isacov consenting to amendment	0.100
3279	3278.0	09/15/10	JPF	E-mail from Isacov's attorney re Amended Complaint	0.100
3280	3279.0	04/04/12	JPF	Email from JHMC	0.100
3281	3280.0	04/04/12	JPF	Email from JHMC	0.100
3282	3281.0	04/04/12	JPF	Email from JHMC re change in amended language	0.100
3283	3282.0	01/10/12	JPF	Email from JMH re outstanding discovery from plaintiff	0.100
3284	3283.0	09/26/12	JPF	Email from JN adjourning dep of AS re: medical issues he was having	0.100
3285	3284.0	09/10/12	JPF	Email from JN re 120 extension of discovery	0.100
3286	3285.0	09/28/10	JPF	E-mail from JN re article in Russian news	0.100
3287	3286.0	03/12/12	JPF	Email from JN re corrections	0.100
3288	3287.0	08/22/12	JPF	Email from JN re dep dates	0.100
3289	3288.0	08/10/12	JPF	Email from JN re extension of discovery	0.100
3290	3289.0	09/25/10	JPF	E-mail from JN re fed meeting	0.100
3291	3290.0	08/14/12	JPF	Email from JN re letter to City w/ tax authorizations	0.100
3292	3291.0	10/11/10	JPF	E-mail from JN re Lewis whistleblower cop	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3293	3292.0	07/28/10	JPF	E-mail from JN re meeting with Polanco/Graham Raymond & Rocco P.	0.100
3294	3293.0	10/12/12	JPF	Email from JN re photos used @ AS dep	0.100
3295	3294.0	08/10/12	JPF	Email from JN re plaintiff's dep	0.100
3296	3295.0	08/14/12	JPF	Email from JN re plaintiff's dep	0.100
3297	3296.0	08/16/12	JPF	Email from JN re plaintiff's dep	0.100
3298	3297.0	01/01/11	JPF	E-mail from JN re Wall Street Journal article about case	0.100
3299	3298.0	10/02/10	JPF	E-mail from JN re whistleblower cop	0.100
3300	3299.0	04/30/12	JPF	Email from JN to City re additions to protective order	0.100
3301	3300.0	10/12/12	JPF	Email from JN to City re allowing AS access to QAD report	0.100
3302	3301.0	08/29/12	JPF	Email from JN to defendants enclosing discovery	0.100
3303	3302.0	08/28/12	JPF	Email from JN to defendants enclosing responses to discovery	0.100
3304	3303.0	08/22/12	JPF	Email from Kretz re AS dep date	0.100
3305	3304.0	09/26/12	JPF	Email from Kretz re Launderborn dep	0.100
3306	3305.0	08/21/12	JPF	Email from Lee consenting	0.100
3307	3306.0	08/23/12	JPF	Email from Lee on plaintiff's dep dates	0.100
3308	3307.0	08/22/12	JPF	Email from Lee re AS dep datr	0.100
3309	3308.0	06/08/12	JPF	Email from Lee re docs in response to subpoenas outstanding	0.100
3310	3309.0	08/21/12	JPF	Email from Lee re scheduling AS dep	0.100
3311	3310.0	08/23/12	JPF	Email from Lee re second day for AS dep	0.100
3312	3311.0	02/04/15	JPF	Email from Nat Smith re logistics of representation	0.100
3313	3312.0	03/14/12	JPF	Email from Nic re doc in connection w/ Schoolcraft meeting	0.100
3314	3313.0	09/04/15	JPF	Email from NS adjusting motion in lim filing deadline to 9/21/15 motion	0.100
3315	3314.0	03/20/15	JPF	Email from NS re a movie about AS that Kretz wants discovery on	0.100
3316	3315.0	05/08/15	JPF	Email from NS wanting to schedule team meeting prior to 5/12/15 conf.	0.100
3317	3316.0	06/05/12	JPF	Email from NY Times in response	0.100
3318	3317.0	06/07/12	JPF	Email from NY Times re inventory	0.100
3319	3318.0	03/13/12	JPF	Email from PBS producer Weinrich on documentary of Schoolcraft	0.100
3320	3319.0	04/13/12	JPF	Email from plaintiff re 1st Amendment claim	0.100
3321	3320.0	05/17/12	JPF	Email from Publichas re Schoolcraft Aff.	0.100
3322	3321.0	02/23/15	JPF	Email from Scott Korenbaum ("SK") re motion in lim prep	0.100
3323	3322.0	07/31/10	JPF	E-mail JN & GC re edited Complaint	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3324	3323.0	03/12/12	JPF	Email letter to City re amendment	0.100
3325	3324.0	04/06/15	JPF	Email motion to team for review	0.100
3326	3325.0	03/23/12	JPF	Email of Amended Complaint to City	0.100
3327	3326.0	10/02/10	JPF	E-mail re whistleblower cop from JN	0.100
3328	3327.0	09/10/12	JPF	Email response from Brady	0.100
3329	3328.0	09/10/12	JPF	Email response from City	0.100
3330	3329.0	09/10/12	JPF	Email response from Greg Rad	0.100
3331	3330.0	09/10/12	JPF	Email response from Kretz	0.100
3332	3331.0	09/10/12	JPF	Email response from Lee	0.100
3333	3332.0	07/13/12	JPF	Email response re tax authorizations	0.100
3334	3333.0	01/25/11	JPF	Email Response to GC re statements from Jamaica Hospital to Village Voice	0.100
3335	3334.0	09/24/12	JPF	Email response to Kretz & City	0.100
3336	3335.0	04/03/15	JPF	Email rough draft of Mot. In Lim. to JN for review	0.100
3337	3336.0	04/07/15	JPF	Email team w/ revisions to motion in lim	0.100
3338	3337.0	12/17/10	JPF	E-mail to AS with opp to Jamaica's motion	0.100
3339	3338.0	09/10/12	JPF	Email to City re Hanlon amend	0.100
3340	3339.0	07/09/12	JPF	Email to City re redaction issue	0.100
3341	3340.0	04/04/12	JPF	Email to City re updated version of proposed Amended Complaint	0.100
3342	3341.0	03/31/12	JPF	Email to City requesting clarification on reason for refusal	0.100
3343	3342.0	08/21/12	JPF	Email to City w/ Amended Complaint	0.100
3344	3343.0	06/05/12	JPF	Email to Ct. re proposed amended complaint	0.100
3345	3344.0	09/24/12	JPF	Email to defendants re service of amended complaint	0.100
3346	3345.0	04/04/12	JPF	Email to JHMC	0.100
3347	3346.0	07/24/12	JPF	Email to JN re Albany meeting w/ Schoolcrafts	0.100
3348	3347.0	12/17/10	JPF	E-mail to JN re AS benefits	0.100
3349	3348.0	08/04/10	JPF	E-mail to JN re Complaint	0.100
3350	3349.0	08/06/10	JPF	E-mail to JN re Complaint revised	0.100
3351	3350.0	08/09/10	JPF	E-mail to JN re Final version of Complaint	0.100
3352	3351.0	07/07/10	JPF	E-mail to JN re Labor Law research	0.100
3353	3352.0	02/12/15	JPF	Email to JN re proposed email	0.100
3354	3353.0	08/03/10	JPF	E-mail to JN re Reviped Complaint	0.100
3355	3354.0	08/08/10	JPF	Email to JN re: revision of Schoolcraft complaint	0.100
3356	3355.0	03/14/12	JPF	Email to JN with proposed Amended Complaint	0.100
3357	3356.0	04/25/12	JPF	Email to plaintiff re letter to amend on 1st Amendment claim	0.100
3358	3357.0	04/08/15	JPF	Email to team final motion	0.100
3359	3358.0	06/18/12	JPF	Email w/ draft to GC & JN	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3360	3359.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
3361	3360.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
3362	3361.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
3363	3362.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
3364	3363.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
3365	3364.0	05/02/12	JPF	Email from JN to City re confidentiality and discovery issues	0.100
3366	3365.0	06/04/12	JPF	Letter from Kretz re discovery	0.100
3367	3366.0	04/02/15	JPF	Phone call with JN regarding area of expertise and scope of testimony for Eterno	0.100
3368	3367.0	12/17/10	JPF	Phone convo with Lany Schoolcraft re NYPD benefits & suspension status	0.100
3369	3368.0	06/08/12	JPF	Read and review of Times letter re inventory	0.100
3370	3369.0	09/26/12	JPF	Response email from B Brady re service of amended complaint	0.100
3371	3370.0	08/10/12	JPF	Response email re deposition from Greg R.	0.100
3372	3371.0	08/01/12	JPF	Response email to City re motion to amend	0.100
3373	3372.0	03/20/15	JPF	Response email to NS	0.100
3374	3373.0	04/24/12	JPF	Response emails	0.100
3375	3374.0	09/24/12	JPF	Response from B Lee	0.100
3376	3375.0	09/26/12	JPF	Response from B Lee	0.100
3377	3376.0	04/25/12	JPF	Response from City	0.100
3378	3377.0	09/27/12	JPF	Response from City	0.100
3379	3378.0	09/10/12	JPF	Response from City on Hanlon amend	0.100
3380	3379.0	09/27/12	JPF	Response from Greg R	0.100
3381	3380.0	09/24/12	JPF	Response from Greg R	0.100
3382	3381.0	09/24/12	JPF	Response from Kretz	0.100
3383	3382.0	09/24/12	JPF	Response from Kretz	0.100
3384	3383.0	09/26/12	JPF	Response from Kretz	0.100
3385	3384.0	04/30/12	JPF	Response to email	0.100
3386	3385.0	04/05/15	JPF	Response to email	0.100
3387	3386.0	09/28/10	JPF	Review of article from Rocco & Daily News	0.100
3388	3387.0	10/18/12	JPF	Review of email from B Lee asking that plaintiff withdraw opp to extra day of dep for AS	0.100
3389	3388.0	08/20/12	JPF	Review of email from JN to City re amendment adding Hanlon	0.100
3390	3389.0	10/29/10	JPF	Review of letter front City extending Answer time for Amended Complaint	0.100
3391	3390.0	11/04/10	JPF	Review of letter re Bernier's extension to answer Amended Complaint	0.100
3392	3391.0	11/08/10	JPF	Review of letter to Sweet extending motion time	0.100
3393	3392.0	12/07/11	JPF	Review order adjourning conf.	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3394	3393.0	06/18/10	GMC	Meeting w/Jon Norinsberg (JN) and Joshua Fitch (JF) re: Schoolcraft coming to our office and retaining for lawsuit	0.800
3395	3394.0	06/20/10	GMC	Email from Adrian Schoolcraft (AS) re: meeting with JN	0.100
3396	3395.0	06/21/10	GMC	Email from AS re: Gerald Nelson	0.250
3397	3396.0	06/23/10	GMC	Meeting w/JN and JF re: JN's upcoming meeting w/ district attorney	0.750
3398	3397.0	06/24/10	GMC	PC with JN re: meeting w/Schoolcraft	0.400
3399	3398.0	06/25/10	GMC	Meeting w/JN and JF re: scope of Schoolcraft materials that need to be reviewed for complaint	3.250
3400	3399.0	06/25/10	GMC	Review of AS medical records	1.750
3401	3400.0	06/25/10	GMC	Meeting with JF & JN re: possible discovery demands after suit is filed	1.400
3402	3401.0	06/25/10	GMC	Drafted retainer for Schoolcraft	0.600
3403	3402.0	06/26/10	GMC	Reviewed transcript of Polanco tapes	0.750
3404	3403.0	06/28/10	GMC	Online search of PBA Arbitration decision and phone call w/Bonnie Siber Weinstock (arbitrator)	2.100
3405	3404.0	06/28/10	GMC	Discussion with JN and JF re retainer & meeting with Schoolcrafts	1.250
3406	3405.0	06/28/10	GMC	Discussion with JN, JF & Adrian Schoolcraft (AS) re: prior counsel Jonathan Moore	0.300
3407	3406.0	06/28/10	GMC	Review of interview memo re: Eddie Velasquez	0.300
3408	3407.0	06/28/10	GMC	Review of correspondence w/Jonathan Moore re: AS	0.100
3409	3408.0	06/29/10	GMC	Meeting w/JN and JF re: PBA matters and how they can be used in Schoolcraft	1.250
3410	3409.0	06/29/10	GMC	Review of David Velez arbitration decision	0.500
3411	3410.0	06/29/10	GMC	Discussion with JN & JF re decision on PBA arbitration case	0.400
3412	3411.0	06/29/10	GMC	Correspondence w/JN re: Jonathan Moore	0.250
3413	3412.0	06/29/10	GMC	Discussion with JN & JF re substitution of counsel Moore	0.250
3414	3413.0	06/29/10	GMC	Email from JN re: Stop and Frisk case	0.100
3415	3414.0	06/29/10	GMC	Email to JN re: Stop and Frisk case	0.100
3416	3415.0	06/29/10	GMC	Review of email from JN re: Schoolcraft matter	0.100
3417	3416.0	06/29/10	GMC	Sent email to JN re: Schoolcraft matter	0.100
3418	3417.0	06/30/10	GMC	Discussion with JN & JF re FOIL requests for 911's & how to proceed	0.500
3419	3418.0	06/30/10	GMC	Review of email from AS	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3420	3419.0	07/02/10	GMC	Phone call w/Eric Schneiderman staff re: Schoolcraft	0.300
3421	3420.0	07/06/10	GMC	Meeting w/JN and JF re: new whistleblower contacted JN re: Schoolcraft	1.300
3422	3421.0	07/06/10	GMC	Meeting with JN/JF re: progress/developments on the case, meeting in NYC on Wednesday and filing of lawsuit	1.750
3423	3422.0	07/07/10	GMC	Reviewed of Schoolcraft documents, evals, photos, memos, UF49s, letters to PBA, letters to Mauriello...	2.900
3424	3423.0	07/07/10	GMC	Listened to Schoolcraft recordings	1.800
3425	3424.0	07/07/10	GMC	Meeting w/only Schoolcraft	1.500
3426	3425.0	07/07/10	GMC	Meeting with AS, Larry Schoolcraft (LS), JF & JN	0.750
3427	3426.0	07/09/10	GMC	Reviewed AS timeline of events	1.400
3428	3427.0	07/12/10	GMC	Draft Schoolcraft complaint	2.300
3429	3428.0	07/13/10	GMC	Reviewed Schoolcraft materials, listened to recording, made notes for further drafting of complaint	1.750
3430	3429.0	07/14/10	GMC	Meeting w/JN and JF re: Schoolcraft complaint	1.250
3431	3430.0	07/15/10	GMC	Draft Schoolcraft complaint	2.100
3432	3431.0	07/15/10	GMC	Discussion with JF and JN re tapes	1.100
3433	3432.0	07/16/10	GMC	Meeting with JN re: Schoolcraft issues and complaint	1.250
3434	3433.0	07/17/10	GMC	Reviewed of Schoolcraft documents, evals, photos, memos, UF49s, letters to PBA, letters to Mauriello...	2.100
3435	3434.0	07/19/10	GMC	Review of Village Voice Articles re: Schoolcraft	1.250
3436	3435.0	07/20/10	GMC	Researched case law for complaint and continued drafting complaint	2.100
3437	3436.0	07/21/10	GMC	Drafted complaint	1.500
3438	3437.0	07/22/10	GMC	Discussed causes of action w/JF	1.400
3439	3439.0	07/26/10	GMC	Review and revised Schoolcraft materials and complaint	3.100
3440	3439.0	07/26/10	GMC	Meeting with JN & JF re case & updates on Brendan Delpozo	2.100
3441	3440.0	07/23/10	GMC	Drafted and revised complaint	1.250
3442	3441.0	07/26/10	GMC	Meeting JF and JN re issues for Schoolcraft complaint	1.000
3443	3442.0	07/26/10	GMC	Discussion with JF & JN re Complaint & drafts going forward	0.600
3444	3443.0	07/26/10	GMC	Discussion w/JN re Brandon del Pozo	0.300
3445	3444.0	07/26/10	GMC	Review of email from JN re: Del Pozo	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3446	3445.0	07/27/10	GMC	Review and revise Complaint	2.000
3447	3446.0	07/27/10	GMC	Meeting w/JN and JF to discuss Complaint	1.250
3448	3447.0	07/27/10	GMC	Mtg JN re draft of complaint and proposed revisions	0.750
3449	3448.0	07/28/10	GMC	Listen to AS recordings, locate quotes, add to complaint	3.800
3450	3449.0	07/28/10	GMC	Review of David Velez Arbitration Decision	0.750
3451	3450.0	07/28/10	GMC	Discussion with JF and JN re: Adhyl Polanco and other whistleblowers	0.500
3452	3451.0	07/28/10	GMC	Review of email re: meeting with press	0.100
3453	3452.0	07/29/10	GMC	Review and Revise AS complaint	3.100
3454	3453.0	07/30/10	GMC	Meeting with JN, JF, Polanco & Graham Raymond (GR) re: Schoolcraft & Monell claim	3.250
3455	3454.0	07/30/10	GMC	Review and revise complaint, transcribed partial recordings, research case law	2.400
3456	3455.0	07/30/10	GMC	Meet with JF and JN re: changes and additions to complaint	1.250
3457	3456.0	07/31/10	GMC	Meeting with Polanco + GR, JN, JF re: quotas and Monell Claim	3.200
3458	3457.0	07/31/10	GMC	E-mail from JF re edited Complaint	0.100
3459	3458.0	08/02/10	GMC	Review and revise AS complaint	1.250
3460	3459.0	08/03/10	GMC	Review of 1st amendment case law	1.100
3461	3460.0	08/03/10	GMC	Review of JN's revised Schoolcraft complaint	1.000
3462	3461.0	08/03/10	GMC	Read and reviewed certain transcribed AS recordings	0.800
3463	3462.0	08/03/10	GMC	Meeting w/JN re: Schoolcraft complaint and other whistleblower police officers	0.500
3464	3463.0	08/03/10	GMC	Phone call with Jim Hoffer (ABC News) re: Schoolcraft	0.300
3465	3464.0	08/03/10	GMC	Email correspondence re: media coverage of filing Schoolcraft complaint	0.250
3466	3465.0	08/05/10	GMC	Read and reviewed certain transcribed AS recordings	2.400
3467	3466.0	08/05/10	GMC	Review and revise AS complaint	0.800
3468	3467.0	08/06/10	GMC	Read and reviewed certain transcribed AS recordings	2.750
3469	3468.0	08/06/10	GMC	Review of Schoolcraft complaint for typos	1.100
3470	3469.0	08/06/10	GMC	Review of transcribed call from LS to FBI	0.250
3471	3470.0	08/08/10	GMC	Review of email re: revision of Schoolcraft complaint	0.100
3472	3471.0	08/09/10	GMC	Meeting w/JN and JF re: Schoolcraft website to support Monell theory	1.500
3473	3472.0	08/09/10	GMC	Read and reviewed certain transcribed AS recordings	1.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3474	3473.0	08/09/10	GMC	Review of final draft of AS complaint to be filed	0.500
3475	3474.0	08/09/10	GMC	Discussion with JF re website content	0.400
3476	3475.0	08/09/10	GMC	Discussion with JF and JN re Adrian interview	0.300
3477	3476.0	08/09/10	GMC	Review of legal issues re: Negligent hiring claim	0.300
3478	3477.0	08/10/10	GMC	Meeting with AS to finalize for complaint filing, news coverage, and prep for website launch	2.750
3479	3478.0	08/10/10	GMC	Draft Schoolcraft website content	2.250
3480	3479.0	08/10/10	GMC	Compiled news articles, stories, and formatted for website	2.100
3481	3480.0	08/10/10	GMC	Phone and email correspondence with Off the Page Creations to discuss design of Schoolcraft Justice website	1.250
3482	3481.0	08/10/10	GMC	Discussion with JN & JF re articles and possible typo in Complaint	0.250
3483	3482.0	08/10/10	GMC	Reviewed and signed contract for website hosting	0.250
3484	3483.0	08/10/10	GMC	Schoolcraft complaint prepared for filing	0.250
3485	3484.0	08/10/10	GMC	Emailed draft of Schoolcraft website content to JF and JN for review	0.100
3486	3485.0	08/11/10	GMC	Review and revise Schoolcraft website content	1.400
3487	3486.0	08/11/10	GMC	Discussion with JF re JN re anonymous P.O.	0.300
3488	3487.0	08/11/10	GMC	Review of email from whistleblower "JF" from 81st precinct - info on Mauriello	0.250
3489	3488.0	08/11/10	GMC	Review of San Francisco Chronicle coverage	0.100
3490	3489.0	08/12/10	GMC	Meeting w/JN and JF re: legal strategies on Monell and whistleblower cop contacts	0.800
3491	3490.0	08/12/10	GMC	Email of docs from potential whistleblower PO "KR"	0.750
3492	3491.0	08/12/10	GMC	Meeting w/JF and JN re: legal strategies + next steps for moving forward	0.500
3493	3492.0	08/13/10	GMC	Discussion with JF & JN re Jonathan Moore issue - cease & desist letter	0.400
3494	3493.0	08/13/10	GMC	Review of Bloomberg coverage of AS complaint	0.250
3495	3494.0	08/15/10	GMC	Meeting with JN and JF re NYTimes story about quotas & Schoolcraft	0.600
3496	3495.0	08/15/10	GMC	Email w/JN re: NY Times to run Schoolcraft story	0.250
3497	3496.0	08/15/10	GMC	E-mail to JF re NYPD blog picking up case	0.100
3498	3497.0	08/16/10	GMC	Email re: updates to Schoolcraftjustice.com	0.100
3499	3498.0	08/17/10	GMC	Discussion with JF and JN re anonymous e-mails that we got as a result of the e-mail	0.400
3500	3499.0	08/17/10	GMC	Review of Mark Toor article - JF interview	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3501	3500.0	08/17/10	GMC	Updated AS website added new articles	0.250
3502	3501.0	08/18/10	GMC	Email correspondence w/website designer re: Schoolcraftjustice.com	0.250
3503	3502.0	08/19/10	GMC	Discussion with JF and JN re: new recordings and documents provided by AS	1.250
3504	3503.0	08/22/10	GMC	Meeting with JN & JF re whistleblowers reaching out through the website	0.800
3505	3504.0	08/22/10	GMC	Phone call w/ "DM" former police officer re: Schoolcraft	0.300
3506	3505.0	08/22/10	GMC	Review of Schoolcraftjustice posts	0.300
3507	3506.0	08/23/10	GMC	Phone call with Isakoff Attorney - Brian Lee	0.800
3508	3507.0	08/23/10	GMC	Review of Schoolcraftjustice posts	0.400
3509	3508.0	08/23/10	GMC	Email correspondence w/JN re: Schoolcraftjustice posts	0.250
3510	3509.0	08/25/10	GMC	Meeting with JF, PO from 81st precinct "PF" re: corruption	2.750
3511	3510.0	08/25/10	GMC	Drafted interview memo of "PF"	2.100
3512	3511.0	08/25/10	GMC	Meeting w/JN and JF re: ACC assigned, Schoolcraft initial disclosures	1.750
3513	3512.0	08/25/10	GMC	Meeting with JN & JF re more whistleblower email & meeting with P.O. "PF"	0.900
3514	3513.0	08/25/10	GMC	Meeting with JN & JF re: Whitehead	0.750
3515	3514.0	08/25/10	GMC	Review of email correspondence w/ Len Levitt re: WSJ police correspondence	0.250
3516	3515.0	08/25/10	GMC	Review of email correspondence w/"DM" (former PO) re: Schoolcraft	0.250
3517	3516.0	08/25/10	GMC	Emailed former anonymous PO re: Schoolcraft post	0.100
3518	3517.0	08/26/10	GMC	Meeting with JF and JN re: interview of PO from 81st precinct "PF" re: corruption	1.500
3519	3518.0	08/26/10	GMC	Correspondence w/JN re: Frank Serpico	0.250
3520	3519.0	08/26/10	GMC	Email correspondence with Frank Serpico	0.100
3521	3520.0	08/27/10	GMC	Interview with JF of Walter Lipscomb, former PO confirms quotas - wants to help Schoolcraft	3.250
3522	3521.0	08/27/10	GMC	Drafted interview memo of Walter Lipscomb	2.000
3523	3522.0	08/27/10	GMC	Discussion with JF & JN re having Eterno & Silverman as experts	0.600
3524	3523.0	08/27/10	GMC	Discussion w/Jim Hoffer re: story on 81st precinct	0.500
3525	3524.0	08/27/10	GMC	Email to website designer with updates for Schoolcraftjustice website	0.300
3526	3525.0	08/27/10	GMC	Review of Schoolcraftjustice posts	0.250
3527	3526.0	08/29/10	GMC	Discussion with JN re: Lipscomb interview	0.500
3528	3527.0	08/29/10	GMC	Phone call w/former PO re: Schoolcraft	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3529	3528.0	08/30/10	GMC	Meeting with JN & JF re "MG" cop from 81 who knows Schoolcraft & has info on quotas	1.250
3530	3529.0	08/30/10	GMC	Meeting with JN & JF re IAB Labor & Employment case & 12(b)(6) motion	0.400
3531	3530.0	08/30/10	GMC	Email correspondence w/JN re: "MG" (PO in 81st precinct)	0.100
3532	3531.0	08/30/10	GMC	Email w/JN re: ACC Donna Cannfield (DC)	0.100
3533	3532.0	08/30/10	GMC	Review of Donna Canfield (DC) Notice of Appearance	0.100
3534	3533.0	08/30/10	GMC	Review of AOS prior to filing	0.100
3535	3534.0	08/31/10	GMC	Interview with JF of "DH" and "EB" former NYPD, reviewed materials, recordings re: quotas, downgrading	3.250
3536	3535.0	08/31/10	GMC	Interview of "ER" NYPD officer re: quotas, downgrading	1.800
3537	3536.0	08/31/10	GMC	Email of docs from potential whistleblower PO "KR"	0.900
3538	3537.0	08/31/10	GMC	Conversation with JN and JF re: topics to be discussed/disclosed with Mark Toor in Chief article	0.250
3539	3538.0	08/31/10	GMC	Email correspondence w/Jim Hoffer re: Schoolcraft	0.100
3540	3539.0	09/01/10	GMC	Meeting w/JN and JF re: discuss anonymous POs contacting and how they can help Schoolcraft	1.800
3541	3540.0	09/01/10	GMC	Drafted interview memo of "ER" meeting	1.500
3542	3541.0	09/01/10	GMC	Review of DC extension letter	0.100
3543	3542.0	09/02/10	GMC	Drafted interview memo of "EB" meeting	2.400
3544	3543.0	09/02/10	GMC	Drafted interview memo of "DH" meeting	1.100
3545	3544.0	09/03/10	GMC	Meeting with PO from 81st precinct "MG" re: corruption	2.750
3546	3545.0	09/03/10	GMC	Meeting with JN and JF to discuss information provided by DH, MG, EB whistleblower cops in furtherance of the Monell claim	1.400
3547	3546.0	09/03/10	GMC	Review and revised JF draft of Rant post	0.600
3548	3547.0	09/03/10	GMC	Meeting w/JN re: THEE RANT post to get officers to contact us on Schoolcraftjustice.com	0.500
3549	3548.0	09/03/10	GMC	Email correspondence w/JN re: THEE RANT post	0.250
3550	3549.0	09/03/10	GMC	Email correspondence w/JN re: This American Life Radio show	0.100
3551	3550.0	09/07/10	GMC	Review of JHMC Answer	0.300
3552	3551.0	09/07/10	GMC	Review of Media coverage NYTimes	0.250
3553	3552.0	09/07/10	GMC	Review of JHMC corporate disclosure	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3554	3553.0	09/10/10	GMC	Listened to AS NPR radio show	1.000
3555	3554.0	09/10/10	GMC	Review of Times article points with JF	0.250
3556	3555.0	09/10/10	GMC	Review of Judge Sweet's endorsement of extension	0.100
3557	3556.0	09/13/10	GMC	Drafted interview memo of "MG" meeting	2.100
3558	3557.0	09/13/10	GMC	Review of Amended complaint	0.500
3559	3558.0	09/13/10	GMC	Email correspondence w/ "WJC" former NYPD	0.250
3560	3559.0	09/15/10	GMC	Review of Eddie Velasquez depo from Floyd	1.100
3561	3560.0	09/15/10	GMC	Email correspondence re: Amended Complaint with medical defendants	0.100
3562	3561.0	09/15/10	GMC	Review of stip extending time for Benier answer	0.100
3563	3562.0	09/17/10	GMC	Reviewed and cataloged Schoolcraftjustice.com posts	2.800
3564	3563.0	09/17/10	GMC	Meeting with JN and JF regarding information obtained from Floyd litigation and its impact on Schoolcrafts Monell and Retaliation claims	1.300
3565	3564.0	09/18/10	GMC	Conversation with JF & JN re new whistleblower cop	0.300
3566	3565.0	09/18/10	GMC	Correspondence w/JN re: anonymous Schoolcraft post	0.250
3567	3566.0	09/20/10	GMC	Meeting with JF with PO "JB" re: NYPD quotas and downgrading	2.500
3568	3567.0	09/20/10	GMC	Review of Angel Heran depo from Floyd	1.750
3569	3568.0	09/20/10	GMC	Review of Steve Mauriello depo from Floyd	1.500
3570	3569.0	09/20/10	GMC	Review of Donald McHugh depo from Floyd	1.100
3571	3570.0	09/20/10	GMC	Updated Schoolcraft Justice media page with Radio interview	0.500
3572	3571.0	09/20/10	GMC	Discussion & review with JF & JN re media to upload to website	0.250
3573	3572.0	09/21/10	GMC	Drafted interview memo of "JB" meeting	1.500
3574	3573.0	09/23/10	GMC	Meeting with JF, JN and Center for Constitutional Rights (CCR) re Schoolcraft	2.250
3575	3574.0	09/23/10	GMC	Reviewed and finalized THEE RANT post	0.250
3576	3575.0	09/24/10	GMC	Discussion with JN and JF re: first meeting with the DOJ and upcoming meeting with the DOJ and AS	1.750
3577	3576.0	09/24/10	GMC	Drafted email and sent post to anonymous PO to post on THEE RANT	0.250
3578	3577.0	09/25/10	GMC	Meeting with JF & JN re AS interview with feds	0.500
3579	3578.0	09/25/10	GMC	Email re: Schoolcraft visit to meet with Feds, NY Times, ABC news	0.250
3580	3579.0	09/25/10	GMC	Email to Jim Hoffer re: Schoolcraft visit	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3581	3580.0	09/27/10	GMC	Schoolcraft interview with Civil Rights Division DOJ (pre and post), NY Times, ABC news	5.250
3582	3581.0	09/27/10	GMC	Meeting w/AS with JN, JF to prep for discussion with US attorneys office EDNY	3.250
3583	3582.0	09/28/10	GMC	"Rich" anonymous cop discussion with JF	0.600
3584	3583.0	09/28/10	GMC	Review of Schoolcraftjustice.com posts	0.250
3585	3584.0	09/28/10	GMC	Review of Daily News article re: Schoolcraft	0.100
3586	3585.0	09/29/10	GMC	Phone interview of PO "VM" re quotas and downgrading	1.300
3587	3586.0	09/29/10	GMC	Phone interview of PO "EF" re quotas and downgrading	0.800
3588	3587.0	09/29/10	GMC	Review of Schoolcraftjustice.com posts	0.300
3589	3588.0	09/30/10	GMC	Meeting with JF and JN re: anonymous cop interviews VM and EF	1.100
3590	3589.0	09/30/10	GMC	Review of Bernier answer	0.300
3591	3590.0	10/01/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3592	3591.0	10/02/10	GMC	Email correspondence w/JN re: whistleblower cops	0.400
3593	3592.0	10/02/10	GMC	Phone call with former PO "BS"	0.300
3594	3593.0	10/04/10	GMC	Meeting w/ JF and "JR" retired police officer re: quotas, downgrading, NYPD corruption	1.800
3595	3594.0	10/04/10	GMC	Met with potential whistleblower PO "MF" re: Schoolcraft, quotas, corruption	1.100
3596	3595.0	10/04/10	GMC	Meeting w/ JF and JN to discuss information from "JR" retired police officer re: quotas, downgrading, NYPD corruption	0.750
3597	3596.0	10/04/10	GMC	Emailed w/anonymous NYPD Captain re: Schoolcraft allegations	0.400
3598	3597.0	10/05/10	GMC	Drafted interview memo of "MF" meeting	1.250
3599	3598.0	10/05/10	GMC	Reviewed Schoolcraftjustice posts, made calls, returned emails and set up appointments	1.250
3600	3599.0	10/05/10	GMC	Drafted interview memo of "JR" meeting	0.800
3601	3600.0	10/06/10	GMC	Phone interview w/"PR" former 81st precinct PO	0.400
3602	3601.0	10/07/10	GMC	Meeting with JF and "EB" retired police officer re: quotas, downgrading, NYPD corruption	1.800
3603	3602.0	10/08/10	GMC	Drafted interview memo of "EB" meeting	1.500
3604	3603.0	10/08/10	GMC	Phone interview with "MV" retired PO re: quotas, retaliation, downgrading	1.300
3605	3604.0	10/08/10	GMC	Email correspondence w "NB" re: more recordings	0.250
3606	3605.0	10/08/10	GMC	Review of AP story re: Schoolcraft case	0.250
3607	3606.0	10/09/10	GMC	Review of Schoolcraft post from former PO "WN"	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3608	3607.0	10/10/10	GMC	Meeting with JN and JF re: information provided by MV, NB, EB whistleblower cops	1.400
3609	3608.0	10/10/10	GMC	Review of Schoolcraft posts	0.400
3610	3609.0	10/11/10	GMC	Review of Schoolcraft posts	0.300
3611	3610.0	10/11/10	GMC	Email correspondence w/JN re: Posts	0.250
3612	3611.0	10/11/10	GMC	Review of email from a police practices expert	0.250
3613	3612.0	10/12/10	GMC	Phone interview police officer "RL" re: quotas, retaliation, downgrading	1.100
3614	3613.0	10/12/10	GMC	Meeting w/ JF and JN re: Schoolcraftjustice.com calls from POs	1.000
3615	3614.0	10/12/10	GMC	Phone interview police officer "PL" re: quotas, retaliation, downgrading	0.750
3616	3615.0	10/12/10	GMC	Review of JHMC motion to dismiss	0.750
3617	3616.0	10/12/10	GMC	Phone call and email w/ CUNY professor who has info re: Schoolcraft	0.250
3618	3617.0	10/12/10	GMC	Review of Schoolcraft posts	0.250
3619	3618.0	10/13/10	GMC	Spoke to police officer "PL" re: quotas, retaliation, downgrading	0.400
3620	3619.0	10/14/10	GMC	Meeting with JN re: information provided by PL and RL whistleblower cops to support Monell claim	0.750
3621	3620.0	10/14/10	GMC	Email to web designer updating Schoolcraftjustice.com	0.400
3622	3621.0	10/15/10	GMC	Review of order setting deadlines for Motion to Dismiss	0.100
3623	3622.0	10/16/10	GMC	Review of Schoolcraft posts	0.250
3624	3623.0	10/18/10	GMC	Phone call w/ "MG" re: quotas at 81st precinct	0.750
3625	3624.0	10/18/10	GMC	Review of letter requesting additional time to respond to Motion to Dismiss	0.250
3626	3625.0	10/19/10	GMC	Review of Schoolcraft posts	0.250
3627	3626.0	10/20/10	GMC	Meeting with technician to reduce size of Schoolcraft audio files	0.400
3628	3627.0	10/22/10	GMC	Phone call with police officer "MR" re: NYPD quotas, downgrading, corruption	1.250
3629	3628.0	10/23/10	GMC	Left VM for JN re: Schoolcraft	0.100
3630	3629.0	10/24/10	GMC	Phone call with David Velez	0.300
3631	3630.0	10/24/10	GMC	Review of Schoolcraft posts	0.250
3632	3631.0	10/25/10	GMC	Phone call with retired PO "RC" re: meeting to discuss quotas provide evidence	0.600
3633	3632.0	10/25/10	GMC	Phone call with DC re: City Answer	0.250
3634	3633.0	10/26/10	GMC	Meeting with JF and "RC" to discuss experience with quotas in a Brooklyn North precinct	3.100
3635	3634.0	10/27/10	GMC	Drafted interview memo of meeting w/"RC"	1.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3636	3635.0	10/27/10	GMC	Meeting with JF and David Velez re: arbitration, quotas, Michael Marino	1.400
3637	3636.0	10/27/10	GMC	Review of Isakov Answer to Amended complaint	0.250
3638	3637.0	10/28/10	GMC	Interview memo for meeting with David Velez	1.400
3639	3638.0	10/29/10	GMC	Review of City's request for an extension of time to Answer to amended complaint	0.250
3640	3639.0	10/30/10	GMC	Meeting with JF & JN re: information provided by MR, MG RC whistleblower cops and movie and book publicist contacting AS for information	2.250
3641	3640.0	10/30/10	GMC	Phone call with entertainment lawyer	0.400
3642	3641.0	10/30/10	GMC	Email correspondence re: selling Schoolcraft life rights for movie or book so that Adrian can support himself while case proceeds	0.300
3643	3642.0	11/01/10	GMC	Reviewed Schoolcraftjustice posts made calls, returned emails and set up appointments	1.750
3644	3643.0	11/01/10	GMC	Meeting with JN and JF re: updating Schoolcraft website	0.300
3645	3644.0	11/01/10	GMC	Drafted content to update website	0.250
3646	3645.0	11/01/10	GMC	Review of Judge Sweet's order granting City more time to file Answer	0.100
3647	3646.0	11/02/10	GMC	Email and phone correspondence with web designer re: updates to Schoolcraftjustice.com	0.750
3648	3647.0	11/03/10	GMC	Review of mark ups from entertainment lawyer re: Schoolcraft entertainment contracts	0.300
3649	3648.0	11/04/10	GMC	Meeting with JF and police officer "BP" re: quotas, downgrading, and NYPD corruption	2.300
3650	3649.0	11/04/10	GMC	Review of letter and stipulation re: extension of time to Answer Amended Complaint	0.250
3651	3650.0	11/05/10	GMC	Interview memo for "BP"	1.400
3652	3651.0	11/08/10	GMC	Met with JF and police officer "MC" re: quotas	0.800
3653	3652.0	11/08/10	GMC	Review of Document Demands and Interrogatories filed by Isakov	0.500
3654	3653.0	11/08/10	GMC	Review of letter requesting additional time to oppose motion to dismiss	0.250
3655	3654.0	11/09/10	GMC	Spoke to anonymous police officer CW re: quotas in the 81st precinct	0.750
3656	3655.0	11/09/10	GMC	Meeting with JN about interviews with CW and MC whistleblower cops regarding Monell claim	0.600
3657	3656.0	11/10/10	GMC	Phone call w/ police officer "JW" re: quotas and retaliation in a Brooklyn precinct	0.500
3658	3657.0	11/10/10	GMC	Review of Schoolcraftjustice.com posts	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3659	3658.0	11/11/10	GMC	Meeting with JF and "JW" cop to discuss quotas/retaliation	1.600
3660	3659.0	11/11/10	GMC	Review of discovery demands from Bernier	0.400
3661	3660.0	11/11/10	GMC	Review of draft of plaintiff's first set of interrogatories	0.300
3662	3661.0	11/11/10	GMC	Review of amended answer from Bernier	0.250
3663	3662.0	11/12/10	GMC	Interview memo for meeting with "JW"	1.100
3664	3663.0	11/12/10	GMC	Meeting with JN and JF re: issues on our motion opposition and about information provided by JW anonymous cop	1.000
3665	3664.0	11/13/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3666	3665.0	11/16/10	GMC	Phone call with Charney re: Schoolcraft affidavit	0.400
3667	3666.0	11/16/10	GMC	Review of affidavit Darius Charney wants Schoolcraft to sign for Floyd case	0.400
3668	3667.0	11/16/10	GMC	Emailed JN re: changes to Schoolcraft Floyd affidavit	0.100
3669	3668.0	11/16/10	GMC	Left voice message for Charney re: affidavit	0.100
3670	3669.0	11/16/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3671	3670.0	11/17/10	GMC	Reviewed and revised Discovery Demands and Requests to Admit to be served on City Defendants	3.800
3672	3671.0	11/18/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3673	3672.0	11/19/10	GMC	Email correspondence with French documentarian	0.100
3674	3673.0	11/19/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3675	3674.0	11/20/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3676	3675.0	11/21/10	GMC	Review of WSJ article re: Schoolcraft case	0.250
3677	3676.0	11/29/10	GMC	Review of AS's changes to Floyd affidavit	0.500
3678	3677.0	11/29/10	GMC	Phone call w/AS re: Floyd affidavit	0.300
3679	3678.0	11/30/10	GMC	Implemented AS's changes to Floyd affidavit for final review by Charney	3.400
3680	3679.0	12/01/10	GMC	Email and phone correspondence w/Charney re Floyd affidavit	0.800
3681	3680.0	12/01/10	GMC	Discussion with JF & JN re affidavit from Schoolcraft	0.400
3682	3681.0	12/02/10	GMC	Review of City Defendants answer to Amended Complaint	0.400
3683	3682.0	12/02/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3684	3683.0	12/06/10	GMC	Revise and review opposition to JHMC motion to dismiss	1.250
3685	3684.0	12/06/10	GMC	Discussion with JF & JN re final corrections	0.800
3686	3685.0	12/06/10	GMC	Drafted letter response to premature discovery demands for Bernier and Isakov	0.400
3687	3686.0	12/08/10	GMC	Review of NYPD re: new quota bill	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3688	3687.0	12/08/10	GMC	Email correspondence from Lee re: Docket sheet	0.100
3689	3688.0	12/08/10	GMC	Review of email correspondence w/Graham Raymond	0.100
3690	3689.0	12/08/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3691	3690.0	12/09/10	GMC	Discussion w/ JN & JF re discovery responses & timing	0.500
3692	3691.0	12/09/10	GMC	Review of email re: Discovery from Isakov	0.100
3693	3692.0	12/09/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3694	3693.0	12/10/10	GMC	Email w/JN re: HIPAAs	0.100
3695	3694.0	12/12/10	GMC	Review of Daily News article w/memo showing proof of quota	0.250
3696	3695.0	12/14/10	GMC	Correspondence w/Charney and Schoolcraft re: Floyd affidavit	0.400
3697	3696.0	12/24/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3698	3697.0	12/26/10	GMC	Review of Schoolcraftjustice.com posts	0.100
3699	3698.0	01/03/11	GMC	Review of email correspondence from police officer "CW" re: Marino and quotas	0.250
3700	3699.0	01/10/11	GMC	Meeting with JF & JN re interrogatories and demands	1.500
3701	3700.0	01/20/11	GMC	Review of JHMC reply memo in support of motion to dismiss	0.500
3702	3701.0	01/20/11	GMC	Meeting with JN, JF to discuss JHMC's reply memo of law	0.400
3703	3702.0	01/26/11	GMC	Appearance for motion to dismiss in Schoolcraft	1.000
3704	3703.0	01/26/11	GMC	Discussion with JF & JN re oral arguments	0.600
3705	3704.0	01/26/11	GMC	Travel from SDNY for appearance for motion to dismiss in Schoolcraft (.5)	0.250
3706	3705.0	01/26/11	GMC	Travel to SDNY for appearance for motion to dismiss in Schoolcraft (.5)	0.250
3707	3706.0	01/31/11	GMC	Discussion w/JN re: requesting Queens DA to investigate Halloween night	0.400
3708	3707.0	01/31/11	GMC	Meeting with JN & JF re send documents & authorizations to Queens DA office	0.400
3709	3708.0	01/31/11	GMC	Review of materials sent to Queens DA to start investigation	0.250
3710	3709.0	02/08/11	GMC	Discussion w/ JN & JF re letter to court to schedule discovery	0.300
3711	3710.0	02/10/11	GMC	Review of JHMC motion to stay discovery	0.250
3712	3711.0	02/11/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3713	3712.0	02/14/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3714	3713.0	02/17/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3715	3714.0	02/19/11	GMC	Meeting with JF re: getting transcript for Bryant v. City verdict finding quotas existed	0.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3716	3715.0	02/19/11	GMC	Phone call with former NYPD officer "SS"	0.300
3717	3716.0	02/19/11	GMC	Email correspondence w/JN re: Seth Harris verdict finding quota	0.100
3718	3717.0	02/19/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3719	3718.0	03/01/11	GMC	Meeting with anonymous cops from T34 w/ JF and JN - provided recordings of Lt. Janice Williams	1.250
3720	3719.0	03/03/11	GMC	Email correspondence with former NYPD PO PK	0.100
3721	3720.0	03/03/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3722	3721.0	03/13/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3723	3722.0	03/16/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3724	3723.0	04/11/11	GMC	Phone call with Adrian and Larry Schoolcraft re: Letter from NYPD charges and specs	0.750
3725	3724.0	04/12/11	GMC	Review of email re: Adrian charges	0.250
3726	3725.0	04/14/11	GMC	Review of email from WME re: Schoolcraft life rights	0.100
3727	3726.0	04/15/11	GMC	Meeting w/Harry Levine Queens College re: Schoolcraft, quota study	0.500
3728	3727.0	04/18/11	GMC	Discussion w/ JN & JF re prep of letter re NYPD hearing & PBA representation	0.300
3729	3728.0	04/20/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3730	3729.0	04/26/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3731	3730.0	05/06/11	GMC	Review of Judge Sweet's opinion re: JHMC motion to dismiss	0.600
3732	3731.0	05/06/11	GMC	Email correspondence w/JN and JF re: motion to dismiss decision	0.250
3733	3732.0	05/09/11	GMC	Meeting with JN and JF re: necessary disclosures under Rule 26 for plaitniff	1.750
3734	3733.0	05/10/11	GMC	Meeting with JN and JF re: edits to intial disclosures and discussion regarding requests to admit	1.400
3735	3734.0	05/10/11	GMC	Review of Initial disclosures and discussion with JF	0.750
3736	3735.0	05/10/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3737	3736.0	05/12/11	GMC	Discussion w/ JF & JN re agency agreement	0.400
3738	3737.0	05/12/11	GMC	Review of Book deal agreement for Adrian Schoolcraft	0.250
3739	3738.0	05/13/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3740	3739.0	05/14/11	GMC	Meeting with JF reviewing RFA's	2.750
3741	3740.0	05/15/11	GMC	Meeting with JN and JF re: edits to RFA's	1.000
3742	3741.0	05/18/11	GMC	Drafted outline and notes for neccessary discovery demands for JN	1.300
3743	3742.0	05/18/11	GMC	Meeting with JF to discuss documents that must be requested in our demands	1.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3744	3743.0	05/19/11	GMC	Discuss w/ JN & JF edits & topic areas that should be explored on interrogatories	1.250
3745	3744.0	05/19/11	GMC	Review of JN's draft document demands	0.750
3746	3745.0	05/19/11	GMC	Email from JN re: dep notices to be served	0.100
3747	3746.0	05/20/11	GMC	Discussion w/ JF & JN re request to admit corrections/additions	1.500
3748	3747.0	05/20/11	GMC	Discuss interrogatories & discuss EBTs w/ JN & JF	1.300
3749	3748.0	05/20/11	GMC	Review of JN's request for admission	0.300
3750	3749.0	05/20/11	GMC	Review of JN's revised draft document demands	0.300
3751	3750.0	05/20/11	GMC	Email from Adrian Schoolcraft	0.100
3752	3751.0	05/24/11	GMC	Review of email and correspondence w/JN re anonymous PO from 81st precinct	0.400
3753	3752.0	05/30/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3754	3753.0	06/13/11	GMC	Email correspondence with anonymous PO re: Schoolcraft matter	0.250
3755	3754.0	06/19/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3756	3755.0	06/23/11	GMC	Discussion with JF & JN re responses & requests from Isacov	0.600
3757	3756.0	06/23/11	GMC	Review of Isakov response to Discovery Demands	0.600
3758	3757.0	06/23/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3759	3758.0	06/27/11	GMC	Discussion with JN and JF re City's failure to response to discovery requests	0.300
3760	3759.0	06/27/11	GMC	Review of email correspondence with DC	0.300
3761	3760.0	07/05/11	GMC	Review of Discovery plan and correspondence regarding same	0.750
3762	3761.0	07/06/11	GMC	Discussion w/ JN & JF re changing to case management plan	0.400
3763	3762.0	07/08/11	GMC	Discussion with JF and JN re: meeting with Jim Leander and AS about investigation	1.750
3764	3763.0	07/08/11	GMC	Review of pretrial order for conference	0.100
3765	3764.0	07/11/11	GMC	Final review of discovery plan w/ JN & JF	0.250
3766	3765.0	07/15/11	GMC	Meeting with JF and JN re: discovery plan and issues to raise	0.500
3767	3766.0	07/15/11	GMC	Review revised discovery plan	0.400
3768	3767.0	07/15/11	GMC	Review of JN email re: objections to discovery plan	0.100
3769	3768.0	07/18/11	GMC	Review of changes to discovery plan made by Lee	0.250
3770	3769.0	07/18/11	GMC	Review of email by JN to DC re changes	0.100
3771	3770.0	07/19/11	GMC	Review of Literary Agency agreement for Schoolcraft	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3772	3771.0	07/25/11	GMC	Review of email from Brian Lee re: Discovery plan dispute	0.250
3773	3772.0	07/26/11	GMC	Review of email correspondence between parties finalizing language of discovery plan	0.400
3774	3773.0	07/27/11	GMC	Executed discovery plan email	0.100
3775	3774.0	08/04/11	GMC	Fully executed discovery plan	0.250
3776	3775.0	08/08/11	GMC	Review and revised responses to Bernier Discovery demands	0.500
3777	3776.0	08/09/11	GMC	Drafted responses to JHMC discovery demands	1.800
3778	3777.0	08/09/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3779	3778.0	08/10/11	GMC	Review of JN comments to JHMC responses	0.250
3780	3779.0	08/11/11	GMC	Review of Isakov demands	0.250
3781	3780.0	08/14/11	GMC	Drafted responses to all discovery demands for medical defendants and emailed to JN for his review	4.750
3782	3781.0	08/15/11	GMC	Review of email correspondence re: delay in discovery production	0.250
3783	3782.0	08/16/11	GMC	Review of City protective order stipulation	0.400
3784	3783.0	08/17/11	GMC	Discuss confidentiality stip w/ JF & JN b/c of plaintiff's objections	1.250
3785	3784.0	08/17/11	GMC	Review of Brian Lee objections to protective order stip	0.250
3786	3785.0	08/18/11	GMC	Drafted letters accompanying responses to Discovery Demands and prepared thumb drives that included responsive documents	1.100
3787	3786.0	08/23/11	GMC	Review of email from Gregory Radmosli re: Protective order stip	0.100
3788	3787.0	08/30/11	GMC	Review of email correspondence from Brian Lee re: protective order stip changes	0.300
3789	3788.0	08/31/11	GMC	Email response from DC re stip	0.100
3790	3789.0	09/01/11	GMC	Review of email from Darius Charney enclosing Floyd decision	0.500
3791	3790.0	09/02/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3792	3791.0	09/12/11	GMC	Review and revise motion to compel City to produce discovery	0.400
3793	3792.0	09/28/11	GMC	Discussion w/ JN and TF re law enforcement privilege & motion to compel	1.250
3794	3793.0	09/28/11	GMC	Attend oral argument on motion to compel	1.000
3795	3794.0	09/28/11	GMC	Travel from SDNY- motion to compel (.5)	0.250
3796	3795.0	09/28/11	GMC	Travel to SDNY- motion to compel (.5)	0.250
3797	3796.0	09/29/11	GMC	Review, revised, and executed amended discovery plan	0.300
3798	3797.0	09/30/11	GMC	Email from all parties re: executed amended discovery plan	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3799	3798.0	10/12/11	GMC	Receipt and review defendants first discovery responses	2.000
3800	3799.0	10/12/11	GMC	Review of motion to approve protective order	0.250
3801	3800.0	10/17/11	GMC	Review of pre-trial order	0.100
3802	3801.0	10/21/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3803	3802.0	10/22/11	GMC	Review of Schoolcraftjustice.com posts	0.300
3804	3803.0	10/23/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3805	3804.0	10/24/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3806	3805.0	10/25/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3807	3806.0	10/26/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3808	3807.0	10/27/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3809	3808.0	10/28/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3810	3809.0	10/29/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3811	3810.0	11/02/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3812	3811.0	11/03/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3813	3812.0	11/04/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3814	3813.0	11/05/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3815	3814.0	11/12/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3816	3815.0	11/13/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3817	3816.0	11/17/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3818	3817.0	11/29/11	GMC	Review of email re: discovery from Brian Lee	0.100
3819	3818.0	11/29/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3820	3819.0	12/06/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3821	3820.0	12/07/11	GMC	Review of order re: pretrial conference	0.100
3822	3821.0	12/13/11	GMC	Phone call with Larry and Adrian Schoolcraft	0.800
3823	3822.0	12/13/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3824	3823.0	12/15/11	GMC	Review of Schoolcraftjustice.com posts	0.100
3825	3824.0	12/19/11	GMC	Discussion w/ JF & JN re plaintiff's thoughts on discovery	0.500
3826	3825.0	01/05/12	GMC	Review of letter from Bernier's attorneys	0.250
3827	3826.0	01/10/12	GMC	Meeting with AS, JN and JF	4.900
3828	3827.0	01/12/12	GMC	Review of City Defendants first Discovery Demands	0.500
3829	3828.0	01/20/12	GMC	Phone call with Adrian and Larry	0.750
3830	3829.0	01/24/12	GMC	Spoke to JN re: AS salary	0.250
3831	3830.0	01/24/12	GMC	Email copy of NOC with salary included	0.100
3832	3831.0	02/07/12	GMC	Review of email demanding authorizations from Brian Lee	0.250
3833	3832.0	02/07/12	GMC	Email from JN re: supplemental demands	0.100
3834	3833.0	02/07/12	GMC	Email correspondence re: pretrial conference	0.100
3835	3834.0	02/07/12	GMC	Review notice of appearance for City Defendants	0.100
3836	3835.0	02/08/12	GMC	Pre-trial conference before Judge Sweet	1.000
3837	3836.0	02/08/12	GMC	Discussion with JF and JN re: conference and discovery and strategy moving forward	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3838	3837.0	02/08/12	GMC	Travel from SDNY- motion to compel (.5)	0.250
3839	3838.0	02/08/12	GMC	Travel to SONY- motion to compel (.5)	0.250
3840	3839.0	02/10/12	GMC	Drafted proposed supplemental demands for the City and emailed to JN for review	1.800
3841	3840.0	02/10/12	GMC	Discussion w/ JN & JF re additional items of discovery	1.600
3842	3841.0	02/10/12	GMC	Review of email from JN re discovery we need to follow up with city	0.250
3843	3842.0	02/10/12	GMC	Email from JN re: Cancellation of Adrian and Larry trip to NYC	0.100
3844	3843.0	02/10/12	GMC	Review of email to Jeremy (Meridian Investigations) re: subpoena of Schoolcraft records	0.100
3845	3844.0	02/13/12	GMC	Review of final supplemental discovery demands for NYC	0.300
3846	3845.0	02/24/12	GMC	Review of email correspondence w/Chris Dunn	0.250
3847	3846.0	02/27/12	GMC	Meeting with JF and JN re: documents received from Johnstown PD for plaintiff's subpoena	0.750
3848	3847.0	02/27/12	GMC	Review of subpoena response from Johstown PD	0.750
3849	3848.0	02/28/12	GMC	Review of email from AS's former partner	0.100
3850	3849.0	02/29/12	GMC	Phone call with AS's former partner	0.750
3851	3850.0	02/29/12	GMC	Phone call w/Adrian reformer partner	0.400
3852	3851.0	02/29/12	GMC	Email to AS's former partner	0.100
3853	3852.0	03/01/12	GMC	Phone call with AS re: former partner	0.300
3854	3853.0	03/06/12	GMC	Review of Village Voice Article re QAD investigation	0.300
3855	3854.0	03/07/12	GMC	Discussed adding 1st amendment claim with JN and JF	0.250
3856	3855.0	03/07/12	GMC	Phone call with Larry and Adrian Schoolcraft	0.250
3857	3856.0	03/07/12	GMC	Email to JN an JF re: conversation with Larry and Adrian	0.100
3858	3857.0	03/07/12	GMC	Review of NOA by Suzanna Publicker ("SP")	0.100
3859	3858.0	03/07/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3860	3859.0	03/08/12	GMC	Discussion with JN & JF re VV article and the confidential report	0.750
3861	3860.0	03/08/12	GMC	Email from Jim Hoffer	0.100
3862	3861.0	03/08/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3863	3862.0	03/08/12	GMC	Review of Schoolcraf iustice.com posts	0.100
3864	3863.0	03/09/12	GMC	Discussion with JN & JF re reinstating 1st Amendment claims in this case based on Garcetti & actions after the fact	1.250
3865	3864.0	03/09/12	GMC	Review of Schoolcraftjustice.com posts	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3866	3865.0	03/10/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3867	3866.0	03/12/12	GMC	Meeting with JN & JF re letter from City	0.600
3868	3867.0	03/12/12	GMC	Review of SP letter re "leaked" QAD report	0.400
3869	3868.0	03/12/12	GMC	Email correspondence with defendants re Amendment	0.250
3870	3869.0	03/12/12	GMC	Review & edit response to City's letter re protective order	0.250
3871	3870.0	03/12/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3872	3871.0	03/12/12	GMC	Review of signed protective order	0.100
3873	3872.0	03/13/12	GMC	Email correspondence with Mark Toor	0.100
3874	3873.0	03/13/12	GMC	Email from PBS producer Weinrich on documentary of Schoolcraft	0.100
3875	3874.0	03/13/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3876	3875.0	03/14/12	GMC	Review and revise of amended complaint adding 1st amendment claim	0.500
3877	3876.0	03/14/12	GMC	Email correspondence w/Nic re docs in connection w/ Schoolcraft meeting	0.250
3878	3877.0	03/14/12	GMC	Review of NY Times article on Schoolcraft	0.100
3879	3878.0	03/14/12	GMC	Review order on City motion re QAD	0.100
3880	3879.0	03/15/12	GMC	Meeting with JN and JF re proposed Amended Complaint	0.600
3881	3880.0	03/15/12	GMC	Email correspondence from anonymous "MD" PO re: 81st precinct	0.100
3882	3881.0	03/16/12	GMC	Radio interview re: Schoolcraft	0.400
3883	3882.0	03/20/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3884	3883.0	03/21/12	GMC	Review of NY Times motion to unseal Schoolcraft records	0.400
3885	3884.0	03/21/12	GMC	Email correspondence w/JN re: NY Times motion	0.100
3886	3885.0	03/22/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3887	3886.0	03/24/12	GMC	Email correspondence w/Defendants re Amended complaint	0.250
3888	3887.0	03/28/12	GMC	Oral Argument on City motion	1.000
3889	3888.0	03/28/12	GMC	Discussion with JN and JF re: court's order on City's motion for breach of confidentiality agreement	0.500
3890	3889.0	03/28/12	GMC	Legal research: review of Garcetti and progeny to discuss Amendment issues	0.400
3891	3890.0	03/28/12	GMC	Meeting w/ JN & JF prior to conference to prep	0.400
3892	3891.0	03/28/12	GMC	Travel from SDNY for Oral Argument on City motion (.5)	0.250
3893	3892.0	03/28/12	GMC	Travel to SDNY for Oral Argument on City motion (.5)	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3894	3893.0	03/29/12	GMC	Revised and help draft proposed AEO stip w/JN and JF for City	0.800
3895	3894.0	03/30/12	GMC	Email correspondence w/SP re Discovery extension and opposition to amendment of Complaint	0.600
3896	3895.0	03/30/12	GMC	Meeting w/ JN & JF re AEO changes	0.600
3897	3896.0	03/30/12	GMC	Discussion with JN and JF re: filing motion to amend and discovery issues	0.500
3898	3897.0	03/30/12	GMC	Final review of proposed AEO stip	0.300
3899	3898.0	03/30/12	GMC	Emailed proposed AEO stip to the City	0.100
3900	3899.0	04/05/12	GMC	Reviewed and revised responses to City defendants discovery requests	1.800
3901	3900.0	04/05/12	GMC	Review & discuss w/ JN & JF plaintiffs responses to City demands	0.800
3902	3901.0	04/05/12	GMC	Review of basis for City's opposition to Amendment	0.250
3903	3902.0	04/06/12	GMC	Correspondence w/ NY Times counsel re: protective order	0.300
3904	3903.0	04/09/12	GMC	Email correspondence w/JN re: discovery responses	0.100
3905	3904.0	04/10/12	GMC	Meeting w/ AS	4.600
3906	3905.0	04/10/12	GMC	Email enclosing discovery responses to City demands	0.100
3907	3906.0	04/10/12	GMC	Email re: Schoolcraft arrival to NYC	0.100
3908	3907.0	04/13/12	GMC	Discussion with JN and JF re: Matthews decision	0.600
3909	3908.0	04/13/12	GMC	Review of Matthews decision	0.600
3910	3909.0	04/13/12	GMC	Email from plaintiff re 1st Amendment claim	0.100
3911	3910.0	04/24/12	GMC	Review and revise JF motion to Amend 1st Amendment claim	0.750
3912	3911.0	04/24/12	GMC	Email correspondence to City correcting Lt. Gough for Amended Complaint	0.100
3913	3912.0	04/25/12	GMC	Email from City re: Vallone and Vans subpoenas	0.100
3914	3913.0	04/30/12	GMC	Review NY Times proposed language to protective order and email sent to City Defendants	0.400
3915	3914.0	04/30/12	GMC	Discussion w/ JN and JF re NY Times alteration to protective order	0.300
3916	3915.0	04/30/12	GMC	Review of correspondence with SP re: adjourning oral argument on Amendment	0.250
3917	3916.0	05/01/12	GMC	Discussions w/ JN and JF re City's request for affidavits & deposition for confidentiality breach	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3918	3917.0	05/02/12	GMC	Email to City re: failure to provide discovery or respond to proposed AEO	0.250
3919	3918.0	05/03/12	GMC	Review of defendants proposed AEO stip and declaration re: "leak"	1.250
3920	3919.0	05/03/12	GMC	Discussion w/ JF & JN re Affidavits and conf. stip AEO	0.750
3921	3920.0	05/03/12	GMC	Review of correspondence with SP re: adjourning oral argument on Amendment again	0.100
3922	3921.0	05/08/12	GMC	Discussion w/ JN and JF re argument on 1st Amendment claim	0.600
3923	3922.0	05/08/12	GMC	Review of NOA William Fraenkel	0.100
3924	3923.0	05/09/12	GMC	Attended Oral Argument on 1st Amendment claim	1.000
3925	3924.0	05/09/12	GMC	Travel from SDNY for Argument on 1st Amendment claim (.5)	0.250
3926	3925.0	05/09/12	GMC	Travel to SDNY for Argument on 1st Amendment claim (.5)	0.250
3927	3926.0	05/11/12	GMC	Read and review of defendant's letter to quash and discussion w/ JF & JN	2.100
3928	3927.0	05/15/12	GMC	Email correspondence w/SP re: Breach Affidavit	0.100
3929	3928.0	05/16/12	GMC	Discussion w/ JN and JF re opp to defendant's motion to quash	0.600
3930	3929.0	05/16/12	GMC	Email correspondence w/Darius Charney	0.250
3931	3930.0	05/17/12	GMC	Review and edit plaintiff's opp to defendant's motion to quash Vallone and Vans motion to quash	0.800
3932	3931.0	05/17/12	GMC	Discussion w/JN and JF re: AS breach affidavit	0.750
3933	3932.0	05/17/12	GMC	Review and discuss City New York Times opp letter w/ JN & JF	0.400
3934	3933.0	05/17/12	GMC	Phone call with NY Times counsel re: Stip language	0.300
3935	3934.0	05/17/12	GMC	Email re: AS breach affidavit	0.100
3936	3935.0	05/18/12	GMC	Meet and confer w/SP re: Stips	0.600
3937	3936.0	05/18/12	GMC	Email correspondence w/SP re: scheduling oral argument on motion to quash	0.100
3938	3937.0	05/22/12	GMC	Discussion w/ JN & JF re defendant's letter re Vallone subpoena	0.600
3939	3938.0	05/23/12	GMC	Attend and argue against motion to quash	1.000
3940	3939.0	05/23/12	GMC	Prep for argument w/ JF & JN	1.000
3941	3940.0	05/23/12	GMC	Discussion w/ JN & JF re defendant's letter re subpoena	0.600
3942	3941.0	05/23/12	GMC	Travel from SDNY for motion to quash (.5)	0.250
3943	3942.0	05/23/12	GMC	Travel to SDNY for motion to quash (.5)	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3944	3943.0	05/24/12	GMC	Drafted and submitted supplemental evidence to support our opposition to quash Vans and Vallone subpoena	0.500
3945	3944.0	05/24/12	GMC	Review of NOA-Walter Kretz ("WK")	0.100
3946	3945.0	05/25/12	GMC	Read and review NY Times response to SP letter	0.250
3947	3946.0	05/29/12	GMC	Revised City proposed AEO and Conf Stips incorporating NY Times requests	0.500
3948	3947.0	05/30/12	GMC	Email correspondence w/JN re City stips and revisions	0.300
3949	3948.0	05/31/12	GMC	Meeting w/JN and JF re: City conf. Stips	0.900
3950	3949.0	06/04/12	GMC	Review of WK correspondence re: discovery	0.100
3951	3950.0	06/05/12	GMC	Review of email correspondence between SP and Times	0.100
3952	3951.0	06/06/12	GMC	Review of email correspondence between SP and Times	0.100
3953	3952.0	06/07/12	GMC	Revised AEO and Conf stips to send back to the City and emailed to JN for final review	1.400
3954	3953.0	06/07/12	GMC	Review of email correspondence between SP and Times	0.100
3955	3954.0	06/08/12	GMC	Email re: subpoenaed docs	0.100
3956	3955.0	06/08/12	GMC	Emailed stip to SP with revisions in track changes	0.100
3957	3956.0	06/08/12	GMC	Review of correspondence with NY Times and SP re: Schoolcraft materials	0.100
3958	3957.0	06/14/12	GMC	Meet with JN and JF to discuss motion for reconsideration on 1st amendment claim	0.750
3959	3958.0	06/14/12	GMC	Review of Judge Sweet re: motion to amend and motion quash subpoena	0.600
3960	3959.0	06/14/12	GMC	Phone call with Adrian and Larry re; decision	0.500
3961	3960.0	06/14/12	GMC	Email correspondence with JN re: decision	0.250
3962	3961.0	06/18/12	GMC	Review of JF motion for reconsideration on motion to amend	0.750
3963	3962.0	06/19/12	GMC	Meeting w/ Schoolcraft in Johnstown	4.800
3964	3963.0	06/19/12	GMC	Travel back to NYC from Johnstown (3.5)	1.750
3965	3964.0	06/19/12	GMC	Travel to Johnstown (3.5)	1.750
3966	3965.0	06/19/12	GMC	Email and phone correspondence with Adhyl Polanco re: Schoolcraft issues	0.100
3967	3966.0	06/20/12	GMC	Final edit and review of Motion for Reconsideration	0.300
3968	3967.0	06/20/12	GMC	Reviewed SP response to Stip proposal	0.300
3969	3968.0	06/21/12	GMC	Email correspondence w/JN and JF re Schoolcraft issues	0.250
3970	3969.0	06/30/12	GMC	Review of Schoolcraftjustice.com posts	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3971	3970.0	07/02/12	GMC	Discussion w/ AS and Larry Schoolcraft re financial issues	0.400
3972	3971.0	07/06/12	GMC	Review of email from JF re Stips	0.100
3973	3972.0	07/09/12	GMC	Researched donations to individuals	0.500
3974	3973.0	07/09/12	GMC	Drafted proposed language for Donate button on website	0.400
3975	3974.0	07/10/12	GMC	Review of City response re Stips	0.100
3976	3975.0	07/17/12	GMC	Email w/JN re: meeting in Albany with Schoolcrafts	0.100
3977	3976.0	07/20/12	GMC	Review of opinion on Plaintiff's motion to reconsider	0.300
3978	3977.0	07/23/12	GMC	Discussion w/ JF & JN re meeting w/ Schoolcrafts in Albany	0.300
3979	3978.0	07/23/12	GMC	Correspondence re: visiting Schoolcrafts in Albany	0.250
3980	3979.0	07/26/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3981	3980.0	07/28/12	GMC	Discussion w/ JN & JF re motion to amend to add prior restraint	0.600
3982	3981.0	08/01/12	GMC	Review and revise motion to amend	0.400
3983	3982.0	08/03/12	GMC	Email correspondence w/SP re: document production	0.250
3984	3983.0	08/04/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3985	3984.0	08/06/12	GMC	Email re: meeting with Schoolcrafts	0.100
3986	3985.0	08/07/12	GMC	Email correspondence re: authorizations	0.250
3987	3986.0	08/08/12	GMC	Meeting w/ JN & JF re meeting w/ AS in Albany for prep	1.300
3988	3987.0	08/08/12	GMC	Review of final stips	0.500
3989	3988.0	08/08/12	GMC	Printed out docs to go over with Adrian	0.250
3990	3989.0	08/09/12	GMC	Meeting w/AS in Albany	5.750
3991	3990.0	08/09/12	GMC	Traveled from Albany back to NYC (3.0)	1.500
3992	3991.0	08/09/12	GMC	Traveled to Albany to meet Client (3.0)	1.500
3993	3992.0	08/10/12	GMC	Email correspondence re: extension of disco	0.250
3994	3993.0	08/10/12	GMC	Email correspondence re: Schoolcraft deposition	0.250
3995	3994.0	08/10/12	GMC	Email w/JN re Schoolcraft breach affidavit	0.100
3996	3995.0	08/12/12	GMC	Review of Schoolcraftjustice.com posts	0.100
3997	3996.0	08/13/12	GMC	Review of email from SP re: scheduling AS depo	0.100
3998	3997.0	08/14/12	GMC	Email web designers re: donation for Schoolcrafts button on website	0.250
3999	3998.0	08/14/12	GMC	Review of correspondence re Tax returns	0.100
4000	3999.0	08/15/12	GMC	Email correspondence with all defendants re: subpoenaed docs	0.250
4001	4000.0	08/15/12	GMC	Email correspondence re: Schoolcraft deposition	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4002	4001.0	08/16/12	GMC	Discussion w/ JN & JF re City's suggestion on multiple dates for deps	0.750
4003	4002.0	08/16/12	GMC	Email correspondence re: Schoolcraft deposition	0.100
4004	4003.0	08/20/12	GMC	Discussion w/ JN & JF re additional amendment of the complaint to add Hanlon	0.600
4005	4004.0	08/21/12	GMC	Review of Amended Complaint adding Hanlon	0.500
4006	4005.0	08/21/12	GMC	Email from Brady consenting to Amendment	0.100
4007	4006.0	08/21/12	GMC	Email from Brady re scheduling AS dep	0.100
4008	4007.0	08/21/12	GMC	Email from City requesting copy of complaint	0.100
4009	4008.0	08/21/12	GMC	Email from Lee consenting	0.100
4010	4009.0	08/21/12	GMC	Email from Lee re scheduling AS dep	0.100
4011	4010.0	08/21/12	GMC	Email to City w/ Amended Complaint	0.100
4012	4011.0	08/22/12	GMC	Meeting w/ JF & JN re Kretz's request to have an additional day to depose plaintiff	0.400
4013	4012.0	08/22/12	GMC	Email from City re AS dep date	0.100
4014	4013.0	08/22/12	GMC	Email from Greg Rad re AS dep	0.100
4015	4014.0	08/22/12	GMC	Email from JN re dep dates	0.100
4016	4015.0	08/22/12	GMC	Email from Kretz re AS dep date	0.100
4017	4016.0	08/22/12	GMC	Email from Lee re AS dep date	0.100
4018	4017.0	08/23/12	GMC	Review of discovery provided by City defendants	3.500
4019	4018.0	08/23/12	GMC	Email from Brady re plaintiff's dep date	0.100
4020	4019.0	08/23/12	GMC	Email from Lee on plaintiff's dep dates	0.100
4021	4020.0	08/23/12	GMC	Email from Lee re second day for AS dep	0.100
4022	4021.0	08/28/12	GMC	Email from JN to defendants enclosing responses to discovery	0.100
4023	4022.0	08/28/12	GMC	Email JN and JF re Chief article	0.100
4024	4023.0	08/28/12	GMC	Review of correspondence sending out Fulton County records	0.100
4025	4024.0	08/29/12	GMC	Meeting w/ JF & JN re: City's Suppl. Disclosure & the need for us to depose at least 5 of the 9 new witnesses identified by City & other gen. strategy issues for advancing discovery	0.800
4026	4025.0	08/29/12	GMC	Email 2 & 3 from JN re discovery to defendants	0.100
4027	4026.0	08/29/12	GMC	Email from JN to defendants enclosing discovery	0.100
4028	4027.0	09/10/12	GMC	Read and review Opinion & Order from Sweet on plaintiff's motion to amend	0.750
4029	4028.0	09/10/12	GMC	Phone call with PO "FP" re Schoolcraft	0.400
4030	4029.0	09/10/12	GMC	Email from City re fax# confirmation	0.100
4031	4030.0	09/10/12	GMC	Email from JN re 120 day extension of discovery	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4032	4031.0	09/10/12	GMC	Email response from Brady	0.100
4033	4032.0	09/10/12	GMC	Email response from City	0.100
4034	4033.0	09/10/12	GMC	Email response from Greg Rad	0.100
4035	4034.0	09/10/12	GMC	Email response from Kretz	0.100
4036	4035.0	09/10/12	GMC	Email response from Lee	0.100
4037	4036.0	09/10/12	GMC	Email to City re Hanlon amend	0.100
4038	4037.0	09/10/12	GMC	Response from City on Hanlon amend	0.100
4039	4038.0	09/15/12	GMC	Reviewed IAB recordings provided by the City	3.800
4040	4039.0	09/17/12	GMC	Review of draft letter to amend to add Hanlon to complaint	0.250
4041	4040.0	09/18/12	GMC	Review of order granting ext. of disco deadline	0.100
4042	4041.0	09/19/12	GMC	Received final Stips	0.100
4043	4042.0	09/21/12	GMC	Email correspondence w/Darius Charney re: Floyd	0.250
4044	4043.0	09/24/12	GMC	Meeting w/JN and JF to discuss City deficiency letter and AS dep prep	1.750
4045	4044.0	09/24/12	GMC	Email from City re service of amended complaint, Lauderborn dep, & discovery deficiencies	0.500
4046	4045.0	09/24/12	GMC	Email correspondence w/Darius Charney re: Floyd	0.250
4047	4046.0	09/24/12	GMC	Email correspondence re service of amended complaint	0.100
4048	4047.0	09/25/12	GMC	Prep AS for his dep	3.500
4049	4048.0	09/25/12	GMC	Meeting w/ AS & JF & JN re dep prep	2.900
4050	4049.0	09/26/12	GMC	Meeting w/ JN & JF & AS re adjourning dep due to father's medical emergency	0.600
4051	4050.0	09/26/12	GMC	Brady email re: service of process	0.100
4052	4051.0	09/26/12	GMC	Review of email from JN adjourning AS dep	0.100
4053	4052.0	09/27/12	GMC	Reviewed and signed stips	0.250
4054	4053.0	09/28/12	GMC	Reviewed and resigned stips	0.100
4055	4054.0	10/02/12	GMC	Review of QAD interview of AS	2.250
4056	4055.0	10/03/12	GMC	Received AS new email address	0.100
4057	4056.0	10/04/12	GMC	Review of IAB recordings	2.750
4058	4057.0	10/04/12	GMC	Phone call and email correspondence w/Darius Charney	0.750
4059	4058.0	10/04/12	GMC	Review of plaintiff's responses to defendants interrogatories	0.400
4060	4059.0	10/10/12	GMC	Prep Adrian for deposition	4.600
4061	4060.0	10/10/12	GMC	Review amended complaint	0.750
4062	4061.0	10/11/12	GMC	Attended AS deposition and meeting afterwards	8.900
4063	4062.0	10/11/12	GMC	Meeting with JN, JF, AS before depo	0.500
4064	4063.0	10/12/12	GMC	Correspondence to SP re: color photos and QAD file review by AS	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4065	4064.0	10/15/12	GMC	Meeting w/JN & JF re: Marino's IAB interview & inconsistencies w/claims in UF 49 & Halloween Night recording	1.200
4066	4065.0	10/15/12	GMC	Read and reviewed Kretz motion to have extra day to depose AS	0.300
4067	4066.0	10/17/12	GMC	Meeting w/JN & JF re: City's privilege claims and possible arguments/motions to defeat such claims highlights of Lauterborn interview & inconsistencies w/Marino & home invasion recording	3.300
4068	4067.0	10/17/12	GMC	Discussion w/ JF & JN re City's refusal to allow AS to see QAD file	0.400
4069	4068.0	10/17/12	GMC	Email from SP re: QAD file	0.100
4070	4069.0	10/18/12	GMC	Meeting w/JF & JN re: City's Deliberative Process and Grand Jury privilege claims and best strategy for defeating same.	1.200
4071	4070.0	10/18/12	GMC	Read and review Answer to Amended Complaint from City	0.750
4072	4071.0	10/18/12	GMC	Review and revised of JN Motion permitting AS to review QAD material and opposing 3 days of depositions for AS	0.500
4073	4072.0	10/18/12	GMC	Email from SP re: service of newly named City defendants	0.100
4074	4073.0	10/18/12	GMC	Review of email from B Lee asking that plaintiff withdraw opp to extra day of dep for AS	0.100
4075	4074.0	10/20/12	GMC	Phone call w/JN & JF re: P.O. Nowacki acknowledging quota (15 c's per month) at 81 & possibly serving non-party subpoena on her for dep and discovering other possible w's at 81 re summons quota	0.900
4076	4075.0	10/22/12	GMC	Review of City request to enlarge Hanlon time to respond	0.100
4077	4076.0	10/23/12	GMC	Drafted responses and compiled responsive docs for City defendants second request for discovery sent to JN for review	3.400
4078	4077.0	10/24/12	GMC	Hearing on issue of extra dep time for AS	0.800
4079	4078.0	10/24/12	GMC	Travel from SDNY for conference re: trial date (.5)	0.250
4080	4079.0	10/24/12	GMC	Travel from SDNY for conference re: trial date (.5)	0.250
4081	4080.0	11/02/12	GMC	Review of case law sent by Lee re: medical defendants liability	0.400
4082	4081.0	11/02/12	GMC	Email from JN re: Schoolcraft phone numbers	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4083	4082.0	11/07/12	GMC	Hearing on issue of AS able to review QAD file	0.800
4084	4083.0	11/07/12	GMC	Review of letter by SP relieving City as counsel for Mauriello	0.300
4085	4084.0	11/07/12	GMC	Travel from SDNY for conference re: trial date (.5)	0.250
4086	4085.0	11/07/12	GMC	Travel from SDNY for conference re: trial date (.5)	0.250
4087	4086.0	11/07/12	GMC	Email w/JN re: service of newly named defendants	0.100
4088	4087.0	11/13/12	GMC	Confirming with JF w/AS on the phone that he is terminating representation	0.300
4089	4088.0	11/13/12	GMC	Various correspondence confirming termination of representation with the parties	0.250
4090	4089.0	11/13/12	GMC	Correspondence from City re rep of AS	0.100
4091	4090.0	11/14/12	GMC	Receipt and review of letter terminating our representation of AS	0.100
4092	4091.0	11/15/12	GMC	Review and signed letter to court informing we no longer represent AS	0.250
4093	4092.0	11/19/12	GMC	Review of court order prohibiting providing AS AEO material	0.100
4094	4093.0	11/26/12	GMC	Review of correspondence to AS enclosing files	0.250
4095	4094.0	01/23/15	GMC	Call w/JN and JF about taking over case again	0.800
4096	4095.0	02/02/15	GMC	Discussion w/ JF & JN re representing AS again for trial	1.300
4097	4096.0	02/02/15	GMC	Phone conversation w/JN re AS wants to rehire us	0.300
4098	4097.0	02/04/15	GMC	Phone call w JN and JF re: pending trial strategy and misc.evidentiary issues, and setting up meeting to discuss same in greater detail	0.900
4099	4098.0	02/04/15	GMC	Review of email from AS re: QAD memo from Sgt. Scott	0.400
4100	4099.0	02/04/15	GMC	Read and reviewed email from AS re: rehiring us	0.300
4101	4100.0	02/04/15	GMC	Discussion w/ JN & JF re scheduling a meeting w/ NS to discuss case status and trial prep	0.250
4102	4101.0	02/04/15	GMC	Review of email from Nat Smith ("NS") acknowledging and logistics of representation	0.100
4103	4102.0	02/05/15	GMC	Read and reviewed AS deposition	2.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4104	4103.0	02/05/15	GMC	Phone call w. JN re: updates on discussion with Nat Smith, records and transcripts provided by Adrian and goal to streamline case for trial	0.500
4105	4104.0	02/08/15	GMC	Read and reviewed AS deposition	3.250
4106	4105.0	02/08/15	GMC	Email correspondence re: videos of depositions	0.250
4107	4106.0	02/09/15	GMC	Read and reviewed Larry Schoolcraft Deposition	2.750
4108	4107.0	02/09/15	GMC	Phone call JN re: issues that came up in Adrian's Dep and Larry's Dep and possible Motions in Limine	0.400
4109	4108.0	02/10/15	GMC	Meeting w/ JN & JF regarding global trial strategy, witnesses to be called (or not called), exhibits to use, Rule 68 offer and next steps for moving forward.	3.500
4110	4109.0	02/10/15	GMC	Email correspondence w/AS, JN re: Defendants request to adjourn trial	0.250
4111	4110.0	02/11/15	GMC	Review of deposition exhibits	3.100
4112	4111.0	02/11/15	GMC	Review of summary judgment motions and exhibits	2.500
4113	4112.0	02/11/15	GMC	Review of witness/exhibit list from JN and discuss with JF	1.300
4114	4113.0	02/11/15	GMC	Review of email from AS	0.100
4115	4114.0	02/12/15	GMC	Review of deposition exhibits	4.400
4116	4115.0	02/12/15	GMC	Review of NOA for Howard Scheiner	0.100
4117	4116.0	02/13/15	GMC	Review of all evidence we have and what we are missing, drafted a list for JN to discuss, prepared items to put in binder, organized critical evidence for trial prep	5.250
4118	4117.0	02/13/15	GMC	Meeting w/JN to discuss which witnesses I would be responsible for at trial	1.300
4119	4118.0	02/13/15	GMC	Review of letter by Ryan Shaffer requesting more time for reply and 2 week adjournment of trial	0.100
4120	4119.0	02/13/15	GMC	Review of order setting trial date to April 20, 2015	0.100
4121	4120.0	02/15/15	GMC	Review of deposition exhibits	4.800
4122	4121.0	02/16/15	GMC	Review of summary judgment motions and exhibits	3.100
4123	4122.0	02/17/15	GMC	Review of deposition exhibits	3.750
4124	4123.0	02/17/15	GMC	Listened and took notes of PAA Boston IAB interviews and reviewed Scott interview memos	1.600
4125	4124.0	02/18/15	GMC	Began cross examination draft of PAA Boston	2.300
4126	4125.0	02/18/15	GMC	Read, reviewed and took notes of PAA Boston deposition	2.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4127	4126.0	02/18/15	GMC	Phone call JN regarding meeting for Friday, important testimony from PAA Boston and issues to cover in the plaintiffs direct (re: downgrading and MIL regarding Johnstown Social Services	0.600
4128	4127.0	02/19/15	GMC	Drafted Boston Cross outline	2.300
4129	4128.0	02/19/15	GMC	Reviewed Mauriello's motion for SMJ and opposition to plaintiff's motion for SMJ	1.400
4130	4129.0	02/19/15	GMC	Retrieved a portion of AS deposition for JN	1.250
4131	4130.0	02/19/15	GMC	Phone call JN regarding best and worst PTS from Huffman, Adrian's handling of downgrading issue at his deposition, fit for duty reports, and general issues that might come up at tomorrows meeting	0.500
4132	4131.0	02/19/15	GMC	Emailed JN summary of deposition section and noted it for prep of AS at trial	0.300
4133	4132.0	02/20/15	GMC	Meeting w/ TEAM to discuss trial strategy, division of Labor, motions	3.500
4134	4133.0	02/20/15	GMC	Drafted Boston cross outline	1.500
4135	4134.0	02/20/15	GMC	Meeting w/ JN and JF before meeting with Nat Smith to discuss how we are going to proceed at meeting	1.000
4136	4135.0	02/20/15	GMC	Phone call JN regarding summary of todays meeting	0.200
4137	4136.0	02/20/15	GMC	Review of letter AS wishes to send to Zachary Carter re indemnification from Mauriello claim	0.100
4138	4137.0	02/23/15	GMC	Read, reviewed and took notes on Huffman deposition	3.000
4139	4138.0	02/23/15	GMC	Follow-up email with NS re: meeting	0.250
4140	4139.0	02/24/15	GMC	Drafted Huffman cross examination outline	3.400
4141	4140.0	02/24/15	GMC	Review of John Eterno Deposition	1.900
4142	4141.0	02/24/15	GMC	Listened and isolated points of 10/31 day tour recording from cross outline	1.250
4143	4142.0	02/24/15	GMC	Listened to Huffman IAB interviews and reviewed Scott memo re same	1.100
4144	4143.0	02/24/15	GMC	Discussion with JF re: Huffman cross	0.750
4145	4144.0	02/24/15	GMC	Email correspondence w/NS re confidentiality	0.250
4146	4145.0	02/24/15	GMC	Review of email from JN to NS re missing docs needed for crosses	0.250
4147	4146.0	02/25/15	GMC	Drafted Huffman cross examination outline	3.400
4148	4147.0	02/25/15	GMC	Drafted Valenti examination outline	2.400
4149	4148.0	02/25/15	GMC	Review of Valenti deposition	1.500
4150	4149.0	02/25/15	GMC	Review of patrol guide procedures re sick leave and AWOL	0.900
4151	4150.0	02/25/15	GMC	Review of email from AS re timeline	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4152	4151.0	02/25/15	GMC	Email correspondence re: major points to hit with Valenti	0.300
4153	4152.0	02/26/15	GMC	Drafted Valenti examination	3.400
4154	4153.0	02/26/15	GMC	Review of all recordings inventory and identifying recordings that are missing	1.800
4155	4154.0	02/26/15	GMC	Meeting w/JN and JF re: outstanding items we need from trial from NS	1.100
4156	4155.0	02/26/15	GMC	Discussion with JF re: Valenti exmanination	0.500
4157	4156.0	02/26/15	GMC	Email w/NS team re: missing recordings	0.400
4158	4157.0	02/26/15	GMC	Phone call with JN regarding plaintiff's conversation with Huffman, recording of same and making transcripts of other recordings.	0.400
4159	4158.0	02/26/15	GMC	Phone call w/JN and Merry Soeto re: IAB and DAO recording	0.300
4160	4159.0	02/26/15	GMC	Email correspondence w/NS and JN re: IAB recorded interviews	0.250
4161	4160.0	02/27/15	GMC	Review of deposition summaries by NS team	3.800
4162	4161.0	02/27/15	GMC	Email and phone correspondence w/Veritext re: transcribing IAB recordings	1.250
4163	4162.0	02/27/15	GMC	Email correspondence with NS and JN re: dep summaries, index of all exhibits, potential trial exhibits	0.400
4164	4163.0	02/27/15	GMC	Emailed confidentiality stip to Veritext for transcribers to sign	0.250
4165	4164.0	03/02/15	GMC	Review of deposition summaries by NS team	1.400
4166	4165.0	03/03/15	GMC	Review and revise Huffman cross examination outline	1.800
4167	4166.0	03/03/15	GMC	Phone call JN regarding IAB tapes, strategy for plaintiff direct and for use of home invasion audio in opening	0.500
4168	4167.0	03/04/15	GMC	Review and revise Huffman cross examination outline	2.300
4169	4168.0	03/04/15	GMC	Phone call with JN regarding Huffman cross-x points, and using Valenti deposition testimony to refute same and reassigning Sgt. James cross and obtaining a draft of direct for plaintiff from NS	0.500
4170	4169.0	03/04/15	GMC	Phone and email call w/JN re: witness list	0.300
4171	4170.0	03/04/15	GMC	E-mail exchange JN regarding Velez PBA transcript, copy of same	0.100
4172	4171.0	03/04/15	GMC	E-mail exchange with JN regarding identity of other IAB investigator	0.100
4173	4172.0	03/04/15	GMC	E-mail from JN with revised witness list	0.100
4174	4173.0	03/05/15	GMC	Received and reviewed (for accuracy) transcribed IAB recordings from Veritext	2.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4175	4174.0	03/06/15	GMC	Review of defendants Reply memorandums for SMJ	2.250
4176	4175.0	03/06/15	GMC	Discussion w/JN & JF re proposed witnesses	0.600
4177	4176.0	03/06/15	GMC	Review of AS proposed witness list	0.300
4178	4177.0	03/09/15	GMC	Review of plaintiff's consolidated 56.1	1.000
4179	4178.0	03/09/15	GMC	Review of Marino deposition	0.800
4180	4179.0	03/09/15	GMC	Phone call w/NS re consolidated 56.1	0.400
4181	4180.0	03/09/15	GMC	Phone call w. JN regarding E-mails sent to Smith and setting up meeting with him and his trial team	0.300
4182	4181.0	03/09/15	GMC	Review of Lamstein depostion errata sheet	0.300
4183	4182.0	03/10/15	GMC	Began drafting AS direct examination	4.800
4184	4183.0	03/10/15	GMC	Discussion with JF to help outline AS direct examination	1.500
4185	4184.0	03/10/15	GMC	Email and phone correspondence w/NS team re Schoolcraft recordings of 10/31	0.600
4186	4185.0	03/11/15	GMC	Draft AS direct examination, review deps, audios	5.500
4187	4186.0	03/11/15	GMC	Email w/NS and JN re: exhibits and meeting	0.100
4188	4187.0	03/12/15	GMC	Meeting w/ JF, JN, NS, and Jon L re trial, motions	2.400
4189	4188.0	03/12/15	GMC	Draft AS direct examination, review deps, audios	2.250
4190	4189.0	03/12/15	GMC	Email from AS re: witness list	0.100
4191	4190.0	03/13/15	GMC	Draft AS direct examination, review deps, audios	4.300
4192	4191.0	03/13/15	GMC	Review of proposed jury instructions drafted by NS team	0.400
4193	4192.0	03/13/15	GMC	Review of email from JN re:	0.250
4194	4193.0	03/16/15	GMC	Draft AS direct examination, spoke to AS on phone, developed ideas re points to cover	3.400
4195	4194.0	03/16/15	GMC	Review of production index and evidence to assess documents still missing and needed for review and incorporation into examinations	1.400
4196	4195.0	03/16/15	GMC	Discussion with JF re: AS direct examination and points to cover, strategy	1.300
4197	4196.0	03/16/15	GMC	Drafted and sent email to NS team re: missing documents	0.300
4198	4197.0	03/17/15	GMC	Draft AS direct examination, reviewed docs, memos, recordings	6.250
4199	4198.0	03/17/15	GMC	Review of interview memo of Stretmoyers	0.300
4200	4199.0	03/18/15	GMC	Began Draft James cross examination, reviewed docs, memos, hospital records	5.400
4201	4200.0	03/18/15	GMC	Drafted and emailed subpoenas of City defendants to NS	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4202	4201.0	03/18/15	GMC	Email w/JN re Schoolcraft direct	0.250
4203	4202.0	03/18/15	GMC	Review of NS striking Lamstein report	0.250
4204	4203.0	03/19/15	GMC	Draft James cross examination, reviewed docs, memos, hospital records	3.900
4205	4204.0	03/19/15	GMC	Discussion with JF re: James cross examinaiton	0.750
4206	4205.0	03/19/15	GMC	Review of NS verdict sheet	0.250
4207	4206.0	03/20/15	GMC	Began Draft Sawyer cross examination, reviewed docs, memos, hospital records, audio	4.800
4208	4207.0	03/20/15	GMC	Email re Kretz finding Schoolcraft	0.250
4209	4208.0	03/22/15	GMC	Review of NS letter re Lamstein and emailed comments	0.400
4210	4209.0	03/23/15	GMC	Draft Sawyer cross examination, reviewed docs, memos, hospital records, audio	2.750
4211	4210.0	03/23/15	GMC	Discussion with JF re: Sawyer points for cross examination	0.600
4212	4211.0	03/23/15	GMC	Various email correspondence w/NS re: verdict sheet, Lamstein letter and exhibit list/chart	0.500
4213	4212.0	03/23/15	GMC	Meeting with JN regarding important points of Sgt/ James and Sgt. Sawyer's testimony	0.400
4214	4213.0	03/23/15	GMC	Phone call w/JN re: James call to Lauterborn	0.400
4215	4214.0	03/23/15	GMC	Phone correspondence w/ JN re: AS discussion of Home Invasion	0.300
4216	4215.0	03/23/15	GMC	Email correspondence re: Schoolcraft short film	0.250
4217	4216.0	03/23/15	GMC	Email to NS team re: PO Miller IAB tape	0.250
4218	4217.0	03/23/15	GMC	Locate and send AS deposition testimony to help with JN crosses	0.250
4219	4218.0	03/23/15	GMC	Review of Kretz supplemental interrogatories re Schoolcraft movie	0.250
4220	4219.0	03/23/15	GMC	Email from JN w/portion of Lauterborn cross re James	0.100
4221	4220.0	03/23/15	GMC	Email to NS re: Sawyer memo book	0.100
4222	4221.0	03/24/15	GMC	Updated Huffman cross examination w/roll call recordings, QAD findings	1.750
4223	4222.0	03/24/15	GMC	Meeting w/JN discussing role of Sadowsky, Miller and Sawyer; Also, QAD Huffman interview and relation to Mauriello and general trial strategy	0.600
4224	4223.0	03/24/15	GMC	Email and phone correspondence w/JN re: Huffman QAD connection	0.300
4225	4224.0	03/25/15	GMC	Drafted email to NS team re: locating points of AS Audio recordings	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4226	4225.0	03/25/15	GMC	Email correspondence w/JN and NS regarding regular meetings	0.250
4227	4226.0	03/26/15	GMC	Updated AS direct examination	3.250
4228	4227.0	03/26/15	GMC	Review of AS medical records from JHMC, Sure, Luell, Forrest Hills	2.300
4229	4228.0	03/26/15	GMC	Email correspondence w/AS re Kretz Jetter	0.100
4230	4229.0	03/26/15	GMC	Email from JN re: medical records	0.100
4231	4230.0	03/26/15	GMC	Review of Kretz letter re film	0.100
4232	4231.0	03/27/15	GMC	Phone call with NS, JL and JN regarding multiple issues related to prepping for trial, including exhibits, experts, jury charges, voir dire, speaking to landlord, prepping client and comp stat clips	1.900
4233	4232.0	03/27/15	GMC	Phone conference with JN, NS, JF, John Lenoir ("JL")	1.000
4234	4233.0	03/27/15	GMC	Review of documents produced by Graham Raymond	0.500
4235	4234.0	03/27/15	GMC	Various email correspondence JN and NS re: Meeting missing IAB Lauterborn recording	0.400
4236	4235.0	03/27/15	GMC	Review of Sgt. Chu and Scott memo	0.300
4237	4236.0	03/27/15	GMC	Review of emails w/City re subpoenas	0.250
4238	4237.0	03/27/15	GMC	Email correspondence w/Merry Soetano re: AS audio clips	0.100
4239	4238.0	03/27/15	GMC	Phone call JN regarding preparing for conference call with NS today and using Veritext software	0.100
4240	4239.0	03/28/15	GMC	Emailed JN and NS rough draft of AS direct	0.100
4241	4240.0	03/29/15	GMC	Review of AS email, timeline, records	0.400
4242	4241.0	03/30/15	GMC	Began Draft Broschart cross examination, reviewed docs, memos, audio	4.500
4243	4242.0	03/30/15	GMC	Phone call JN & JF regarding admissibility of tape recorded statements of persons interviewed by IAB	0.300
4244	4243.0	03/30/15	GMC	Phone call w/JN re: Citys request to adjourn	0.300
4245	4244.0	03/30/15	GMC	Review of AS letter requesting conference	0.250
4246	4245.0	03/30/15	GMC	Email from JN w/IAB report	0.100
4247	4246.0	03/31/15	GMC	Draft Broschart cross examination, reviewed docs, memos, audio	3.500
4248	4247.0	03/31/15	GMC	Email correspondence w/NS and JN re trial witnesses and exhibits	0.250
4249	4248.0	04/01/15	GMC	Reviewed and revised Broschart cross examination	3.900

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4250	4249.0	04/01/15	GMC	Phone Call with JN regarding important points from Valenti and Broschart and additional grounds for impeaching Huffman and difference between Administrative leave and lost time	0.500
4251	4250.0	04/01/15	GMC	Email re: meeting w/JN, and NS team	0.100
4252	4251.0	04/02/15	GMC	Meeting with JN and NS team	1.900
4253	4252.0	04/02/15	GMC	Drafted and sent follow up emails w/NS team and JN after meeting re: exhibits	0.500
4254	4253.0	04/02/15	GMC	Review of SK jury instructions along with email re: same	0.300
4255	4254.0	04/02/15	GMC	Email and phone correspondence with veritext re: Lauterborn audio	0.250
4256	4255.0	04/02/15	GMC	Phone call w/NS re IAB transcripts	0.250
4257	4256.0	04/02/15	GMC	Phone call with JN regarding Lauterborn's second PG in September 2010 and getting recordings of same	0.100
4258	4257.0	04/03/15	GMC	Updated revised and drafted Broschart cross examination outline	5.500
4259	4258.0	04/03/15	GMC	Phone call JN regarding important point from Broschart testimony and defendants' of obsession to suspend and real reason for entering apartment (illegal search and destroy evidence)	0.300
4260	4259.0	04/03/15	GMC	Review of revised Scott Korenbaum ("SK") jury instructions along with email re: same	0.250
4261	4260.0	04/03/15	GMC	Review email from JN including AS performance report	0.100
4262	4261.0	04/04/15	GMC	Email from NS re: revised exhibit list	0.250
4263	4262.0	04/04/15	GMC	Review of revised verdict sheet from NS	0.100
4264	4263.0	04/05/15	GMC	Email correspondence w/JN and NS re revised exhibit list	0.250
4265	4264.0	04/05/15	GMC	Review email from JN including AS W2s	0.100
4266	4265.0	04/06/15	GMC	Review and revised JF MIL	1.250
4267	4266.0	04/06/15	GMC	Phone call with NS & JN regarding exhibit list, verdict sheet, important points for opening regarding Bernier and Isakov and failure of med departments to speak with IAB	1.000
4268	4267.0	04/06/15	GMC	Phone call w/JN and NS re: trial exhibits	0.500
4269	4268.0	04/06/15	GMC	Review of audio clips from NS	0.400
4270	4269.0	04/06/15	GMC	Review of revised SK jury instructions along with email re: same	0.250
4271	4270.0	04/06/15	GMC	Email from NS re Audio clips	0.100
4272	4271.0	04/06/15	GMC	Review of City letter request for extension	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4273	4272.0	04/06/15	GMC	Review of email correspondence re Alan Scheiner ("AS") request for adjournment	0.100
4274	4273.0	04/07/15	GMC	Began Draft Duncan cross examination, reviewed docs, memos, audio	3.500
4275	4274.0	04/07/15	GMC	Review of revised JF MIL	0.500
4276	4275.0	04/07/15	GMC	Review and discuss NS letter to court re: delay of trial and announcing our rehiring w/JN	0.300
4277	4276.0	04/07/15	GMC	Review of Jury Instructions from Magdalena Bauza ("MB")	0.300
4278	4277.0	04/07/15	GMC	Phone call JN & NS regarding best strategy for handling City's request for adjournment	0.200
4279	4278.0	04/07/15	GMC	Phone call with JN regarding City's application for adjournment	0.100
4280	4279.0	04/07/15	GMC	Review of SK comments on JF MIL draft	0.100
4281	4280.0	04/08/15	GMC	Draft Duncan cross examination, reviewed docs, memos, audio	3.800
4282	4281.0	04/08/15	GMC	Phone call with JN and JF regarding trial adjournment, proposed filings, various strategies for trying to make sure trial goes on April 20	0.750
4283	4282.0	04/08/15	GMC	Email and phone correspondence re: pushing trial back a week to avoid delay of trial post summer	0.600
4284	4283.0	04/08/15	GMC	Final review of MIL	0.300
4285	4284.0	04/08/15	GMC	Phone call JN regarding points from Duncan deposition regarding ESU, meat cleaver and travelling to Johnstown	0.200
4286	4285.0	04/08/15	GMC	Phone call NS and JN re writing a supplemental letter to Court regarding trial date issues	0.200
4287	4286.0	04/09/15	GMC	Draft Duncan cross examination, reviewed docs, memos, audio	4.100
4288	4287.0	04/09/15	GMC	Emailed JN a portion of Duncan cross	0.100
4289	4288.0	04/09/15	GMC	Emailed NS for BNIU exhibits for inclusion on JPTO	0.100
4290	4289.0	04/11/15	GMC	Email correspondence w/JN and NS re: trial date and schedule	0.250
4291	4290.0	04/11/15	GMC	Email w/NS re Home Invasion Transcript	0.100
4292	4291.0	04/13/15	GMC	Update and revise Duncan cross examination,	2.100
4293	4292.0	04/13/15	GMC	Conf. on trial date- case adjourned	1.000
4294	4293.0	04/13/15	GMC	Meeting w/JN and JF re new trial date	0.500
4295	4294.0	04/13/15	GMC	Email w/veritext re: changes to Home Invasion transcript	0.250
4296	4295.0	04/13/15	GMC	Travel from SDNY for conference re: trial date (.5)	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4297	4296.0	04/13/15	GMC	Travel to SDNY for conference re: trial date (.5)	0.250
4298	4297.0	04/13/15	GMC	Email correspondence w/RS and NS re: Lauterborn interview	0.100
4299	4298.0	04/14/15	GMC	Email correspondence with SK re: Jury instructions	0.100
4300	4299.0	04/15/15	GMC	Reviewed and revised Boston outline for deposition read ins	2.250
4301	4300.0	04/15/15	GMC	Review of newly produced Lamstein notes	0.250
4302	4301.0	04/15/15	GMC	Emailed w/JN and NS re mediation offer from the City	0.100
4303	4302.0	04/15/15	GMC	Phone call w/JN re Boston unavailability	0.100
4304	4303.0	04/15/15	GMC	Review of correspondence re: PAA Boston	0.100
4305	4304.0	04/17/15	GMC	Phone call w/ rest of trial team regarding City' proposal for mediation and best strategy for responding	0.600
4306	4305.0	04/17/15	GMC	Conference call with team re: best strategy for responding to City latest "offer"	0.500
4307	4306.0	04/17/15	GMC	Phone call with JN & JF following up on phone call and discussing settlement position vs. going to trial	0.400
4308	4307.0	04/17/15	GMC	Email from RS re Lauterborn audios	0.100
4309	4308.0	04/21/15	GMC	Review of letter from City requesting more time for MIL	0.250
4310	4309.0	04/27/15	GMC	Email correspondence with City re: Lauterborn Audio	0.250
4311	4310.0	04/29/15	GMC	Email with NS re trial issues and AS	0.250
4312	4311.0	05/05/15	GMC	Read and review Ct's Opinion on SJ	1.400
4313	4312.0	05/05/15	GMC	Discussion w/JN and JF re SMJ	0.500
4314	4313.0	05/05/15	GMC	Email w/JN re SMJ opinion	0.100
4315	4314.0	05/08/15	GMC	Discussion w/ JF & JN re decision and impact on trial and motion in lim	0.800
4316	4315.0	05/12/15	GMC	Meeting w/NS team JN and JF pre-conf	1.500
4317	4316.0	05/12/15	GMC	Team meeting following conf.	1.250
4318	4317.0	05/12/15	GMC	Conf. trial adjourned to Oct. 19	1.000
4319	4318.0	05/12/15	GMC	Travel from SDNY for conf. (.5)	0.250
4320	4319.0	05/12/15	GMC	Travel to SDNY for conf. (.5)	0.250
4321	4320.0	05/13/15	GMC	Email correspondence w/SK re conference	0.100
4322	4321.0	05/14/15	GMC	Email correspondence all parties re: pretrial submissions schedule	0.100
4323	4322.0	05/15/15	GMC	Email correspondence all parties re: pretrial submissions schedule	0.100
4324	4323.0	05/18/15	GMC	Review of letter motion titled by City re JPTO dates	0.100
4325	4324.0	05/21/15	GMC	Email NS resettlement offer from City	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4326	4325.0	05/28/15	GMC	Email JN re Veritext bill	0.100
4327	4326.0	05/29/15	GMC	Email w/JN and NS re: City bifurcation request	0.250
4328	4327.0	05/29/15	GMC	Email correspondence all parties re: pretrial submissions schedule	0.100
4329	4328.0	06/01/15	GMC	Review and comment on NS draft reconsideration	0.400
4330	4329.0	06/02/15	GMC	Review of citys motion to bifurcate	0.250
4331	4330.0	06/03/15	GMC	Review of email correspondence w/court re motions	0.250
4332	4331.0	06/04/15	GMC	Review of Mauriello's motion for reconsideration	0.500
4333	4332.0	06/10/15	GMC	Phone call with Schoolcrafts and JN	0.800
4334	4333.0	06/22/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.250
4335	4334.0	06/23/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.100
4336	4335.0	06/23/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.100
4337	4336.0	06/24/15	GMC	Review of email correspondcnce re: opposition to reconsideration motions	0.100
4338	4337.0	06/24/15	GMC	Review of email correspondence w SK re: motion schedules	0.100
4339	4338.0	06/29/15	GMC	Review of NS motion opposing bifurcation	0.250
4340	4339.0	07/06/15	GMC	Review of opposition motions to defendants reconsideration motions	0.750
4341	4340.0	07/06/15	GMC	Review of email correspondence between all parties	0.100
4342	4341.0	07/07/15	GMC	Review of email correspondence between NS team re Eterno	0.100
4343	4342.0	07/07/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.100
4344	4343.0	07/08/15	GMC	Review of email correspondence between all parties	0.100
4345	4344.0	07/13/15	GMC	Review of JHMC to NS motion for recon	0.300
4346	4345.0	07/15/15	GMC	Review of email correspondence between all parties	0.100
4347	4346.0	07/17/15	GMC	Review of Email correspondence between JL and NS re: John Eterno	0.250
4348	4347.0	07/20/15	GMC	Review of Email correspondence between JN and NS re: John Eterno	0.100
4349	4348.0	07/23/15	GMC	Review of reply memo for AS	0.750
4350	4349.0	07/23/15	GMC	Review of City Defendants reply affirmations recon motions	0.500
4351	4350.0	07/24/15	GMC	Schoolcraft team meeting	2.900

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4352	4351.0	07/24/15	GMC	Phone call with JN & JF regarding issues to discuss at meeting today with rest of trial team	0.500
4353	4352.0	07/24/15	GMC	Follow up email Schoolcraft team re trial docs	0.300
4354	4353.0	07/27/15	GMC	Email JN re Polanco as witness	0.100
4355	4354.0	07/27/15	GMC	Email w MS re: master exhibit list	0.100
4356	4355.0	07/28/15	GMC	Review of updated jury instructions	0.400
4357	4356.0	07/29/15	GMC	Emails with Schoolcraft team re: settlement	0.100
4358	4357.0	07/30/15	GMC	Phone call JN regarding settlement position & response to City's settlement position and response to City's settlement overtures	0.400
4359	4358.0	07/30/15	GMC	Phone call w/JN and NS re settlement	0.400
4360	4359.0	07/30/15	GMC	Emails with Schoolcraft team re: settlement	0.100
4361	4360.0	07/31/15	GMC	Emails with Schoolcraft team re: settlement	0.100
4362	4361.0	08/03/15	GMC	Review and revise Gough cross	3.300
4363	4362.0	08/03/15	GMC	Review and revise Duncan cross	2.750
4364	4363.0	08/03/15	GMC	Email w/NS re Gough deposition	0.100
4365	4364.0	08/04/15	GMC	Phone call w/JN re: witness list and exhibit list	0.400
4366	4365.0	08/04/15	GMC	Review of NS revised witness and exhibit list	0.300
4367	4366.0	08/05/15	GMC	Phone calls with JN and NS re: exhibit and witness list	1.000
4368	4367.0	08/07/15	GMC	Phone call with JN, JL & NS regarding multiple issues in defendants' respective JPTO's	1.000
4369	4368.0	08/07/15	GMC	Review of Bernier and Jsakov proposed JPTO sections	0.500
4370	4369.0	08/09/15	GMC	Review of email correspondence re: JPTO and motion deadlines	0.100
4371	4370.0	08/10/15	GMC	Review of email correspondence re: JPTO and motion deadlines	0.100
4372	4371.0	08/11/15	GMC	Draft Yeager examination - review records, listen to audio and work of transcription	2.400
4373	4372.0	08/11/15	GMC	Review of City defendants JPTO	0.750
4374	4373.0	08/11/15	GMC	Review of new discovery served by City	0.250
4375	4374.0	08/12/15	GMC	Add to and revise Yeager examination	3.400
4376	4375.0	08/12/15	GMC	Update and revise Gough examination	2.500
4377	4376.0	08/13/15	GMC	Reviewed and updated Sawyer examination	3.750
4378	4377.0	08/13/15	GMC	Update and revise James cross examination	2.900
4379	4378.0	08/13/15	GMC	Review of correspondence all parties re: JPTO	0.100
4380	4379.0	08/14/15	GMC	Review and update cross examination drafts to date and emailed all to team	4.800
4381	4380.0	08/14/15	GMC	Review of Lauterborn transcribed audio interview and emailed to team	0.600
4382	4381.0	08/14/15	GMC	Review of City's email re JPTO	0.250
4383	4382.0	08/14/15	GMC	Email re: City filing JPTO without our input	0.100
4384	4383.0	08/18/15	GMC	Phone call and email w/JN re Huffman	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4385	4384.0	08/21/15	GMC	Sent updated crosses to team	0.250
4386	4385.0	08/21/15	GMC	Email all parties re MIL due date	0.100
4387	4386.0	08/22/15	GMC	Updated AS examination and sent to team	2.900
4388	4387.0	08/24/15	GMC	Reviewed JN cross outlines and updated witness examinations	1.750
4389	4388.0	08/24/15	GMC	Drafted points to discuss w/JN	0.400
4390	4389.0	08/24/15	GMC	Review of NS email re upstate visits to AS	0.250
4391	4390.0	08/24/15	GMC	Received JN cross examinations	0.100
4392	4391.0	08/26/15	GMC	Reviewed JN cross outlines and updated my own witness examinations	3.300
4393	4392.0	08/26/15	GMC	Drafted points to discuss w/JN	0.750
4394	4393.0	08/27/15	GMC	Reviewed JN cross outlines and updated my own witness examinations	2.500
4395	4394.0	08/31/15	GMC	Review of JF MIL with additional points	0.500
4396	4395.0	09/01/15	GMC	Reviewed JN cross outlines and updated my own witness examinations	2.800
4397	4396.0	09/02/15	GMC	Drafted points to discuss w/JN	1.400
4398	4397.0	09/03/15	GMC	Review of City letter re: JPTO schedule	0.250
4399	4398.0	09/08/15	GMC	Update and revise Schoolcraft direct examination	3.400
4400	4399.0	09/08/15	GMC	Phone call with Adrian Schoolcraft re: trial	0.750
4401	4400.0	09/08/15	GMC	Phone call with JN & JF recapping discussion with defense counsel and clients over the weekend	0.600
4402	4401.0	09/08/15	GMC	Phone call with NS, JF and JN regarding best strategy for handling settlement discussions with the City	0.600
4403	4402.0	09/08/15	GMC	Phone call w/JN re Schoolcrafts	0.300
4404	4403.0	09/09/15	GMC	Review and update Valenti deposition	1.250
4405	4404.0	09/10/15	GMC	Update Huffman cross examination	2.750
4406	4405.0	09/11/15	GMC	Review of email time line from Schoolcraft	0.900
4407	4406.0	09/11/15	GMC	Phone calls with NS and JN re City settlement offer	0.800
4408	4407.0	09/11/15	GMC	Email w/JN re Schoolcraft timeline	0.100
4409	4408.0	09/15/15	GMC	Reviewed JN cross outlines and updated my own witness examinations	2.300
4410	4409.0	09/16/15	GMC	Review of NS cross examination outlines	3.600
4411	4410.0	09/16/15	GMC	Phone call w/Schoolcraft re settlement	0.800
4412	4411.0	09/16/15	GMC	Review of new Rule 68 offer	0.500
4413	4412.0	09/16/15	GMC	Review of NS memo to Schoolcraft re settlement	0.300
4414	4413.0	09/16/15	GMC	Email w NS re memo and settlement	0.250
4415	4414.0	09/16/15	GMC	Review of NS email to Schoolcraft resettlement	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4416	4415.0	02/16/13	JL	Review of case history and complaint; document preparation for presentation to DOJ	3.500
4417	4416.0	02/17/13	JL	Review of case files and and audio recordings; document preparation to formally request DOJ intervention	3.250
4418	4417.0	02/18/13	JL	Review of case timeline and document preparation for Main Justice and US Attorney presentation	4.000
4419	4418.0	02/19/13	JL	Telephone conference with EDNY Civil Rts Chief Pam Chen; document preparation.	0.750
4420	4419.0	02/20/13	JL	Prepare draft letters to DOJ--Main Justice and USAO, EDNY	1.500
4421	4420.0	02/21/13	JL	Telephone conference with Peter Gleason and client Schoolcraft in reference to case preparation for trial (DOJ letter review).	1.250
4422	4421.0	03/20/13	JL	Final Draft, review and mail of letters to Main Justice and US Attorney	1.500
4423	4422.0	04/01/13	JL	Meeting with Peter Gleason to prepare for client meeting April 7 and court appearance April 10	1.000
4424	4423.0	04/09/13	JL	Meeting with Nat Smith to prepare for Hearing April 10, 2013	2.500
4425	4424.0	04/10/13	JL	Court: Hearing re discovery before Judge Sweet - SDNY, 500 Pearl Street, NYC. Meeting w/Smith to review hearing and discovery plan.	3.250
4426	4425.0	04/11/13	JL	Meeting with R. Koshets; Nat Smith; Peter Gleason; Gilbert to review NYPD pending internal charges v. client	2.750
4427	4426.0	04/25/13	JL	Meeting with Adrian Schoolcraft and Nat Smith to prepare client for depositions; review status of case	1.250
4428	4427.0	04/26/13	JL	Meeting with Adrian Schoolcraft and Nat Smith to prepare for depositions	5.750
4429	4428.0	04/27/13	JL	Meeting with Schoolcraft and Nat Smith to prepare for depositions.	5.500
4430	4429.0	05/09/13	JL	Meeting with Nat Smith to review and prepare discovery, engage investigator and prepare depositions	3.250
4431	4430.0	05/12/13	JL	Review of audio recordings made by client; sort and prepare summaries.	4.500
4432	4431.0	05/13/13	JL	Meet investigator Helena Melisi; review case re engagement as investigator	2.750
4433	4432.0	05/16/13	JL	Telephone call with Nat Smith and Helena Melisi re: NYPD reinstatement options for AS.	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4434	4433.0	05/16/13	JL	Review of IAB reports of interviews with individual officers	2.750
4435	4434.0	05/17/13	JL	Telephone call with Nat Smith 3:30-4:15 and draft email re: strategy for NYPD departmental hearing June 17-18, 2013.	1.500
4436	4435.0	05/17/13	JL	Review of IAB interviews of individual defendants and others; prepare notes	4.250
4437	4436.0	05/18/13	JL	Review of IAB interviews; telephone call with Nat Smith and AS re: strategy for NYPD departmental hearing	3.500
4438	4437.0	05/21/13	JL	Meeting with Nat Smith and telephone call with James McCutcheon re: NYPD departmental trial strategy	2.250
4439	4438.0	06/05/13	JL	Appearance in court; Sweet, J. redpositions and discovery status; post hearing conf w/Smith	1.750
4440	4439.0	06/07/13	JL	Meeting with potential expert witnesses, Dr. Tom Litwack, Dr. Eli Silverman and Dr. John Eterno; introduction of Nat Smith to experts	2.500
4441	4440.0	06/09/13	JL	Review and edit of Memorandum and proposed Order for filing with Court	1.000
4442	4441.0	06/26/13	JL	Meeting with client and Nat Smith - Johnston New York Holiday Inn. 7 hours are travel time billed separately	5.500
4443	4442.0	07/10/13	JL	Travel for meeting with client and Nat Smith--Albany	3.500
4444	4442.0	07/10/13	JL	Meeting with client and co-counsel Smith in Albany NY. Full review of discovery and trial posture. (7 hr travel)	5.000
4445	4443.0	06/26/13	JL	Travel for meeting with client and Nat Smith - Johnston New York Holiday Inn.	3.500
4446	4445.0	08/06/13	JL	Confirm with Tom Litwack meeting re: Expert Witness participation	0.750
4447	4446.0	08/07/13	JL	Meeting with trial illustrator (11am-1pm). Meeting with potential expert witness, Dr. Tom Litwack - (3pm-5pm).	3.500
4448	4447.0	08/24/13	JL	Telephone conference with Smith re invest report on DCPI Brown	0.500
4449	4448.0	08/27/13	JL	Client meeting at, Saugerties, NY. with Nat Smith; Review case status and strategy with client. [7 hr travel]	5.500
4450	4449.0	08/27/13	JL	Travel from NYC to Saugerties and return for client meeting	3.500
4451	4450.0	09/04/13	JL	Prepare biweekly status report for client;; review motion status and prepare case report.	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4452	4451.0	09/10/13	JL	Review of documents in preparation for client's examination before trial	4.500
4453	4452.0	09/13/13	JL	Prepare status report for client	0.500
4454	4453.0	09/25/13	JL	Prepare for hearing on discovery (1.0); Oral Argument re: discovery - USDC SDNY Sweet, J (.75).; consultation with client and Smith in preparation for depositions (4.75)	6.500
4455	4454.0	09/26/13	JL	Representation of client along with co-counsel Smith in examination before trial by defendant Mauriello and NYC - Walter Kretz law office 444 Madison Avenue, NY.	9.000
4456	4455.0	09/27/13	JL	Co-counsel with Smith in representation of client at deposition of client by defendant Mauriello and Jamaica Hospital defendants - Callan, Koster, Brady & Brennan, LLP - One Whitehall Street, 10th Floor New York, NY 10004.	9.000
4457	4456.0	09/30/13	JL	Review of Mauriello examination before trial notes.	0.750
4458	4457.0	10/04/13	JL	Preparing docs and audio recordings for Marino deposition; Tel Conf with Smith	2.750
4459	4458.0	10/07/13	JL	Meeting with client and Smith re depositions of Mauriello and Marino	3.500
4460	4459.0	10/08/13	JL	co-counsel w/Smith in deposition of Marino; post depo confer /Smith and client	9.000
4461	4460.0	10/09/13	JL	Telephone conference with Smith and client re case status after Marino depo	0.500
4462	4461.0	10/10/13	JL	Telephone conference with Smith re depositions	0.500
4463	4462.0	10/13/13	JL	Telephone conference with Smith and NYACLU re assistance in case	0.750
4464	4463.0	10/14/13	JL	Telephone conference with Smith re status of case and share of responsibilities	0.750
4465	4464.0	10/16/13	JL	co-counsel at deposition Dfnt Bernier - 111 Broadway- by H. Suckle	1.750
4466	4465.0	10/16/13	JL	Prepare deposition of defendant Lauterborn (1.25). Hearing re: Discovery and Defendant Mauriello counterclaim - USDC, SDNY, Judge Sweet (.75). Review of hearing results (.50); prepare report for client (2.75)	5.250
4467	4466.0	10/23/13	JL	Telephone conference with Smith re PD expert report and testimony; Tel Conf w/Eterno	1.500
4468	4467.0	10/25/13	JL	Appearance in court re attorney video of deposition- Bernier	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4469	4468.0	11/01/13	JL	Review docs and audio for Lauterborn deposition	2.750
4470	4469.0	11/07/13	JL	Prepare and take w/Smith examination before trial of defendant Lauterborn. Review documents and audio recordings; prepare exhibits.	9.500
4471	4470.0	11/13/13	JL	Motion hearing at Judge Sweet Courtroom; review of hearing outcome w/co-counsel; draft report to client.	3.750
4472	4471.0	11/14/13	JL	Review of hospital and NYPD files and audio recordings in preparation for examination before trial of Bernier and Mauriello.	5.500
4473	4472.0	11/17/13	JL	Review of client Schoolcraft examination before trial.	2.250
4474	4473.0	11/18/13	JL	Consultation with non-party witnesses, audio recordings of IAB interviews and document review.	2.500
4475	4474.0	11/21/13	JL	Review and produce Marino and Lauterborn video depositions; reconcile Plaintiff depositions transcript with video.	2.750
4476	4475.0	11/22/13	JL	Mauriello terminated examination before trial preparation; review of Court's decision and additional City discovery documents provided.	2.750
4477	4476.0	11/24/13	JL	Review of Plaintiff's depositions (1.00); review defendant Mauriello and Lauterborn depositions and produce videos (2.25); prepare status report (.75).	4.000
4478	4477.0	11/26/13	JL	Review of depositions; prepare challenge to City Defendant obstructions; prepare for Lt. Caughey examination before trial.	5.500
4479	4478.0	11/27/13	JL	Review of examination before trial transcripts with video; prepare for Defendant Caughey examination.	2.750
4480	4479.0	11/29/13	JL	Review of Marino and Lauterborn depositions re response City's Refusal to Allow Witness to Respond and otherwise interferes with the examination before trial.	2.000
4481	4480.0	11/30/13	JL	Review of dfnt Marino and Lauterborn examination before trial research for motion to compel and additional requests for production.	2.500
4482	4481.0	12/01/13	JL	Review of Marino and Lauterborn examinations before trial to identify areas for motion to compell and additional requests for production.	1.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4483	4482.0	12/02/13	JL	Telephone conference with Smith and client re case status of depositions	1.500
4484	4483.0	12/07/13	JL	Telephone conference with Smith re Mauriello counterclaim	0.500
4485	4484.0	12/09/13	JL	Prepare and 2d seat with Smith examination before trial for dfnt Caughey; meeting with Peter Kelley re potential assistance in trial prep.	7.750
4486	4485.0	12/11/13	JL	Represent client (w/Bauza) at depo of Larry Schoolcraft--Albany [8:30 travel time]	6.500
4487	4486.0	12/11/13	JL	Amtrak NYC - Albany - NYC for Larry Schoolcraft deposition (w/Bauza)	4.250
4488	4487.0	12/18/13	JL	Prepare for defendant Mauriello examination before trial; review of motion for reconsideration.	3.250
4489	4488.0	12/19/13	JL	Prepare for Mauriello examination before trial.	2.750
4490	4489.0	12/20/13	JL	Represent client with Smith at Mauriello examination before trial at Scoppetta Seiff Kretz & Abercrombie.	9.500
4491	4490.0	12/24/13	JL	Telephone conference with Smith and client re case status and possible settlement range	0.750
4492	4491.0	12/26/13	JL	Meeting with Smith, Bauza and client to review Mauriello EBT; review settlement parameters	2.000
4493	4492.0	12/29/13	JL	Meeting with client, Smith and Bauza re status and go-forward; review audio recordings	2.500
4494	4493.0	12/30/13	JL	Confer with John Curran re Stroz Friedberg analysis of recording device and audio enhancement	1.250
4495	4494.0	01/02/14	JL	Telephone conference with Smith re status and schedule of depositions	0.750
4496	4495.0	01/03/14	JL	Preparing docs and audio for Sgt Huffman and PAA Boston depositions	2.500
4497	4496.0	01/06/14	JL	co-counsel w/Smith depositions of Huffman and Boston; post EBT review w/Smith and Bauza	9.500
4498	4497.0	01/10/14	JL	Prepare case files and review audio records for future depositions	2.000
4499	4498.0	01/12/14	JL	Prepare for Hanlon deposition; review docs and audio files	1.750
4500	4499.0	01/13/14	JL	co-counsel w/Smith at Hanlon deposition	8.500
4501	4500.0	01/15/14	JL	Appearance in court, Sweet, J. re discovery; confer with Smith and Bauza re status	1.500
4502	4501.0	01/29/14	JL	Preparing for Lamstein deposition	2.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4503	4502.0	01/30/14	JL	conduct as co-counsel w/Smith Lamstein deposition	8.500
4504	4503.0	02/03/14	JL	Telephone conference with Smith re deposition schedules	0.500
4505	4504.0	02/04/14	JL	Prepare and review discovery demands.	1.500
4506	4505.0	02/05/14	JL	Conference with Smith re: discovery demands.	1.750
4507	4506.0	02/06/14	JL	Conference call with client re: discovery.	1.000
4508	4507.0	02/10/14	JL	Preparing depositions of Bernier and Isakov; review NYS 9.39	2.500
4509	4508.0	02/11/14	JL	Deposition of defendant Dr. Bernier.111 B'Way--co-counsel with Smith and Suckel	8.500
4510	4509.0	02/12/14	JL	co-counsel with Smith and Suckle at deposition of Defendant Dr. Isakov.	7.500
4511	4510.0	02/13/14	JL	Review with Smith notes and exhibits of depositions of Bernier and Isakov.	1.000
4512	4511.0	02/16/14	JL	Telephone conference with client and Smith re case status and way ahead	1.250
4513	4512.0	02/18/14	JL	Review of discovery demands with counsel and client.	1.500
4514	4513.0	02/19/14	JL	Review of correspondence re: discovery demands. tel conf client and Smith re discovery	1.750
4515	4514.0	02/23/14	JL	Telephone conference. Smith re depositions	0.750
4516	4515.0	02/24/14	JL	Review file to prepare examination before trial material for Gough.	1.500
4517	4516.0	02/25/14	JL	Prepare examination before trial materials for Weiss.	0.750
4518	4517.0	02/26/14	JL	Prepare examination before trial materials for Duncan.	0.500
4519	4518.0	02/27/14	JL	Prepare examination before trial Marquez.	0.500
4520	4519.0	02/27/14	JL	Prepare for Sangianetti.	0.500
4521	4520.0	02/28/14	JL	Prepare examination before trial docs for Sergeant James.	0.750
4522	4521.0	03/03/14	JL	Prepare examination before trial materials for Broschart.	0.750
4523	4522.0	03/04/14	JL	Counsel conference call. Smith re status and strategy. Needs for trial preparation.	1.500
4524	4523.0	03/05/14	JL	Review discovery and depositions; update case status report for client	1.250
4525	4524.0	03/05/14	JL	Prepare examination before trial materials for Timothy Trainor.	0.500
4526	4525.0	03/07/14	JL	Draft, review and edit correspondence re: discovery.	1.250
4527	4526.0	03/07/14	JL	Research re: NYS CPL 190.25(4).	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4528	4527.0	03/09/14	JL	Review research re: response to City Defendants non-production.	1.000
4529	4528.0	03/10/14	JL	Schoolcraft research for response to discovery and deposition issues and hearing.	3.500
4530	4529.0	03/11/14	JL	Schoolcraft research and draft letter to court re: discovery and deposition issues (4.00); confer w/co-counsel (1.00)	5.000
4531	4530.0	03/12/14	JL	Schoolcraft preparation for Hearing re: discovery.	2.500
4532	4531.0	03/13/14	JL	Hearing and conference. SDNY Sweet, J., re discovery status	0.750
4533	4532.0	03/13/14	JL	Schoolcraft preparation fr Hearing re: discovery.	2.500
4534	4533.0	03/14/14	JL	Review scheduling for examination before trial.	0.750
4535	4534.0	03/16/14	JL	Update case status report; Prep plaintiff demands in discovery and re-schedule depositions.	2.000
4536	4535.0	03/17/14	JL	Review schedule of examination before trial w Smith and opposing counsel.	1.500
4537	4536.0	03/18/14	JL	Review and consultation with Mauriello counsel re: scheduling of inspection in Johnstown, New York; related discovery review and research.	1.250
4538	4537.0	03/19/14	JL	Review City Defendants production requests; research and prepare response and plaintiff production demands. Tel conf with client.	4.500
4539	4538.0	03/21/14	JL	Review City Defendants' correspondence re: discovery demands.	0.750
4540	4539.0	03/24/14	JL	Prepare deposition schedules in consult with Smith and defendants counsel. Review discovery and prep motion draft.	3.750
4541	4540.0	03/25/14	JL	Review City Defendants' supplemental discovery demands.	0.750
4542	4541.0	03/26/14	JL	Appearance in court for hearing re discovery status and issues (.75); prep plaintiff discovery production (2.75).	3.500
4543	4542.0	03/27/14	JL	Prepare, review, and edit correspondence re 30(b)(6) examination before trial.	1.500
4544	4543.0	03/28/14	JL	Finalize Plaintiff 30(b)(6) notices. Prepare examination of City 30(b)(6) witnesses	3.250
4545	4544.0	03/30/14	JL	Review jury instructions with Magdalena.	1.000
4546	4545.0	03/31/14	JL	Consultation re: settlement context strategy and demands. (Smith and client)	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4547	4546.0	04/01/14	JL	Prepare trial memorandum/ telephone call to City re: settlement/ and prepare for Trainor and Gough examination before trial.	2.750
4548	4547.0	04/02/14	JL	Prepare draft trial memorandum.	1.500
4549	4548.0	04/03/14	JL	Review terms and strategy re: settlement negotiations. Smith and client.	1.500
4550	4549.0	04/04/14	JL	Review correspondence to Court re: referral to Magistrate; consult re: settlement strategy.	1.000
4551	4550.0	04/07/14	JL	Review filings (ECF posts) and correspondence.	1.500
4552	4551.0	04/09/14	JL	Review settlement strategy with client; Hearing .	2.250
4553	4552.0	04/10/14	JL	Prepare/conduct w co-counsel Smith examination before trial of Trainor.	8.250
4554	4553.0	04/11/14	JL	Prepare/conduct as co-counsel w/ Smith examination before trial of Gough.	7.500
4555	4554.0	04/13/14	JL	Meet possible Psychiatric expert Dr. Lubit; review case and discuss Dr. Lubit's participation.	2.750
4556	4555.0	04/14/14	JL	Telephone conference with client, Smith and MJ Freeman re: settlement demands and discovery issues.	1.500
4557	4556.0	04/15/14	JL	Review ECF filing by JHC defendant.	0.500
4558	4557.0	04/16/14	JL	Meeting with Smith (1.25); research on jury verdicts/awards (2.25); telephone conference with client to discuss settlement and trial issues (1.00).	4.500
4559	4558.0	04/17/14	JL	Schoolcraft settlement research (1.00); consultation with Smith (2.00); telephone conf with Schoolcraft re: settlement issues (1.25).	3.250
4560	4559.0	04/18/14	JL	Research on detention verdicts (.75), discussion and planning re: settlement (1.00); telephone call with defense counsel (.50). Tel conf with client and Smith (.75)	3.000
4561	4560.0	04/25/14	JL	Prepare/conduct w/Smith examination before trial for Sawyer.	6.250
4562	4561.0	04/26/14	JL	Telephone conference with client and Smith re: settlement.	1.000
4563	4562.0	04/27/14	JL	Telephone conference with client re: settlement and trial strategy re: medical defendants and PTS.	1.500
4564	4563.0	04/28/14	JL	Prepare/conduct w/Smith examination before trial: Duncan.	7.500
4565	4564.0	04/29/14	JL	Schoolcraft meeting (client and Smith) re: settlement strategy and discovery schedule.	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4566	4565.0	04/30/14	JL	Schoolcraft hearing with Judge Sweet re: discovery (.75); post hearing consultation with Smith and Henry Steinglass re: trial strategy (2.75).	3.500
4567	4566.0	05/01/14	JL	Conference with Smith re: prior counsel fees/expenses; brief client on settlement issues; research re: use/abuse of psychiatry for political intimidation and retaliation.	1.750
4568	4567.0	05/02/14	JL	Review and conf (all counsel) with re: deposition schedules; review case law re: settlement (range of awards of involuntary confinement, false arrest..).	1.750
4569	4568.0	05/05/14	JL	Telephone conference with Smith re proposed mtn to compel	0.500
4570	4569.0	05/06/14	JL	Research and confer with Nat Smith re: settlement issues (1.00); discussion with client re: settlement (1.25); preparation of status report (.75).	3.000
4571	4570.0	05/07/14	JL	Prepare and review response to City Motion re: 30(b)(6) EBT.	1.000
4572	4571.0	05/08/14	JL	Prepare for settlement conference (1.25); conference call with Magistrate Freeman re: settlement (.75); review settlement negotiations (2.00); research and outreach to proposed ER Medicine expert (1:00).	4.500
4573	4572.0	05/09/14	JL	Review hospital records; City production re: 081 lockers; prepare status report.	1.250
4574	4573.0	05/10/14	JL	Consultation and correspondence with Nat Smith re: City defendants' discovery production re: 081 lockers; prepare EBT of Sgt James.	2.500
4575	4574.0	05/11/14	JL	Consultation by telephone with Dr. Halpern-Ruder re: EMT and ER procedures as potential expert witness; review correspondence with client.	2.000
4576	4575.0	05/12/14	JL	Preparation/conduct w/Smith EBT of Sgt Shantel James; EBT Sgt James 10am-3:30pm; review of EBT; follow up with Dr. Halpern-Ruder; EMT/ER expert.	7.000
4577	4576.0	05/13/14	JL	meet (w/Smith) with potential witness for plaintiff; NYPD Lt (Ret) Joseph Ferrara; telephone conference with Chris Dunne re: possible settlement issues; prepare EBTs of the EMTs. [POV travel to-from Holbrook NY--3:00]	4.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4578	4577.0	05/13/14	JL	Drive (Lenoir's POV) from 111 Broadway, NY, NY to Long Island to meet with Lt Ferrara (ret)	1.500
4579	4578.0	05/14/14	JL	EBT (w/Smith) of Marquez, EMT/JHC; prepare status report.	7.500
4580	4579.0	05/15/14	JL	Preparation/conduct w/Smith EBT of Sangetti; EMT/JHC; preparation - conduct post depo-review with Smith.	5.250
4581	4580.0	05/15/14	JL	Review of EBT; review case and settlement strategy with client and Smith	1.750
4582	4581.0	05/16/14	JL	Prepare EBT for Broschart - review City motion to strike 30(b)(6) issues.	2.500
4583	4582.0	05/19/14	JL	Prepare for meeting with client and full status review of discovery; settlement and trial strategy.	2.250
4584	4583.0	05/20/14	JL	Consultation with client re: discovery; settlement and trial strategy; settlement conference call with Magistrate Freeman and client; Verizon "Hot Spot" internet connectivity device for client communication.	5.500
4585	4584.0	05/20/14	JL	POV (Lenoir) 111 Broadway; NYC to Johnston, N Y and return for consultation with client re: discovery; settlement and trial strategy; and settlement	3.500
4586	4585.0	05/27/14	JL	Research and outreach re: potential Law Enforcement expert(s) research re: damages and settlement issues.	2.000
4587	4586.0	05/28/14	JL	Preparation for hearing (1.50); hearing re: EBT City 30(b)(6) issues (.75); review court holdings (.75); prepare Weiss EBT (4.50).	7.500
4588	4587.0	05/30/14	JL	Review w/co-counsel EBT Jamaica Hospital 30(b)(6); Skype conference with client (:30).	1.500
4589	4588.0	05/31/14	JL	Skype conference with client to review discovery, etc.	1.000
4590	4589.0	06/02/14	JL	Telephone conference with client (1.25); prepare additional discovery requests (1.25); review status of discovery received from defendants (2.00).	4.500
4591	4590.0	06/04/14	JL	Represent (with Smith) Ferrara at City deposition, 100 Church St	4.500
4592	4591.0	06/04/14	JL	Meeting with Smith and Ferrara to prepare for examination before trial; review EBT materials: documents and audio.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4593	4592.0	06/06/14	JL	Telephone conference with law enforcement experts; call with John Eterno and Eli Silverman; review and discuss law enforcement expert report and testimony; prepare status report for client and trial team.	2.750
4594	4593.0	06/09/14	JL	Telephone conference with client; preparation and review discovery and settlement issues.	2.000
4595	4594.0	06/11/14	JL	(with Smith) Prepare and meet with Dr. Dan Halpern-Ruder in Providence RI re proposed EMT and ER expert.	4.000
4596	4595.0	06/11/14	JL	Drive POV (Lenoir's) from 111 Broadway to Providence, RI to meet with Dr. Dan Halpern proposed EMT and ER expert	2.250
4597	4596.0	06/12/14	JL	Return drive POV (Lenoir's) to 111 Broadway NYC from Providence, RI for meeting with Dr. Dan Halpern proposed EMT and ER expert.	2.000
4598	4597.0	06/13/14	JL	Telephone conference with Eterno and Silverman re: law enforcement expert research and testimony; review and preparation of retainer agreements.	2.000
4599	4598.0	06/16/14	JL	Prepare status report for client; draft trial memo	1.750
4600	4599.0	06/18/14	JL	Prepare for and conduct (with Smith) Broschart examination before trial; review notes.	7.500
4601	4600.0	06/19/14	JL	Status update on discovery schedule for client and trial team.	1.000
4602	4601.0	06/20/14	JL	Telephone conference with co-counsel re: law enforcement experts; draft retainer agreements.	2.000
4603	4602.0	06/21/14	JL	Draft and review law enforcement expert retainer agreement.	0.500
4604	4603.0	06/23/14	JL	Prepare for, and conduct with Smith dfnt Duncan examination before trial; review Duncan examination before trial.	7.500
4605	4604.0	06/25/14	JL	Telephone conference with party counsel and co-counsel re:discovery scheduling.	1.000
4606	4605.0	06/26/14	JL	Telephone conference with client, co-counsel and psychiatric expert re: meeting with client; call with co-counsel re: examination before trial scheduling.	2.000
4607	4606.0	06/27/14	JL	Meeting (telephone conference) with client; co-counsel and expert re: evaluation by psychiatric expert.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4608	4607.0	06/29/14	JL	Telephone conference with client; co-counsel and expert (Lubit) re: scheduling of evaluation meeting.	1.000
4609	4608.0	06/30/14	JL	Meeting with client (2.00); arrange meeting with psychiatric expert (2.00); conference with Dr. Lubit; call with client re: evaluation (1.25).	5.250
4610	4609.0	07/01/14	JL	Prepare and conduct w/Smith examination before trial for Mauriello. Review w/client and Smith.	8.500
4611	4610.0	07/02/14	JL	Telephone conference with client re: deposition review and trial preparation; Adrian departs NYC via Amtrak	1.000
4612	4611.0	07/03/14	JL	Prepare and review w/Smith re: Dr. Lwin's examination before trial.	3.500
4613	4612.0	07/04/14	JL	Prepare for 30(b)(6) depositions and other JHC witnesses.	3.750
4614	4613.0	07/07/14	JL	Prepare for and attend deposition as co-counsel; and review; 30(b)(6) witness to testify about JHMC's policy on involuntary hospitalization.	4.500
4615	4614.0	07/08/14	JL	Schedule and plan remaining depositions (2.00); review final discovery productions (2.50).	4.500
4616	4615.0	07/09/14	JL	Negotiate expert agreements with Dr. Silverman and Dr. Eterno; draft retainer contracts; conference call to resolve issues, finalize expert agreement and schedule meetings and reports; and prepare for City 30(b)(6) examination before trial.	1.750
4617	4616.0	07/10/14	JL	Consultation and negotiation with psych and law enforcement experts; revise retainer agreements.	2.250
4618	4617.0	07/11/14	JL	Arrange and negotiate terms for ER MD expert witness; prepare for City examination before trial.	1.750
4619	4618.0	07/14/14	JL	Prepare for City 30(b)(6) examination before trial.	2.250
4620	4619.0	07/15/14	JL	Conduct two City 30(b)(6) examinations before trial.	7.500
4621	4620.0	07/16/14	JL	Conduct two City 30(b)(6) examination before trial.	7.000
4622	4621.0	07/17/14	JL	Conduct two City 30(b)(6) examination before trial.	7.000
4623	4622.0	07/18/14	JL	Prepare, do, and review telephone call with MD expert; client and co-counsel.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4624	4623.0	07/21/14	JL	Review of discovery and depositions.	1.500
4625	4624.0	07/22/14	JL	Status conference with Smith and client.	1.250
4626	4625.0	07/30/14	JL	Telephone conference with Smith and LE experts re repost	0.750
4627	4626.0	07/31/14	JL	Preparing letter to Court; tel conf w/Smith and LE experts	1.500
4628	4627.0	08/01/14	JL	Draft case status report; update Trial Memorandum.	1.500
4629	4628.0	08/04/14	JL	Telephone conference with LE experts; Eterno and Silverman with Nat Smith.	1.000
4630	4629.0	08/05/14	JL	Discovery review; review letter to Court re: outstanding issues; finalize status report.	2.500
4631	4630.0	08/06/14	JL	Review and summarize depositions; confer w/Smith re: expert reports.	1.750
4632	4631.0	08/07/14	JL	Review depositions; prepare index and summaries; confer re: expert testimony and reports.	2.500
4633	4632.0	08/08/14	JL	Review depositions; index and summarize; plan expert report submission and prepare for depositions.	2.250
4634	4633.0	08/09/14	JL	Confer w/Smith re: expert reports; conference call with LE experts.	2.000
4635	4634.0	08/10/14	JL	Review expert reports; conference calls with psychiatric expert.	2.500
4636	4635.0	08/11/14	JL	Plaintiff's expert disclosure due; prepare packages and send.	4.250
4637	4636.0	08/14/14	JL	Research and review existing material re: expert depositions and dispositive motions.	1.500
4638	4637.0	08/15/14	JL	Prepare for depositions of plaintiff's experts.	1.500
4639	4638.0	08/16/14	JL	Telephone conference with Nat Smith re: expert report follow up and deposition.	1.000
4640	4639.0	08/18/14	JL	Respond to City Defendant letter re: expert reports; review and index depositions.	2.500
4641	4640.0	08/19/14	JL	Review deposition summaries; draft correspondence re: discovery issues.	2.500
4642	4641.0	08/20/14	JL	Draft response to City Defendants letter re: 30(b)(6) witness; also renew demands for production of Marino and other discovery documents.	4.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4643	4642.0	08/21/14	JL	Telephone conference with Smith re: case scheduling with Larry Schoolcraft (.75); draft response to medical defendants re: depositions of Dr. Patel and Dr. Lwin and City Defendants re: discovery issues (1.25); complete Adrian Schoolcraft 2nd deposition summary (2.50).	4.500
4644	4643.0	08/22/14	JL	Confer with all expert witnesses re: schedule availability for depositions.	1.250
4645	4644.0	08/26/14	JL	Confer with experts re: additional information on reports; and schedule availability; review defendant Mauriello letter to dismiss charges.	1.750
4646	4645.0	08/29/14	JL	Review Court Order re: discovery; confer with Smith.	1.500
4647	4646.0	09/02/14	JL	Confer with co-counsel on expert discovery response, schedule of depositions.	1.500
4648	4647.0	09/04/14	JL	Schedule of expert depositions (.75); review defendants letter motion re: expert reports and depositions (1.25); prepare for expert depositions (1.50).	4.500
4649	4648.0	09/05/14	JL	Confer with co-counsel re: expert reports and depositions; prepare response to defendants' letter motion re: expert reports and deposition schedules; organize further deposition summaries.	3.500
4650	4649.0	09/06/14	JL	Review process of summarizing deposition transcripts; confidentiality agreement, billing procedures,	3.500
4651	4650.0	09/07/14	JL	Review PD expert Silverman prior research.	1.500
4652	4651.0	09/08/14	JL	Confer with co-counsel re: expert discovery; schedule and deposition strategy; review Monel law and facts..	2.750
4653	4652.0	09/10/14	JL	Review with all counsel expert witness deposition schedule and outstanding discovery production; review research material for depositions.	2.500
4654	4653.0	09/12/14	JL	Meeting with client and trial team in Mayfield NY (Smith, Bauza and legal asst) in preparation for trial.	4.000
4655	4654.0	09/12/14	JL	POV from 111 Broadway NYC to 467 Bunker Hill Road, Mayfield, NY for trial planning session with client.	2.000
4656	4655.0	09/13/14	JL	Meeting with client at Bunker Hill, Mayfield, NY.	7.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4657	4656.0	09/14/14	JL	POV (Smith) from 467 Bunker Hill Road, Mayfield, NY (trial planning session with client and trial team) to NYC.	2.000
4658	4657.0	09/14/14	JL	Meeting with client in Mayfield, NY. for trial prep with trial team.	4.000
4659	4658.0	09/15/14	JL	Review discovery materials produced by City Defendants; conferred with LE expert Eterno by telephone; and conference call with LE experts.	2.500
4660	4659.0	09/16/14	JL	Reivew and consult re: expert discovery.	2.500
4661	4660.0	09/17/14	JL	Prepare for Hearing; hearing with Judge Sweet courtroom at 500 Pearl Street, NYC.	3.000
4662	4661.0	09/18/14	JL	Prepare for City 30(b)(6) examination before trial on Friday; prepare for motion for summary judgment; defendants expert disclosure due.	2.500
4663	4662.0	09/19/14	JL	With Smith: City 30(b)(6) deposition with Sgt Purpi; and City 30(b)(6) witness on gun amnesty program.	2.750
4664	4663.0	09/21/14	JL	Prepare ER expert for examination before trial; confer w/Smith re med experts.	2.750
4665	4664.0	09/22/14	JL	ER and Psych Expert deposition preparation (2.00); review defendants' expert reports (2.00).	4.500
4666	4665.0	09/23/14	JL	Expert deposition with Dr. Lubit at MCB 220 East 42nd Street, NYC.	7.500
4667	4666.0	09/24/14	JL	Expert deposition: Review Lubit deposition; review defendants' expert reports; prepare for LE experts.	1.500
4668	4667.0	09/25/14	JL	Discuss and prepare documentation for LE Expert depositions.	2.000
4669	4668.0	09/29/14	JL	Prepare (w/Smith) Dr. Halpern-Rudger for examination before trial at 330 East 42nd Street, NYC.	2.000
4670	4669.0	09/30/14	JL	Expert deposition with Dr. Halpern-Ruder at MCB.	7.500
4671	4670.0	10/01/14	JL	Prepare for hearing on defendants' motion (1.25); hearing on city and hospital defendants' motion (.75); review of rulings from hearing (.25); prep production of LE expert resource materials (.75).	3.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4672	4671.0	10/02/14	JL	Prepare for summary judgment motion (1.25); summarize examination before trial (1.00); review LE expert resource materials for production (1.50); prepare and schedule legal assistants (Jeanette and Lysia) for examination before trial summaries (2.50).	6.250
4673	4672.0	10/03/14	JL	Case conference with client and Smith; preparation for summary judgment motions; prepare research for motion to amend complaint.	3.750
4674	4673.0	10/06/14	JL	Review of discovery correspondence and scheduling of remaining depositions.	1.500
4675	4674.0	10/10/14	JL	Tel Conference with Lubit and Silverman re: schedule and prepare for deposition.	1.000
4676	4675.0	10/14/14	JL	Meet Nat Smith for meeting with LE expert Eterno; drive to and from Molloy College from NYC to discuss expert report and prepare for Dr. Eterno for examination before trial. [mtg:2:30] [travel: 2:00]	2.500
4677	4676.0	10/14/14	JL	POV (Nat Smith) to and from Molloy College from NYC for meeting with LE expert Eterno; to discuss expert report and prepare for Dr. Eterno for examination before trial.	1.000
4678	4677.0	10/15/14	JL	Conference w/Smith re: City Defendants settlement proposal; prepare counter proposal.	2.000
4679	4678.0	10/16/14	JL	Conference with client and Smith re: settlement options and trial strategy.	1.500
4680	4679.0	10/17/14	JL	Examination before trial of Dr. Eterno (with Smith).	8.500
4681	4680.0	10/20/14	JL	Meeting (conference call) with client and Smith re City settlement possibilities	0.750
4682	4681.0	10/22/14	JL	Review of 2nd Amended Complaint; research for proposed 3rd Amendment.	1.500
4683	4682.0	10/23/14	JL	Prepare and review summaries of deposition transcripts; schedule remaining depositions with counsel; prepare Silverman for deposition.	3.500
4684	4683.0	10/24/14	JL	Defend with Smith City's examination before trial of Silverman.	7.500
4685	4684.0	10/28/14	JS	Review discovery issues outstanding and preparation for hearing 10/29/2014.	2.000
4686	4685.0	10/29/14	JL	Hearing before Judge Sweet.	1.000
4687	4686.0	11/03/14	JL	Telephone conference with Smith re: 3rd Amended Complaint.	0.750
4688	4687.0	11/06/14	JL	Case conference with client and Smith; update re: strategy and outstanding discovery matters.	2.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4689	4688.0	11/10/14	JL	Defend with Smith Lubit examination before trial	4.000
4690	4689.0	11/13/14	JL	Lubit deposition continued (defend plaintiff psych expert with Smith).	5.500
4691	4690.0	11/16/14	JL	Review draft of 3rd Amended Complaint.	1.750
4692	4691.0	11/18/14	JL	Review of legal assistant's work in summarizing deposition transcripts.	1.000
4693	4692.0	11/20/14	JL	Follow up re: Lubit deposition and prep materials for trial testimony.	1.000
4694	4693.0	12/03/14	JL	Review draft of 3rd Amended Complaint; review plaintiff motion for Summary Judgment and dismiss Mauriello counterclaim.	3.000
4695	4694.0	12/04/14	JL	Review draft of 3rd Amended Complaint and motion v. Mauriello.	1.500
4696	4695.0	12/08/14	JL	Review deposition summaries; research on motions for summary judgment; confer with Smith re preparation for opposition.	3.000
4697	4696.0	12/09/14	JL	Research review for motion for summary judgment and opposition to Mauriello counterclaim.	2.000
4698	4697.0	12/21/14	JL	Draft and Review plaintiff motion summary judgment.	2.000
4699	4698.0	12/22/14	JL	Review plaintiff motion for summary judgment.	1.500
4700	4699.0	01/03/15	JL	Meeting with Nat Smith re: Summary Judgment motion.	1.750
4701	4700.0	01/05/15	JL	Review of summary judgment motion; prepare response.	4.500
4702	4701.0	01/07/15	JL	Meeting with Nat Smith and James McCutcheon re: review of Compstat DVD's.	1.500
4703	4702.0	01/08/15	JL	Review and index CompStat DVD's (4.50); prepare response to summary judgment motion (4.00).	8.500
4704	4703.0	01/09/15	JL	Review of Compstat DVD's (2.50); prep index. Meeting with Nat Smith re: summary judgment motion (2.00).	4.500
4705	4704.0	01/10/15	JL	Review CompStat DVD's; prep index.	7.500
4706	4705.0	01/11/15	JL	Review CompStat DVD's; telephone call re: CompStat DVD's; review CompStat DVD's.	8.250
4707	4706.0	01/12/15	JL	CompStat DVD review.	6.500
4708	4707.0	01/13/15	JL	Review and index CompStat DVD's.	6.000
4709	4708.0	01/14/15	JL	Meeting re: summary judgment motion (2.00); CompStat DVD review (4.50).	6.500
4710	4709.0	01/15/15	JL	Review and index CompStat DVD's.	6.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4711	4710.0	01/19/15	JL	Draft Response to Mauriello summary judgment motion (4.50); telephone call (Smith and McCutcheon) re: CompStat DVD review (.75); research for Response to Mauriello (1.50); meeting for summary judgment (1.25).	8.000
4712	4711.0	01/20/15	JL	Review defendants Order re: TAC; prepare Summary Judgment Response Mauriello.	3.500
4713	4712.0	01/21/15	JL	Research, review and drafting portions of plaintiff SJ mtn	7.000
4714	4713.0	01/22/15	JL	Draft and research for Responses to Mauriello Summary Judgment motion.	7.500
4715	4714.0	01/23/15	JL	Review CompStat DVD's; prepare Summary Judgment Response Statement of motion and facts.	3.000
4716	4715.0	01/24/15	JL	Research and draft Responses to defendant Mauriello Summary Judgment motion.	3.500
4717	4716.0	01/25/15	JL	Research and Drafting in collab with Smith plaintiff SJ mtn	4.000
4718	4717.0	01/26/15	JL	Client conference call (1.50); research and drafting re: summary judgment defendant Mauriello (7.00).	8.500
4719	4718.0	01/27/15	JL	Meeting / consult with Smith re: summary judgment responses (2.00); research re: summary judgment response Mauriello (4.00).	6.000
4720	4719.0	01/28/15	JL	Research and draft; prepare for summary judgment response Mauriello.	10.500
4721	4720.0	01/29/15	JL	Mauriello response and research, record, and draft.	4.750
4722	4721.0	01/30/15	JL	Summary Judgment response, research, and draft.	2.000
4723	4722.0	01/31/15	JL	Prepare, research, write draft for response to Mauriello summary judgment.	8.500
4724	4723.0	02/01/15	JL	Confer with Smith in final draft: Mauriello Summary Judgment Response and review.	4.500
4725	4724.0	02/02/15	JL	Telephone conference with Smith and client; meeting re: summary judgment motions and trial. Trial Memo review. [client to reinstate Norinsberg et al to trial team]	4.500
4726	4725.0	02/03/15	JL	Meeting with Nat re: summary judgment motion; summary judgment Mauriello research.	3.500
4727	4726.0	02/04/15	JL	Meeting with Nat re: summary judgment motions.	1.000
4728	4727.0	02/05/15	JL	Research and draft response to defendant Mauriello motion for summary judgment; Mauriello summary judgment motion response.	7.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4729	4728.0	02/06/15	JL	Research and draft Summary judgment motion.	7.500
4730	4729.0	02/07/15	JL	Review and draft Summary Judgment Motions.	6.500
4731	4730.0	02/08/15	JL	Preparation in opposition to defendants summary judgment motion.	8.500
4732	4731.0	02/09/15	JL	Summary Judgment motions; confer w/Smith re prepare in opposition to motions and response to Rule 56.1 Statement.	9.500
4733	4732.0	02/10/15	JL	Prepare memorandum in opposition to defendant's motions for summary judgment and Rule 56.1 Statement.	8.500
4734	4733.0	02/11/15	JL	Review and edit of opposition to defendant's summary judgment motion.	6.500
4735	4734.0	02/12/15	JL	Telephone conference with co-counsel; review of summary judgment motions by defendants.	2.500
4736	4735.0	02/13/15	JL	Review of defendant's motions in opposition to plaintiffs motion summary judgment; review of defendant's motions and prepare for plaintiffs reply re: Schoolcraft discovery.	2.000
4737	4736.0	02/17/15	JL	Review of defendant Mauriello's motion and prepare plaintiff reply.	2.500
4738	4737.0	02/18/15	JL	Review and research on plaintiff reply memorandum to defendant Mauriello's response motion.	3.000
4739	4738.0	02/19/15	JL	Review of examination before trial summaries.	1.000
4740	4739.0	02/20/15	JL	Prepare for meeting with new trial team; meet with Norinsberg trial team; and review draft of trial memo.	4.500
4741	4740.0	02/23/15	JL	Review of Mauriello summary judgment motion response; research and review documents for summary judgment reply.	3.000
4742	4741.0	02/24/15	JL	Review discovery to draft response to Mauriello motion opposition.	2.500
4743	4742.0	02/25/15	JL	Draft and research for reply to Mauriello summary judgment response motion.	2.000
4744	4743.0	02/26/15	JL	Review of Rule 56.1 Mauriello.	2.500
4745	4744.0	02/28/15	JL	Review of Mauriello Rule 56.1.	1.500
4746	4745.0	03/02/15	JL	Review and draft summary judgment motion; reply to defendant's motion.	2.250
4747	4746.0	03/03/15	JL	Research and review of defendants motions and summary judgment statements re: re-preparation w/Smith of reply brief.	6.500
4748	4747.0	03/04/15	JL	Review of case file and research for summary judgment motion reply brief.	7.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4749	4748.0	03/05/15	JL	Draft, discuss and review summary judgment motion.	8.500
4750	4749.0	03/06/15	JL	Review and edit of summary judgment reply.	3.500
4751	4750.0	03/09/15	JL	Research and draft letter to Court re: Matthews.	2.500
4752	4751.0	03/10/15	JL	Telephone conference with Nat.	0.500
4753	4752.0	03/11/15	JL	Meeting with Nat Smith re: Matthews letter and response; trial strategy.	2.500
4754	4753.0	03/12/15	JL	Review motions; prepare letter to court. re; Matthews and quantified immunity. Meeting with Norinsberg team at 225 Bway	4.500
4755	4754.0	03/13/15	JL	Smith meeting at 111 Broadway for review of trial strategy and responsibilities with new team.	2.500
4756	4755.0	03/16/15	JL	Review motion response re: Lamstein Affidavit and reply to attorney motion.	2.500
4757	4756.0	03/18/15	JL	Review of trial; prepare exhibits.	0.500
4758	4757.0	03/22/15	JL	Trial exhibits preparation.	1.500
4759	4758.0	03/23/15	JL	Meeting with Nat MSith at 100 Wall Street; prepare trial exhibits and witness list.	4.500
4760	4759.0	03/24/15	JL	Draft/prepare jury verdict sheet template. Research re jury instruction re elements of complaint.	4.500
4761	4760.0	03/25/15	JL	Review of of trial preparation - especially Lubit Direct Outline.	2.500
4762	4761.0	03/27/15	JL	Telephone conference with new trial team; assign witness; complete jury questions round up; compstat video by Wednesday.	2.000
4763	4762.0	03/28/15	JL	Update Trial Memo	1.500
4764	4763.0	03/29/15	JL	Prepare expert witness direct; draft jury instruction round up.	4.750
4765	4764.0	03/30/15	JL	Trial preparation; expect witness direct - Eterno, Lubit, Halpren-Ruder.	6.000
4766	4765.0	03/31/15	JL	Prepare trial examination - Eterno, Lubit, and Halpren-Ruder.	6.500
4767	4766.0	04/01/15	JL	Prepare expert witness testimony and trial notebook.	6.500
4768	4767.0	04/02/15	JL	Meeting with trial team; research expert testimony for direct testimony and prep for cross.	5.000
4769	4768.0	04/03/15	JL	Research and prepare expert witness; direct and cross	4.500
4770	4769.0	04/04/15	JL	Trial memo preparation.	2.000
4771	4770.0	04/06/15	JL	Prepare expert trial testimony for Eterno; review examination before trial for Eterno.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4772	4771.0	04/07/15	JL	Prepare trial testimony for Halpren-Ruder; review jury instructions and motion.	4.250
4773	4772.0	04/08/15	JL	Review of trial exhibits for expert witnesses Eterno and Halpren-Ruder; prepare expert testimony for Halpren-Ruder.	3.000
4774	4773.0	04/09/15	JL	Expert trial preparation for Eterno; outline direct and prepare exhibits.	4.500
4775	4774.0	04/10/15	JL	Prepare expert trial testimony for Halpre-Ruder; expert witness preparation for Lubit.	4.250
4776	4775.0	04/11/15	JL	Prepare Eterno direct, with exhibits	2.500
4777	4776.0	04/13/15	JL	Prepare for hearing before Judge Sweet re: trial schedule; meeting with trial team re: trial schedule and strategy.	3.500
4778	4777.0	04/15/15	JL	Review of additional discovery by City Defendants re: Lamstein.	1.500
4779	4778.0	04/17/15	JL	Review of City Proposal for settlement; telephone call to Schoolcraft re: City Settlement offer.	1.500
4780	4779.0	04/24/15	JL	Telephone conference with Nat Smith re possible settlement strategy	0.500
4781	4780.0	04/28/15	JL	Telephone conference with Nat Smith; call to Roy Lubit re: trial schedule.	1.250
4782	4781.0	05/01/15	JL	Telephone conference with Nat Smith re trial responsibilities, tactics and overall strategy	0.750
4783	4782.0	05/05/15	JL	Review / discussion of court's 200 page Opinion re: Summary Judgment Motions.	3.000
4784	4783.0	05/06/15	JL	Review and discuss with Smith plaintiff response re court's Opinion.	2.500
4785	4784.0	05/11/15	JL	Prepare for hearing re: Court's Opinion/Order re: dispositive motions.	2.500
4786	4785.0	05/12/15	JL	Meeting with full trial team re: hearing; status conference with Judge Sweet.	1.750
4787	4786.0	06/01/15	JL	Research and draft letter motion re: reconsideration of order re: modified complaint.	5.750
4788	4787.0	06/02/15	JL	Review of draft and additional research re: court motion to reconsider re: Dr HR; review draft of reconsideration letter and motion.	2.000
4789	4788.0	06/22/15	JL	Discussion re: opposition to city & summary motions to reconsideration (Nat Smith).	0.750
4790	4789.0	06/23/15	JL	Discussion with Nat Smith re: opposition to consideration motions.	0.500
4791	4790.0	06/24/15	JL	Prepare opposition response re bifurcation.	1.500
4792	4791.0	06/25/15	JL	Draft and research re: bifurcation issue.	7.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4793	4792.0	06/26/15	JL	Research and draft plaintiff opposition to bifurcation of Monell claim.	4.500
4794	4793.0	06/27/15	JL	Further research and draft of plaintiff opposition to bifurcation motion; finalize draft of opposition to bifurcation.	4.000
4795	4794.0	07/06/15	JL	Review draft of opposition memo for reconsideration.	0.750
4796	4795.0	07/08/15	JL	Research re: production of plaintiff PD expert to city defendants.	2.500
4797	4796.0	07/09/15	JL	Confer with expert; Draft response to city re: plaintiff expert resource material; review police expert disclosure requirements.	5.750
4798	4797.0	07/13/15	JL	Response to city defendants request for additional discovery re: PD experts.	2.500
4799	4798.0	07/14/15	JL	Review / research of JHMC Opposition Memo re: Halpren-Ruder.	0.200
4800	4799.0	07/15/15	JL	Prepare response to defendant JHMC Memo in Opposition to motion for reconsideration re: expert Halpren-Ruder.	5.500
4801	4800.0	07/17/15	JL	Discussion and review re: Compstat Records; PD expert disclosure.	1.250
4802	4801.0	07/20/15	JL	Draft opposition to JHMC Memorandum re Medical Expert Halpren-Ruder.	5.000
4803	4802.0	07/22/15	JL	Prepare Response to JHMC Opposition to Plaintiff Medical Expert.	4.250
4804	4803.0	07/23/15	JL	Research and draft Memo In Response to JHMC opposition memo;	7.500
4805	4804.0	07/24/15	JL	Meeting with trial team re JPTO etc. at 100 Wall Street.	2.250
4806	4805.0	07/27/15	JL	Review documentary film on client with Eterno.	0.750
4807	4806.0	08/07/15	JL	Review JPTO's filed by defendants; telephone conference with counsel team re: JPTO; conference with co-counsel re: Trial Draft.	3.500
4808	4807.0	08/14/15	JL	Meeting with Smith re JPTO	1.000
4809	4808.0	08/21/15	JL	Draft letter to court re experts at trial.	1.000
4810	4809.0	08/24/15	JL	Review of trial exhibits, expert rpts and EBTs; prepare expert trial witness outlines.	6.500
4811	4810.0	08/25/15	JL	Review and edit letter to court re: opposition to city defendants 2 letters; witness trial outlines: Eterno.	2.000
4812	4811.0	08/26/15	JL	Prepare witness trial outlines.	3.500
4813	4812.0	09/16/15	JL	Confer with trial team re City R 68 offer of jmt;	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4814	4813.0	7/31/2013	HS	meeting with Nat Smith to review role and case	2.500
4815	4814.0	8/1/2013	HS	emails from and/or to Nat Smith	0.250
4816	4815.0	8/2/2013	HS	reviewed amended complaint	1.000
4817	4816.0	8/6/2013	HS	reviewed Jamaica Hospital's doc exchange	1.500
4818	4817.0	8/7/2013	HS	read Plaintiff's depo	1.500
4819	4818.0	8/13/2013	HS	emails to and/or from Nat Smith	0.200
4820	4819.0	8/22/2013	HS	reviewed availability, called and emailed Nat Smith re: my availability for depositions	0.250
4821	4820.0	9/4/2013	HS	reviewed status report	0.200
4822	4821.0	9/13/2013	HS	reviewed departmental action affect on case by city and emailed to group	1.750
4823	4822.0	10/1/2013	HS	prep for inspection of Schoolcraft home and Hosp: reviewed records & depo of pit	4.000
4824	4823.0	10/2/2013	HS	home and hosp inspection and Scene inspection	6.250
4825	4824.0	10/7/2013	HS	read Kretz transcript	0.500
4826	4825.0	10/15/2013	HS	read John L status report	0.200
4827	4826.0	10/15/2013	HS	reviewed motion papers for motions of 10/16	1.500
4828	4827.0	10/17/2013	HS	started review of dots from drop box invasion tape	6.000
4829	4828.0	10/18/2013	HS	prep for Aldana-Bernier depo	4.000
4830	4829.0	10/21/2013	HS	reviewed Aldana-Bernier interrogatories and further prep for depo	3.250
4831	4830.0	10/22/2013	HS	meeting with Nat Smith to review case	2.500
4832	4831.0	10/24/2013	HS	prep deposition binder for Aldana-Bernier depo	10.000
4833	4832.0	10/25/2013	HS	appeared for Aldana-Bernier depo and strategized with John Meg and Nat Smit	5.000
4834	4833.0	10/25/2013	HS	reviewed Nat Smith email re: discovery	0.100
4835	4834.0	10/28/2013	HS	reviewed motion by medical deft re; video depo/6 emails	3.500
4836	4835.0	10/28/2013	HS	performed research on video tape depositions	2.500
4837	4836.0	10/29/2013	HS	emails to team re: motion for video dep/ research	1.000
4838	4837.0	11/13/2013	HS	Appeared for SDNY motion: re video depositions	1.250
4839	4838.0	11/4/2013	HS	emails to team	0.100
4840	4839.0	11/18/2013	HS	telephone call with John Lenoir and emails re: Larry Schoolcraft deposition	1.250
4841	4840.0	1/8/2014	HS	email to John Lenoir	0.100
4842	4841.0	2/9/2014	HS	call and email re: Deposition of hospital with deft counsel	0.200
4843	4842.0	2/11/2014	HS	reviewed client's deposition questions	0.500
4844	4843.0	2/10/2014	HS	deposition preparation	5.200
4845	4844.0	2/11/2014	HS	prep Isakov deposition	9.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4846	4845.0	2/12/2014	HS	prep and conducted Isakov deposition	7.250
4847	4846.0	2/14/2014	HS	researched statutory duty	2.100
4848	4847.0	4/20/2014	HS	preparation Aldana-Bernier deposition	4.500
4849	4848.0	4/22/2014	HS	preparation Aldana-Bernier deposition	3.000
4850	4849.0	4/23/2014	HS	prep and conducted Aldana-Bernier deposition	8.000
4851	4850.0	8/10/2014	HS	reviewed expert report and emailed team re: expert report	1.500
4852	4851.0	12/8/2014	HS	researched statutory standard and emailed team with research	4.250
4853	4852.0	3/25/2015	HS	prepared request to charge	1.250
4854	4853.0	02/21/13	MB	Initial meeting with Peter Gleason and Jeremy Skehan	2.000
4855	4854.0	03/05/13	MB	Meeting with Peter Gleason re: coming on board the Schoolcraft team.	3.000
4856	4855.0	03/09/13	MB	Meeting with Peter and Nat re briefing of the case.	3.000
4857	4856.0	03/15/13	MB	Started research on admissibility of demonstrative evidence story board project.	6.000
4858	4857.0	03/27/13	MB	Conference with Peter, Nat, and Artist re Story Board project.	3.000
4859	4858.0	04/01/13	MB	Memo to counsel re: research on prior restraint in response to motion for gag order.	6.000
4860	4859.0	04/07/13	MB	Meeting with Adrian and team in Saugerties (travel to and from meeting 4 hours).	6.000
4861	4859.5	04/07/13	Peter J. Gleason	Meeting in Saugerties with AS, LS and legal team. (Travel at 1/2 hr. rate)	8.000
4862	4860.0	08/01/13	MB	Meeting with Nat re: jury instructions project.	3.000
4863	4861.0	08/02/13	MB	Review Complaint, record, and prior case decisions.	7.000
4864	4862.0	08/05/13	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.	5.000
4865	4863.0	08/06/13	MB	Jury instructions project.	5.000
4866	4864.0	08/07/13	MB	Prep for meeting with illustrator re demonstrative project; meeting with potential "dangerousness expert," Tom Litwack.	7.000
4867	4865.0	08/12/13	MB	Jury instructions project.	5.000
4868	4866.0	08/13/13	MB	Meeting with Nat at 3pm re update on projects	3.000
4869	4867.0	08/14/13	MB	Jury instructions project.	5.000
4870	4868.0	08/19/13	MB	Jury instructions project.	5.000
4871	4869.0	08/20/13	MB	Jury instructions project.	5.000
4872	4870.0	08/21/13	MB	Jury instructions project.	5.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4873	4871.0	08/23/13	MB	Meeting with Nat at 5pm re state action research project	3.000
4874	4872.0	08/26/13	MB	Jury instructions project.	5.000
4875	4873.0	08/27/13	MB	Te meeting with Adrian in Saugerties. (Travel time 4.5 hours)	7.750
4876	4874.0	08/29/13	MB	Jury instructions project.	5.000
4877	4875.0	09/01/13	MB	Nat's office, listen to audios and review production.	3.000
4878	4876.0	09/03/13	MB	Jury instructions project.	5.000
4879	4877.0	09/05/13	MB	Preparing detailed timelines for case on plaintiff's entire work history; NYPD work history; hospital events and events of 10-31-09.	5.000
4880	4878.0	09/06/13	MB	Timeline Project.	5.000
4881	4879.0	09/09/13	MB	Timeline Project.	5.000
4882	4880.0	09/11/13	MB	Timeline Project.	5.000
4883	4881.0	09/12/13	MB	Timeline Project.	5.000
4884	4882.0	09/13/13	MB	Meeting with Nat 4:30pm re update of current projects	3.000
4885	4883.0	09/18/13	MB	Meeting with Nat and Adrian	2.000
4886	4884.0	09/19/13	MB	Inspection of 81st Precinct	6.000
4887	4885.0	09/24/13	MB	Meeting with Adrian to work on layout of Glendale apt	3.000
4888	4886.0	09/25/13	MB	Oral Argument; team meeting	4.000
4889	4889.0	10/02/13	MB	Jamaica Hospital inspection.	6.000
4890	4890.0	10/03/13	MB	Prepare Marino examination before trial; compile relevant discovery docs into searchable PDF; review record and prepare questions	5.000
4891	4891.0	10/04/13	MB	Prepare Marino examination before trial.	5.000
4892	4892.0	10/07/13	MB	Prepare Marino examination before trial.	5.000
4893	4893.0	10/08/13	MB	Deposition of Deputy Chief Michael Marino.	0.000
4894	4894.0	10/10/13	MB	Research caselaw on involuntary commitments involving private hospitals	5.000
4895	4895.0	10/11/13	MB	Research involuntary commitments and MHL 9.39.	5.000
4896	4896.0	10/14/13	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.	5.000
4897	4897.0	10/15/13	MB	Prepare medical defendants examination before trial.	5.000
4898	4898.0	10/16/13	MB	Judge Sweet's courtroom hearing.	3.000
4899	4899.0	10/17/13	MB	Prepare medical defendants examination before trial	3.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4900	4900.0	10/18/13	MB	Research involuntary commitments and due process violations; brief cases.	5.000
4901	4901.0	10/21/13	MB	Prepare medical defendants exination before trial	6.000
4902	4902.0	10/22/13	MB	Prepare medical defendants exination before trial	5.000
4903	4903.0	10/23/13	MB	Prepare medical defendants exination before trial.	5.000
4904	4904.0	10/24/13	MB	Meeting with Nat re status on projects	3.000
4905	4905.0	10/25/13	MB	Dr. Aldana-Berner; deposition was cancelled.	2.500
4906	4906.0	10/28/13	MB	Research re: defendant's objection to plaintiffs use of video at deposition; research Rule 30, Rule 28(c), CPLR 3313 (b).	5.000
4907	4907.0	10/29/13	MB	Research video deposition Rule 30.	5.000
4908	4908.0	10/30/13	MB	Research video deposition Rule 30.	5.000
4909	4909.0	10/31/13	MB	Memo to counsel re; research video deposition Rule 30.	5.000
4910	4910.0	11/01/13	MB	Prepare Lauterborn examination before trial; review record; listen to audios; compile discovery docs into searchable PDF; draft deposition questions.	5.000
4911	4911.0	11/04/13	MB	Prepare Lauterborn examination before trial.	5.000
4912	4912.0	11/05/13	MB	Prepare Lauterborn examination before trial	5.000
4913	4913.0	11/06/13	MB	Prepare Lauterborn examination before trial	5.000
4914	4914.0	11/07/13	MB	Lauterborn deposition.	0.000
4915	4915.0	11/08/13	MB	Review discovery, catalog, and convert to searchable PDF files.	5.000
4916	4916.0	11/09/13	MB	Review discovery, organize, and convert to searchable files.	5.000
4917	4917.0	11/11/13	MB	Review discovery, catalog, and convert to searchable PDF files.	5.000
4918	4918.0	11/12/13	MB	Canvas Glendale neighborhood with Terry; interview Adrian's next door neighbor and current resident of Glendale apt.; take photos.	5.000
4919	4919.0	11/13/13	MB	Judge Sweet's courtroom hearing.	5.000
4920	4920.0	11/14/13	MB	Prepare Mauriello exination before trial; review record; listen to audios; compile discovery docs into searchable PDF; draft deposition questions.	5.000
4921	4921.0	11/15/13	MB	Prepare Mauriello exination before trial.	5.000
4922	4922.0	11/18/13	MB	Interview with Carol Stretmoyer at Midtown location (w/Terry Skinner).	3.000
4923	4923.0	11/20/13	MB	Interview with Ted Stretmoyer at Glendale apt. (with Terry Skinner).	3.000
4924	4924.0	11/21/13	MB	Prepare Mauriello examination before trial	5.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4925	4925.0	11/22/13	MB	Mauriello deposition cancelled; begin Prof Rule 4.2 no contact research.	4.500
4926	4926.0	11/24/13	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."	3.000
4927	4927.0	11/25/13	MB	Prof Rule 4.2 no contact research.	6.000
4928	4928.0	11/26/13	MB	Draft memo to counsel re: Prof Rule 4.2 no contact research.	6.000
4929	4929.0	11/29/13	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.	5.000
4930	4930.0	11/30/13	MB	Rule 30(c)(2) research re: discoverable disciplinary records; convictions; sanctions; applying state law privileges.	5.000
4931	4931.0	12/02/13	MB	Rule 30(c)(2) research.	5.000
4932	4932.0	12/03/13	MB	Draft memo to counsel re: Rule 30(c)(2) research	5.000
4933	4933.0	12/04/13	MB	Draft memo to counsel re: Rule 30(c)(2) research	5.000
4934	4934.0	12/05/13	MB	Write up on all deposition objection issues.	5.000
4935	4935.0	12/06/13	MB	Write up on all deposition objection issues.	5.000
4936	4936.0	12/10/13	MB	Prepare Larry Schoolcraft examination before trial.	5.000
4937	4937.0	12/11/13	MB	Larry Schoolcraft deposition in Albany, NY. (travel 6.5 hours).	12.750
4938	4938.0	12/12/13	MB	Review discovery, organize, and convert to searchable files.	5.000
4939	4939.0	12/13/13	MB	Review discovery, organize, and convert to searchable files; listen to audio.	5.000
4940	4940.0	12/16/13	MB	Prepare Mauriello examination before trial; review documents; create searchable PDF; review depositions and record; listen to audio.	5.000
4941	4941.0	12/17/13	MB	Prepare Mauriello examination before trial.	5.000
4942	4942.0	12/18/13	MB	Prepare Mauriello examination before trial.	5.000
4943	4943.0	12/19/13	MB	Prepare Mauriello examination before trial.	5.000
4944	4944.0	12/20/13	MB	Mauriello deposition.	0.000
4945	4945.0	12/22/13	MB	Meeting with Adrian Schoolcraft re: demonstrative evidence project.	3.000
4946	4946.0	12/24/13	MB	Meeting with Team and Adrian Schoolcraft.	3.000
4947	4947.0	12/26/13	MB	Meeting with Adrian re demonstrative evidence project; joined by John Lenoir.	3.000
4948	4948.0	12/27/13	MB	Meeting with Adrian Schoolcraft re demonstrative evidence project.	3.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4949	4949.0	12/29/13	MB	Meeting at Nat's office w/ Adrian; review audio and record.	4.000
4950	4950.0	12/30/13	MB	Meeting at Nat's office w/ Adrian; review audio and record.	3.000
4951	4951.0	01/03/14	MB	Prepare for Huffman and Boston Deposition; review discovery docs; draft questions.	4.500
4952	4952.0	01/05/14	MB	Prepare for Boston and Huffman Deposition.	6.020
4953	4955.0	01/06/14	MB	Team meeting re review of Boston and Huffman depositions.	1.750
4954	4956.0	01/10/14	MB	Review and catalog discovery production at Nat's office; listen to Hanlon audio.	7.000
4955	4957.0	01/12/14	MB	Analyze NYPD emergency protocol; review NYPD Patrol guide.	2.200
4956	4958.0	01/12/14	MB	Prepare for Hanlon's deposition; review EMT emergency procedure and discovery documents.	4.130
4957	4960.0	01/15/14	MB	Hearing with Judge Sweet re discovery issues; team meeting re status of case.	2.000
4958	4961.0	01/28/14	MB	Prepare for Lamstein deposition; review handwritten notes in discovery docs; draft questions.	3.750
4959	4962.0	01/29/14	MB	Meeting Nat's Office re: review and prep for Lamstein EBT.	4.000
4960	4963.0	01/30/14	MB	Lamstein Deposition.	10.000
4961	4964.0	02/03/14	MB	Research inadvertent production and ethics on production obligation; search files and remove discovery documents in question.	6.080
4962	4965.0	02/04/14	MB	Research inadvertent production and ethics on production obligation; research Rule 502, Fed. R. Civ. P. 26(b)(5)(B) and caselaw.	6.500
4963	4966.0	02/05/14	MB	Draft memo to counsel re: inadvertent production research.	6.050
4964	4967.0	02/07/14	MB	Meeting with Nat re: inadvertent production redaction issues; begin prep for Medical Defendants EBTs.	5.000
4965	4968.0	02/08/14	MB	Prepare for Medical Defendant's EBTs; review medical chart, record, and deposition summaries; review Beiner's prior litigation testimony.	5.750
4966	4969.0	02/10/14	MB	Conference with Howard Suckle re deposition prep; prep for Medical Defendants depositions.	6.250
4967	4970.0	02/11/14	MB	Bernier Deposition	0.000
4968	4971.0	02/12/14	MB	Isakov Deposition.	0.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4969	4972.0	02/20/14	MB	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.	6.220
4970	4973.0	02/20/14	MB	Draft memo to counsel re: Dr. Isakov.	2.000
4971	4974.0	03/04/14	MB	Conference call with City defendants; team conference re trial prep status.	1.500
4972	4975.0	03/07/14	MB	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).	5.700
4973	4976.0	03/08/14	MB	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)).	4.650
4974	4977.0	03/09/14	MB	Draft Memo to counsel re: City Defendants deposition objection issues.	6.660
4975	4978.0	03/10/14	MB	Research defendants assertion of privilege for grand jury subpoenas.	5.230
4976	4979.0	03/11/14	MB	Review and comment Letter to Judge Sweet; team meeting re discovery issues.	3.360
4977	4980.0	03/12/14	MB	Catalogue and review new discovery at Nat's office.	6.500
4978	4981.0	03/12/14	MB	Letter to counsel re: search for missing discovery files.	1.000
4979	4982.0	03/14/14	MB	Draft subject matter for NYPD 30(b)(6) notices.	5.670
4980	4983.0	03/14/14	MB	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.	5.470
4981	4984.0	03/15/14	MB	Continue with research and drafting NYPD proposed jury instructions; draft charges for supervisor liability, First Amendment retaliation and prior restraint.	6.000
4982	4985.0	03/16/14	MB	Research and draft NYPD proposed jury instructions; draft conspiracy and state action charges.	5.880
4983	4986.0	03/19/14	MB	Draft NYPD proposed jury instructions; continue state action research re: Medical Defendants.	6.430

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4984	4987.0	03/21/14	MB	Research state action re: City defendants section 1983 conspiracy liability.	7.800
4985	4988.0	03/27/14	MB	Draft subject matter for JHMC 30(b)(6) notices.	5.250
4986	4989.0	03/28/14	MB	Meeting with Nat re: NYPD proposed jury instructions draft.	6.250
4987	4990.0	04/02/14	MB	Research re: possible medical experts.	6.500
4988	4991.0	04/03/14	MB	Memo to counsel re: possible medical expert Dr. Peter Stastny, MD.	5.530
4989	4992.0	04/04/14	MB	Research medical experts; review Roy Lubit's filings.	6.850
4990	4993.0	04/11/14	MB	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.	3.650
4991	4994.0	04/12/14	MB	Continue proposed jury instructions for case against Medical Defendants; draft neg per say charges.	5.000
4992	4995.0	04/13/14	MB	Team meeting with potential expert, Roy Lubit.	4.250
4993	4996.0	04/14/14	MB	Team conference call with Adrian re status and settlement.	0.660
4994	4997.0	04/14/14	MB	Continue drafting proposed jury instructions Medical Defendants; draft medical malpractice and other state claims.	4.550
4995	4998.0	04/16/14	MB	Conference call with Adrian re trial issues and settlement; team conference to confer.	2.500
4996	4999.0	04/17/14	MB	Team conference call re progress on settlement issues.	1.250
4997	5000.0	04/24/14	MB	Research re: jury awards of damages.	4.170
4998	5001.0	04/24/14	MB	Research the various state action tests in the context of a private hospital; collect and analyze Second Circuit case law.	4.000
4999	5002.0	04/26/14	MB	Draft memo to counsel re: state action research.	5.230
5000	5003.0	05/13/14	MB	Prepare EMT Jessica Marquez's deposition; research right to refuse medical attention; right to choice of hospital.	4.000
5001	5004.0	05/14/14	MB	EMT Jessica Marquez Deposition.	0.000
5002	5005.0	05/20/14	MB	Trip to Johnstown to meet with Adrian (6.5 hours of travel time).	8.250
5003	5006.0	05/21/14	MB	Research re: blue wall of silence police retaliation cases; the deliberative process privilege; the law enforcement privilege.	5.270

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5004	5007.0	05/23/14	MB	Blue wall of silence research; analyze and review prior testimony of possible police procedures expert, Dr. Leinen.	6.610
5005	5008.0	05/24/14	MB	Review and catalog new discovery production.	3.980
5006	5009.0	05/25/14	MB	Analyze case law granting summary judgment on plaintiff's Monell claims connected to practices in Mollen report.	4.000
5007	5010.0	05/26/14	MB	Draft writeup on blue wall of silence research.	6.230
5008	5011.0	05/27/14	MB	Create Medical defendants evaluation timeline in the ER, psyche ER, and psyche ward.	5.980
5009	5012.0	05/28/14	MB	Hearing with Judge Sweet oral arguments on motion.	2.000
5010	5013.0	05/28/14	MB	Prepare Weiss deposition; team conference call re Weiss deposition.	4.100
5011	5015.0	05/29/14	MB	Draft summary of Weiss deposition send to counsel; prepare for JHMC 30(b)6 depositions on policy; review Beiner's depo transcript; draft questions.	6.700
5012	5017.0	06/04/14	MB	Prepare for Ferrara Deposition.	3.000
5013	5019.0	06/06/14	MB	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.	2.500
5014	5020.0	06/09/14	MB	Team conference call w/ Adrain re trial prep and update.	1.500
5015	5021.0	06/13/14	MB	Team conference call w/ Silverman and Eterno re expert testimony; conference with Nat re conflict of interest issue.	2.500
5016	5022.0	06/27/14	MB	Prep for Mauriello's deposition; review prior deposition; review City defendants depo summaries.	4.000
5017	5023.0	07/01/14	MB	Mauriello Deposition.	0.000
5018	5024.0	07/02/14	MB	Prep for Lwin deposition; review Beiner deposition notes and hospital chart.	1.500
5019	5027.0	07/13/14	MB	Prep for City 30(b)(6) deposition topics; research anti-quota law, New York Labor Law § 215-a, and Operations Order No. 52.	6.000
5020	5030.0	07/18/14	MB	Team conference call with expert Dr. Halpren.	2.000
5021	5031.0	07/22/14	MB	Research re City's application of subsequent remedial measure; team conference call re status.	3.650
5022	5032.0	07/24/14	MB	City 30(b)(6) witness deposition, Cooper.	0.000
5023	5033.0	07/24/14	MB	Prep for Patel deposition.	1.000
5024	5034.0	07/25/14	MB	Patel deposition.	0.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5025	5035.0	07/31/14	MB	Analyze potential withdrawal of claims.	2.150
5026	5036.0	07/31/14	MB	Team conference call with experts, Halpern-Ruder and Dr. Lubit.	1.500
5027	5037.0	08/04/14	MB	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.	3.100
5028	5038.0	08/06/14	MB	Conference call with Nat re: defendant's objection to video; new assignments.	0.500
5029	5039.0	08/09/14	MB	Review and analyze Dr. Lubit's expert report.	3.130
5030	5040.0	08/10/14	MB	Team conference call with Dr. Lubit re testimony.	1.250
5031	5041.0	08/14/14	MB	Draft response addressing 8.5.14 Letter re: Purpi's 30(b)(6) issues.	4.900
5032	5042.0	09/04/14	MB	Search for missing case citations for Dr. Lubit's prior expert testimony.	2.320
5033	5043.0	09/12/14	MB	Team Meeting weekend in Mayfield, NY (including travel time of 4 hours).	6.000
5034	5044.0	09/13/14	MB	Team Meeting weekend in Mayfield, NY.	7.500
5035	5045.0	09/14/14	MB	Team Meeting weekend in Mayfield, NY (including travel time of 4 hours).	6.000
5036	5046.0	09/20/14	MB	Review Medical defendants expert reports; review expert Tancredo's deposition transcripts.	4.620
5037	5047.0	09/21/14	MB	Team meeting with Dr. Lubit re: deposition prep.	4.000
5038	5048.0	10/02/14	MB	Team conference call re: trial prep.	0.750
5039	5049.0	10/03/14	MB	Team meeting Nat's office re upcoming motion papers; conference w/Adrian.	3.000
5040	5050.0	10/18/14	MB	Research Rule 68; review letter to Adrian re settlement offer.	4.000
5041	5051.0	10/19/14	MB	Conference call w/ team re Rule 68 Offer.	2.250
5042	5052.0	10/23/14	MB	Create claims "cheat sheet" from proposed jury instructions.	5.890
5043	5053.0	10/23/14	MB	Review/comment re: Letter Rejecting Rule 68 Offer.	1.000
5044	5054.0	12/01/14	MB	Review 2nd Amended Complaint track proposed changes.	4.700
5045	5055.0	12/02/14	MB	Review Third Amended Complaint; draft proposed addition of malicious abuse of process claim and violation of substantive and procedural due process claims.	4.660

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5046	5056.0	12/02/14	MB	Memo of law in support of Motion to Amend; examine and analyze developing caselaw re: respondent superior liability for private corporations under § 1983 (Shields).	7.920
5047	5057.0	12/03/14	MB	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.	6.500
5048	5058.0	12/03/14	MB	Review final draft Third Amended Complaint; review final draft Memo in Support.	5.250
5049	5059.0	12/11/14	MB	Meeting Nat's office re: NYPD and Medical Defendants summary judgment claims.	5.250
5050	5060.0	12/16/14	MB	Draft summary judgment issues; analyze Fourth Amendment search and seizure Second Circuit summary judgment decisions.	7.600
5051	5061.0	12/18/14	MB	Mauriello's Counterclaim issue; analyze tortious interference w/prospective advantage summary judgment decisions.	8.800
5052	5062.0	12/19/14	MB	Summary judgment Memo in Support; research and analyze Second Circuit decisions determining exigent circumstances; review NYPD Patrol Guide emergency protocol.	5.200
5053	5063.0	12/20/14	MB	Summary judgment motion; review MHL statute provisions, JHMC hospital chart and record.	5.400
5054	5064.0	12/21/14	MB	Summary judgment memo in support draft; track comments and caselaw support.	7.400
5055	5065.0	12/22/14	MB	Review Summary judgment memo in support draft; track comments and changes.	6.500
5056	5066.0	12/22/14	MB	Review final draft Summary judgment Memo in Support.	3.700
5057	5067.0	01/04/15	MB	Review City defendants summary judgment motions; research caselaw cited.	4.000
5058	5068.0	01/05/15	MB	Review Medical defendants summary judgment motions; research cited caselaw; conference with Nat re: motions.	6.000
5059	5069.0	01/07/15	MB	Prepare for opposition papers; draft Medical Defendants' summary judgment issues; analyze cited caselaw.	6.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5060	5070.0	01/08/15	MB	Meeting with Nat re: Medical Defendants summary judgment issues; conduct research on issues.	5.500
5061	5071.0	01/09/15	MB	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.	6.100
5062	5072.0	01/11/15	MB	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.	4.000
5063	5073.0	01/12/15	MB	Research Medical Defendants summary judgment issues; draft the state action issue; analyze McGugan v. Aldana-Bernier and Doe.	5.550
5064	5074.0	01/14/15	MB	Research Medical Defendant's summary judgment motion issues; respondeat superior, vicarious liability; apparent authority.	5.400
5065	5075.0	01/15/15	MB	Research Medical Defendant's summary judgment issues; review Dr. Lubit's Report for establishing the standard of care.	7.100
5066	5076.0	01/16/15	MB	Continue research on Medical Defendants summary judgment issues; research applicable standard of care; analyze "substantially below" legal standard; review defendants deposition summaries.	6.700
5067	5077.0	01/21/15	MB	Continue research on defendants summary judgment issues; conspiracy/joint activity state action liability.	7.000
5068	5078.0	01/22/15	MB	Research re: intracorporate conspiracy doctrine.	6.750
5069	5079.0	01/26/15	MB	Research re: intracorporate doctrine; draft memo to counsel re: intra-Corporate doctrine.	6.420
5070	5080.0	01/27/15	MB	Draft memo to counsel re: intracorporate doctrine.	4.500
5071	5081.0	01/27/15	MB	Meeting with Nat re: opposition issues; 1st amendment issue.	4.500
5072	5082.0	01/28/15	MB	Research First Amendment issues; analyze recent development in the law limiting Garcetti (Lane, Griffin, Hagan).	7.000

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5073	5083.0	01/29/15	MB	Research intentional infliction of emotional distress claim.	4.700
5074	5084.0	01/29/15	MB	Continue IIED research; IIED claim not duplicative of the other claims issue.	3.400
5075	5085.0	02/01/15	MB	Memo to counsel re: IIED research.	6.830
5076	5086.0	02/02/15	MB	Research First Amendment issues; Monell research.	8.000
5077	5087.0	02/03/15	MB	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.	6.000
5078	5088.0	02/04/15	MB	Memo to counsel re: Monell research.	6.100
5079	5089.0	02/05/15	MB	Continue to research Medical Defendants Memo in Opposition issues; research defendant's argument of legal justification to confine plaintiff under EMTALA.	6.500
5080	5090.0	02/06/15	MB	Draft opposition to Medical Defendants summary judgment arguments.	5.600
5081	5091.0	02/07/15	MB	Draft opposition to Medical Defendants summary judgment arguments.	7.500
5082	5092.0	02/08/15	MB	Call with Nat discuss current status on JHMC opposition issues.	0.500
5083	5093.0	02/09/15	MB	Call with Nat re: progress on research Medical defendants issues.	0.500
5084	5094.0	02/10/15	MB	Draft opposition to JHMC summary judgment arguments.	4.600
5085	5095.0	02/10/15	MB	Draft opposition to JHMC summary judgment motions.	2.800
5086	5096.0	02/11/15	MB	Review and track proposed changes on first draft of Motion in Opposition.	5.650
5087	5097.0	02/11/15	MB	Review/edit second draft of Motion in Opposition.	3.750
5088	5098.0	02/13/15	MB	Review all defendants motions in opposition submissions; Meeting with Nat to discuss submissions.	6.000
5089	5100.0	02/14/15	MB	Draft issues re: reply to Mauriello opposition motion.	5.230
5090	5101.0	02/15/15	MB	Reply to Mauriello opp; research tortious interference with prospective relations claim; wrongful means constituting tortious conduct; malice intent as the "sole motivation" for plaintiffs alleged interference.	6.000
5091	5102.0	02/16/15	MB	Reply to Mauriello opposition motion; research defamation and damages.	4.300

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1	No.	Date	Timekeeper	Description	Hours
5092	5103.0	02/17/15	MB	Draft portion of reply to Mauriello opposition motion.	6.220
5093	5104.0	02/19/15	MB	Draft reply to Mauriello opposition motion.	4.230
5094	5105.0	02/20/15	MB	Team meeting; meet with Norinsberg and new team.	4.500
5095	5106.0	02/24/15	MB	reply to Medical defendants memo in opp.	7.200
5096	5106.0	02/25/15	MB	Research sham affidavit doctrine.	3.820
5097	5107.0	02/23/15	MB	Draft issues re: reply to Medical defendants memo in opp.	7.000
5098	5108.0	02/26/15	MB	Memo to counsel re; sham affidavit doctrine research.	4.300
5099	5109.0	02/27/15	MB	Research re: inadmissibility of hearsay on summary judgment motions.	4.700
5100	5110.0	02/28/15	MB	Draft issues re: reply to City memo in opposition.	6.080
5101	5111.0	03/02/15	MB	Research re: collective knowledge doctrine.	4.000
5102	5112.0	03/03/15	MB	Memo to counsel re: collective knowledge doctrine research.	5.160
5103	5113.0	03/05/15	MB	Review and track proposed changes to Reply motion draft.	5.500
5104	5114.0	03/06/15	MB	Final review/edit of Reply papers.	4.000
5105	5115.0	03/07/15	MB	Prepare police expert Prof. Eterno deposition summary.	5.050
5106	5116.0	03/08/15	MB	Prepare police expert Prof. Eterno's deposition summary.	7.050
5107	5117.0	03/09/15	MB	Draft Eterno Deposition Summary; team conference call.	6.900
5108	5118.0	03/10/15	MB	Draft Prof. Eterno deposition summary.	5.920
5109	5119.0	03/11/15	MB	Prepare Prof. Eterno deposition summary.	6.100
5110	5120.0	03/12/15	MB	Prepare Prof. Eterno deposition summary.	4.830
5111	5121.0	03/12/15	MB	Meeting with Team re new issues on reply.	3.000
5112	5122.0	03/12/15	MB	Revise NYPD jury instructions; distribute revised charges to counsel.	1.700
5113	5123.0	03/13/15	MB	Meeting Nat's office with new team re division of upcoming work.	4.000
5114	5124.0	03/16/15	MB	Review Defendants Reply memos.	3.000
5115	5125.0	03/16/15	MB	Draft Prof. Eterno's direct examination for trial.	2.100
5116	5126.0	03/17/15	MB	Review/comment March 17 Letter to the court.	1.200
5117	5127.0	03/18/15	MB	Draft Prof. Eterno's direct examination for trial.	6.500
5118	5128.0	03/19/15	MB	Draft Prof. Eterno's direct examination for trial.	4.300

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5119	5129.0	03/20/15	MB	Draft Prof. Eterno's direct examination for trial.	3.600
5120	5130.0	03/25/15	MB	Conference call w/ Nat re: status and assignments moving forward.	0.500
5121	5131.0	03/26/15	MB	Team meeting at Nat's new office; review Prof. Eterno's direct examination outline.	5.000
5122	5132.0	03/28/15	MB	Draft proposed jury instructions for claims against Medical Defendants; draft charges for medical malpractice and other state claims.	6.600
5123	5133.0	03/29/15	MB	Draft proposed jury instructions for Medical Defendants; draft state false imprisonment charge.	5.700
5124	5134.0	03/29/15	MB	Make changes to diagram of the Glendale apt.	1.700
5125	5135.0	03/30/15	MB	Call with Nat re: Glendale diagram/jury charges.	0.500
5126	5136.0	03/31/15	MB	Draft proposed jury instructions Medical Defendants; draft corporate negligence charge.	5.500
5127	5137.0	04/01/15	MB	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	5.700
5128	5138.0	04/02/15	MB	Trial Team meeting re trial prep, jury instructions.	0.100
5129	5139.0	04/03/15	MB	Combine NYPD and Medical Defendants Jury Instructions.	3.950
5130	5140.0	04/06/15	MB	Combine NYPD and Medical Defendants Jury Instructions.	6.330
5131	5141.0	04/08/15	MB	Revise jury instructions Medical Defendants incorporating Nat's edits; conference w/ team.	5.800
5132	5142.0	04/10/15	MB	Call with Nat re: progress on current projects.	0.750
5133	5143.0	04/13/15	MB	Conference with Judge Sweet; team conference.	2.500
5134	5144.0	05/05/15	MB	Review of Court's Opinion re: summary judgment motions.	1.000
5135	5145.0	05/12/15	MB	Conference with Judge Sweet; Trial team meeting re status.	3.500
5136	5146.0	05/27/15	MB	Draft motion for reconsideration issues; research post-suspension First Amendment claim; review cross examination outlines for defendants.	6.150
5137	5147.0	05/28/15	MB	Analyze Second Circuit freedom-of-speech cases (Jackler, Gacetti, Walsh); conference call w/ Nat re reconsideration motion.	4.330

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5138	5148.0	05/31/15	MB	Memo to counsel re: post-suspension retaliation claim.	4.780
5139	5149.0	06/01/15	MB	Review letter to Judge for reconsideration draft; track changes; research issue of qualified immunity in a First Amendment retaliation case.	6.900
5140	5150.0	06/02/15	MB	Memo to counsel re: qualified immunity and "clearly established" law doctrine.	4.250
5141	5151.0	09/15/15	MB	Review cross examination of defendants outlines; review/comment on client memo.	4.500
5142	5152.0	09/16/15	MB	Research Rule 68 issue; research offset issue; general obligations law 15-108.	2.250
5143	5171.0	11/18/12	Harvey A. Levine	Review of Larry Schoolcraft (LS) documents re: son's case; confer with RG re: evaluation potential strategies for Adrian Schoolcraft (AS) litigation	3.500
5144	5172.0	11/19/12	Harvey A. Levine	Further review of LS documents, ECF filings including pleadings & internet materials Meeting with RG to discuss case & strategy relative to further AS and LS contact	4.5
5145	5173.0	11/22/12	Harvey A. Levine	Conf. with RG & PG regarding meeting with AS & LS on moving forward, litigation strategies and client management issues.	1.000
5146	5174.0	11/23/12	Harvey A. Levine	TC's with RG re: issues arising during meeting with Adrian Schoolcraft (AS).	0.500
5147	5175.0	11/26/12	Harvey A. Levine	Conf with RG re: meeting with AS; review of documents from AS smart drive, ECF entries & documents; discuss discharge of outgoing counsel	4.500
5148	5176.0	11/28/12	Harvey A. Levine	Conf. with RG re: prior cc oushnel discharge "for cause" issues dispute over disbursements	0.450
5149	5177.0	11/30/12	Harvey A. Levine	Conf. with RG re: TC with co-counsel re: AS email and discharge of PC "for cause"	1.500
5150	5178.0	12/3/12	Harvey A. Levine	Conf. with RG re: discharge/email from outgoing attorney & TC from PG and TC with AS	0.500
5151	5179.0	12/7/12	Harvey A. Levine	Conf. with RG, re: AS disciplinary charges with NYPD/employment issues/potential damages reinstatement/retirement	1.5
5152	5180.0	12/11/12	Harvey A. Levine	TCs with RG re: meeting with AS, etc. Issues & strategies moving forward	.8

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5153	5181.0	12/14/12	Harvey A. Levine	Conf. with RG; review Queens D.A. press release Multiple, TC's with PG and AS; alternate responses discussed.	1.500
5154	5182.0	12/17/12	Harvey A. Levine	Conf. RG & PG re: discharge for cause. vs. alternatives; review of correspondence to outgoing attorney	1.500
5155	5183.0	12/18/12	Harvey A. Levine	Conf. RG & PG re: AS file transfer Begin Inventory of files	1.500
5156	5184.0	12/22/12	Harvey A. Levine	Cont. inventory of contents of file conf. w/ RG re: amended complaint	2.500
5157	5185.0	12/23/12	Harvey A. Levine	Complete inventory of AS files	3.500
5158	5186.0	12/26/12	Harvey A. Levine	Begin comprehensive review of transferred files & notes; pleadings & discovery	6.000
5159	5187.0	12/27/12	Harvey A. Levine	Continued review of AS files w/notes discovery materials	5.000
5160	5188.0	12/28/12	Harvey A. Levine	Continued review of AS files w/notes discovery materials	6.000
5161	5189.0	1/2/13	Harvey A. Levine	Continued review of AS files w/notes Conf. with PG & RG at office re: update on file review & discussion of "eyes only" file. continued review of file.	6.250
5162	5190.0	1/4/13	Harvey A. Levine	Continued review of file; meeting with PG	6.000
5163	5191.0	1/5/13	Harvey A. Levine	Memo summarizing and analyzing contents	3.500
5164	5192.0	1/8/13	Harvey A. Levine	Conf. with PG & RG reviewing analysis and Strategy going forward	3.500
5165	5193.0	1/11/12	Harvey A. Levine	Conf. with RG re: Union's failure to represent AS in trial room and/or return to full duty strategy	1.000
5166	5194.0	1/12/12	Harvey A. Levine	Review of research on Union's representation and failure to advocate for AS 2.0	0.700

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1	No.	Date	Timekeeper	Description	Hours
5167	5195.0	1/14/12	Harvey A. Levine	Conf. with RG re: Union rep. research & strategy	0.750
5168	5196.0	1/19/12	Harvey A. Levine	Conf. RG re: correspondence to Queens D.A. & redrafts	0.250
5169	5197.0	1/21/12	Harvey A. Levine	Review of PG correspondence Confer with RG letter	0.200
5170	5198.0	1/23/12	Harvey A. Levine	Review of PG correspondence to NYPD	0.125
5171	5199.0	1/29/12	Harvey A. Levine	Review of proposed AS affidavit for Center for Constitutional Rights (CCR)	0.500
5172	5200.0	1/30/12	Harvey A. Levine	Conf. with RG re: dinner meeting w/ PG with PG.	0.250
5173	5201.0	01/31/12	Harvey A. Levine	Review of RG cease & desist letter re: website	0.250
5174	5202.0	2/6/13	Harvey A. Levine	Conf. RG re: expansion of legal team; and transfer of banker boxes & files to PG & Nat Smith (NS) for scanning; organizing files	1.000
5175	5203.0	2/12/13	Harvey A. Levine	Conf. with RG re: deposition of AS	0.500
5176	5204.0	11/16/12	Richard A. Gilbert	Meeting with my Peter Gleason, Esq. (PG), Retired NYPD 2 nd grade Detective (D2) and Larry Schoolcraft (LS) to confer on merits of claim Filed by Adrian Schoolcraft (AS) against NYC, Jamaica Hospital & other medical defendants Review of documents provided by LS.	14
5177	5205.0	11/18/12	Richard A. Gilbert	Further review of documents provided and tc's with PG relating to AS. Conferred with Harvey Levine (HL) re: merits of claim and potential strategies for litigation	5.500
5178	5206.0	11/19/12	Richard A. Gilbert	Meeting with PG to discuss case parameters & strategy relative to further AS and LS contact. & impact of LS documents provided. Confer with Confer with HL re: PG discussion & strategy	2.500

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1	No.	Date	Timekeeper	Description	Hours
5179	5207.0	11/22/12	Richard A. Gilbert	Multiple phone conversation with PG regarding a meeting the following day with AS/LS. Confer with HL regarding potential strategies.	1.500
5180	5208.0	11/23/12	Richard A. Gilbert	Meeting with PG, AS, LS, in Albany to meet client Discussed scope of work, strategy, investigation.	10.500
5181	5209.0	11/26/12	Richard A. Gilbert	Confer with HL re: first AS meeting; Meeting with PG regarding obtaining Schoolcraft file from prior counsel (PC); review of client's smart drive, court notes and documents filed in USDC; TC with outgoing counsel; draft of correspondence to PC	3.400
5182	5210.0	11/27/12	Richard A. Gilbert	Obtained phone for client; further review of smart drive and filed documents; follow up phone conversation with PG on PC file with PG regarding the Schoolcraft file. TC with PC & follow up correspondence Forwarding Consent	2.450
5183	5211.0	11/28/12	Richard A. Gilbert	Review of PC case disbursements claimed as prereq. for transfer of file; research on atty. discharge for cause and excessive disbursements	4.200
5184	5212.0	11/29/12	Richard A. Gilbert	Research on "cause" continued; TC & email with AS re: facts underlying "cause" forward. TC with PG on "cause"	3.000
5185	5213.0	11/30/12	Richard A. Gilbert	TC with PC re: transfer of file vs. allowable disb. Multiple TCs with PG on strategy and focus of investigation, discharge of PC "for cause" & Review of AS email and attachments; confer with HL regarding course of action	1.500
5186	5214.0	12/2/12	Richard A. Gilbert	TC's. with PG regarding correspondence to and conversation with PC.	0.500
5187	5215.0	12/3/12	Richard A. Gilbert	Review of email from PC; confer with HL re: same TC with PG regarding e-mail from PC.	0.500
5188	5216.0	12/3/12	Richard A. Gilbert	Phone conv. with AS regarding e-mail from his previous counsel, investigation and setting up another meeting.	0.500
5189	5217.0	12/5/12	Richard A. Gilbert	Review of e-mail from AS & TC with PG re: transfer of file from PC	0.800

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1	No.	Date	Timekeeper	Description	Hours
5190	5218.0	12/6/12	Richard A. Gilbert	Phone conv. with PG re: VP investigation update	0.250
5191	5219.0	12/7/12	Richard A. Gilbert	Meeting with PG, re: NYPD disciplinary charges NYPD employment issues: confer with HL re: legal position on disciplinary charges & return to duty potential v. retirement	1.500
5192	5220.0	12/10/12	Richard A. Gilbert	E-mail and TC with PG, re: file transfer/termination for cause of PC.	0.500
5193	5221.0	12/11/12	Richard A. Gilbert	TC with PG regarding Albany meeting with AS & others; confer with HL re: same	0.500
5194	5222.0	12/13/12	Richard A. Gilbert	review of E-mail from AS with Queens D.A. Press Release re: no criminality: multiple TC's with PG and AS & confer with HL re: same	3.000
5195	5223.0	12/14/12	Richard A. Gilbert	Confer with HL re: press release; TC with PG, re: 1PP's position on AS.	1.000
5196	5224.0	12/14/12	Richard A. Gilbert	review of PG E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft; confer with HL re: same	0.125
5197	5225.0	12/17/12	Richard A. Gilbert	Review of E-mail to Kearns (NYPD) re: Schoolcraft NYPD employment issues; confer with HL	0.200
5198	5226.0	12/17/12	Richard A. Gilbert	Meeting with PG, update on securing file from PC, NYPD employment issues, investigation	2.000
5199	5227.0	12/17/12	Richard A. Gilbert	Additional research on discharge for cause. Conferred with HL re: merits of moving v. merits of negotiated transfer; conferred with PC reaching agreement on file transfer; draft letter	2.250
5200	5228.0	12/18/12	Richard A. Gilbert	Confer with PG prior to file transfer; travel to PC Office to effectuate transfer of 6 banker boxes of files; brief review of files at PC office.	6
5201	5229.0	12/19/12	Richard A. Gilbert	TC with AS & LS update & strategy discussed.	0.700
5202	5230.0	12/22/12	Richard A. Gilbert	Review of PG E-mail re, amended complaint Discuss with HL	0.200

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1	No.	Date	Timekeeper	Description	Hours
5203	5231.0	1/2/13	Richard A. Gilbert	Meeting with HL & PG at office re: update on file review & discussion of "eyes only" file. continued review of file.	4.500
5204	5232.0	1/4/13	Richard A. Gilbert	Continued review of file; meeting with PG	6.000
5205	5233.0	1/5/13	Richard A. Gilbert	Continued review of file Memo to file.	3.500
5206	5234.0	1/8/13	Richard A. Gilbert	Meeting with PG, HL re: file contents strategy.	3.500
5207	5235.0	1/9/12	Richard A. Gilbert	Meeting with PG RE: investigation strategy.	0.750
5208	5236.0	1/11/12	Richard A. Gilbert	Meeting with PG, re: Union's failure to represent Confer with HL on failure/strategy	1.000
5209	5237.0	1/12/12	Richard A. Gilbert	Research on Union's failure to advocate for A.S	2.000
5210	5238.0	1/14/12	Richard A. Gilbert	Meeting with PG, re: Queens DA. Research Discovery of D.A.'s investigative file: email PG Confer with HL regarding research outcome & strategy with regard to same	4.750
5211	5239.0	1/16/12	Richard A. Gilbert	Phone conv. with VP re: update, meeting to follow.	0.125
5212	5240.0	1/19/12	Richard A. Gilbert	Multiple e-mails to /from PG, re: draft letter to NYPD & redrafts	1.500
5213	5241.0	1/21/12	Richard A. Gilbert	Review of PG, re: NYPD letter. Confer with HL regarding letter	0.200
5214	5242.0	1/22/12	Richard A. Gilbert	Multiple emails to PG re: 1 PP letter Meeting with PG, Re: NYPD letter; review letter	1.800
5215	5243.0	1/23/12	Richard A. Gilbert	Phone conv. with PG, Re: NYPD letter	0.125
5216	5244.0	1/25/12	Richard A. Gilbert	Meeting with PG to discuss NYPD's response to e- mail communications.	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5217	5245.0	1/29/12	Richard A. Gilbert	Review of PG E-mail & affidavit from Center for Constitutional Rights (CCR)	0.500
5218	5246.0	1/29/12	Richard A. Gilbert	Dinner meeting with PG, FS atty. Discuss potential expert consulting	1.500
5219	5247.0	1/30/12	Richard A. Gilbert	Confer with HL re: dinner meeting; multiple TC's with PG.	0.700
5220	5248.0	1/31/12	Richard A. Gilbert	Per conv. PG draft cease & desist to PC Regarding website	0.400
5221	5249.0	2/1/12	Richard A. Gilbert	E-mail to PG, re: e-mail from CCR. Final draft cease & desist to PC re: website	0.125
5222	5250.0	2/2/13	Richard A. Gilbert	Draft memo on warrantless search by NYPD TC's with AS & LS re: progress / strategy	2.500
5223	5251.0	2/5/13	Richard A. Gilbert	Research memo & draft subpoena to Queens D.A.	2.500
5224	5252.0	2/6/13	Richard A. Gilbert	Organize file for transfer to PG & Nat Smith (NS)	1.000
5225	5253.0	2/7/13	Richard A. Gilbert	Draft receipt to PG for transfer of hard copy of files For scanning for the legal team.	0.500
5226	5254.0	2/10/13	Richard A. Gilbert	Review of file for deposition	3.000
5227	5255.0	2/11/13	Richard A. Gilbert	Emails to/from PG, re: deposition.	0.200
5228	5256.0	2/11/13	Richard A. Gilbert	Conf. call Chambers of Judge Scheindlin and conferred with AS, PG & NS NS, AS & RG.	2.000
5229	5257.0	2/12/13	Richard A. Gilbert	Prep and defense of deposition of AS	6.000
5230	5258.0	2/13/13	Richard A. Gilbert	Phone conv. with PG & NS, re: case status.	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED IN "NO." ORDER IN COLUMN A)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5231	5259.0	2/14/13	Richard A. Gilbert	Meeting with PG & NS at office & file transfer of Nat Smith. Meeting with NS to discuss how file is formatted. Meeting with AS and legal team.	0.500
5232	5260.0	2/21/13	Richard A. Gilbert	Email to PG re: file preservation	0.250
5233	5261.0	2/27/13	Richard A. Gilbert	Review of e-mail from Corp. Counsel containing additional "Attorney's eyes only" documents and discussion with PG & NS.	1.250
5234	5262.0	3/1/13	Richard A. Gilbert	Review of A.S. deposition transcript	1.300
5235	5263.0	3/5/13	Richard A. Gilbert	TC's with PG updating status	0.200
5236	5264.0	3/21/13	Richard A. Gilbert	TC's with PG updating status	0.300
5237	5265.0	3/25/13	Richard A. Gilbert	TC's with PG updating status	0.200
5238	5266.0	4/2/13	Richard A. Gilbert	TC's with PG updating status	0.200
5239	5267.0	4/8/13	Richard A. Gilbert	TC's with PG regarding appearance SDNY re: gag order & other relief; review of papers in support and opposition to relief	2.5
5240	5267.1	4/8/13	Richard A. Gilbert	TC's with PG regarding appearance SDNY re: gag order & other relief; review of papers in support and opposition to relief	0.300
5241	5268.0	4/11/13	Richard A. Gilbert	Appearance SDNY oral argument	2.000
5242				TOTAL	9279.09