

EXHIBIT A-1

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2	262.0	06/06/10	JLN	Discussions with Joshua Fitch ("JF") re Schoolcraft case	0.800
3	2933.0	06/06/10	JPF	Meeting w/ Gerald Cohen ("GC") and JN re: Schoolcraft coming to our office for interview	0.800
4	263.0	06/18/10	JLN	Meeting w/ Gerald Cohen ("GC") and JF re: Schoolcraft coming to our office for interview	0.800
5	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
6	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
7	264.0	06/20/10	JLN	Read Voice articles on Schoolcraft	2.100
8	2769.0	06/20/10	JPF	Reading Village Voice articles on; Schoolcraft and Halloween night	2.100
9	2934.0	06/20/10	JPF	Discussions with Jon Norinsberg (JN) re Schoolcraft case	0.800
10	3394.0	06/20/10	GMC	Email from Adrian Schoolcraft (AS) re: meeting with JN	0.100
11	265.0	06/21/10	JLN	Read articles sent by Schoolcraft on Gerald Nelson	0.800
12	3012.0	06/21/10	JPF	Review of articles sent by Schoolcraft on Gerald Nelson	0.600
13	3395.0	06/21/10	GMC	Email from AS re: Gerald Nelson	0.250
14	266.0	06/22/10	JLN	Discussion with GC and JF re Schoolcraft case & causes of action	0.800
15	2931.0	06/22/10	JPF	Discussion with Gerald Cohen (GC) and JN re Schoolcraft case & causes of action	0.800
16	267.0	06/23/10	JLN	Meeting w/ GC and JF re: GC's upcoming meeting w/ Schoolcraft	0.750
17	2963.0	06/23/10	JPF	Meeting w/JN and GC re: JN's upcoming meeting w/ district attorney	0.750
18	3396.0	06/23/10	GMC	Meeting w/JN and JF re: JN's upcoming meeting w/ district attorney	0.750
19	268.0	06/24/10	JLN	Initial client meeting & interview with AS in Johnstown	7.400
20	269.0	06/24/10	JLN	Traveled to Johnstown to meet prospective Client Adrian Schoolcraft (3.6)	1.800
21	270.0	06/24/10	JLN	Travel back to NYC (3.2)	1.600
22	271.0	06/24/10	JLN	TC with GC re: meeting w/Schoolcraft	0.400
23	3397.0	06/24/10	GMC	PC with JN re: meeting w/Schoolcraft	0.400
24	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

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1	No.	Date	Timekeeper	Description	Hours
25	273.0	06/25/10	JLN	Read Schoolcraft's PBA contract; took notes re: same	2.500
26	274.0	06/25/10	JLN	Meeting with GC & JF re: possible discovery demands after suit is filed and general strategy	1.400
27	275.0	06/25/10	JLN	Reviewed transcript of Polanco tapes; took notes re: same	0.400
28	276.0	06/25/10	JLN	Sent GC information for retainer; forwarded retainer to AS; forwarded signed retainer back to GC	0.100
29	1753.0	06/25/10	NB	Saved retainer signed by client to file	0.100
30	1754.0	06/25/10	NB	Prepared Substitution of Attorney for taking case over from JM	0.200
31	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
32	2739.0	06/25/10	JPF	Review of Schoolcraft 's Patrolmens Benevolent Assocation ("PBA") contract	2.500
33	2819.0	06/25/10	JPF	Meeting with GC & JN re: possible discovery demands after suit is filed	1.400
34	3184.0	06/25/10	JPF	Review of Schoolcraft retainer	0.250
35	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
36	3399.0	06/25/10	GMC	Review of AS medical records	1.750
37	3400.0	06/25/10	GMC	Meeting with JF & JN re: possible discovery demands after suit is filed	1.400
38	3401.0	06/25/10	GMC	Drafted retainer for Schoolcraft	0.600
39	277.0	06/26/10	JLN	Reviewed Schoolcraft's records from Jamaica Hospital Medical Center; took notes re: same	3.250
40	2710.0	06/26/10	JPF	Review of Schoolcraft's medical records	3.100
41	2876.0	06/26/10	JPF	Review of PBA contract	1.250
42	3402.0	06/26/10	GMC	Reviewed transcript of Polanco tapes	0.750
43	278.0	06/28/10	JLN	Discussion with JF and GC re retainer & meeting with Schoolcrafts	1.250
44	279.0	06/28/10	JLN	Discussion with JF re meeting with P.O. Velasquez re policy of quotas	0.900
45	280.0	06/28/10	JLN	Discussion with JF & Adrian Schoolcraft (AS) re prior counsel Jonathan Moore	0.300
46	281.0	06/28/10	JLN	Memo re: Eddie Velasquez	0.300
47	282.0	06/28/10	JLN	Review of correspondence w/Jonathan Moore re: AS	0.100
48	1755.0	06/28/10	NB	Downloaded documents from new client Adrian Schoolcraft from CD to compuler file	0.200
49	1756.0	06/28/10	NB	Faxed Substitution of Attorney to Jonathon Moore; mailed same via regular mail	0.200

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1	No.	Date	Timekeeper	Description	Hours
50	1757.0	06/28/10	NB	Saved Witness Summary of Eddie Valasquez to client file	0.100
51	1758.0	06/28/10	NB	E-mailed Substitution of Attorney and Signed retainer Agreement to J LN	0.100
52	1759.0	06/28/10	NB	Saved additional witness information to client file	0.100
53	2851.0	06/28/10	JPF	Discussion with JN and GC re retainer & meeting with Schoolcrafts	1.250
54	2914.0	06/28/10	JPF	Discussion with JN re meeting with P.O. Velasquez re policy of quotas	0.900
55	3099.0	06/28/10	JPF	Discussion with JN, GC & Adrian Schoolcraft ("AS") re: prior counsel Jonathan Moore	0.300
56	3403.0	06/28/10	GMC	Online search of PBA Arbitration decision and phone call w/Bonnie Siber Weinstock (arbitrator)	2.100
57	3404.0	06/28/10	GMC	Discussion with JN and JF re retainer & meeting with Schoolcrafts	1.250
58	3405.0	06/28/10	GMC	Discussion with JN, JF & Adrian Schoolcraft (AS) re: prior counsel Jonathan Moore	0.300
59	3406.0	06/28/10	GMC	Review of interview memo re: Eddie Velasquez	0.300
60	3407.0	06/28/10	GMC	Review of correspondence w/Jonathan Moore re: AS	0.100
61	283.0	06/29/10	JLN	Listened to "home invasion" recording from Oct. 31 multiple times; took notes re: same	2.600
62	284.0	06/29/10	JLN	Meeting w/ GC and JF re: PBA materials for use in Schoolcraft	1.250
63	285.0	06/29/10	JLN	Review of 75th Pct arbitration decision	0.900
64	286.0	06/29/10	JLN	Discussion with JF & GC re decision on PBA arbitration case	0.400
65	287.0	06/29/10	JLN	Drafted correspondence to Jonathan Moore	0.300
66	288.0	06/29/10	JLN	Correspondence w/ GC re: Jonathan Moore substitution	0.200
67	289.0	06/29/10	JLN	Discussion with JF & GC re substitution of counsel Moore	0.200
68	290.0	06/29/10	JLN	E-mail exchange GC re: Schoolcraft matter	0.200
69	291.0	06/29/10	JLN	E-mail exchange with AS re: 911 calls and getting copies of same	0.100
70	292.0	06/29/10	JLN	E-mail from GC re: Stop and Frisk case	0.100
71	293.0	06/29/10	JLN	E-mail to GC re: Stop and Frisk case	0.100
72	2869.0	06/29/10	JPF	Receipt & review of Weinstein arbitration decision in PBA case	1.250
73	3055.0	06/29/10	JPF	Disussion with JN & GC re decision on PBA arbitration case	0.400

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1	No.	Date	Timekeeper	Description	Hours
74	3141.0	06/29/10	JPF	Discussion with JN & GC re substitution of counsel Moore	0.250
75	3408.0	06/29/10	GMC	Meeting w/JN and JF re: PBA matters and how they can be used in Schoolcraft	1.250
76	3409.0	06/29/10	GMC	Review of David Velez arbitration decision	0.500
77	3410.0	06/29/10	GMC	Discussion with JN & JF re decision on PBA arbitration case	0.400
78	3411.0	06/29/10	GMC	Correspondence w/JN re: Jonathan Moore	0.250
79	3412.0	06/29/10	GMC	Discussion with JN & JF re substitution of counsel Moore	0.250
80	3413.0	06/29/10	GMC	Email from JN re: Stop and Frisk case	0.100
81	3414.0	06/29/10	GMC	Email to JN re: Stop and Frisk case	0.100
82	3415.0	06/29/10	GMC	Review of email from JN re: Schoolcraft matter	0.100
83	3416.0	06/29/10	GMC	Sent email to JN re: Schoolcraft matter	0.100
84	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
85	295.0	06/30/10	JLN	Listened to call from AS to IAB on Oct. 31; took notes re: same	0.700
86	296.0	06/30/10	JLN	Reviewed composite file of materials on Cmr. Julie Schwartz compiled by AS	0.600
87	297.0	06/30/10	JLN	Discussion with JF & GC re FOIL requests for 911 calls & how to proceed	0.500
88	298.0	06/30/10	JLN	Reviewed FOIL requests for 911 calls made by AS to NYPD and discussed with JF	0.300
89	299.0	06/30/10	JLN	Reviewed PBA quota affidavit	0.100
90	2950.0	06/30/10	JPF	Review of PBA website internal access for P.O.s with AS	0.800
91	3024.0	06/30/10	JPF	Discussion with JN & GC re FOIL requests for 911's & how to proceed	0.500
92	3128.0	06/30/10	JPF	Review of FOIL requests for 911 calls made by AS to NYPD and discuss with JN	0.300
93	3417.0	06/30/10	GMC	Discussion with JN & JF re FOIL requests for 911's & how to proceed	0.500
94	3418.0	06/30/10	GMC	Review of email from AS	0.100
95	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
96	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
97	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

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1	No.	Date	Timekeeper	Description	Hours
98	303.0	07/01/10	JLN	Reviewed UF 49 dated Aug. 20, 2009 from AS to C. Campisi (Chief IAB)	0.200
99	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
100	1760.0	07/01/10	NB	Calendared JLN meeting with Justice Dept. re: Schoolcraft	0.100
101	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
102	306.0	07/02/10	JLN	Reviewed media stories & news articles provided by AS; notes re: same	4.200
103	307.0	07/02/10	JLN	Discussion with JF re AS' ability to pursue claim under Labor Law 215-a	0.600
104	2659.0	07/02/10	JPF	Research of Labor Law 215-a for potential claim	3.750
105	2993.0	07/02/10	JPF	Discussion with JN re AS' ability to pursue claim under Labor Law 215-a	0.600
106	3419.0	07/02/10	GMC	Phone call w/Eric Schneiderman staff re: Schoolcraft	0.300
107	2643.0	07/03/10	JPF	Review of Schoolcraft recordings	4.250
108	308.0	07/04/10	JLN	Read e-mails from A. Schoolcraft re: articles on Mauriello and Palestro	0.250
109	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
110	310.0	07/05/10	JLN	Reviewed composite file on Ray Kelly prepared by AS; took notes re:same	1.600
111	311.0	07/05/10	JLN	T/c AS re: Palestro, Daily News Contact, trip to NYC and news interviews	1.200
112	312.0	07/05/10	JLN	Reviewed memo showing contact between Lt. Caughey & Lt. R. Lee at Early Intervention Unit ("EIU")	0.100
113	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
114	314.0	07/06/10	JLN	Meeting w/ GC and JF re: new whistleblower who contacted GC re: Schoolcraft	1.300
115	315.0	07/06/10	JLN	T/c Len Levit re: his knowledge of NYPD & thoughts about case	0.500
116	316.0	07/06/10	JLN	T/c R.P. (Daily News reporter) re: AS case;	0.500
117	2715.0	07/06/10	JPF	Research Labor Law issue	2.900
118	2793.0	07/06/10	JPF	Meeting w/JN and JF re: new whistleblower contacted JN re: Schoolcraft	1.300

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1	No.	Date	Timekeeper	Description	Hours
119	2837.0	07/06/10	JPF	Meeting w/JN and GC re: new whistleblower contacted JN re: Schoolcraft	1.300
120	3420.0	07/06/10	GMC	Meeting w/JN and JF re: new whistleblower contacted JN re: Schoolcraft	1.300
121	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
122	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
123	318.0	07/07/10	JLN	Reviewed Schoolcraft documents, evals, memos, letters to PBA, letters to Mauriello	2.700
124	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
125	320.0	07/07/10	JLN	Meeting w/ AS prior to group meeting later today	1.500
126	321.0	07/07/10	JLN	Discussion with JF re Labor Law research	0.800
127	322.0	07/07/10	JLN	Meeting with AS, LS, JF & GC	0.750
128	323.0	07/07/10	JLN	Meeting with JF and GC re Schoolcraft Meeting and tapes;	0.500
129	324.0	07/07/10	JLN	T/c AS/LS and Hampton Inn re: authorization for cc; fax letter re same	0.250
130	2808.0	07/07/10	JPF	Meeting w/ only with AS	1.500
131	2932.0	07/07/10	JPF	Discussion with JN re Labor Law research	0.800
132	2964.0	07/07/10	JPF	Meeting with AS, LS, GC & JN	0.750
133	3351.0	07/07/10	JPF	E-mail to JN re Labor Law research	0.100
134	3422.0	07/07/10	GMC	Reviewed of Schoolcraft documents, evals, photos, memos, UF49s, letters to PBA, letters to Mauriello...	2.900
135	3423.0	07/07/10	GMC	Listened to Schoolcraft recordings	1.800
136	3424.0	07/07/10	GMC	Meeting w/only Schoolcraft	1.500
137	3425.0	07/07/10	GMC	Meeting with AS, Larry Schoolcraft (LS), JF & JN	0.750
138	325.0	07/08/10	JLN	Started review of CD Recordings (2008 roll calls) provided by AS; took notes re: same	3.700
139	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
140	327.0	07/08/10	JLN	T/c with LS regarding status of move and discussions with landlord Stretmoyers (witnesses)	0.250
141	328.0	07/08/10	JLN	Read tribute to Mauriello praising effectiveness in crime reduction	0.100

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1	No.	Date	Timekeeper	Description	Hours
142	329.0	07/08/10	JLN	Reviewed UF 49 from AS to DI Brower (former CO 81) re: forced overtime	0.100
143	330.0	07/09/10	JLN	Continued listening to 2008 Roll Call recordings; notes re: same.	6.400
144	331.0	07/09/10	JLN	Discussion with JF re timeline	1.100
145	332.0	07/09/10	JLN	Drafted bullet pt time line summarizing criT/cal events in Schoolcraft case	1.000
146	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
147	334.0	07/09/10	JLN	Reviewed PG Guide 314-11- re: appeals of evaluation; took notes re: same	0.400
148	2764.0	07/09/10	JPF	Review of Schoolcraft timeline prepared by JN	2.250
149	2883.0	07/09/10	JPF	Discussion with JN re timeline	1.100
150	3426.0	07/09/10	GMC	Reviewed AS timeline of events	1.400
151	335.0	07/12/10	JLN	Listened to recording of appeal meeting on Feb. 25, 2009; replayed and took notes re: same	3.400
152	336.0	07/12/10	JLN	T/c AS re QAD interviews and PBA letter re: illegal quotas	0.750
153	337.0	07/12/10	JLN	Reviewed memo from Lt. Mascol re: TS operators not to speak with complainants	0.100
154	1761.0	07/12/10	NB	Went through documents from CD Schoolcraft's provided; watched videos & recordings & prepared digest of same	4.100
155	2638.0	07/12/10	JPF	Review of Schoolcraft tapes	4.400
156	3427.0	07/12/10	GMC	Draft Schoolcraft complaint	2.300
157	338.0	07/13/10	JLN	Review of additional Schoolcraft recordings; took notes re: same	4.200
158	339.0	07/13/10	JLN	Reviewed recording of conv. blw AS & Lt. Mascol on Feb. 20, 20September ; took notes re: same	0.600
159	340.0	07/13/10	JLN	Reviewed FDNY PCR for AS; took notes re: same	0.500
160	341.0	07/13/10	JLN	T/c Rae Koshets re: status of Schoolcraft matter & pending charges & speed	0.500
161	342.0	07/13/10	JLN	Listened to recording b/w AS & Det. Peterson on Sept. 13, 2009	0.400
162	343.0	07/13/10	JLN	T/c RP re: Frank Palestro	0.250
163	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
164	1763.0	07/13/10	NB	Continued review of Schoolcraft recordings; prepared digest of same	4.200

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165	1764.0	07/13/10	NB	Examined FDNY PCR for AS; prepared summary of same	0.500
166	1765.0	07/13/10	NB	Reviewed recording of conversations b/w AS & Lt. Mascol on Feb. 20, 2009; prepared digest of	0.600
167	3428.0	07/13/10	GMC	Reviewed Schoolcraft materials, listened to recording, made notes for further drafting of complaint	1.750
168	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
169	345.0	07/14/10	JLN	Meeting w/ GC and JF re: Schoolcraft complaint & next steps for moving forward	1.250
170	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
171	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
172	1766.0	07/14/10	NB	Continued reviewing CD recordings (2008 roll calls) and prepared digest of same	3.600
173	2669.0	07/14/10	JPF	Review of Schoolcraft tapes	3.600
174	2858.0	07/14/10	JPF	Meeting w/JN and GC re: Schoolcraft complaint	1.250
175	3429.0	07/14/10	GMC	Meeting w/JN and JF re: Schoolcraft complaint	1.250
176	348.0	07/15/10	JLN	Review of Schoolcraft recordings (2008 roll calls)	3.100
177	349.0	07/15/10	JLN	Discussion with GC and JF re tapes	1.100
178	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
179	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
180	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
181	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
182	354.0	07/15/10	JLN	Reviewed AS Meritorious Police Duty Medal	0.100

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183	355.0	07/15/10	JLN	Reviewed ltr from AS to Senator Hugh Farley requesting assistance	0.100
184	356.0	07/15/10	JLN	Reviewed UF 49 from AS to Mauriello dated 9/2/09 re: appeal of his evaluation	0.100
185	1767.0	07/15/10	NB	Continued reviewing Schoolcraft roll calls (2009 roll calls); prepared digest of same	3.100
186	2678.0	07/15/10	JPF	Review of Schoolcraft tapes	3.400
187	2882.0	07/15/10	JPF	Discussion with GC and JN re tapes	1.100
188	3430.0	07/15/10	GMC	Draft Schoolcraft complaint	2.100
189	3431.0	07/15/10	GMC	Discussion with JF and JN re tapes	1.100
190	357.0	07/16/10	JLN	Continued listening to recordings (appeal meeting; Mascot conversation; Lauterborn Duty Captain incident); took notes re same.	5.400
191	358.0	07/16/10	JLN	Continued review of Schoolcraft recordings (2008 roll calls)	3.400
192	359.0	07/16/10	JLN	Meeting with GC re: Schoolcraft issues and status of complaint & overall strategy	1.250
193	360.0	07/16/10	JLN	Reviewed composite file on Brandon Del Pozzo (former CO of 50 Pct);	1.200
194	361.0	07/16/10	JLN	T/c AS re: Eric Sanders conversation and status of hard drive retrieval	0.750
195	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
196	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
197	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
198	3432.0	07/16/10	GMC	Meeting with JN re: Schoolcraft issues and complaint	1.250
199	365.0	07/17/10	JLN	Listened to 3 different recordings of interviews by Lamstein (NYPD Psych); took notes re same:	3.400
200	366.0	07/17/10	JLN	Reviewed 81st Pct Chart regarding monthly self-inspections for 20September ; notes re: same	0.300
201	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
202	368.0	07/17/10	JLN	E-mail exchange with AS re: UF 250's	0.100
203	2644.0	07/17/10	JPF	Review of Schoolcraft tapes	4.250
204	3433.0	07/17/10	GMC	Reviewed of Schoolcraft documents, evals, photos, memos, UF49s, letters to PBA, letters to Mauriello...	2.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
205	2654.0	07/18/10	JPF	Review of Schoolcraft tapes	3.900
206	369.0	07/19/10	JLN	Review of Schoolcraft roll calls (2009 roll calls); notes re: same	4.200
207	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
208	3434.0	07/19/10	GMC	Review of Village Voice Articles re: Schoolcraft	1.250
209	371.0	07/20/10	JLN	Continued review of Schoolcraft roll calls (2009); took notes on same	3.900
210	372.0	07/20/10	JLN	T/c with AS regarding case status	0.500
211	3435.0	07/20/10	GMC	Researched case law for complaint and continued drafting complaint	2.100
212	373.0	07/21/10	JLN	T/c call b/w AS, JN&LS re: GR infonnation and Del Pozzo "offer" & new officer fired b/c if quotas	2.100
213	374.0	07/21/10	JLN	Conference call b/w Graham Raymond ("GR") GR & AS & LS re call by NYPD to GR	1.200
214	375.0	07/21/10	JLN	T/c GR re NYPD contact by Brandon Del Pozzo re Schoolcraft employment issues	0.250
215	2629.0	07/21/10	JPF	Review of Schoolcraft documents & tapes	4.750
216	3436.0	07/21/10	GMC	Drafted complaint	1.500
217	376.0	07/22/10	JLN	Continued review of Schoolcraft recordings (2009 roll calls)	3.100
218	377.0	07/22/10	JLN	T/c AS re Del Pozzo, GR & letters to Stuart London	1.100
219	378.0	07/22/10	JLN	T/c JFIGC re updates on Schoolcraft	0.500
220	379.0	07/22/10	JLN	E-mail exchange with AS re: council speaker wants CCRB to try its own cases	0.100
221	2708.0	07/22/10	JPF	Review of Schoolcraft documents & tapes	3.100
222	2817.0	07/22/10	JPF	Discussed causes of action w/GC	1.400
223	3437.0	07/22/10	GMC	Discussed causes of action w/JF	1.400
224	3440.0	07/23/10	GMC	Drafted and revised complaint	1.250
225	380.0	07/26/10	JLN	Meeting with JF & GC re case & updates on Brendan Del Pozzo	2.100
226	381.0	07/26/10	JLN	Meeting JF/GC reissues for Schoolcraft complaint	1.000
227	382.0	07/26/10	JLN	Discussion with GC & JF re complaint draft next steps moving forward	0.600
228	383.0	07/26/10	JLN	T/c Larry Schoolcraft re: Del Pozzo e-mail GR & PBA letter to Stuart London	0.600
229	384.0	07/26/10	JLN	Discussion w/ GC re Brandon del Pozzo	0.300
230	385.0	07/26/10	JLN	T/c w/ GR re: new rookie (PO Chris Bienz) fired b/c of quota	0.300
231	386.0	07/26/10	JLN	Sent E-mail to GC re: Del Pozzo	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
232	2767.0	07/26/10	JPF	Meeting with JN & GC re case & updates on Brendan Delpozo	2.100
233	2828.0	07/26/10	JPF	Review of draft of Complaint prepared by GC	1.400
234	2903.0	07/26/10	JPF	Meeting GC and JN re issues for Schoolcraft complaint	1.000
235	2987.0	07/26/10	JPF	Discussion with GC & JN re Complaint & drafts going forward	0.600
236	3439.0	07/26/10	GMC	Review and revised Schoolcraft materials and complaint	3.100
237	3439.0	07/26/10	GMC	Meeting with JN & JF re case & updates on Brendan Delpozo	2.100
238	3441.0	07/26/10	GMC	Meeting JF and JN re issues for Schoolcraft complaint	1.000
239	3442.0	07/26/10	GMC	Discussion with JF & JN re Complaint & drafts going forward	0.600
240	3443.0	07/26/10	GMC	Discussion w/JN re Brandon del Pozo	0.300
241	3444.0	07/26/10	GMC	Review of email from JN re: Del Pozo	0.100
242	387.0	07/27/10	JLN	Meeting w/AS, GC, JF to prep for discussion with US attorneys office EDNY	3.250
243	388.0	07/27/10	JLN	Meeting w GC and JF to discuss complaint	1.250
244	389.0	07/27/10	JLN	Mtg GC re draft of complaint and proposed revisions	0.750
245	2859.0	07/27/10	JPF	Meeting w/JN and GC to discuss Complaint	1.250
246	3445.0	07/27/10	GMC	Review and revise Complaint	2.000
247	3446.0	07/27/10	GMC	Meeting w/JN and JF to discuss Complaint	1.250
248	3447.0	07/27/10	GMC	Mtg JN re draft of complaint and proposed revisions	0.750
249	390.0	07/28/10	JLN	Discussion with JF and GC re: Adhyl Polanco and other whistleblowers	0.500
250	391.0	07/28/10	JLN	Discussion with JF re complaint (proposed areas for improvement)	0.400
251	392.0	07/28/10	JLN	E-mail to JF re meeting with Polanco, Raymond & Rocco	0.100
252	393.0	07/28/10	JLN	Reviewed AS Certificate of Completion of Police Academy	0.100
253	394.0	07/28/10	JLN	Reviewed UF 49 from Sgt. Meyer (81) re: shooting in confines of 81 Sept. 2009	0.100
254	3022.0	07/28/10	JPF	Discussion with GC and JN re: Adhyl Polanco and other whistl blowers	0.500
255	3058.0	07/28/10	JPF	Discussion with JN re Complaint	0.400
256	3292.0	07/28/10	JPF	E-mail from JN re meeting with Polanco/Graham Raymond & Rocco P.	0.100
257	3448.0	07/28/10	GMC	Listen to AS recordings, locate quotes, add to complaint	3.800
258	3449.0	07/28/10	GMC	Review of David Velez Arbitration Decision	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
259	3450.0	07/28/10	GMC	Discussion with JF and JN re: Adhyl Polanco and other whistleblowers	0.500
260	3451.0	07/28/10	GMC	Review of email re: meeting with press	0.100
261	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
262	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
263	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
264	3452.0	07/29/10	GMC	Review and Revise AS complaint	3.100
265	397.0	07/30/10	JLN	Meeting with JF, GC, Polanco & Raymond re: Schoolcraft & Monell claim	3.250
266	398.0	07/30/10	JLN	Continued edits and revisions to complaint	3.200
267	399.0	07/30/10	JLN	Meeting with JF and GC re: changes & additions to complaint	1.200
268	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
269	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
270	402.0	07/30/10	JLN	Reviewed Boro Daily Impact OT Form	0.100
271	2692.0	07/30/10	JPF	Meeting with JN, GC, Polanco & Raymond re: Schoolcraft & Monell claim	3.250
272	2737.0	07/30/10	JPF	Revision of Complaint	2.600
273	2857.0	07/30/10	JPF	Meet with GC and JN re: changes and additions to complaint	1.250
274	3453.0	07/30/10	GMC	Meeting with JN, JF, Polanco & Graham Raymond (GR) re: Schoolcraft & Monell claim	3.250
275	3454.0	07/30/10	GMC	Review and revise complaint, transcribed partial recordings, research case law	2.400
276	3455.0	07/30/10	GMC	Meet with JF and JN re: changes and additions to complaint	1.250
277	403.0	07/31/10	JLN	Cont'd review of Schoolcraft tapes and timeline chart	3.100
278	404.0	07/31/10	JLN	Continued edits/revisions of complaint	2.800
279	405.0	07/31/10	JLN	E-mail from JF re edited complaint	0.100
280	2699.0	07/31/10	JPF	Meeting with Polanco, Raymond, JN, GC re: quotas and Monell Claim	3.200
281	2709.0	07/31/10	JPF	Review of Schoolcraft tapes & timeline	3.100
282	2720.0	07/31/10	JPF	Revision of Complaint	2.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
283	3322.0	07/31/10	JPF	E-mail JN & GC re edited Complaint	0.100
284	3456.0	07/31/10	GMC	Meeting with Polanco + GR, JN, JF re: quotas and Monell Claim	3.200
285	3457.0	07/31/10	GMC	E-mail from JF re edited Complaint	0.100
286	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
287	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
288	2662.0	08/01/10	JPF	Review of new documents and recording CD from AS	3.750
289	2679.0	08/01/10	JPF	Review of Schoolcraft tapes & timeline	3.400
290	408.0	08/02/10	JLN	Further edits revisions & additions to complaint	3.200
291	409.0	08/02/10	JLN	Reviewed original Notice of Claim filed by AS	0.100
292	3458.0	08/02/10	GMC	Review and revise AS complaint	1.250
293	410.0	08/03/10	JLN	Edited complaint and sent to JF for review	1.600
294	411.0	08/03/10	JLN	Meeting w/ GC re: Schoolcraft complaint and other whistleblower police officers to possibly include in complaint	0.500
295	412.0	08/03/10	JLN	Compose E-mail to JF with detailed edits for the revised Complaint	0.400
296	413.0	08/03/10	JLN	Discussion with JF re corrections	0.300
297	414.0	08/03/10	JLN	Reviewed memo from Lt. Ragnello (81Cdr. 3rd Platoon) re: creating Crime Reduction Unit at 81	0.300
298	415.0	08/03/10	JLN	Reviewed Schoolcraft UF 49 re: Lt Jones (filed in June 07)	0.300
299	416.0	08/03/10	JLN	Discussion with JF re corrections to complaint	0.250
300	417.0	08/03/10	JLN	E-mail exchange with JF re Revised complaint	0.100
301	2755.0	08/03/10	JPF	Review of Complaint edits by JN	2.300
302	2785.0	08/03/10	JPF	Revise and edit of Complaint	1.800
303	3062.0	08/03/10	JPF	Discussion with Rocco re Schoolcraft recordings	0.400
304	3067.0	08/03/10	JPF	E-mail from JN re Revised Complaint	0.400
305	3096.0	08/03/10	JPF	Discussion with JN re corrections to complaint	0.300
306	3142.0	08/03/10	JPF	Discussion with JN re corrections	0.250
307	3353.0	08/03/10	JPF	E-mail to JN re Reviped Complaint	0.100
308	3459.0	08/03/10	GMC	Review of 1st amendment case law	1.100
309	3460.0	08/03/10	GMC	Review of JN's revised Schoolcraft complaint	1.000
310	3461.0	08/03/10	GMC	Read and reviewed certain transcribed AS recordings	0.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
311	3462.0	08/03/10	GMC	Meeting w/JN re: Schoolcraft complaint and other whistleblower police officers	0.500
312	3463.0	08/03/10	GMC	Phone call with Jim Hoffer (ABC News) re: Schoolcraft	0.300
313	3464.0	08/03/10	GMC	Email correspondence re: media coverage of filing Schoolcraft complaint	0.250
314	418.0	08/04/10	JLN	Review of AS chronology for complaint; incorporated same	1.400
315	419.0	08/04/10	JLN	Further edits and revisions to complaint	1.200
316	420.0	08/04/10	JLN	Read AS memo re: Brandon Del Pozo	0.200
317	421.0	08/04/10	JLN	E-mail exchange JF re complaint edits	0.100
318	2784.0	08/04/10	JPF	Review of client's chain of events for Complaint	1.800
319	2830.0	08/04/10	JPF	Revise and edit Complaint	1.400
320	3348.0	08/04/10	JPF	E-mail to JN re Complaint	0.100
321	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
322	423.0	08/05/10	JLN	E-mail exchange with JF re: clarification of some factual issues in the complaint	0.200
323	2731.0	08/05/10	JPF	Review of transcribed tape recording from August & March 2009 from Legal Language	2.750
324	2774.0	08/05/10	JPF	Review of Complaint with client's chain of events & correction	2.100
325	3167.0	08/05/10	JPF	E-mail to JN re clarification of some factual issues in the Complaint	0.250
326	3465.0	08/05/10	GMC	Read and reviewed certain transcribed AS recordings	2.400
327	3466.0	08/05/10	GMC	Review and revise AS complaint	0.800
328	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
329	425.0	08/06/10	JLN	Review of revised complaint from JF: made edits and revisions to same	2.100
330	426.0	08/06/10	JLN	Continued review transcriptions of August 2009 logs	1.400
331	427.0	08/06/10	JLN	E-mail exchange with JF re community visits	0.200
332	428.0	08/06/10	JLN	E-mail from JF re: complaint revisions	0.100
333	2732.0	08/06/10	JPF	Review of transcripts from Legal Language re June 2009 roll calls, Halloween Night, & visits to Johnston	2.750
334	2871.0	08/06/10	JPF	Review and edit Complaint after clarification	1.250
335	2877.0	08/06/10	JPF	Review of revised Complaint from JN	1.250
336	3064.0	08/06/10	JPF	Discussions with JN about quotes to add to complaint from transcribed recordings	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
337	3165.0	08/06/10	JPF	E-mail to JN & from JN re community visits	0.250
338	3349.0	08/06/10	JPF	E-mail to JN re Complaint revised	0.100
339	3467.0	08/06/10	GMC	Read and reviewed certain transcribed AS recordings	2.750
340	3468.0	08/06/10	GMC	Review of Schoolcraft complaint for typos	1.100
341	3469.0	08/06/10	GMC	Review of transcribed call from LS to FBI	0.250
342	429.0	08/07/10	JLN	Continued review transcriptions of March 2009 logs	1.800
343	430.0	08/07/10	JLN	E-mail exchange JF re explanation of community visits	0.250
344	3166.0	08/07/10	JPF	E-mail to JN & from re explanation of community visits	0.250
345	431.0	08/08/10	JLN	Reviewed transcription of December 2008 logs of roll calls; notes re: same	3.600
346	432.0	08/08/10	JLN	Discussion with JF re: edits to complaint	0.400
347	433.0	08/08/10	JLN	E-mail to JF with additional allegations for complaint	0.100
348	434.0	08/08/10	JLN	Review of E-mail re: revision of Schoolcraft complaint	0.100
349	2802.0	08/08/10	JPF	Editing Complaint with additional allegations	1.600
350	3059.0	08/08/10	JPF	Discussion with JN re edits to Complaint	0.400
351	3104.0	08/08/10	JPF	E-mail from JN with additional allegations for Complaint	0.300
352	3354.0	08/08/10	JPF	Email to JN re: revision of Schoolcraft complaint	0.100
353	3470.0	08/08/10	GMC	Review of email re: revision of Schoolcraft complaint	0.100
354	435.0	08/09/10	JLN	Meeting with AS to finalize complaint	2.700
355	436.0	08/09/10	JLN	Meeting w/GC and JF re: Schoolcraft website to support <u>Monell</u> theory	1.500
356	437.0	08/09/10	JLN	E-mail from JF re final draft of complaint; reviewed same	1.250
357	438.0	08/09/10	JLN	Review of final draft of AS complaint to be filed	0.500
358	439.0	08/09/10	JLN	Discussion with GC and JF re Adrian interview	0.300
359	440.0	08/09/10	JLN	E-mail to JF re negligent ret. claim	0.300
360	441.0	08/09/10	JLN	Review of legal issues re: Negligent hiring claim	0.300
361	442.0	08/09/10	JLN	Reviewed fax from anonymous PO re: Marino's quota system	0.100
362	2800.0	08/09/10	JPF	Edit/Revise Complaint	1.600
363	2809.0	08/09/10	JPF	Meeting w/JN and GC re: Schoolcraft website to support Monell theory	1.500
364	3054.0	08/09/10	JPF	Discussion with GC re website content	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
365	3093.0	08/09/10	JPF	Discussion with GC and JN re Adrian interview	0.300
366	3103.0	08/09/10	JPF	E-mail from JN re negligent ret. claim	0.300
367	3350.0	08/09/10	JPF	E-mail to JN re Final version of Complaint	0.100
368	3471.0	08/09/10	GMC	Meeting w/JN and JF re: Schoolcraft website to support Monell theory	1.500
369	3472.0	08/09/10	GMC	Read and reviewed certain transcribed AS recordings	1.400
370	3473.0	08/09/10	GMC	Review of final draft of AS complaint to be filed	0.500
371	3474.0	08/09/10	GMC	Discussion with JF re website content	0.400
372	3475.0	08/09/10	GMC	Discussion with JF and JN re Adrian interview	0.300
373	3476.0	08/09/10	GMC	Review of legal issues re: Negligent hiring claim	0.300
374	443.0	08/10/10	JLN	Began review of new CD from Client w/ numerous additional recordings and docs	3.700
375	444.0	08/10/10	JLN	Listened to Brian Lehrer show (podcast) re: Schoolcraft allegations	0.500
376	445.0	08/10/10	JLN	Reviewed transcript of excerpts that refer to "Mauriello Specials", as provided by AS	0.500
377	446.0	08/10/10	JLN	Review of Articles about Schoolcraft complaint	0.400
378	447.0	08/10/10	JLN	Discussion with JF & GC re articles and possible typo in complaint	0.200
379	448.0	08/10/10	JLN	Reviewed GC draft of Schoolcraft website content	0.200
380	1768.0	08/10/10	NB	Filed Summons and Complaint; sent s&c to as Aetna Judicial for service	0.600
381	3127.0	08/10/10	JPF	Review of articles about Schoolcraft Complaint	0.300
382	3140.0	08/10/10	JPF	Discussion with JN & GC re articles and possible typo in Complaint	0.250
383	3477.0	08/10/10	GMC	Meeting with AS to finalize for complaint filing, news coverage, and prep for website launch	2.750
384	3478.0	08/10/10	GMC	Draft Schoolcraft website content	2.250
385	3479.0	08/10/10	GMC	Compiled news articles, stories, and formatted for website	2.100
386	3480.0	08/10/10	GMC	Phone and email correspondence with Off the Page Creations to discuss deign of Schoolcraft Justice website	1.250
387	3481.0	08/10/10	GMC	Discussion with JN & JF re articles and possible typo in Complaint	0.250
388	3482.0	08/10/10	GMC	Reviewed and signed contract for website hosting	0.250
389	3483.0	08/10/10	GMC	Schoolcraft complaint prepared for filing	0.250
390	3484.0	08/10/10	GMC	Emailed draft of Schoolcraft website content to JF and JN for review	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
391	449.0	08/11/10	JLN	Meeting with PO Kevin Rodriguez 52nd Precinct	2.750
392	450.0	08/11/10	JLN	Discussion with GC re anonymous P.O. re: quota/retaliation	0.300
393	451.0	08/11/10	JLN	Review post of anonymous P.O. who contacted website re recording Mauriello	0.200
394	1769.0	08/11/10	NB	Saved witness information to client file	0.100
395	1770.0	08/11/10	NB	Began review of new CD from Client w/ numerous additional recordings and docs	3.900
396	3094.0	08/11/10	JPF	Discussion with GC re JN re anonymous P.O.	0.300
397	3115.0	08/11/10	JPF	Phone call with Mark Toor re article in Chief	0.300
398	3187.0	08/11/10	JPF	Review post of anonymous P.O. who contacted website re recording Mauriello	0.250
399	3359.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
400	3360.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
401	3361.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
402	3362.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
403	3363.0	08/11/10	JPF	E-mail with Mark Toor - Chief	0.100
404	3485.0	08/11/10	GMC	Review and revise Schoolcraft website content	1.400
405	3486.0	08/11/10	GMC	Discussion with JF re JN re anonymous P.O.	0.300
406	3487.0	08/11/10	GMC	Review of email from whistleblower "JF" from 81st precinct - info on Mauriello	0.250
407	3488.0	08/11/10	GMC	Review of San Francisco Chronicle coverage	0.100
408	452.0	08/12/10	JLN	Reviewed transcription of Jan 2009 logs; notes re: same	2.900
409	453.0	08/12/10	JLN	Reviewed PBA by-laws and const.	0.900
410	454.0	08/12/10	JLN	Meeting w/JF and GC re: legal strategies on Monell and whistleblower cop contacts	0.800
411	455.0	08/12/10	JLN	Meeting w/GC and JF re: legal strategies & next steps for moving forward	0.500
412	2938.0	08/12/10	JPF	Meeting w/JN and GC re: legal strategies on Monell and whistleblower cop contacts	0.800
413	3033.0	08/12/10	JPF	Meeting w/GC and JN re: legal strategies + next steps for moving forward	0.500
414	3489.0	08/12/10	GMC	Meeting w/JN and JF re: legal strategies on Monell and whistleblower cop contacts	0.800
415	3490.0	08/12/10	GMC	Email of docs from potential whistleblower PO "KR"	0.750
416	3491.0	08/12/10	GMC	Meeting w/JF and JN re: legal strategies + next steps for moving forward	0.500
417	456.0	08/13/10	JLN	Read Eterno & Silverman's article on Compstat ("Compare Statistics or Compose Statistics"); took notes re same	0.700
418	457.0	08/13/10	JLN	Discussion with GC & JF re Jonathan Moore Cease & Desist letter	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
419	2976.0	08/13/10	JPF	Review of PBA regulations	0.750
420	3052.0	08/13/10	JPF	Discussion with GC & JN re Jonathan Moore issue - cease & desist letter	0.400
421	3492.0	08/13/10	GMC	Discussion with JF & JN re Jonathan Moore issue - cease & desist letter	0.400
422	3493.0	08/13/10	GMC	Review of Bloomberg coverage of AS complaint	0.250
423	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
424	459.0	08/15/10	JLN	Internet research on Eterno/Silverman studies & articles & on Compstat	2.200
425	460.0	08/15/10	JLN	Meeting with JF and GC re NY Times story about quotas & Schoolcraft	0.600
426	3000.0	08/15/10	JPF	Meeting with JN and GC re NYTimes story about quotas & Schoolcraft	0.600
427	3263.0	08/15/10	JPF	E-mail from GC re NYPD blog picking up case	0.100
428	3494.0	08/15/10	GMC	Meeting with JN and JF re NYTimes story about quotas & Schoolcraft	0.600
429	3495.0	08/15/10	GMC	Email w/JN re: NY Times to run Schoolcraft story	0.250
430	3496.0	08/15/10	GMC	E-mail to JF re NYPD blog picking up case	0.100
431	461.0	08/16/10	JLN	Continued review of new CD from client	4.100
432	462.0	08/16/10	JLN	Interview of J. Ferrera (former Lt. at 81st Pct.)	3.400
433	463.0	08/16/10	JLN	Read CCRB Report on 75th & 81st Pcts, as provided by AS; took notes re: same	1.200
434	464.0	08/16/10	JLN	Travel back to NYC (1.40)	0.700
435	465.0	08/16/10	JLN	Travel to Long Island to meet Ferrara (1.2)	0.600
436	466.0	08/16/10	JLN	Read articles about NYPD's gun buy-back program provided by AS	0.300
437	3101.0	08/16/10	JPF	E-mail article from "Gman" re downgrading stats & PBA admission about quotas from 1994	0.300
438	3270.0	08/16/10	JPF	E-mail from GC re website update for articles on case	0.100
439	3497.0	08/16/10	GMC	Email re: updates to Schoolcraftjustice.com	0.100
440	467.0	08/17/10	JLN	Meeting with Eterno & Silverman	2.300
441	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
442	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
443	470.0	08/17/10	JLN	Travel back downtown (.80)	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
444	471.0	08/17/10	JLN	Travel uptown to meet Eterno & Silvennan in midtown (.80)	0.400
445	472.0	08/17/10	JLN	Reviewed NYPD Charges & Specs against AS; created bullet point summary of same	0.200
446	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
447	3131.0	08/17/10	JPF	Conversation with Adhyl Polanco re article, website, status of the case	0.250
448	3159.0	08/17/10	JPF	E-mail from Mark Toor re Chief article	0.250
449	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
450	3499.0	08/17/10	GMC	Review of Mark Toor article - JF interview	0.250
451	3500.0	08/17/10	GMC	Updated AS website added new articles	0.250
452	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
453	474.0	08/18/10	JLN	Reviewed AS Quarterly Performance report from 08; took notes re: same	1.600
454	475.0	08/18/10	JLN	T/c w/AS & LS re: my review of PG sections relating to charges & specs, & best args. for challenging same	0.900
455	476.0	08/18/10	JLN	Discussion with JF re Rocco's story in Daily News	0.250
456	1771.0	08/18/10	NB	E-mailed JLN schoolcraft audio files	0.100
457	3143.0	08/18/10	JPF	Discussion with JN re Rocco's story in Daily News	0.250
458	3501.0	08/18/10	GMC	Email correspondence w/website designer re: Schoolcraftjustice.com	0.250
459	477.0	08/19/10	JLN	Finished review of new CD recordings and documents from client; took notes re: same	2.900
460	478.0	08/19/10	JLN	Discussion with JF and GC re: new recordings and documents provided by AS	1.250
461	479.0	08/19/10	JLN	T/c w/AS and LS re: chronology of events & questions relating to specific entries	1.100
462	480.0	08/19/10	JLN	Reviewed AS's chronology 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
463	481.0	08/19/10	JLN	E-mail from P.O. Chris Whitehead worked under Marino in 75th Pct.	0.100
464	1772.0	08/19/10	NB	Filed Affidavit of Service as to Frederick Sawyer	0.100
465	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
466	3502.0	08/19/10	GMC	Discussion with JF and JN re: new recordings and documents provided by AS	1.250
467	482.0	08/20/10	JLN	T/c w/Chris Whitehead re: quotas at 75th Pct. & retaliation	0.900
468	483.0	08/20/10	JLN	Interviewed Marc Johnson, Ph.D., re: possible use as expert for psych claims	0.600
469	484.0	08/22/10	JLN	Meeting with JF & GC re whistleblowers reaching out through the website	0.800
470	485.0	08/22/10	JLN	Reviewed notes from AS activity log from Jan. September to March September	0.700
471	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
472	487.0	08/22/10	JLN	E-mail exchange with AS re: Internet search results on Dr. Lamstein and previous Cheroff case	0.200
473	2939.0	08/22/10	JPF	Meeting with JN & GC re whistleblowers reaching out through the website	0.800
474	3503.0	08/22/10	GMC	Meeting with JN & JF re whistleblowers reaching out through the website	0.800
475	3504.0	08/22/10	GMC	Phone call w/ "DM" former police officer re: Schoolcraft	0.300
476	3505.0	08/22/10	GMC	Review of Schoolcraftjustice posts	0.300
477	488.0	08/23/10	JLN	Reviewed NYPD "Critical Objectives" & statistics re: index crimes, as	1.200
478	489.0	08/23/10	JLN	Reviewed Investigations Unit comment sheet provided by AS re: Sgt. Defabizio & contacts with Schoolcraft	0.200
479	3506.0	08/23/10	GMC	Phone call with Isakoff Attorney - Brian Lee	0.800
480	3507.0	08/23/10	GMC	Review of Schoolcraftjustice posts	0.400
481	3508.0	08/23/10	GMC	Email correspondence w/JN re: Schoolcraftjustice posts	0.250
482	490.0	08/24/10	JLN	Mtg. w/Chris Whitehead (P.O. 75 Pct.)	2.400
483	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
484	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
485	493.0	08/24/10	JLN	Travel to L.I. to meet Chris Whitehead (1.20)	0.600
486	494.0	08/24/10	JLN	Travel back to NYC from meeting with C. Whitehead (1.40)	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
487	495.0	08/25/10	JLN	Meeting w/GC and JF re: ACC assigned, Schoolcraft Initial Disclosures	1.750
488	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
489	497.0	08/25/10	JLN	Meeting with JF & GC re more whistleblower email & meeting with P.O. Fioranelli	0.900
490	498.0	08/25/10	JLN	Reviewed NYC Bar Ass'n Statement on NYC Stop & Frisk Practices; took notes re: same	0.800
491	499.0	08/25/10	JLN	Meeting with JF & GC re: Whitehead mtg.	0.750
492	2725.0	08/25/10	JPF	Meeting with GC, PO from 81st precinct "PF" re: corruption	2.750
493	2790.0	08/25/10	JPF	Meeting w/JN and GC re: ACC assigned, Schoolcraft initial disclosures	1.750
494	2918.0	08/25/10	JPF	Meeting with JN & GC re more whistleblower email & meeting with P.O Fioranelli	0.900
495	2966.0	08/25/10	JPF	Meeting with JN & GC re: Whitehead Meeting.	0.750
496	3509.0	08/25/10	GMC	Meeting with JF, PO from 81st precinct "PF" re: corruption	2.750
497	3510.0	08/25/10	GMC	Drafted interview memo of "PF"	2.100
498	3511.0	08/25/10	GMC	Meeting w/JN and JF re: ACC assigned, Schoolcraft initial disclosures	1.750
499	3512.0	08/25/10	GMC	Meeting with JN & JF re more whistleblower email & meeting with P.O. "PF"	0.900
500	3513.0	08/25/10	GMC	Meeting with JN & JF re: Whitehead	0.750
501	3514.0	08/25/10	GMC	Review of email correspondence w/ Len Levitt re: WSJ police correspondence	0.250
502	3515.0	08/25/10	GMC	Review of email correspondence w/"DM" (former PO) re: Schoolcraft	0.250
503	3516.0	08/25/10	GMC	Emailed former anonymous PO re: Schoolcraft post	0.100
504	500.0	08/26/10	JLN	Meeting with JF and GC re: interview of PO from 81st precinct "PF" re: corruption	1.500
505	501.0	08/26/10	JLN	Correspondence w/GC re: Frank Serpico	0.200
506	2812.0	08/26/10	JPF	Meeting with GC and JN re: interview of PO from 81st precinct "PF" re: corruption	1.500
507	3517.0	08/26/10	GMC	Meeting with JF and JN re: interview of PO from 81st precinct "PF" re: corruption	1.500
508	3518.0	08/26/10	GMC	Correspondence w/JN re: Frank Serpico	0.250
509	3519.0	08/26/10	GMC	Email correspondence with Frank Serpico	0.100
510	502.0	08/27/10	JLN	Read arT/cles by Eterno & Silverman re: Compstat	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
511	503.0	08/27/10	JLN	Discussion with GC & JF re having Eterno & Silverman as experts	0.600
512	2689.0	08/27/10	JPF	Interview with GC of Walter Cipscomb, former PO confirms quotas - wants to help Schoolcraft	3.250
513	2944.0	08/27/10	JPF	Reading articles written by Eterno & Silverman re Compstat & numbers game	0.800
514	2988.0	08/27/10	JPF	Discussion with GC & JN re having Eterno & Silverman as experts	0.600
515	3520.0	08/27/10	GMC	Interview with JF of Walter Lipscomb, former PO confirms quotas - wants to help Schoolcraft	3.250
516	3521.0	08/27/10	GMC	Drafted interview memo of Walter Lipscomb	2.000
517	3522.0	08/27/10	GMC	Discussion with JF & JN re having Eterno & Silverman as experts	0.600
518	3523.0	08/27/10	GMC	Discussion w/Jim Hoffer re: story on 81st precinct	0.500
519	3524.0	08/27/10	GMC	Email to website designer with updates for Schoolcraftjustice website	0.300
520	3525.0	08/27/10	GMC	Review of Schoolcraftjustice posts	0.250
521	504.0	08/29/10	JLN	Discussion with GC re: Walter Lipscomb interview	0.500
522	3526.0	08/29/10	GMC	Discussion with JN re: Lipscomb interview	0.500
523	3527.0	08/29/10	GMC	Phone call w/former PO re: Schoolcraft	0.400
524	505.0	08/30/10	JLN	Meeting with JF & GC re Garcia (cop from 81 who knows Schoolcraft & has info on quotas)	1.250
525	506.0	08/30/10	JLN	Meeting with JF & GC re Labor & Employment case & 12(b)(6) motion	0.500
526	507.0	08/30/10	JLN	E-mail correspondence w/GC re: MG (PO in 81st precinct)	0.100
527	508.0	08/30/10	JLN	E-mail w/ GC re: ACC Donna Canfield	0.100
528	509.0	08/30/10	JLN	Reviewed Notice of Appearance by Donna Canfield ("DC") on behalf of The City Of New York	0.100
529	1773.0	08/30/10	NB	Filed Affidavit of Service as to Jamaica Hospital Medical Center	0.100
530	1774.0	08/30/10	NB	Filed Affidavit of Service as to Steven Mauriello	0.100
531	1775.0	08/30/10	NB	Filed Affidavit of Service as to Christopher Broschart	0.100
532	1776.0	08/30/10	NB	Filed Affidavit of Service as to Timothy Caughey	0.100
533	1777.0	08/30/10	NB	Filed Affidavit of Service as to Michael Marino	0.100
534	1778.0	08/30/10	NB	Filed Affidavit of Service as to Shantel James	0.100
535	1779.0	08/30/10	NB	Filed Affidavit of Service as to Theodore Lauterborn	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
536	1780.0	08/30/10	NB	Filed Affidavit of Service as to Lillian Aldana-Bernier	0.100
537	1781.0	08/30/10	NB	Filed Affidavit of Service as to Isak Isakov	0.100
538	1782.0	08/30/10	NB	Filed Affidavit of Service as to defendant Gerald Nelson	0.100
539	2861.0	08/30/10	JPF	Meeting with JN & GC re Garcia cop from 81 who knows Schoolcraft & has info on quotas	1.250
540	3071.0	08/30/10	JPF	Meeting with JN & GC re Labor & Employment case & 12(b)(6) motion	0.400
541	3528.0	08/30/10	GMC	Meeting with JN & JF re "MG" cop from 81 who knows Schoolcraft & has info on quotas	1.250
542	3529.0	08/30/10	GMC	Meeting with JN & JF re IAB Labor & Employment case & 12(b)(6) motion	0.400
543	3530.0	08/30/10	GMC	Email correspondence w/JN re: "MG" (PO in 81st precinct)	0.100
544	3531.0	08/30/10	GMC	Email w/JN re: ACC Donna Cannfield (DC)	0.100
545	3532.0	08/30/10	GMC	Review of Donna Canfield (DC) Notice of Appearance	0.100
546	3533.0	08/30/10	GMC	Review of AOS prior to filing	0.100
547	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
548	1783.0	08/31/10	NB	Saved AS personal information to file	0.100
549	2688.0	08/31/10	JPF	Interview with GC of "DH" and "EB" former NYPD, reviewed materials, recordings re: quotas, downgrading	3.250
550	2776.0	08/31/10	JPF	Drafting Amended Complaint	1.900
551	3116.0	08/31/10	JPF	Phone call with Mark Toor re new article	0.300
552	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
553	3534.0	08/31/10	GMC	Interview with JF of "DH" and "EB" former NYPD, reviewed materials, recordings re: quotas, downgrading	3.250
554	3535.0	08/31/10	GMC	Interview of "ER" NYPD officer re: quotas, downgrading	1.800
555	3536.0	08/31/10	GMC	Email of docs from potential whistleblower PO "KR"	0.900
556	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
557	3538.0	08/31/10	GMC	Email correspondence w/Jim Hoffer re: Schoolcraft	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
558	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
559	2781.0	09/01/10	JPF	Meeting w/JN and GC re: discuss anonymous POs contacting and how they can help Schoolcraft	1.800
560	3134.0	09/01/10	JPF	Correspondence from Donna Canfield re extension of time to response	0.250
561	3539.0	09/01/10	GMC	Meeting w/JN and JF re: discuss anonymous POs contacting and how they can help Schoolcraft	1.800
562	3540.0	09/01/10	GMC	Drafted interview memo of "ER" meeting	1.500
563	3541.0	09/01/10	GMC	Review of DC extension letter	0.100
564	3542.0	09/02/10	GMC	Drafted interview memo of "EB" meeting	2.400
565	3543.0	09/02/10	GMC	Drafted interview memo of "DH" meeting	1.100
566	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 Monell claim	1.400
567	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
568	514.0	09/03/10	JLN	Discussion with JF re AS interview with This American Life	0.400
569	515.0	09/03/10	JLN	E-mail w/GC re: THEE RANT post	0.200
570	516.0	09/03/10	JLN	E-mail w/ GC re: This American Life Radio show	0.100
571	2724.0	09/03/10	JPF	Meeting with GC with PO from 81st precinct "MG" re: corruption	2.750
572	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
573	3057.0	09/03/10	JPF	Discussion with JN re AS interview with This American Life	0.400
574	3085.0	09/03/10	JPF	Composing post to get more cops to talk to us about Schoolcraft & Monell claim	0.300
575	3544.0	09/03/10	GMC	Meeting with PO from 81st precinct "MG" re: corruption	2.750
576	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
577	3546.0	09/03/10	GMC	Review and revised JF draft of Rant post	0.600
578	3547.0	09/03/10	GMC	Meeting w/JN re: THEE RANT post to get officers to contact us on Schoolcraftjustice.com	0.500
579	3548.0	09/03/10	GMC	Email correspondence w/JN re: THEE RANT post	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
580	3549.0	09/03/10	GMC	Email correspondence w/JN re: This American Life Radio show	0.100
581	517.0	09/04/10	JLN	Reviewed PG section 216-05 (EDPS), notes re: same	0.400
582	2818.0	09/04/10	JPF	Drafting Amended Complaint	1.400
583	518.0	09/05/10	JLN	Reviewed indictment of Sgt. Stukes (AS Supervisor) filed in Kings County	0.100
584	2902.0	09/05/10	JPF	Editing Amended Complaint	1.000
585	519.0	09/06/10	JLN	Discussion with JF re amended complaint	0.400
586	520.0	09/06/10	JLN	E-mail exchanges with Joseph Ferrara (former Lt. 81 pct)	0.200
587	3056.0	09/06/10	JPF	Discussion with JN re Amended Complaint	0.400
588	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
589	522.0	09/07/10	JLN	Reviewed Defendant Isakov's answer to complaint	0.300
590	523.0	09/07/10	JLN	E-mail exchange with Joseph Ferrara	0.100
591	524.0	09/07/10	JLN	Reviewed Aff of Service by defendants Jamaica Hospital Medical Center.	0.100
592	525.0	09/07/10	JLN	Reviewed defendant JHMC's corporate disclosure statement	0.100
593	526.0	09/07/10	JLN	Reviewed defendants answer to complaint filed by Jamaica Hospital Medical Center	0.100
594	2973.0	09/07/10	JPF	Review of Answer to Complaint from Jamaica Hosp.	0.750
595	3061.0	09/07/10	JPF	Discussion with Mark Toor re article in Chief about Amended Complaint	0.400
596	3182.0	09/07/10	JPF	Review of Chief article on AS	0.250
597	3550.0	09/07/10	GMC	Review of JHMC Answer	0.300
598	3551.0	09/07/10	GMC	Review of Media coverage NYTimes	0.250
599	3552.0	09/07/10	GMC	Review of JHMC corporate disclosure	0.100
600	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
601	3186.0	09/10/10	JPF	Review of Times article points with GC	0.250
602	3553.0	09/10/10	GMC	Listened to AS NPR radio show	1.000
603	3554.0	09/10/10	GMC	Review of Times article points with JF	0.250
604	3555.0	09/10/10	GMC	Review of Judge Sweet's endorsement of extension	0.100
605	528.0	09/12/10	JLN	Reviewed "Crime, Police & the Community" report by Citizens Crime Commission, as provided by AS	0.800
606	529.0	09/12/10	JLN	Reviewed "Police & Public Safety in NYC" report from Citizens Crime	0.700

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
607	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
608	531.0	09/13/10	JLN	T/c w/AS re: salary with NYPD, benefits, and overall lost earnings claim	0.900
609	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
610	533.0	09/13/10	JLN	Reviewed Notices of Claim filed by AS for "Property Loss" and "Salary Loss"	0.200
611	1784.0	09/13/10	NB	Filed Amended Complaint	0.300
612	3556.0	09/13/10	GMC	Drafted interview memo of "MG" meeting	2.100
613	3557.0	09/13/10	GMC	Review of Amended complaint	0.500
614	3558.0	09/13/10	GMC	Email correspondence w/ "WJC" former NYPD	0.250
615	534.0	09/15/10	JLN	Reviewed Dep. of Eddie Valasquez (P.O. punished for not meeting quota); took notes re: same	1.200
616	535.0	09/15/10	JLN	Reviewed defendant Bernier's endorsed stipulation extending time to answer	0.100
617	3278.0	09/15/10	JPF	E-mail from Isacov's attorney re Amended Complaint	0.100
618	3559.0	09/15/10	GMC	Review of Eddie Velasquez depo from Floyd	1.100
619	3560.0	09/15/10	GMC	Email correspondence re: Amended Complaint with medical defendants	0.100
620	3561.0	09/15/10	GMC	Review of stip extending time for Benier answer	0.100
621	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
622	1785.0	09/16/10	NB	Reviewed AS hospital records to locate discharge summary; sent JLN same	0.200
623	3161.0	09/16/10	JPF	E-mail from other hospital defendant re Amended Complaint	0.250
624	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
625	538.0	09/17/10	JLN	Started review of transcript from Velez proceedings; took notes re: same	0.600
626	1786.0	09/17/10	NB	Printed Judge Weinslock opinion re: Velez proceedings for JLN review	0.100
627	2746.0	09/17/10	JPF	Reviewed documents and depositions from the Floyd litigation for purposes of Monell claim	2.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
628	2839.0	09/17/10	JPF	Meeting with JN and GC regarding information obtained from Floyd litigation and its impact on Schoolcrafts Monell and Retaliation claims	1.300
629	3562.0	09/17/10	GMC	Reviewed and cataloged Schoolcraftjustice.com posts	2.800
630	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
631	539.0	09/18/10	JLN	Reviewed NYPD Admin guide provided by AS; took notes re: same	1.200
632	540.0	09/18/10	JLN	Conversation with GC & JF re new whistleblower cop	0.300
633	541.0	09/18/10	JLN	Correspondence w/ GC re: anonymous Schoolcraft post	0.200
634	1787.0	09/18/10	NB	Printed NYPD Admin Guide provided by AS for JLN review	0.150
635	3087.0	09/18/10	JPF	Conversation with GC & JN re new whistleblower cop	0.300
636	3564.0	09/18/10	GMC	Conversation with JF & JN re new whistleblower cop	0.300
637	3565.0	09/18/10	GMC	Correspondence w/JN re: anonymous Schoolcraft post	0.250
638	542.0	09/19/10	JLN	E-mail exchange w/ J. Ferrara re: Browne's reaction to Quota Tapes	0.100
639	543.0	09/20/10	JLN	Discussion with JF re meeting with DOJ on AS case	0.400
640	544.0	09/20/10	JLN	Discussion with GC & JF re media upload to website	0.200
641	2684.0	09/20/10	JPF	Review of deposition of Mauriello from Floyd case	3.300
642	2738.0	09/20/10	JPF	Meeting with GC with PO "JB" re: NYPD quotas and downgrading	2.500
643	2936.0	09/20/10	JPF	Listening to This American Life interview with client	0.800
644	3060.0	09/20/10	JPF	Discussion with JN re meeting with Department of Justice ("DOJ") on AS case	0.400
645	3137.0	09/20/10	JPF	Discussion & review with GC & JN re media to upload to website	0.250
646	3566.0	09/20/10	GMC	Meeting with JF with PO "JB" re: NYPD quotas and downgrading	2.500
647	3567.0	09/20/10	GMC	Review of Angel Heran depo from Floyd	1.750
648	3568.0	09/20/10	GMC	Review of Steve Mauriello depo from Floyd	1.500
649	3569.0	09/20/10	GMC	Review of Donald McHugh depo from Floyd	1.100
650	3570.0	09/20/10	GMC	Updated Schoolcraft Justice media page with Radio interview	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
651	3571.0	09/20/10	GMC	Discussion & review with JF & JN re media to upload to website	0.250
652	545.0	09/21/10	JLN	Meeting with DOJ EDNY regarding potential civil rights enforcement action and setting up meeting w/ AS	3.100
653	2754.0	09/21/10	JPF	Review of Angel Heran depo from Floyd	2.300
654	2779.0	09/21/10	JPF	Review of Donald McHugh depo from Floyd	1.900
655	3572.0	09/21/10	GMC	Drafted interview memo of "JB" meeting	1.500
656	546.0	09/22/10	JLN	Meeting with JF to prepare for EDNY DOJ	1.100
657	2700.0	09/22/10	JPF	Meeting with DOJ EDNY	3.100
658	2887.0	09/22/10	JPF	Meeting with JN to prepare for EDNY DOJ	1.100
659	3163.0	09/22/10	JPF	E-mail to DOJ with medical records	0.250
660	547.0	09/23/10	JLN	Meeting with GC, JF and Center for Constitutional Rights (CCR) re Schoolcraft	2.250
661	548.0	09/23/10	JLN	Discussion with JF re new post for THEE Rant for more whistleblower Pos to support <u>Monell</u> claim	0.300
662	549.0	09/23/10	JLN	Reviewed insurance coverage for Def. Isakov	0.100
663	2758.0	09/23/10	JPF	Meeting with GC, JN and Center for Constitutional Rights (CCR) re Schoolcraft	2.250
664	3098.0	09/23/10	JPF	Discussion with JN re new post for RANT for more whistleblower Pos	0.300
665	3573.0	09/23/10	GMC	Meeting with JF, JN and Center for Constitutional Rights (CCR) re Schoolcraft	2.250
666	3574.0	09/23/10	GMC	Reviewed and finalized THEE RANT post	0.250
667	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
668	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
669	3267.0	09/24/10	JPF	E-mail from GC re The RANT	0.100
670	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
671	3576.0	09/24/10	GMC	Drafted email and sent post to anonymous PO to post on THEE RANT	0.250
672	551.0	09/25/10	JLN	Meeting with GC & JF re: upcoming AS interview with feds	0.500
673	552.0	09/25/10	JLN	E-mail from JF re: upcoming fed meeting with AS	0.100
674	3035.0	09/25/10	JPF	Meeting with GC & JN re AS interview with feds	0.500
675	3289.0	09/25/10	JPF	E-mail from JN re fed meeting	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
676	3577.0	09/25/10	GMC	Meeting with JF & JN re AS interview with feds	0.500
677	3578.0	09/25/10	GMC	Email re: Schoolcraft visit to meet with Feds, NY Times, ABC news	0.250
678	3579.0	09/25/10	GMC	Email to Jim Hoffer re: Schoolcraft visit	0.100
679	553.0	09/27/10	JLN	Meeting with AS and Feds re: potential fed civil rights violations	2.300
680	554.0	09/27/10	JLN	Discussion with JF re: location of witnesses from This American Life interview	0.500
681	2690.0	09/27/10	JPF	Meeting w/AS with JN, GC to prep for discussion with US attorneys office EDNY	3.250
682	2711.0	09/27/10	JPF	Schoolcraft interview with Civil Rights Division JN, GC, DOJ	3.100
683	3027.0	09/27/10	JPF	Discussion with JN re location & witnesses from This American Life interview	0.500
684	3580.0	09/27/10	GMC	Schoolcraft interview with Civil Rights Division DOJ (pre and post), NY Times, ABC news	5.250
685	3581.0	09/27/10	GMC	Meeting w/AS with JN, JF to prep for discussion with US attorneys office EDNY	3.250
686	555.0	09/28/10	JLN	Continued review of transcript of PBA (Velez) hearing re: quotas	1.700
687	556.0	09/28/10	JLN	E-mail from JF re article in Russian news	0.100
688	2979.0	09/28/10	JPF	"Rich" anonymous cop discussion with GC	0.600
689	3254.0	09/28/10	JPF	E-mail from GC re article on AS	0.100
690	3285.0	09/28/10	JPF	E-mail from JN re article in Russian news	0.100
691	3386.0	09/28/10	JPF	Review of article from Rocco & Daily News	0.100
692	3582.0	09/28/10	GMC	"Rich" anonymous cop discussion with JF	0.600
693	3583.0	09/28/10	GMC	Review of Schoolcraftjustice.com posts	0.250
694	3584.0	09/28/10	GMC	Review of Daily News article re: Schoolcraft	0.100
695	557.0	09/29/10	JLN	Finished review of PBA transcript	2.800
696	3585.0	09/29/10	GMC	Phone interview of PO "VM" re quotas and downgrading	1.300
697	3586.0	09/29/10	GMC	Phone interview of PO "EF" re quotas and downgrading	0.800
698	3587.0	09/29/10	GMC	Review of Schoolcraftjustice.com posts	0.300
699	558.0	09/30/10	JLN	Meeting with GC and JF re: anonymous cop interviews (VM and EF)	1.100
700	559.0	09/30/10	JLN	Reviewed answer to complaint filed by Lillian Aldana-Bernier	0.500
701	560.0	09/30/10	JLN	Reviewed Bernier's corporate disclosure statement	0.100
702	2885.0	09/30/10	JPF	Meeting with GC and JN re: anonymous cop interviews VM and EF	1.100
703	2946.0	09/30/10	JPF	Review of Answer to Complaint by Bernier	0.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
704	3588.0	09/30/10	GMC	Meeting with JF and JN re: anonymous cop interviews VM and EF	1.100
705	3589.0	09/30/10	GMC	Review of Bernier answer	0.300
706	3590.0	10/01/10	GMC	Review of Schoolcraftjustice.com posts	0.100
707	561.0	10/02/10	JLN	E-mail exchanges w/ GC re: whistleblower cops	0.300
708	562.0	10/02/10	JLN	E-mail from JF re whistleblower cop	0.100
709	563.0	10/02/10	JLN	E-mail re whistleblower cop from JF	0.100
710	3298.0	10/02/10	JPF	E-mail from JN re whistleblower cop	0.100
711	3326.0	10/02/10	JPF	E-mail re whistleblower cop from JN	0.100
712	3591.0	10/02/10	GMC	Email correspondence w/JN re: whistleblower cops	0.400
713	3592.0	10/02/10	GMC	Phone call with former PO "BS"	0.300
714	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
715	2780.0	10/04/10	JPF	Meeting w/ GC and "JR" retired police officer re: quotas, downgrading, NYPD corruption	1.800
716	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
717	3593.0	10/04/10	GMC	Meeting w/ JF and "JR" retired police officer re: quotas, downgrading, NYPD corruption	1.800
718	3594.0	10/04/10	GMC	Met with potential whistleblower PO "MF" re: Schoolcraft, quotas, corruption	1.100
719	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
720	3596.0	10/04/10	GMC	Emailed w/anonymous NYPD Captain re: Schoolcraft allegations	0.400
721	3597.0	10/05/10	GMC	Drafted interview memo of "MF" meeting	1.250
722	3598.0	10/05/10	GMC	Reviewed Schoolcraftjustice posts, made calls, returned emails and set up appointments	1.250
723	3599.0	10/05/10	GMC	Drafted interview memo of "JR" meeting	0.800
724	565.0	10/06/10	JLN	Reviewed answer to amended complaint filed by Jamaica Hospital	0.100
725	2920.0	10/06/10	JPF	Review of Answer to Complaint by Jamaica	0.900
726	3600.0	10/06/10	GMC	Phone interview w/"PR" former 81st precinct PO	0.400
727	566.0	10/07/10	JLN	T/c w/ Colleen Long (AP wire) re: doing story on Schoolcraft	0.600
728	2782.0	10/07/10	JPF	Meeting with GC and "EB" retired police officer re: quotas, downgrading, NYPD corruption	1.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
729	3601.0	10/07/10	GMC	Meeting with JF and "EB" retired police officer re: quotas, downgrading, NYPD corruption	1.800
730	567.0	10/08/10	JLN	Review of AP story re: Schoolcraft case	0.200
731	1788.0	10/08/10	NB	Email correspondence w/ GC re: more recordings	0.100
732	3180.0	10/08/10	JPF	Review of article from Associate Press on Schoolcraft	0.250
733	3602.0	10/08/10	GMC	Drafted interview memo of "EB" meeting	1.500
734	3603.0	10/08/10	GMC	Phone interview with "MV" retired PO re: quotas, retaliation, downgrading	1.300
735	3604.0	10/08/10	GMC	Email correspondence w "NB" re: more recordings	0.250
736	3605.0	10/08/10	GMC	Review of AP story re: Schoolcraft case	0.250
737	3606.0	10/09/10	GMC	Review of Schoolcraft post from former PO "WN"	0.100
738	568.0	10/10/10	JLN	Meeting with GC and JF re: information provided by MV, NB, EB whistleblower cops	1.400
739	2822.0	10/10/10	JPF	Meeting with JN and GC re: information provided by MV, NB, EB whistleblower cops	1.400
740	3607.0	10/10/10	GMC	Meeting with JN and JF re: information provided by MV, NB, EB whistleblower cops	1.400
741	3608.0	10/10/10	GMC	Review of Schoolcraft posts	0.400
742	569.0	10/11/10	JLN	E-mail from JF re Lewis whistleblower cop	0.900
743	570.0	10/11/10	JLN	E-mail correspondence w/ GC re: Posts	0.200
744	571.0	10/11/10	JLN	E-mail exchange with Chris Whitehead re Compstat videos and possibly obtaining copies of same	0.100
745	3291.0	10/11/10	JPF	E-mail from JN re Lewis whistleblower cop	0.100
746	3609.0	10/11/10	GMC	Review of Schoolcraft posts	0.300
747	3610.0	10/11/10	GMC	Email correspondence w/JN re: Posts	0.250
748	3611.0	10/11/10	GMC	Review of email from a police practices expert	0.250
749	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
750	573.0	10/12/10	JLN	Meeting w/GC re: Schoolcraftjustice.com calls from Pos	1.000
751	574.0	10/12/10	JLN	Discussion with JF re motion to Dismiss sched.	0.300
752	575.0	10/12/10	JLN	Reviewed Declaration of Gregory J. Radomisli in Support of defendant JHMC motion to Dismiss	0.300
753	1789.0	10/12/10	NB	Printed JHMC MTD for JLN: bound same	0.150
754	2814.0	10/12/10	JPF	Review of Motion to Dismiss by Jamaica Hosp.	1.500
755	2904.0	10/12/10	JPF	Meeting w/ GC and JN re: Schoolcraftjustice.com calls from Pos	1.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
756	3046.0	10/12/10	JPF	Review of JHMC Dec. for motion to dismiss	0.500
757	3097.0	10/12/10	JPF	Discussion with JN re Motion to Dismiss schedule	0.300
758	3612.0	10/12/10	GMC	Phone interview police officer "RL" re: quotas, retaliation, downgrading	1.100
759	3613.0	10/12/10	GMC	Meeting w/ JF and JN re: Schoolcraftjustice.com calls from POs	1.000
760	3614.0	10/12/10	GMC	Phone interview police officer "PL" re: quotas, retaliation, downgrading	0.750
761	3615.0	10/12/10	GMC	Review of JHMC motion to dismiss	0.750
762	3616.0	10/12/10	GMC	Phone call and email w/ CUNY professor who has info re: Schoolcraft	0.250
763	3617.0	10/12/10	GMC	Review of Schoolcraft posts	0.250
764	576.0	10/13/10	JLN	Discussion with JF re: arguments to make in response to JHMC motion	1.250
765	577.0	10/13/10	JLN	Discussion with JF re agreement on briefing sched. w/ defendant Jamaica Hosp.	0.100
766	2852.0	10/13/10	JPF	Discussion with JN re: arguments to make in response to JHMC motion	1.250
767	3212.0	10/13/10	JPF	Discussion with JN re agreement on briefing sched. w/ defendant Jamaica Hosp	0.100
768	3618.0	10/13/10	GMC	Spoke to police officer "PL" re: quotas, retaliation, downgrading	0.400
769	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
770	3619.0	10/14/10	GMC	Meeting with JN re: information provided by PL and RL whistleblower cops to support Monell claim	0.750
771	3620.0	10/14/10	GMC	Email to web designer updating Schoolcraftjustice.com	0.400
772	579.0	10/15/10	JLN	Reviewed order re: defendant JHMC's motion to Dismiss	0.100
773	3621.0	10/15/10	GMC	Review of order setting deadlines for Motion to Dismiss	0.100
774	3622.0	10/16/10	GMC	Review of Schoolcraft posts	0.250
775	3183.0	10/18/10	JPF	Review of letter to court re briefing sched.	0.250
776	3623.0	10/18/10	GMC	Phone call w/ "MG" re: quotas at 81st precinct	0.750
777	3624.0	10/18/10	GMC	Review of letter requesting additional time to respond to Motion to Dismiss	0.250
778	3625.0	10/19/10	GMC	Review of Schoolcraft posts	0.250
779	1790.0	10/20/10	NB	Viewed AS hospital records to find ER notes for JLN: sent JLN same	0.200
780	3626.0	10/20/10	GMC	Meeting with technician to reduce size of Schoolcraft audio files	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
781	3261.0	10/22/10	JPF	E-mail from GC re NY Times article	0.100
782	3627.0	10/22/10	GMC	Phone call with police officer "MR" re: NYPD quotas, downgrading, corruption	1.250
783	3628.0	10/23/10	GMC	Left VM for JN re: Schoolcraft	0.100
784	3204.0	10/24/10	JPF	Article from the "L" re Schoolcraft	0.100
785	3629.0	10/24/10	GMC	Phone call with David Velez	0.300
786	3630.0	10/24/10	GMC	Review of Schoolcraft posts	0.250
787	3631.0	10/25/10	GMC	Phone call with retired PO "RC" re: meeting to discuss quotas provide evidence	0.600
788	3632.0	10/25/10	GMC	Phone call with DC re: City Answer	0.250
789	2701.0	10/26/10	JPF	Meeting with GC and "RC" to discuss experience with quotas in a Brooklyn North precinct	3.100
790	3633.0	10/26/10	GMC	Meeting with JF and "RC" to discuss experience with quotas in a Brooklyn North precinct	3.100
791	1791.0	10/27/10	NB	Filed Affidavit of Service as to defendant The City of New York	0.100
792	1792.0	10/27/10	NB	Filed Affidavit of Service as to defendant Theodore Lauterborn	0.100
793	1793.0	10/27/10	NB	Filed Affidavit of Service as to defendant Christopher Broschart	0.100
794	1794.0	10/27/10	NB	Filed Affidavit of Service as to defendant Steven Mauriello	0.100
795	1795.0	10/27/10	NB	Filed Affidavit of Service as to defendant Timothy Caughey	0.100
796	1796.0	10/27/10	NB	printed and saved answer into computer file and hard file	0.100
797	1797.0	10/27/10	NB	Filed Affidavit of Service as to defendant Isakov	0.100
798	1798.0	10/27/10	NB	Filed Affidavit of Service as to defendant Jamaica Hospital Medical Center	0.100
799	2820.0	10/27/10	JPF	Meeting with GC and David Velez re: arbitration, quotas, Michael Marino	1.400
800	3011.0	10/27/10	JPF	Review of Answer to Amended Complaint Isacov	0.600
801	3634.0	10/27/10	GMC	Drafted interview memo of meeting w/"RC"	1.750
802	3635.0	10/27/10	GMC	Meeting with JF and David Velez re: arbitration, quotas, Michael Marino	1.400
803	3636.0	10/27/10	GMC	Review of Isakov Answer to Amended complaint	0.250
804	3637.0	10/28/10	GMC	Interview memo for meeting with David Velez	1.400
805	3389.0	10/29/10	JPF	Review of letter front City extending Answer time for Amended Complaint	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
806	3638.0	10/29/10	GMC	Review of City's request for an extension of time to Answer to amended complaint	0.250
807	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
808	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
809	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
810	3640.0	10/30/10	GMC	Phone call with entertainment lawyer	0.400
811	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
812	581.0	11/01/10	JLN	Meeting with GC and JF re: updating Schoolcraft website	0.300
813	582.0	11/01/10	JLN	Reviewed letter addressed to Judge Sweet from DC requesting ext. of time to answer	0.100
814	3111.0	11/01/10	JPF	Meeting with JN and GC re: updating Schoolcraft website	0.300
815	3642.0	11/01/10	GMC	Reviewed Schoolcraftjustice posts made calls, returned emails and set up appointments	1.750
816	3643.0	11/01/10	GMC	Meeting with JN and JF re: updating Schoolcraft website	0.300
817	3644.0	11/01/10	GMC	Drafted content to update website	0.250
818	3645.0	11/01/10	GMC	Review of Judge Sweet's order granting City more time to file Answer	0.100
819	3646.0	11/02/10	GMC	Email and phone correspondence with web designer re: updates to Schoolcraftjustice.com	0.750
820	3265.0	11/03/10	JPF	Email from GC re plaintiff's financials	0.100
821	3647.0	11/03/10	GMC	Review of mark ups from entertainment lawyer re: Schoolcraft entertainment contracts	0.300
822	2748.0	11/04/10	JPF	Meeting with GC and police officer "BP" re: quotas, downgrading, and NYPD corruption	2.300
823	3390.0	11/04/10	JPF	Review of letter re Bernier's extension to answer Amended Complaint	0.100
824	3648.0	11/04/10	GMC	Meeting with JF and police officer "BP" re: quotas, downgrading, and NYPD corruption	2.300
825	3649.0	11/04/10	GMC	Review of letter and stipulation re: extension of time to Answer Amended Complaint	0.250
826	3650.0	11/05/10	GMC	Interview memo for "BP"	1.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
827	583.0	11/08/10	JLN	Read 1st Set of Rogs for plaintiff sent by Isakov	0.100
828	584.0	11/08/10	JLN	Reviewed defendant Isakov's dep notice for plaintiff Adrian Schoolcraft	0.100
829	585.0	11/08/10	JLN	Reviewed Defendant Isakov's request for Production of Documents	0.100
830	2667.0	11/08/10	JPF	Research on involuntary confinement & state action	3.600
831	2941.0	11/08/10	JPF	Met with GC and police officer "MC" re: quotas	0.800
832	2947.0	11/08/10	JPF	Review of Doc Demands/Interrogatories by Isakov	0.800
833	3391.0	11/08/10	JPF	Review of letter to Sweet extending motion time	0.100
834	3651.0	11/08/10	GMC	Met with JF and police officer "MC" re: quotas	0.800
835	3652.0	11/08/10	GMC	Review of Document Demands and Interrogatories filed by Isakov	0.500
836	3653.0	11/08/10	GMC	Review of letter requesting additional time to oppose motion to dismiss	0.250
837	586.0	11/09/10	JLN	Meeting with GC about interviews with CW and MC whistleblower cops regarding <u>Monell</u> claim	0.600
838	587.0	11/09/10	JLN	Drafted letter to Judge Sweet requesting extension JHMC's motion to dismiss	0.300
839	588.0	11/09/10	JLN	Reviewed Dep notice for plaintiff from B. Lee	0.100
840	3654.0	11/09/10	GMC	Spoke to anonymous police officer CW re: quotas in the 81st precinct	0.750
841	3655.0	11/09/10	GMC	Meeting with JN about interviews with CW and MC whistleblower cops regarding Monell claim	0.600
842	2641.0	11/10/10	JPF	Research on hospital confinement constituting state action under any of the three tests	4.250
843	3656.0	11/10/10	GMC	Phone call w/ police officer "JW" re: quotas and retaliation in a Brooklyn precinct	0.500
844	3657.0	11/10/10	GMC	Review of Schoolcraftjustice.com posts	0.100
845	589.0	11/11/10	JLN	Reviewed defendant Bernier's 1st Set of Interrogatories	0.100
846	590.0	11/11/10	JLN	Reviewed defendant Bernier's answer to Second amended complaint	0.100
847	591.0	11/11/10	JLN	Reviewed defendant Isakov's corporate disclosure statement	0.100
848	2660.0	11/11/10	JPF	Research on state action standard for private parties - joint action test	3.750
849	2729.0	11/11/10	JPF	Research on traditional function state action test "hospital used as jail"	2.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
850	2803.0	11/11/10	JPF	Meeting with GC and "JW" cop to discuss quotas/retaliation	1.600
851	2949.0	11/11/10	JPF	Review of Interrogatoiiies & Demands Bernier	0.800
852	3044.0	11/11/10	JPF	Review of Answer to Amended Complaint Bernier	0.500
853	3658.0	11/11/10	GMC	Meeting with JF and "JW" cop to discuss quotas/retaliation	1.600
854	3659.0	11/11/10	GMC	Review of discovery demands from Bernier	0.400
855	3660.0	11/11/10	GMC	Review of draft of plaintiff's first set of interrogatories	0.300
856	3661.0	11/11/10	GMC	Review of amended answer from Bernier	0.250
857	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
858	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
859	3662.0	11/12/10	GMC	Interview memo for meeting with "JW"	1.100
860	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
861	3664.0	11/13/10	GMC	Review of Schoolcraftjustice.com posts	0.100
862	593.0	11/14/10	JLN	Reviewed AS recordings w/ Kings County DA and Queens County Michelle Cort	0.400
863	594.0	11/15/10	JLN	Review AS application to NYPD	0.300
864	2673.0	11/15/10	JPF	Research on conspiracy under §1983 versus state action	3.500
865	2694.0	11/15/10	JPF	Research on close nexus test and private parties	3.250
866	3271.0	11/15/10	JPF	E-mail from GC re whistleblower cop	0.100
867	595.0	11/16/10	JLN	Review of affidavit Darius Charney wants Schoolcraft to sign Aff for Floyd	0.400
868	596.0	11/16/10	JLN	E-mailed GC re: changes to Schoolcraft <u>Floyd</u> affidavit	0.100
869	597.0	11/16/10	JLN	Reviewed memo from Lt. Brower (April 10, 2006) re: forced O.T.	0.100
870	1799.0	11/16/10	NB	Sent AS e-mail enclosing Affidavit	0.100
871	3125.0	11/16/10	JPF	Review of affidavit for AS for CCR case	0.300
872	3246.0	11/16/10	JPF	E-mail from Darius Charney re Schoolcraft affidavit	0.100
873	3665.0	11/16/10	GMC	Phone call with Charney re: Schoolcraft affidavit	0.400
874	3666.0	11/16/10	GMC	Review of affidavit Darius Charney wants Schoolcraft to sign for Floyd case	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
875	3667.0	11/16/10	GMC	Emailed JN re: changes to Schoolcraft Floyd affidavit	0.100
876	3668.0	11/16/10	GMC	Left voice message for Charney re: affidavit	0.100
877	3669.0	11/16/10	GMC	Review of Schoolcraftjustice.com posts	0.100
878	1800.0	11/17/10	NB	Formatted First Request for Admissions, request for discovery demands, request for interrogatories and sent same to J LN for review	1.200
879	3670.0	11/17/10	GMC	Reviewed and revised Discovery Demands and Requests to Admit to be served on City Defendants	3.800
880	2619.0	11/18/10	JPF	Draft of argument	4.900
881	2646.0	11/18/10	JPF	Research on joint action w/ private parties and police in the context of false arrest claims	4.100
882	2935.0	11/18/10	JPF	Draft of prelim statement in opp to Motion to Dismiss	0.800
883	3671.0	11/18/10	GMC	Review of Schoolcraftjustice.com posts	0.100
884	2652.0	11/19/10	JPF	Research on joint action w/ private parties and police in the context of false arrest claims	3.900
885	2674.0	11/19/10	JPF	Draft argument	3.400
886	3248.0	11/19/10	JPF	E-mail from French journalist Marie Brunerie re documentary on whistle blowing and Schoolcraft case	0.100
887	3672.0	11/19/10	GMC	Email correspondence with French documentarian	0.100
888	3673.0	11/19/10	GMC	Review of Schoolcraftjustice.com posts	0.100
889	2647.0	11/20/10	JPF	Research on state action - use of private facilities to imprison	4.100
890	2676.0	11/20/10	JPF	Research on joint action where state coerces private action	3.400
891	2756.0	11/20/10	JPF	Draft of Argument	2.250
892	3674.0	11/20/10	GMC	Review of Schoolcraftjustice.com posts	0.100
893	2656.0	11/21/10	JPF	Research on joint action where state coerces private action	3.800
894	2703.0	11/21/10	JPF	Research on hospital state action where EDPs are involved	3.100
895	2778.0	11/21/10	JPF	Research on joint action	1.900
896	2824.0	11/21/10	JPF	Research on supplement jurisdiction	1.400
897	3269.0	11/21/10	JPF	Email from GC re Wall Street Times article	0.100
898	3675.0	11/21/10	GMC	Review of WSJ article re: Schoolcraft case	0.250
899	2625.0	11/22/10	JPF	Draft of Argument	4.750
900	2613.0	11/23/10	JPF	Draft of Argument	5.600
901	2655.0	11/24/10	JPF	Draft of Argument	3.800
902	2635.0	11/26/10	JPF	Draft of Argument	4.400
903	598.0	11/29/10	JLN	Reviewed draft CCR Affidavit by AS	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
904	3219.0	11/29/10	JPF	E-mail from AS re CCR affidavit	0.100
905	3676.0	11/29/10	GMC	Review of AS's changes to Floyd affidavit	0.500
906	3677.0	11/29/10	GMC	Phone call w/AS re: Floyd affidavit	0.300
907	3678.0	11/30/10	GMC	Implemented AS's changes to Floyd affidavit for final review by Charney	3.400
908	599.0	12/01/10	JLN	Discussion with GC & JF re affidavit from Schoolcraft	0.400
909	2788.0	12/01/10	JPF	Draft factual section of opp	1.750
910	2842.0	12/01/10	JPF	Review of Complaint for facts	1.300
911	3051.0	12/01/10	JPF	Discussion with GC & JN re affidavit from Schoolcraft	0.400
912	3207.0	12/01/10	JPF	Correspondence from CCR re affidavit	0.100
913	3679.0	12/01/10	GMC	Email and phone correspondence w/Charney re Floyd affidavit	0.800
914	3680.0	12/01/10	GMC	Discussion with JF & JN re affidavit from Schoolcraft	0.400
915	600.0	12/02/10	JLN	Reviewed AS proposed changes to Affidavit	0.200
916	601.0	12/02/10	JLN	Reviewed Defendant City of New York's answer to amended complaint	0.100
917	2707.0	12/02/10	JPF	Review of Memo of Law argument	3.100
918	2872.0	12/02/10	JPF	Review of Amended Answer filed by City	1.250
919	3260.0	12/02/10	JPF	E-mail from GC re new whistleblower cop on the website	0.100
920	3681.0	12/02/10	GMC	Review of City Defendants answer to Amended Complaint	0.400
921	3682.0	12/02/10	GMC	Review of Schoolcraftjustice.com posts	0.100
922	2626.0	12/03/10	JPF	Draft of argument	4.750
923	2873.0	12/03/10	JPF	Review of argument	1.250
924	602.0	12/04/10	JLN	E-mail exchange w/ AS re: Detective accused of falsifying records and making bogus arrests	0.100
925	2636.0	12/04/10	JPF	Review and edit argument for brief	4.400
926	2651.0	12/04/10	JPF	Draft of argument	3.900
927	2853.0	12/04/10	JPF	Draft section on supplement jurisdiction	1.250
928	603.0	12/05/10	JLN	Reviewed JF's draft Opp to MTD; made edits to same	0.700
929	2617.0	12/05/10	JPF	Edit and Incorporate changes on argument	5.250
930	2706.0	12/05/10	JPF	Review of argument	3.100
931	604.0	12/06/10	JLN	Discussion with GC & JF re final corrections	0.800
932	2622.0	12/06/10	JPF	Review and edit argument	4.800
933	2794.0	12/06/10	JPF	Review and edit brief	1.750
934	2930.0	12/06/10	JPF	Discussion with GC & JN re final corrections	0.800
935	3683.0	12/06/10	GMC	Revise and review opposition to JHMC motion to dismiss	1.250
936	3684.0	12/06/10	GMC	Discussion with JF & JN re final corrections	0.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
937	3685.0	12/06/10	GMC	Drafted letter response to premature discovery demands for Bernier and Isakov	0.400
938	2835.0	12/07/10	JPF	Final review & edit of brief	1.300
939	3169.0	12/07/10	JPF	File final brief	0.250
940	605.0	12/08/10	JLN	Reviewed NYPD memos regarding anti quota legislation	1.200
941	2843.0	12/08/10	JPF	Review of NYPD Memos re anti quota legislation	1.300
942	3275.0	12/08/10	JPF	E-mail from Hospital defendants re docketing error on ECF	0.100
943	3686.0	12/08/10	GMC	Review of NYPD re: new quota bill	0.400
944	3687.0	12/08/10	GMC	Email correspondence from Lee re: Docket sheet	0.100
945	3688.0	12/08/10	GMC	Review of email correspondence w/Graham Raymond	0.100
946	3689.0	12/08/10	GMC	Review of Schoolcraftjustice.com posts	0.100
947	606.0	12/09/10	JLN	Discussion w/ JF & GC re discovery responses & timing	0.500
948	1801.0	12/09/10	NB	Drafted letter to all counsel enclosing, opposition to MTD	0.250
949	3019.0	12/09/10	JPF	Discussion wi JN & GC re discovery responses & timing	0.500
950	3222.0	12/09/10	JPF	E-mail from B. Lee defendants re late responses to interrogatories	0.100
951	3690.0	12/09/10	GMC	Discussion w/ JN & JF re discovery responses & timing	0.500
952	3691.0	12/09/10	GMC	Review of email re: Discovery from Isakov	0.100
953	3692.0	12/09/10	GMC	Review of Schoolcraftjustice.com posts	0.100
954	607.0	12/10/10	JLN	E-mail w/ GC re: HIPAAs for AS meds	0.100
955	1802.0	12/10/10	NB	Prepared AS authorizaitons for Jamaica Hospital and sent same to all counsel	0.700
956	1803.0	12/10/10	NB	Filed Affidavit of Service for Gough and Duncan	0.100
957	1804.0	12/10/10	NB	Prepared attorney list of all defense counsel in case and saved to file	0.200
958	3693.0	12/10/10	GMC	Email w/JN re: HIPAAs	0.100
959	608.0	12/11/10	JLN	E-mail exchange re: posting on Thee Rant relating to Mauriello	0.100
960	3126.0	12/11/10	JPF	Review of article from Eterno & Silverman re manipulation of crime stats	0.300
961	3694.0	12/12/10	GMC	Review of Daily News article w/memo showing proof of quota	0.250
962	609.0	12/14/10	JLN	Reviewed Darius Charney correspondence re affidavit for AS	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
963	3135.0	12/14/10	JPF	Correspondence with Darius Charney affidavit for AS	0.250
964	3695.0	12/14/10	GMC	Correspondence w/Charney and Schoolcraft re: Floyd affidavit	0.400
965	1805.0	12/15/10	NB	Filed Affidavit of Service as to defendant Kurt Duncan	0.100
966	3149.0	12/15/10	JPF	E-mail from GC re article involving Marino	0.250
967	610.0	12/16/10	JLN	Reviewed final AS Affidavit for CCR	0.100
968	3256.0	12/16/10	JPF	E-mail from GC re AS affidavit	0.100
969	611.0	12/17/10	JLN	E-mail from JF re AS benefits	0.100
970	3337.0	12/17/10	JPF	E-mail to AS with opp to Jamaica's motion	0.100
971	3347.0	12/17/10	JPF	E-mail to JN re AS benefits	0.100
972	3367.0	12/17/10	JPF	Phone convo with Lany Schoolcraft re NYPD benefits & suspension status	0.100
973	3696.0	12/24/10	GMC	Review of Schoolcraftjustice.com posts	0.100
974	3697.0	12/26/10	GMC	Review of Schoolcraftjustice.com posts	0.100
975	3215.0	12/29/10	JPF	E-mail article from GC by Len Levitt re AS case	0.100
976	612.0	01/01/11	JLN	E-mail to JF re WSJ article about case	0.100
977	3297.0	01/01/11	JPF	E-mail from JN re Wall Street Journal article about case	0.100
978	3145.0	01/03/11	JPF	E-mail from Chris Whitehead re Compstate DVDs & NYPD summons quota	0.250
979	3698.0	01/03/11	GMC	Review of email correspondence from police officer "CW" re: Marino and quotas	0.250
980	3150.0	01/05/11	JPF	E-mail from GC re NBC news coverage on Schoolcraft	0.250
981	613.0	01/10/11	JLN	Meeting with GC & JF re interrogatories and demands & misc. discovery & strategy issues	1.500
982	2811.0	01/10/11	JPF	Meeting with GC & JN re interrogatories and demands	1.500
983	3699.0	01/10/11	GMC	Meeting with JF & JN re interrogatories and demands	1.500
984	614.0	01/20/11	JLN	Meeting with GC, JF to discuss JHMC's reply memo of law	0.400
985	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
986	3015.0	01/20/11	JPF	Review of defendants' reply memo of law	0.600
987	3073.0	01/20/11	JPF	Meeting with JN, GC to discuss JHMC's reply memo of law	0.400
988	3700.0	01/20/11	GMC	Review of JHMC reply memo in support of motion to dismiss	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
989	3701.0	01/20/11	GMC	Meeting with JN, JF to discuss JHMC's reply memo of law	0.400
990	2866.0	01/25/11	JPF	Prep for oral argument on JHMC motion	1.250
991	3266.0	01/25/11	JPF	Email from GC re statements from Jamaica Hospital to Village Voice	0.100
992	3333.0	01/25/11	JPF	Email Response to GC re statements from Jamaica Hospital to Village Voice	0.100
993	616.0	01/26/11	JLN	Discussion with GC & JF re oral arguments on MTP	0.600
994	2750.0	01/26/11	JPF	Prep for oral argument	2.300
995	2896.0	01/26/11	JPF	Appearance for motion to dismiss in Schoolcraft	1.000
996	2989.0	01/26/11	JPF	Discussion with GC & JN re oral arguments	0.600
997	3190.0	01/26/11	JPF	Travel from SDNY for appearance for motion to dismiss in Schoolcraft (.5)	0.250
998	3197.0	01/26/11	JPF	Travel to SDNY for appearance for motion to dismiss in Schoolcraft (.5)	0.250
999	3702.0	01/26/11	GMC	Appearance for motion to dismiss in Schoolcraft	1.000
1000	3703.0	01/26/11	GMC	Discussion with JF & JN re oral arguments	0.600
1001	3704.0	01/26/11	GMC	Travel from SDNY for appearance for motion to dismiss in Schoolcraft (.5)	0.250
1002	3705.0	01/26/11	GMC	Travel to SDNY for appearance for motion to dismiss in Schoolcraft (.5)	0.250
1003	617.0	01/31/11	JLN	Discussion w/ GC re: requesting Queens DA to investigate Halloween night	0.400
1004	618.0	01/31/11	JLN	Meeting with JF & GC re sending documents & authorizations to Queens DA office	0.400
1005	619.0	01/31/11	JLN	Review of materials sent to Queens DA to start investigation	0.200
1006	3072.0	01/31/11	JPF	Meeting with JN & GC re send documents & authorizations to Queens DA office	0.400
1007	3706.0	01/31/11	GMC	Discussion w/JN re: requesting Queens DA to investigate Halloween night	0.400
1008	3707.0	01/31/11	GMC	Meeting with JN & JF re send documents & authorizations to Queens DA office	0.400
1009	3708.0	01/31/11	GMC	Review of materials sent to Queens DA to start investigation	0.250
1010	620.0	02/08/11	JLN	Discussion w/ JF & GC re letter to court to schedule discovery	0.300
1011	3090.0	02/08/11	JPF	Discussion w/ JN & GC re letter to court to schedule discovery	0.300
1012	3709.0	02/08/11	GMC	Discussion w/ JN & JF re letter to court to schedule discovery	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1013	1806.0	02/09/11	NB	Formatted Ltr. Opposing Defendants' Request Stay pending MTD; made multiple edits and filed same with Court	0.600
1014	3121.0	02/09/11	JPF	Review & edit letter to court re discover schedule	0.300
1015	3710.0	02/10/11	GMC	Review of JHMC motion to stay discovery	0.250
1016	621.0	02/11/11	JLN	Researched issue of stay while MTD is pending	2.400
1017	622.0	02/11/11	JLN	Reviewed JHMC request for stay while MTD is pending	0.100
1018	3711.0	02/11/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1019	623.0	02/12/11	JLN	Discussion with JF re; motion to stay and arguments in opposition	0.900
1020	2915.0	02/12/11	JPF	Discussion with JN re; motion to stay and arguments in opposition	0.900
1021	624.0	02/13/11	JLN	Drafted letter brief opposing stay	3.200
1022	2761.0	02/13/11	JPF	Review and Edit letter brief opposing stay	2.250
1023	3712.0	02/14/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1024	3713.0	02/17/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1025	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
1026	626.0	02/19/11	JLN	E-mail correspondence w/ GC re: Seth Harris verdict finding quota in Carolyn Samuels case	0.100
1027	2998.0	02/19/11	JPF	Meeting with GC re: getting transcript for Bryant v. City verdict finding quotas existed	0.600
1028	3257.0	02/19/11	JPF	E-mail from GC re Bryant v. City verdict finding quotas existed	0.100
1029	3714.0	02/19/11	GMC	Meeting with JF re: getting transcript for Bryant v. City verdict finding quotas existed	0.600
1030	3715.0	02/19/11	GMC	Phone call with former NYPD officer "SS"	0.300
1031	3716.0	02/19/11	GMC	Email correspondence w/JN re: Seth Harris verdict finding quota	0.100
1032	3717.0	02/19/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1033	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
1034	3255.0	02/24/11	JPF	Email from GC re article re Marino misconduct	0.100
1035	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
1036	629.0	03/01/11	JLN	Meeting with anonymous cops from T34 w/ GC and JF- recordings of Lt. Janice Williams	1.250
1037	630.0	03/01/11	JLN	Reviewed recordings of Sgt. Hans. and Lt. Williams provided by PO "Angel" Rosa	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1038	2860.0	03/01/11	JPF	Meeting with anonymous cops from T34 w/ GC and JN - provided recordings of Lt. Janice Williams	1.250
1039	3718.0	03/01/11	GMC	Meeting with anonymous cops from T34 w/ JF and JN - provided recordings of Lt. Janice Williams	1.250
1040	631.0	03/03/11	JLN	E-mail exchange with C. Whitehead re: Daily News article on quotas and pressure.	0.100
1041	3276.0	03/03/11	JPF	Email from HV re article re Lt. Williams	0.100
1042	3719.0	03/03/11	GMC	Email correspondence with former NYPD PO PK	0.100
1043	3720.0	03/03/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1044	1807.0	03/04/11	NB	Prepared authorization and letter enclosing authorization to ACC	0.250
1045	3259.0	03/08/11	JPF	Email from GC re medical defendants' article	0.100
1046	3721.0	03/13/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1047	3722.0	03/16/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1048	2865.0	04/11/11	JPF	Phone convo w/ AS, re representation on his suspension & internal hearing	1.250
1049	3723.0	04/11/11	GMC	Phone call with Adrian and Larry Schoolcraft re: Letter from NYPD charges and specs	0.750
1050	632.0	04/12/11	JLN	Conv w/ JF re AS suspension & our position with NYPD on same	0.300
1051	3117.0	04/12/11	JPF	Phone convo w/JN re suspension issue & our response to the NYPD	0.300
1052	3724.0	04/12/11	GMC	Review of email re: Adrian charges	0.250
1053	633.0	04/13/11	JLN	E-mail exchange with C. Whitehead re: Marino steroids findings & punishment	0.100
1054	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
1055	3725.0	04/14/11	GMC	Review of email from WME re: Schoolcraft life rights	0.100
1056	3726.0	04/15/11	GMC	Meeting w/Harry Levine Queens College re: Schoolcraft, quota study	0.500
1057	635.0	04/18/11	JLN	Discussion w/ JF & GC re prep of letter re NYPD hearing & PBA representation	0.300
1058	3091.0	04/18/11	JPF	Discussion w/ JN & GC re prep of letter re NYPD hearing & PBA representation	0.300
1059	3727.0	04/18/11	GMC	Discussion w/ JN & JF re prep of letter re NYPD hearing & PBA representation	0.300
1060	3728.0	04/20/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1061	3729.0	04/26/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1062	3264.0	05/03/11	JPF	Email from GC re P.O. Hicks. Bronx quota cop	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1063	636.0	05/06/11	JLN	Read Judge Sweet's decision on defendants' MTD; notes re: same	0.300
1064	637.0	05/06/11	JLN	E-mail exchange w/ GC and JF re: motion to dismiss decision	0.200
1065	1808.0	05/06/11	NB	Printed Judge Sweet's decision on defendants' MTD for JLN review	0.200
1066	3006.0	05/06/11	JPF	Read & review the decision & order written disposing of the motion to dismiss	0.600
1067	3250.0	05/06/11	JPF	E-mail from GC on Cts decision on motion	0.100
1068	3730.0	05/06/11	GMC	Review of Judge Sweet's opinion re: JHMC motion to dismiss	0.600
1069	3731.0	05/06/11	GMC	Email correspondence w/JN and JF re: motion to dismiss decision	0.250
1070	638.0	05/09/11	JLN	Drafted 1st Set of Rogs to Isakov	2.100
1071	639.0	05/09/11	JLN	Meeting with GC and JF re: necessary disclosures under Rule 26 for plaintiff	1.750
1072	640.0	05/09/11	JLN	Started drafting R.26 Initial Disclosures	0.400
1073	1809.0	05/09/11	NB	Drafted Deposition notices for all defendants	0.100
1074	2792.0	05/09/11	JPF	Meeting with JN and GC re: necessary disclosures under Rule 26 for plaintiff	1.750
1075	3732.0	05/09/11	GMC	Meeting with JN and JF re: necessary disclosures under Rule 26 for plaintiff	1.750
1076	641.0	05/10/11	JLN	Started drafting Requests For Admission ("RFA") from City	2.500
1077	642.0	05/10/11	JLN	Finished Initial Disclosures.	1.400
1078	643.0	05/10/11	JLN	Meeting with GC and JF re: edits to Initial disclosures and discussion regarding requests to admit	1.400
1079	1810.0	05/10/11	NB	E-mailed JLN Opinion of Judge Sweet	0.100
1080	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
1081	2821.0	05/10/11	JPF	Meeting with JN and GC re: edits to Initial disclosures and discussion regarding requests to admit	1.400
1082	2974.0	05/10/11	JPF	Review of Initial disclosures and discussion with GC	0.750
1083	3733.0	05/10/11	GMC	Meeting with JN and JF re: edits to initial disclosures and discussion regarding requests to admit	1.400
1084	3734.0	05/10/11	GMC	Review of Initial disclosures and discussion with JF	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1085	3735.0	05/10/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1086	644.0	05/12/11	JLN	Discussion w/ GC & JF re agency agreement	0.400
1087	3009.0	05/12/11	JPF	Review of agency agreement for client on book/movie deals he does	0.600
1088	3048.0	05/12/11	JPF	Discussion w/ GC & JN re agency agreement	0.400
1089	3736.0	05/12/11	GMC	Discussion w/ JF & JN re agency agreement	0.400
1090	3737.0	05/12/11	GMC	Review of Book deal agreement for Adrian Schoolcraft	0.250
1091	1812.0	05/13/11	NB	Prepared and sent authorization for NYC employment records to Martin Clearwater and Bell	0.500
1092	3738.0	05/13/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1093	645.0	05/14/11	JLN	Continued drafting RFA for City	2.200
1094	2723.0	05/14/11	JPF	Meeting with GC reviewing Requests For Admission's (RFA's)	2.750
1095	3739.0	05/14/11	GMC	Meeting with JF reviewing RFA's	2.750
1096	646.0	05/15/11	JLN	Finished drafting RFA for City	2.400
1097	647.0	05/15/11	JLN	Meeting with GC and JF re: edits to RFA's	1.000
1098	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
1099	2906.0	05/15/11	JPF	Meeting with JN and GC re: edits to RFA's	1.000
1100	3740.0	05/15/11	GMC	Meeting with JN and JF re: edits to RFA's	1.000
1101	648.0	05/16/11	JLN	Started drafting Rogs for City	1.900
1102	649.0	05/17/11	JLN	Cont'd drafting Rogs cor City	2.400
1103	650.0	05/18/11	JLN	Started drafting 1st Doc Demands City	1.600
1104	2886.0	05/18/11	JPF	Meeting with GC to discuss documents that must be requested in our demands	1.100
1105	3741.0	05/18/11	GMC	Drafted outline and notes for necessary discovery demands for JN	1.300
1106	3742.0	05/18/11	GMC	Meeting with JF to discuss documents that must be requested in our demands	1.100
1107	651.0	05/19/11	JLN	Continued drafting document demands for City	2.100
1108	652.0	05/19/11	JLN	Discuss w/ JF & GC edits & topic areas that should be explored on interrogatories	1.250
1109	653.0	05/19/11	JLN	Drafted Schoolcraft deposition notices.	0.400
1110	654.0	05/19/11	JLN	Review of GC's draft document demands to include in our demands	0.300
1111	655.0	05/19/11	JLN	E-mail from GC re: additional dep noT/ces to be served	0.100
1112	656.0	05/19/11	JLN	Sent draft document demands to GC	0.100
1113	2805.0	05/19/11	JPF	Review & edit demands & interrogatories	1.600
1114	2846.0	05/19/11	JPF	Discuss w/ JN & GC edits & topic areas that should be explored on interrogatories	1.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1115	3743.0	05/19/11	GMC	Discuss w/ JN & JF edits & topic areas that should be explored on interrogatories	1.250
1116	3744.0	05/19/11	GMC	Review of JN's draft document demands	0.750
1117	3745.0	05/19/11	GMC	Email from JN re: dep notices to be served	0.100
1118	657.0	05/20/11	JLN	Finished drafting Rogs for City	2.800
1119	658.0	05/20/11	JLN	Finished drafting 1st Document Demands for City	2.700
1120	659.0	05/20/11	JLN	Discussion w/ GC & JF re request to admit corrections/additions .	1.500
1121	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
1122	661.0	05/20/11	JLN	Finalize interrogatories & discuss EBTs w/ JF & GC	1.300
1123	662.0	05/20/11	JLN	E-mail exchange AS re: 1st Set of Interrogatories	0.200
1124	663.0	05/20/11	JLN	E-mail exchange re: Plaintiffs' First Request for Admissions	0.200
1125	664.0	05/20/11	JLN	Sent GC request for admissions for review	0.100
1126	665.0	05/20/11	JLN	Sent GC revised draft document demands for review	0.100
1127	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
1128	1815.0	05/20/11	NB	Formatted final draft of Rog,s for City; copied same for courtesy copy to all parties; prepared letter enclosing said documents; sent to all parties via regular mail	0.700
1129	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
1130	2806.0	05/20/11	JPF	Discussion w/ GC & JN re request to admit corrections/additions	1.500
1131	2836.0	05/20/11	JPF	Finalize interrogatories & discuss EBTs w/ JN & GC	1.300
1132	2889.0	05/20/11	JPF	Review & edits request for admissions	1.100
1133	3148.0	05/20/11	JPF	Email from client re article on "Collars for Dollars"	0.250
1134	3746.0	05/20/11	GMC	Discussion w/ JF & JN re request to admit corrections/additions	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1135	3747.0	05/20/11	GMC	Discuss interrogatories & discuss EBTs w/ JN & JF	1.300
1136	3748.0	05/20/11	GMC	Review of JN's request for admission	0.300
1137	3749.0	05/20/11	GMC	Review of JN's revised draft document demands	0.300
1138	3750.0	05/20/11	GMC	Email from Adrian Schoolcraft	0.100
1139	666.0	05/21/11	JLN	Started drafting 1st Set of Document Demands for JHMC	2.300
1140	667.0	05/22/11	JLN	Finished 1st Set of Doc Demands Jamaica	2.900
1141	668.0	05/22/11	JLN	Started drafting Schoolcraft document demands for other defendants	1.700
1142	669.0	05/23/11	JLN	Continued drafting Schoolcraft discovery demands and interrogatories against medical defendants	3.600
1143	670.0	05/23/11	JLN	Drafted 1st Set of Rogs for JHMC	2.300
1144	671.0	05/23/11	JLN	E-mail correspondence w/Brian Lee re: dep notices for Caughey & Weiss	0.100
1145	672.0	05/23/11	JLN	Reviewed Notice of Deps for Isakov/Bemier	0.100
1146	2744.0	05/23/11	JPF	Review and Edit discovery demands and rogs against all defendants	2.400
1147	673.0	05/24/11	JLN	Finished drafting discovery demands/rogs for med defendants	3.700
1148	674.0	05/24/11	JLN	Review of E-mail and correspondence w/ GC re anonymous P.O. from 81st precinct	0.300
1149	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
1150	3251.0	05/24/11	JPF	E-mail from GC on new cop whistleblower from the 75th precinct	0.100
1151	3751.0	05/24/11	GMC	Review of email and correspondence w/JN re anonymous PO from 81st precinct	0.400
1152	675.0	05/25/11	JLN	Drafted NoT/ce of Inspection for JHMC	2.300
1153	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
1154	3752.0	05/30/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1155	676.0	06/01/11	JLN	Reviewed initial disclosure from JHMC	0.100
1156	677.0	06/03/11	JLN	Reviewed JHMC's Initial Disclosures	0.100
1157	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1158	679.0	06/11/11	JLN	Ltr from B. Lee re: discovery responses and order of priority	0.100
1159	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
1160	3753.0	06/13/11	GMC	Email correspondence with anonymous PO re: Schoolcraft matter	0.250
1161	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
1162	682.0	06/16/11	JLN	E-mail exchange w/ team re: another NYPD Detective caught giving false testimony	0.100
1163	1819.0	06/16/11	NB	Sent AS authorizaiton to Queens DA	0.200
1164	684.0	06/17/11	JLN	Reviewed Isakov response to Rogs	0.100
1165	3754.0	06/19/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1166	685.0	06/21/11	JLN	E-mail exchange re: 3 cases in EDNY with Mauriello as one of defendants	0.100
1167	686.0	06/21/11	JLN	E-mail exchange re: Queens DA meeting & avoiding any contact w/ press/media	0.100
1168	687.0	06/23/11	JLN	Review of answers to interrogatories by Isakov	0.900
1169	688.0	06/23/11	JLN	Review of response to doc demands by Isakov; notes re: same	0.700
1170	689.0	06/23/11	JLN	Discussion with GC & JF re responses & requests from Isakov	0.600
1171	690.0	06/23/11	JLN	Review of requests for discovery from Isakov	0.300
1172	691.0	06/23/11	JLN	Letter to Jim Leander re: authorizing release of med records to Queens DA	0.100
1173	1820.0	06/23/11	NB	Prepared authorization and letter enclosing authorization to Queens DA	0.250
1174	2826.0	06/23/11	JPF	Review of answers to interrogatories by Isacov	1.400
1175	2911.0	06/23/11	JPF	Review of response to doc demands Isacov	1.000
1176	2977.0	06/23/11	JPF	Review of requests for discovery from Isacov	0.750
1177	2990.0	06/23/11	JPF	Discussion with GC & JN re responses & requests from Isacov	0.600
1178	3755.0	06/23/11	GMC	Discussion with JF & JN re responses & requests from Isacov	0.600
1179	3756.0	06/23/11	GMC	Review of Isakov response to Discovery Demands	0.600
1180	3757.0	06/23/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1181	692.0	06/24/11	JLN	Reviewed Def. Isakov's 2nd Request for Docs	0.100
1182	693.0	06/27/11	JLN	Discussion with JF and GC re City's failure to respond to discovery requests	0.300
1183	694.0	06/27/11	JLN	E-mail exchanges with all counsel re: setting up R. 26 Conf. for scheduling of discovery	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1184	3095.0	06/27/11	JPF	Discussion with JN and GC re City's failure to response to discovery requests	0.300
1185	3758.0	06/27/11	GMC	Discussion with JN and JF re City's failure to response to discovery requests	0.300
1186	3759.0	06/27/11	GMC	Review of email correspondence with DC	0.300
1187	695.0	06/30/11	JLN	Rule 26 Conf. w/all counsel present	0.900
1188	696.0	06/30/11	JLN	Reviewed Brian Lee's Proposed Discovery Plan in advance of mtg later today; notes re: same	0.200
1189	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
1190	698.0	07/01/11	JLN	Reviewed Brian Lee's Proposed Discovery Plan as agreed upon at yesterday's conference.	0.100
1191	699.0	07/05/11	JLN	Review discovery plan w/ JF & GC	0.300
1192	3123.0	07/05/11	JPF	Review discovery plan w/ JN & GC	0.300
1193	3760.0	07/05/11	GMC	Review of Discovery plan and correspondence regarding same	0.750
1194	700.0	07/06/11	JLN	Mtg. w/ Jim Leander & AS re: Schoolcraft investigation	2.400
1195	701.0	07/06/11	JLN	Discussion w/ JF & GC re changing case management plan	0.400
1196	3049.0	07/06/11	JPF	Discussion w/ JN & GC re changing to case management plan	0.400
1197	3761.0	07/06/11	GMC	Discussion w/ JN & JF re changing to case management plan	0.400
1198	702.0	07/08/11	JLN	Discussion with GC and JF re: meeting with Jim Leander and AS about investigation	1.750
1199	703.0	07/08/11	JLN	Reviewed Judge Sweet's order re: Oct. 5 conf	0.100
1200	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
1201	2786.0	07/08/11	JPF	Discussion with GC and JN re: meeting with Jim Leander and AS about investigation	1.750
1202	3762.0	07/08/11	GMC	Discussion with JF and JN re: meeting with Jim Leander and AS about investigation	1.750
1203	3763.0	07/08/11	GMC	Review of pretrial order for conference	0.100
1204	704.0	07/09/11	JLN	E-mail from City on relevancy redaction issue	0.100
1205	705.0	07/09/11	JLN	E-mail to City re: redaction issue	0.100
1206	706.0	07/11/11	JLN	Final review of discovery plan w/ JF & GC	0.250
1207	3171.0	07/11/11	JPF	Final review of discovery plan w/ JN & GC	0.250
1208	3764.0	07/11/11	GMC	Final review of discovery plan w/ JN & JF	0.250
1209	707.0	07/15/11	JLN	Meeting with JF an GC re: discovery plan and issues to raise with defense counsel	0.500
1210	708.0	07/15/11	JLN	sent GC E-mail re: objections to discovery plan	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1211	3036.0	07/15/11	JPF	Meeting with GC an JN re: discovery plan and issues to raise	0.500
1212	3138.0	07/15/11	JPF	Discussion of time limit for plaintiff's EBT as part of discovery plan	0.250
1213	3765.0	07/15/11	GMC	Meeting with JF an JN re: discovery plan and issues to raise	0.500
1214	3766.0	07/15/11	GMC	Review revised discovery plan	0.400
1215	3767.0	07/15/11	GMC	Review of JN email re: objections to discovery plan	0.100
1216	683.0	07/17/11	JLN	Reviewed Isakov response to Document Demands	0.100
1217	709.0	07/18/11	JLN	Review of changes to discovery plan made by B. Lee	0.200
1218	710.0	07/18/11	JLN	Sent draft E-mail to DC re changes for review	0.100
1219	3172.0	07/18/11	JPF	Final/final review of discovery plan w/ time limits	0.250
1220	3768.0	07/18/11	GMC	Review of changes to discovery plan made by Lee	0.250
1221	3769.0	07/18/11	GMC	Review of email by JN to DC re changes	0.100
1222	3043.0	07/19/11	JPF	Review of agency agreement for AS book deals	0.500
1223	3770.0	07/19/11	GMC	Review of Literary Agency agreement for Schoolcraft	0.100
1224	711.0	07/23/11	JLN	E-mail w/Greg Radomisil re: extending time for inspection of JHMC	0.100
1225	3771.0	07/25/11	GMC	Review of email from Brian Lee re: Discovery plan dispute	0.250
1226	3772.0	07/26/11	GMC	Review of email correspondence between parties finalizing language of discovery plan	0.400
1227	3773.0	07/27/11	GMC	Executed discovery plan email	0.100
1228	3151.0	08/04/11	JPF	Email from GC re Polanco charges and specs for retaliation for whistleblowing	0.250
1229	3774.0	08/04/11	GMC	Fully executed discovery plan	0.250
1230	712.0	08/05/11	JLN	Reviewed JHMC guidelines re: Involuntary commitment, Psych ER guidelines and use of handcuffs	0.900
1231	1822.0	08/08/11	NB	Downloaded and printed research received from JLN	0.100
1232	3775.0	08/08/11	GMC	Review and revised responses to Bernier Discovery demands	0.500
1233	3776.0	08/09/11	GMC	Drafted responses to JHMC discovery demands	1.800
1234	3777.0	08/09/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1235	713.0	08/10/11	JLN	Review of GC comments to JHMC discovery responses	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1236	3778.0	08/10/11	GMC	Review of JN comments to JHMC responses	0.250
1237	714.0	08/11/11	JLN	Review of responses to Isakov discovery demands	0.400
1238	2922.0	08/11/11	JPF	Review of responses to Isacov discovery demands	0.900
1239	3779.0	08/11/11	GMC	Review of Isakov demands	0.250
1240	715.0	08/14/11	JLN	Review GC's draft responses to all discovery demands for medical defendants	0.400
1241	3780.0	08/14/11	GMC	Drafted responses to all discovery demands for medical defendants and emailed to JN for his review	4.750
1242	716.0	08/15/11	JLN	Review of our responses to Bernier & Jamaica discovery demands; edits/revisions	0.800
1243	717.0	08/15/11	JLN	Reviewed Rule 26 (a) Discovery plan filed by Isakov	0.100
1244	2763.0	08/15/11	JPF	Review of responses to Bernier & Jamaica discovery demands	2.250
1245	3781.0	08/15/11	GMC	Review of email correspondence re: delay in discovery production	0.250
1246	718.0	08/16/11	JLN	Reviewed confidentiality stip from City	0.300
1247	2874.0	08/16/11	JPF	Review of confidentiality stip from City	1.250
1248	3782.0	08/16/11	GMC	Review of City protective order stipulation	0.400
1249	719.0	08/17/11	JLN	Discuss confidentiality stip w/ GC & JF b/c of plaintiff's objections	1.250
1250	2745.0	08/17/11	JPF	Review of responses to requests & discovery demands from hospital defendants	2.400
1251	2845.0	08/17/11	JPF	Discuss confidentiality stip w/ GC & JN b/c of plaintiff's objections	1.250
1252	3783.0	08/17/11	GMC	Discuss confidentiality stip w/ JF & JN b/c of plaintiff's objections	1.250
1253	3784.0	08/17/11	GMC	Review of Brian Lee objections to protective order stip	0.250
1254	3785.0	08/18/11	GMC	Drafted letters accompanying responses to Discovery Demands and prepared thumb drives that included responsive documents	1.100
1255	3786.0	08/23/11	GMC	Review of email from Gregory Radmosli re: Protective order stip	0.100
1256	720.0	08/26/11	JLN	Read letter from B. Lee re: request for Suppl responses	0.400
1257	3787.0	08/30/11	GMC	Review of email correspondence from Brian Lee re: protective order stip changes	0.300
1258	3788.0	08/31/11	GMC	Email response from DC re stip	0.100
1259	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1260	3013.0	09/01/11	JPF	Review of decision in Floyd on summary judgment & its relevance to Schoolcraft tapes and Monell claim	0.600
1261	3789.0	09/01/11	GMC	Review of email from Darius Charney enclosing Floyd decision	0.500
1262	3790.0	09/02/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1263	3130.0	09/06/11	JPF	Review, edit, discuss confidentiality stip language re related matters	0.300
1264	2921.0	09/11/11	JPF	Review of plaintiff's motion to compel discovery	0.900
1265	722.0	09/12/11	JLN	Drafted letter motion to compel City defendants to produce discovery	0.700
1266	3106.0	09/12/11	JPF	Final review & edit motion to compel	0.300
1267	3791.0	09/12/11	GMC	Review and revise motion to compel City to produce discovery	0.400
1268	723.0	09/20/11	JLN	Reviewed Judge Sweet's order re: motion to compel and setting oral argument date	0.100
1269	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
1270	2733.0	09/27/11	JPF	Research re law enforcement privilege	2.600
1271	725.0	09/28/11	JLN	Discussion w/ JF re law enforcement privilege & motion to compel	1.250
1272	726.0	09/28/11	JLN	Attend oral argument on motion to compel	1.000
1273	727.0	09/28/11	JLN	Prepare for hearing before Judge Sweet regarding Plaintiff's letter motion to Compel	0.700
1274	728.0	09/28/11	JLN	Travel to SDNY- motion to compel (.5)	0.250
1275	729.0	09/28/11	JLN	E-mail from JF re law enforcement privilege	0.100
1276	2847.0	09/28/11	JPF	Discussion w/ JN and GC re law enforcement privilege & motion to compel	1.250
1277	2898.0	09/28/11	JPF	Attend oral argumqnt on motion to compel	1.000
1278	3168.0	09/28/11	JPF	Email to JN re law enforcement privilege	0.250
1279	3181.0	09/28/11	JPF	Review of changes to confidentiality stip & disc. plan	0.250
1280	3188.0	09/28/11	JPF	Travel from SDNY - motion to compel (.5)	0.250
1281	3195.0	09/28/11	JPF	Travel to SDNY - motion to compel (.5)	0.250
1282	3792.0	09/28/11	GMC	Discussion w/ JN and TF re law enforcement privilege & motion to compel	1.250
1283	3793.0	09/28/11	GMC	Attend oral argument on motion to compel	1.000
1284	3794.0	09/28/11	GMC	Travel from SDNY- motion to compel (.5)	0.250
1285	3795.0	09/28/11	GMC	Travel to SDNY- motion to compel (.5)	0.250
1286	3796.0	09/29/11	GMC	Review, revised, and executed amended discovery plan	0.300
1287	730.0	09/30/11	JLN	E-mail from all parties re: executed amended discovery plan	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1288	3797.0	09/30/11	GMC	Email from all parties re: executed amended discovery plan	0.250
1289	731.0	10/05/11	JLN	Reviewed Rule 26 Discovery Plan filed by B. Lee	0.100
1290	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
1291	733.0	10/08/11	JLN	Cont'd review of City's 1st response to doc. Demands. Took notes re same	4.700
1292	734.0	10/08/11	JLN	Review of operations order sent from client	0.400
1293	3798.0	10/12/11	GMC	Receipt and review defendants first discovery responses	2.000
1294	3799.0	10/12/11	GMC	Review of motion to approve protective order	0.250
1295	735.0	10/17/11	JLN	order from Judge Sweet directing parties to appear for PTC	0.100
1296	3800.0	10/17/11	GMC	Review of pre-trial order	0.100
1297	3801.0	10/21/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1298	3802.0	10/22/11	GMC	Review of Schoolcraftjustice.com posts	0.300
1299	3803.0	10/23/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1300	3804.0	10/24/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1301	3805.0	10/25/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1302	3806.0	10/26/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1303	3807.0	10/27/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1304	2975.0	10/28/11	JPF	Review of operations order 10/17/11 sent from client	0.750
1305	3808.0	10/28/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1306	3809.0	10/29/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1307	736.0	11/01/11	JLN	Reviewed Isakov 3rd request for docs	0.100
1308	3810.0	11/02/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1309	3811.0	11/03/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1310	3812.0	11/04/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1311	3813.0	11/05/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1312	3814.0	11/12/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1313	3815.0	11/13/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1314	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
1315	3816.0	11/17/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1316	738.0	11/18/11	JLN	Listened to Polanco recordings, including Heran, McHugh, Sgt. Bennett; took notes re: same.	1.400
1317	739.0	11/18/11	JLN	Reviewed mise recordings re: "4 collars" Jones. Guillermo and Kamper	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1318	740.0	11/29/11	JLN	E-mail from B. Lee re: upcoming discovery conference and status of case	0.100
1319	3817.0	11/29/11	GMC	Review of email re: discovery from Brian Lee	0.100
1320	3818.0	11/29/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1321	741.0	12/05/11	JLN	Started review disclosures from D. Canfield, including BNIU file and multiple CD Recordings	1.800
1322	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
1323	743.0	12/06/11	JLN	Con'td review of BNIU file and recordings; took notes re same	3.750
1324	3819.0	12/06/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1325	3392.0	12/07/11	JPF	Review order adjourning conf.	0.100
1326	3820.0	12/07/11	GMC	Review of order re: pretrial conference	0.100
1327	744.0	12/13/11	JLN	Drafted letter re: supplemental discovery responses for med. Defendants	0.100
1328	1823.0	12/13/11	NB	Sent AS Authorization to James Liander (Queens DA)	0.200
1329	1824.0	12/13/11	NB	Letter to defense counsel enclosing responses to discovery requests (authorizations)	0.200
1330	1825.0	12/13/11	NB	Letter to Callon enclosing Luell and IRS Authorization	0.200
1331	3821.0	12/13/11	GMC	Phone call with Larry and Adrian Schoolcraft	0.800
1332	3822.0	12/13/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1333	3823.0	12/15/11	GMC	Review of Schoolcraftjustice.com posts	0.100
1334	745.0	12/19/11	JLN	Discussion w/ GC & JF re plaintiffs thoughts on discovery & next steps for moving forward	0.500
1335	2913.0	12/19/11	JPF	Convo w/ Larry Schoolcraft re discovery issues, avenues to pursue with defendants	0.900
1336	3018.0	12/19/11	JPF	Discussion w/ GC & JN re plaintiff's thoughts on discovery	0.500
1337	3824.0	12/19/11	GMC	Discussion w/ JF & JN re plaintiff's thoughts on discovery	0.500
1338	746.0	12/23/11	JLN	Reviewed recordings and documents from Frank Palestro	2.400
1339	747.0	01/05/12	JLN	Reviewed ltr from def. counsel re: request for IRS releases	0.100
1340	1826.0	01/05/12	NB	Made reservation for Schoolcrafts for Cosmopolitan Hotel	0.100
1341	3825.0	01/05/12	GMC	Review of letter from Bernier's attorneys	0.250
1342	5235.0	1/9/12	Richard A. Gilbert	Meeting with PG RE: investigation strategy.	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1343	748.0	01/10/12	JLN	Meeting with AS, JF and GC re: multiples issues in use & general strategy for moving forward	4.900
1344	2620.0	01/10/12	JPF	Meeting with AS, JN and GC	4.900
1345	3209.0	01/10/12	JPF	Correspondence mail from medical defendant Isacov re plaintiff EBT	0.100
1346	3282.0	01/10/12	JPF	Email from JMH re outstanding discovery from plaintiff	0.100
1347	3826.0	01/10/12	GMC	Meeting with AS, JN and JF	4.900
1348	1827.0	01/11/12	NB	Sent Callan kletter and AS authorization via regular mail and e-mail	0.100
1349	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
1350	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
1351	3827.0	01/12/12	GMC	Review of City Defendants first Discovery Demands	0.500
1352	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
1353	5237.0	1/12/12	Richard A. Gilbert	Research on Union's failure to advocate for A.S	2.000
1354	5195.0	1/14/12	Harvey A. Levine	Conf. with RG re: Union rep. research & strategy	0.750
1355	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
1356	5239.0	1/16/12	Richard A. Gilbert	Phone conv. with VP re: update, meeting to follow.	0.125
1357	5196.0	1/19/12	Harvey A. Levine	Conf. RG re: correspondence to Queens D.A. & redrafts	0.250
1358	5240.0	1/19/12	Richard A. Gilbert	Multiple e-mails to /from PG, re: draft letter to NYPD & redrafts	1.500
1359	749.0	01/20/12	JLN	Phone call with Adrian and Larry	0.700
1360	2804.0	01/20/12	JPF	Phone call with Larry Schoolcraft re discovery & EBTs	1.600
1361	3828.0	01/20/12	GMC	Phone call with Adrian and Larry	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1362	5197.0	1/21/12	Harvey A. Levine	Review of PG correspondence Confer with RG letter	0.200
1363	5241.0	1/21/12	Richard A. Gilbert	Review of PG, re: NYPD letter. Confer with HL regarding letter	0.200
1364	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
1365	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
1366	1828.0	01/23/12	NB	Letter to Greg Radomisli enclosing auths for medicaid records and disclosing lost earnings	0.250
1367	2968.0	01/23/12	JPF	Phone call with Larry Schoolcraft re plaintiff salary and benefits and work suspension status	0.750
1368	5198.0	1/23/12	Harvey A. Levine	Review of PG correspondence to NYPD	0.125
1369	5243.0	1/23/12	Richard A. Gilbert	Phone conv. with PG, Re: NYPD letter	0.125
1370	750.0	01/24/12	JLN	Spoke to GC re: AS salary	0.200
1371	3829.0	01/24/12	GMC	Spoke to JN re: AS salary	0.250
1372	3830.0	01/24/12	GMC	Email copy of NOC with salary included	0.100
1373	5244.0	1/25/12	Richard A. Gilbert	Meeting with PG to discuss NYPD's response to e-mail communications.	0.500
1374	5199.0	1/29/12	Harvey A. Levine	Review of proposed AS affidavit for Center for Constitutional Rights (CCR)	0.500
1375	5245.0	1/29/12	Richard A. Gilbert	Review of PG E-mail & affidavit from Center for Constitutional Rights (CCR)	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1376	5246.0	1/29/12	Richard A. Gilbert	Dinner meeting with PG, FS atty. Discuss potential expert consulting	1.500
1377	5200.0	1/30/12	Harvey A. Levine	Conf. with RG re: dinner meeting w/ PG with PG.	0.250
1378	5247.0	1/30/12	Richard A. Gilbert	Confer with HL re: dinner meeting; multiple TC's with PG.	0.700
1379	5201.0	01/31/12	Harvey A. Levine	Review of RG cease & desist letter re: website	0.250
1380	5248.0	1/31/12	Richard A. Gilbert	Per conv. PG draft cease & desist to PC Regarding website	0.400
1381	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
1382	751.0	02/07/12	JLN	Email from GC re: supplemental demands	0.100
1383	752.0	02/07/12	JLN	Review Notice of Appearance for City Defendants	0.100
1384	753.0	02/07/12	JLN	Reviewed Notice of Appearance by Max Leighton on behalf of City	0.100
1385	2675.0	02/07/12	JPF	Read and review of JHMC medicals (full set from hospital)	3.400
1386	3158.0	02/07/12	JPF	Email from Lee re outstanding authorizations	0.250
1387	3831.0	02/07/12	GMC	Review of email demanding authorizations from Brian Lee	0.250
1388	3832.0	02/07/12	GMC	Email from JN re: supplemental demands	0.100
1389	3833.0	02/07/12	GMC	Email correspondence re: pretrial conference	0.100
1390	3834.0	02/07/12	GMC	Review notice of appearance for City Defendants	0.100
1391	754.0	02/08/12	JLN	Pre-trial conference before Judge Sweet	1.000
1392	755.0	02/08/12	JLN	Discussion with JF and GC re: conference and discovery and strategy for moving forward	0.750
1393	2910.0	02/08/12	JPF	Pre-trial conference before Judge Sweet	1.000
1394	2956.0	02/08/12	JPF	Discussion with GC and JN re: conference and discovery and strategy moving forward	0.750
1395	3189.0	02/08/12	JPF	Travel from SDNY - motion to compel (.5)	0.250
1396	3196.0	02/08/12	JPF	Travel to SDNY - motion to compel (.5)	0.250
1397	3835.0	02/08/12	GMC	Pre-trial conference before Judge Sweet	1.000
1398	3836.0	02/08/12	GMC	Discussion with JF and JN re: conference and discovery and strategy moving forward	0.750
1399	3837.0	02/08/12	GMC	Travel from SDNY- motion to compel (.5)	0.250
1400	3838.0	02/08/12	GMC	Travel to SONY- motion to compel (.5)	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1401	756.0	02/09/12	JLN	Started drafting Second Set of Document Demands for City	2.600
1402	757.0	02/09/12	JLN	Reviewed Judge Sweet's order setting motion schedule and discovery deadlines	0.100
1403	758.0	02/10/12	JLN	Started drafting 2nd Request for Docs from City	3.400
1404	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
1405	760.0	02/10/12	JLN	Discussion w/ JF & GC re additional items of discovery	1.600
1406	761.0	02/10/12	JLN	T/c with Adrian and Larry regarding update on correspondence and update on new discovery demands	0.700
1407	762.0	02/10/12	JLN	Reviewed proposed supplemental demands for the City	0.400
1408	763.0	02/10/12	JLN	Telephone Conversation with GC regarding discovery demands and additional demands	0.300
1409	764.0	02/10/12	JLN	E-mail to GC re discovery we need to follow up with city	0.200
1410	765.0	02/10/12	JLN	E-mail to JF re additional items of discovery from City & subpoenas for Johnstown records	0.200
1411	766.0	02/10/12	JLN	E-mail to GC re: Cancellation of Adrian and Larry trip to NYC	0.100
1412	767.0	02/10/12	JLN	Review of E-mail to Jeremy Steven (investigator) re: subpoena of Schoolcraft records	0.100
1413	1829.0	02/10/12	NB	E-mail exchange to Jeremy Stephens regarding serving subpoenas on Johnstown PD, FCSD and FCDSS	0.200
1414	2799.0	02/10/12	JPF	Discussion w/ JN & GC re additional items of discovery	1.600
1415	3154.0	02/10/12	JPF	E-mail from JN re additional items of discovery from City & subpoenas for Johnstown records	0.250
1416	3173.0	02/10/12	JPF	Phone call with client cancelling meeting because of eviction issues	0.250
1417	3252.0	02/10/12	JPF	E-mail from GC re additional discovery items to seek	0.100
1418	3839.0	02/10/12	GMC	Drafted proposed supplemental demands for the City and emailed to JN for review	1.800
1419	3840.0	02/10/12	GMC	Discussion w/ JN & JF re additional items of discovery	1.600
1420	3841.0	02/10/12	GMC	Review of email from JN re discovery we need to follow up with city	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1421	3842.0	02/10/12	GMC	Email from JN re: Cancellation of Adrian and Larry trip to NYC	0.100
1422	3843.0	02/10/12	GMC	Review of email to Jeremy (Meridian Investigations) re: subpoena of Schoolcraft records	0.100
1423	768.0	02/13/12	JLN	Review of final supplemental discovery demands for NYC	0.300
1424	2891.0	02/13/12	JPF	Review and edit revised demands for City	1.100
1425	3844.0	02/13/12	GMC	Review of final supplemental discovery demands for NYC	0.300
1426	3262.0	02/23/12	JPF	E-mail from GC re NYCLU lawsuit for POs faced with quotas	0.100
1427	769.0	02/24/12	JLN	Review of E-mail correspondence w/Chris Dunn (NYCLU)	0.200
1428	3845.0	02/24/12	GMC	Review of email correspondence w/Chris Dunn	0.250
1429	770.0	02/26/12	JLN	Reviewed Fulton County Records re: AS Produced pursuant to subpoena; took notes re: same.	2.400
1430	771.0	02/26/12	JLN	Reviewed records from Fulton Ciounty Volume - I	0.700
1431	772.0	02/27/12	JLN	Review of subpoena response from Johstown PD	1.000
1432	773.0	02/27/12	JLN	Reviewed records from Fulton County Volume - II	0.900
1433	774.0	02/27/12	JLN	Meeting with JF and GC re: documents received from Johnstown PD for plaintiff's subpoena	0.750
1434	2965.0	02/27/12	JPF	Meeting with GC and JN re: documents received from Johnstown PD for plaintiff's subpoena	0.750
1435	3045.0	02/27/12	JPF	Review of docs from Johnstown PD re plaintiff's subpoena	0.500
1436	3846.0	02/27/12	GMC	Meeting with JF and JN re: documents received from Johnstown PD for plaintiff's subpoena	0.750
1437	3847.0	02/27/12	GMC	Review of subpoena response from Johstown PD	0.750
1438	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
1439	3848.0	02/28/12	GMC	Review of email from AS's former partner	0.100
1440	3849.0	02/29/12	GMC	Phone call with AS's formaer partner	0.750
1441	3850.0	02/29/12	GMC	Phone call w/Adrian reformer partner	0.400
1442	3851.0	02/29/12	GMC	Email to AS's former partner	0.100
1443	3852.0	03/01/12	GMC	Phone call with AS re: former partner	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1444	776.0	03/06/12	JLN	Reviewed article re: Etemo/Silverman analyzie flaws in NYPD terror effort	0.100
1445	3853.0	03/06/12	GMC	Review of Village Voice Article re QAD investigation	0.300
1446	777.0	03/07/12	JLN	Discussed adding 1st Amendment claim with JF and GC	0.250
1447	778.0	03/07/12	JLN	Reviewed Notice of Appearance by Suzanna Publicker on behalf of City	0.100
1448	3136.0	03/07/12	JPF	Discussed adding 1st amendment claim with JN and GC	0.250
1449	3157.0	03/07/12	JPF	Email from John Etemo re QAD report	0.250
1450	3272.0	03/07/12	JPF	Email from GC re: conversation with Larry and Adrian	0.100
1451	3854.0	03/07/12	GMC	Discussed adding 1st amendment claim with JN and JF	0.250
1452	3855.0	03/07/12	GMC	Phone call with Larry and Adrian Schoolcraft	0.250
1453	3856.0	03/07/12	GMC	Email to JN an JF re: conversation with Larry and Adrian	0.100
1454	3857.0	03/07/12	GMC	Review of NOA by Suzanna Publicker ("SP")	0.100
1455	3858.0	03/07/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1456	779.0	03/08/12	JLN	Discussion with JF & GC re Voice article and the confidential report	0.750
1457	2864.0	03/08/12	JPF	Phone call with client re article and whether confidential info had been disclosed	1.250
1458	2959.0	03/08/12	JPF	Discussion with JN & GC re VV article and the confidential report	0.750
1459	3076.0	03/08/12	JPF	Read Voice article on QAD report	0.400
1460	3859.0	03/08/12	GMC	Discussion with JN & JF re VV article and the confidential report	0.750
1461	3860.0	03/08/12	GMC	Email from Jim Hoffer	0.100
1462	3861.0	03/08/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1463	3862.0	03/08/12	GMC	Review of Schoolcraf iustice.com posts	0.100
1464	780.0	03/09/12	JLN	Began drafting responses to City's Documents Demands	1.700
1465	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
1466	782.0	03/09/12	JLN	Drafted letter to Lt. Gilbo Johnstown PD re: missing documents on visits to Schoolcraft	0.900
1467	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
1468	2752.0	03/09/12	JPF	Research on 1st Amendment claims	2.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1469	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
1470	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
1471	3864.0	03/09/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1472	3865.0	03/10/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1473	3100.0	03/11/12	JPF	Draft email to defendants re amending complaint to add 1st Amendment claims	0.300
1474	783.0	03/12/12	JLN	Continued drafting reponses to City Documents Demands	2.800
1475	784.0	03/12/12	JLN	Meeting with JF & GC re letter from City	0.600
1476	785.0	03/12/12	JLN	Revised & edited response to City's letter re protective order	0.250
1477	786.0	03/12/12	JLN	Read/review of letter from defendant City on breach of confidentiality stip	0.200
1478	787.0	03/12/12	JLN	E-mail to JF re corrections to motion to reinstate	0.100
1479	2999.0	03/12/12	JPF	Meeting with JN & GC re letter from City	0.600
1480	3065.0	03/12/12	JPF	Diaft Response to defendants letter re: breach of protective order	0.400
1481	3077.0	03/12/12	JPF	Read/review of letter from defendant City on breach of confidentiality stip	0.400
1482	3080.0	03/12/12	JPF	Review & edit response to City's letter re protective order	0.400
1483	3185.0	03/12/12	JPF	Review of So Ordered Protective Order re doc produced by City	0.250
1484	3286.0	03/12/12	JPF	Email from JN re corrections	0.100
1485	3323.0	03/12/12	JPF	Email letter to City re amendment	0.100
1486	3866.0	03/12/12	GMC	Meeting with JN & JF re letter from City	0.600
1487	3867.0	03/12/12	GMC	Review of SP letter re "leaked" QAD report	0.400
1488	3868.0	03/12/12	GMC	Email correspondence with defendants re Amendment	0.250
1489	3869.0	03/12/12	GMC	Review & edit response to City's letter re protective order	0.250
1490	3870.0	03/12/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1491	3871.0	03/12/12	GMC	Review of signed protective order	0.100
1492	1831.0	03/13/12	NB	Formatted letter and made edits to letter to Court re: leaks to media	0.300
1493	3318.0	03/13/12	JPF	Email from PBS producer Weinrich on documentary of Schoolcraft	0.100
1494	3872.0	03/13/12	GMC	Email correspondence with Mark Toor	0.100
1495	3873.0	03/13/12	GMC	Email from PBS producer Weinrich on documentary of Schoolcraft	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1496	3874.0	03/13/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1497	788.0	03/14/12	JLN	E-mail from JF with proposed amended complaint	0.100
1498	789.0	03/14/12	JLN	Review of NY Times article on Schoolcraft	0.100
1499	1832.0	03/14/12	NB	Pulled and email GC various documents from Schoolcraft file	0.200
1500	2801.0	03/14/12	JPF	Editing Amended Complaint to add 1st Amendment facts & law	1.600
1501	3312.0	03/14/12	JPF	Email from Nic re doc in connection w/ Schoolcraft meeting	0.100
1502	3355.0	03/14/12	JPF	Email to JN with proposed Amended Complaint	0.100
1503	3875.0	03/14/12	GMC	Review and revise of amended complaint adding 1st amendment claim	0.500
1504	3876.0	03/14/12	GMC	Email correspondence w/Nic re docs in connection w/ Schoolcraft meeting	0.250
1505	3877.0	03/14/12	GMC	Review of NY Times article on Schoolcraft	0.100
1506	3878.0	03/14/12	GMC	Review order on City motion re QAD	0.100
1507	790.0	03/15/12	JLN	Meeting with JF and GC re proposed amended complaint	0.600
1508	3001.0	03/15/12	JPF	Meeting with JN and GC re proposed Amended Complaint	0.600
1509	3068.0	03/15/12	JPF	Incorporating corrections from JN to Amended Complaint	0.400
1510	3879.0	03/15/12	GMC	Meeting with JN and JF re proposed Amended Complaint	0.600
1511	3880.0	03/15/12	GMC	Email correspondence from anonymous "MD" PO re: 81st precinct	0.100
1512	2994.0	03/16/12	JPF	Draft of opp that defendants request plaintiff be ordered to appear @ 3 /28/12 conf.	0.600
1513	3881.0	03/16/12	GMC	Radio interview re: Schoolcraft	0.400
1514	791.0	03/19/12	JLN	Discussions w/ JF re amended complaint	0.500
1515	3028.0	03/19/12	JPF	Disucssion w/ JN re corrections Amended Complaint	0.500
1516	2870.0	03/20/12	JPF	Research on 1st Amendment Second Circuit decisions following Carcetti	1.250
1517	2995.0	03/20/12	JPF	Incorporating language into Amended Complaint	0.600
1518	3153.0	03/20/12	JPF	Email from hospital defendant & City re proposed Amended Complaint	0.250
1519	3882.0	03/20/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1520	792.0	03/21/12	JLN	Read ltr motion from NYT seeking disclosure of Schoolcraft Materials.	0.200
1521	3083.0	03/21/12	JPF	Review of NY Times letter to court re confidentiality	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1522	3883.0	03/21/12	GMC	Review of NY Times motion to unseal Schoolcraft records	0.400
1523	3884.0	03/21/12	GMC	Email correspondence w/JN re: NY Times motion	0.100
1524	793.0	03/22/12	JLN	Final edits on amended complaint w/ JF	0.250
1525	3170.0	03/22/12	JPF	Final edits on Amended Complaint w/ JN	0.250
1526	3885.0	03/22/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1527	3325.0	03/23/12	JPF	Email of Amended Complaint to City	0.100
1528	3886.0	03/24/12	GMC	Email correspondence w/Defendants re Amended complaint	0.250
1529	794.0	03/25/12	JLN	Finished responses to City's document demands; forward same to GC & JF for review	2.400
1530	795.0	03/26/12	JLN	City's response to NYT Ltr motion	0.200
1531	796.0	03/26/12	JLN	E-mail exchange re Whistblowing Sgt. had role in crime spike in Queens Pct.	0.100
1532	797.0	03/26/12	JLN	Reviewed order of Judge Sweet re: NYT motion	0.100
1533	798.0	03/28/12	JLN	Oral Argument on City motion	1.000
1534	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
1535	800.0	03/28/12	JLN	Meeting w/ JF & GC prior to upcoming conference to prep	0.400
1536	801.0	03/28/12	JLN	Ltr from S. Publicker re: plaintiff's outstanding discovery	0.100
1537	2897.0	03/28/12	JPF	Attend oral Argument on City motion	1.000
1538	2926.0	03/28/12	JPF	Conf. re confidentiality stip & Village Voice article	0.800
1539	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
1540	3070.0	03/28/12	JPF	Meeting w/ JN & GC prior to conference to prep	0.400
1541	3194.0	03/28/12	JPF	Travel from SDNY for Oral Argument on City motion (.5)	0.250
1542	3201.0	03/28/12	JPF	Travel to SDNY for Oral Argument on City motion (.5)	0.250
1543	3887.0	03/28/12	GMC	Oral Argument on City motion	1.000
1544	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
1545	3889.0	03/28/12	GMC	Legal research: review of Garcetti and progeny to discuss Amendment issues	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1546	3890.0	03/28/12	GMC	Meeting w/ JN & JF prior to conference to prep	0.400
1547	3891.0	03/28/12	GMC	Travel from SDNY for Oral Argument on City motion (.5)	0.250
1548	3892.0	03/28/12	GMC	Travel to SDNY for Oral Argument on City motion (.5)	0.250
1549	802.0	03/29/12	JLN	Revised and help draft proposed AEO stip w/ GC and JF for City	0.800
1550	803.0	03/29/12	JLN	Review of AEO; Notes regarding same	0.600
1551	2951.0	03/29/12	JPF	Revised and help draft proposed AEO stip w/JN and GC for City	0.800
1552	3042.0	03/29/12	JPF	Review of AEO	0.500
1553	3893.0	03/29/12	GMC	Revised and help draft proposed AEO stip w/JN and JF for City	0.800
1554	804.0	03/30/12	JLN	Discussion with GC and JF re: filing motion to amend and discovery issues	0.600
1555	805.0	03/30/12	JLN	Meeting w/ JF & GC re AEO changes	0.600
1556	806.0	03/30/12	JLN	Final review of proposed AEO stip	0.300
1557	807.0	03/30/12	JLN	E-mail from Eli Silverman re: ABC news story on under reported crime rates; watched same	0.200
1558	808.0	03/30/12	JLN	E-mail from City re: IAB docs and extending time to produce	0.100
1559	809.0	03/30/12	JLN	E-mailed proposed AEO stip to the City	0.100
1560	2997.0	03/30/12	JPF	Meeting w/ JN & GC re AEO changes	0.600
1561	3026.0	03/30/12	JPF	Discussion with JN and GC re: filing motion to amend and discovery issues	0.500
1562	3146.0	03/30/12	JPF	Email from City re IAB docs & extending time to produce	0.250
1563	3236.0	03/30/12	JPF	Email from City re: Amendment opposition	0.100
1564	3894.0	03/30/12	GMC	Email correspondence w/SP re Discovery extension and opposition to amendment of Complaint	0.600
1565	3895.0	03/30/12	GMC	Meeting w/ JN & JF re AEO changes	0.600
1566	3896.0	03/30/12	GMC	Discussion with JN and JF re: filing motion to amend and discovery issues	0.500
1567	3897.0	03/30/12	GMC	Final review of proposed AEO stip	0.300
1568	3898.0	03/30/12	GMC	Emailed proposed AEO stip to the City	0.100
1569	3341.0	03/31/12	JPF	Email to City requesting clarification on reason for refusal	0.100
1570	810.0	04/02/12	JLN	E-mail from Bernier consenting to amendment	0.100
1571	811.0	04/02/12	JLN	E-mail from Isakov consenting to amendment	0.100
1572	3224.0	04/02/12	JPF	Email from Bernier consenting to amendment	0.100
1573	3277.0	04/02/12	JPF	Email from Isacov consenting to amendment	0.100
1574	812.0	04/04/12	JLN	E-mail from JHMC regarding change in amended language	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1575	2927.0	04/04/12	JPF	Conf. re NY Times letter to undo the confidentiality stip	0.800
1576	3210.0	04/04/12	JPF	Correspondence to JHMC re Amended Complaint	0.100
1577	3279.0	04/04/12	JPF	Email from JHMC	0.100
1578	3280.0	04/04/12	JPF	Email from JHMC	0.100
1579	3281.0	04/04/12	JPF	Email from JHMC re change in amended language	0.100
1580	3340.0	04/04/12	JPF	Email to City re updated version of proposed Amended Complaint	0.100
1581	3345.0	04/04/12	JPF	Email to JHMC	0.100
1582	813.0	04/05/12	JLN	Drafted response to Defendants 1st Set of Document Demands	2.800
1583	814.0	04/05/12	JLN	Review & discuss w/ JF & GC plaintiff's responses to City demands	0.800
1584	815.0	04/05/12	JLN	E-mail from City stating reasons why they oppose amendment to complaint	0.100
1585	2825.0	04/05/12	JPF	Review & edit response to City's interogs	1.400
1586	2945.0	04/05/12	JPF	Review and discuss w/ JN & GC plaintiff's responses to City demands	0.800
1587	3147.0	04/05/12	JPF	Email from City stating reasons why they oppose amendment to Complaint	0.250
1588	3899.0	04/05/12	GMC	Reviewed and revised responses to City defendants discovery requests	1.800
1589	3900.0	04/05/12	GMC	Review & discuss w/ JN & JF plaintiff's responses to City demands	0.800
1590	3901.0	04/05/12	GMC	Review of basis for City's opposition to Amendment	0.250
1591	3088.0	04/06/12	JPF	Correspondence w/ NY Times about amendments to Schoolcraft protective order	0.300
1592	3902.0	04/06/12	GMC	Correspondence w/ NY Times counsel re: protective order	0.300
1593	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
1594	817.0	04/09/12	JLN	E-mail correspondence w/GC re: discovery responses	0.100
1595	3903.0	04/09/12	GMC	Email correspondence w/JN re: discovery responses	0.100
1596	818.0	04/10/12	JLN	Meeting w/ AS re: case status general strategy next steps for moving forward	4.600
1597	819.0	04/10/12	JLN	E-mail re: Schoolcraft arrival to NYC	0.100
1598	2632.0	04/10/12	JPF	Meeting w/ AS	4.600
1599	3904.0	04/10/12	GMC	Meeting w/ AS	4.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1600	3905.0	04/10/12	GMC	Email enclosing discovery responses to City demands	0.100
1601	3906.0	04/10/12	GMC	Email re: Schoolcraft arrival to NYC	0.100
1602	3214.0	04/11/12	JPF	Email Amended Complaint to defendants	0.100
1603	820.0	04/13/12	JLN	Discussion with GC and JF re: Matthews decision	0.600
1604	821.0	04/13/12	JLN	Read Matthews decision; took notes re: same	0.500
1605	822.0	04/13/12	JLN	E-mail from plaintiff re 1st Amendment claim	0.100
1606	2992.0	04/13/12	JPF	Discussion with JN and GC re: Matthews decision	0.600
1607	3014.0	04/13/12	JPF	Review of Decision in Matthews 1st Amendment case from Judge Jones	0.600
1608	3319.0	04/13/12	JPF	Email from plaintiff re 1st Amendment claim	0.100
1609	3907.0	04/13/12	GMC	Discussion with JN and JF re: Matthews decision	0.600
1610	3908.0	04/13/12	GMC	Review of Matthews decision	0.600
1611	3909.0	04/13/12	GMC	Email from plaintiff re 1st Amendment claim	0.100
1612	1833.0	04/16/12	NB	E-mail exchange to Jeremy Stephens (investigator) regarding serving subpoenas on Vallone and Kelly	0.200
1613	3217.0	04/19/12	JPF	Email correspondence to City correcting Lt. Gough for Amended complaint	0.100
1614	2969.0	04/20/12	JPF	Phone discussion w/ AS	0.750
1615	3231.0	04/20/12	JPF	Email from City	0.100
1616	2666.0	04/22/12	JPF	Research on 1st Amendment claim	3.600
1617	823.0	04/23/12	JLN	Reviewed draft letter from JF regarding motion to amend complaint; made edits to same	0.400
1618	1834.0	04/23/12	NB	Sent package to all counsel enclosing transcripts of Browne, Pichardo, McHugh, Polanco, Mauriello, Herran, Gianelli, Esposito	0.800
1619	2712.0	04/23/12	JPF	Draft of letter on 1st Amendment claims	2.900
1620	2848.0	04/23/12	JPF	Discussion w/ Larry Schoolcraft re amendments to complaint	1.250
1621	2627.0	04/24/12	JPF	Research on 1st Amendment claims for motion	4.750
1622	2687.0	04/24/12	JPF	Draft of motion to Amend 1st Amendment claim	3.250
1623	3164.0	04/24/12	JPF	Email, to hospital defendants re amendment Gough issue	0.250
1624	3373.0	04/24/12	JPF	Response emails	0.100
1625	3910.0	04/24/12	GMC	Review and revise JF motion to Amend 1st Amendment claim	0.750
1626	3911.0	04/24/12	GMC	Email correspondence to City correcting Lt. Gough for Amended Complaint	0.100
1627	824.0	04/25/12	JLN	Discussion with re: edits/changes to 1st Amendment letter	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1628	825.0	04/25/12	JLN	Reviewed JF letter to Court requesting leave to amend to add Lt. Hanlon	0.100
1629	2747.0	04/25/12	JPF	Final review & edit 1st Amendment letter	2.300
1630	2960.0	04/25/12	JPF	Discussion with JN re: edits/changes to 1st Amendment letter	0.750
1631	3177.0	04/25/12	JPF	Response emails	0.250
1632	3235.0	04/25/12	JPF	Email from City on Vallone subpoena extension	0.100
1633	3356.0	04/25/12	JPF	Email to plaintiff re letter to amend on 1st Amendment claim	0.100
1634	3376.0	04/25/12	JPF	Response from City	0.100
1635	3912.0	04/25/12	GMC	Email from City re: Vallone and Vans subpoenas	0.100
1636	826.0	04/30/12	JLN	Discussion w/ JF re NY Times alteration to protective order	0.300
1637	827.0	04/30/12	JLN	E-mail from JF to City re additions to protective order	0.100
1638	3092.0	04/30/12	JPF	Discussion w/ JN and GC re NY Times alteration to protective order	0.300
1639	3108.0	04/30/12	JPF	Letter from City requesting affidavits & dep of client re confidentiality breach	0.300
1640	3205.0	04/30/12	JPF	City e-mail request to adjourn amendment conf.	0.100
1641	3299.0	04/30/12	JPF	Email from JN to City re additions to protective order	0.100
1642	3384.0	04/30/12	JPF	Response to email	0.100
1643	3913.0	04/30/12	GMC	Review NY Times proposed language to protective order and email sent to City Defendants	0.400
1644	3914.0	04/30/12	GMC	Discussion w/ JN and JF re NY Times alteration to protective order	0.300
1645	3915.0	04/30/12	GMC	Review of correspondence with SP re: adjourning oral argument on Amendment	0.250
1646	828.0	05/01/12	JLN	Discussions w/ JF re City's request for affidavits & deposition for confidentiality breach	0.400
1647	3063.0	05/01/12	JPF	Discussions w/ JN and GC re City's request for affidavits & deposition for confidentiality breach	0.400
1648	3916.0	05/01/12	GMC	Discussions w/ JN and JF re City's request for affidavits & deposition for confidentiality breach	0.400
1649	829.0	05/02/12	JLN	E-mail to JF to City re confidentiality and discovery issues	0.100
1650	3364.0	05/02/12	JPF	Email from JN to City re confidentiality and discovery issues	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1651	3917.0	05/02/12	GMC	Email to City re: failure to provide discovery or respond to proposed AEO	0.250
1652	830.0	05/03/12	JLN	Discussion w/ GC & JF re Affidavits and Conf. Stip AEO	0.750
1653	2953.0	05/03/12	JPF	Discussion w/ GC & JN re Affidavits and conf. stip AEO	0.750
1654	2970.0	05/03/12	JPF	Receipt and review of email from City re: revised confidentiality AEO and Affidavits	0.750
1655	3918.0	05/03/12	GMC	Review of defendants proposed AEO stip and declaration re: "leak"	1.250
1656	3919.0	05/03/12	GMC	Discussion w/ JF & JN re Affidavits and conf. stip AEO	0.750
1657	3920.0	05/03/12	GMC	Review of correspondence with SP re: adjourning oral argument on Amendment again	0.100
1658	3206.0	05/07/12	JPF	City's response keeping the 5/9 date	0.100
1659	831.0	05/08/12	JLN	Discussion w/ JF and GC re argument on 1st Amendment claim	0.600
1660	832.0	05/08/12	JLN	Reviewed Notice of Appearance by William Fraenkel on behalf of City	0.100
1661	2736.0	05/08/12	JPF	Review and prep response to defendant's 1st Amendment letter	2.600
1662	2773.0	05/08/12	JPF	Review caselaw in defendant's letter	2.100
1663	2985.0	05/08/12	JPF	Discussion w/ JN and GC re argument on 1st Amendment claim	0.600
1664	3921.0	05/08/12	GMC	Discussion w/ JN and JF re argument on 1st Amendment claim	0.600
1665	3922.0	05/08/12	GMC	Review of NOA William Fraenkel	0.100
1666	833.0	05/09/12	JLN	Attended Argument on 1st Amendment claim	1.000
1667	2783.0	05/09/12	JPF	Review of cases & letter in prep of argument	1.800
1668	2899.0	05/09/12	JPF	Attended Argument on 1st Amendment claim	1.000
1669	3191.0	05/09/12	JPF	Travel from SDNY for Argument on 1st Amendment claim (.5)	0.250
1670	3198.0	05/09/12	JPF	Travel to SDNY for Argument on 1st Amendment claim (.5)	0.250
1671	3923.0	05/09/12	GMC	Attended Oral Argument on 1st Amendment claim	1.000
1672	3924.0	05/09/12	GMC	Travel from SDNY for Argument on 1st Amendment claim (.5)	0.250
1673	3925.0	05/09/12	GMC	Travel to SDNY for Argument on 1st Amendment claim (.5)	0.250
1674	2833.0	05/10/12	JPF	Draft letter providing supplemental authority in response to defendant's opp	1.300
1675	3016.0	05/10/12	JPF	Review, edit & submit supplemental letter	0.600
1676	834.0	05/11/12	JLN	Read defendant's motion to quash and discussion w/ GC & JF re: same	2.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1677	1835.0	05/11/12	NB	Prepared follow up letter to Gilbo subpoenaing records for JPD; sent same via regular mail	0.250
1678	2768.0	05/11/12	JPF	Read and review of defendant's letter to quash and discussion w/ GC & JN	2.100
1679	3119.0	05/11/12	JPF	Read and review NY Times letter re confidentiality stip	0.300
1680	3120.0	05/11/12	JPF	Read and review of defendant's response to plaintiff's supplemental letter	0.300
1681	3926.0	05/11/12	GMC	Read and review of defendant's letter to quash and discussion w/ JF & JN	2.100
1682	835.0	05/12/12	JLN	Reviewed letter by S. Publicker regarding quashing Vallone subpoena	0.100
1683	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
1684	3927.0	05/15/12	GMC	Email correspondence w/SP re: Breach Affidavit	0.100
1685	837.0	05/16/12	JLN	Legal research regarding City motion to Quash	3.400
1686	838.0	05/16/12	JLN	Began drafting letter opposing City motion	1.600
1687	839.0	05/16/12	JLN	Discussion w/ JF and GC re opp to defendant's motion to quash	0.600
1688	2986.0	05/16/12	JPF	Discussion w/ JN and GC re opp to defendant's motion to quash	0.600
1689	3928.0	05/16/12	GMC	Discussion w/ JN and JF re opp to defendant's motion to quash	0.600
1690	3929.0	05/16/12	GMC	Email correspondence w/Darius Charney	0.250
1691	840.0	05/17/12	JLN	Finished drafting Opposition to motion to Quash	3.200
1692	841.0	05/17/12	JLN	Discussion w/GC and JF re: AS breach affidavit	0.700
1693	842.0	05/17/12	JLN	Review and discuss City New York Times opp letter w/ JF & GC	0.400
1694	1836.0	05/17/12	NB	Sent Schoolcraft Affidavit of GS as per JLN	0.100
1695	2955.0	05/17/12	JPF	Discussion w/JN and GC re: AS breach affidavit	0.750
1696	3008.0	05/17/12	JPF	Review and edit plaintiffs opp to defendant's motion to quash	0.600
1697	3081.0	05/17/12	JPF	Review and discuss City New York Times opp letter w/ JN & GC	0.400
1698	3174.0	05/17/12	JPF	Read and review letter from City re NY Times response	0.250
1699	3320.0	05/17/12	JPF	Email from Publichas re Schoolcraft Aff.	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1700	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
1701	3931.0	05/17/12	GMC	Discussion w/JN and JF re: AS breach affidavit	0.750
1702	3932.0	05/17/12	GMC	Review and discuss City New York Times opp Jetter w/ JN & JF	0.400
1703	3933.0	05/17/12	GMC	Phone call with NY Times counsel re: Stip language	0.300
1704	3934.0	05/17/12	GMC	Email re: AS breach affidavit	0.100
1705	3241.0	05/18/12	JPF	Email from City re moving argument	0.100
1706	3935.0	05/18/12	GMC	Meet and confer w/SP re: Stips	0.600
1707	3936.0	05/18/12	GMC	Email correspondence w/SP re: scheduling oral argument on motion to quash	0.100
1708	843.0	05/22/12	JLN	Discussion w/ JF & GC re defendant's letter re Vallone subpoena	0.600
1709	2943.0	05/22/12	JPF	Phone call w/ Larry Schoolcraft re Vallone and 1st Amendment	0.800
1710	2982.0	05/22/12	JPF	Discussion w/ JN & GC re defendant's letter re Vallone subpoena	0.600
1711	3041.0	05/22/12	JPF	Read and review of defendant's letter re Vallone subpoena	0.500
1712	3178.0	05/22/12	JPF	Review and sign Affidavit re VV article	0.250
1713	3937.0	05/22/12	GMC	Discussion w/ JN & JF re defendant's letter re Vallone subpoena	0.600
1714	844.0	05/23/12	JLN	Prep for argument w/ JF & GC	1.000
1715	2909.0	05/23/12	JPF	Prep for argument w/ GC & JN	1.000
1716	2981.0	05/23/12	JPF	Discussion w/ JN & GC re: defendant's letter re subpoena	0.600
1717	3938.0	05/23/12	GMC	Attend and argue against motion to quash	1.000
1718	3939.0	05/23/12	GMC	Prep for argument w/ JF & JN	1.000
1719	3940.0	05/23/12	GMC	Discussion w/ JN & JF re defendant's letter re subpoena	0.600
1720	3941.0	05/23/12	GMC	Travel from SDNY for motion to quash (.5)	0.250
1721	3942.0	05/23/12	GMC	Travel to SDNY for motion to quash (.5)	0.250
1722	845.0	05/24/12	JLN	Notice of Appearance by Walter Kretz, behalf of Mauriello; Google search re: Kretz	0.200
1723	846.0	05/24/12	JLN	E-mail from S. Publicker re: proposed changes to Confidentiality Stip	0.100
1724	3124.0	05/24/12	JPF	Review letter by GC in response to Vallone subpoena issue	0.300
1725	3943.0	05/24/12	GMC	Drafted and submitted supplemental evidence to support our opposition to quash Vans and Vallone subpoena	0.500
1726	3944.0	05/24/12	GMC	Review of NOA-Walter Kretz ("WK")	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1727	3175.0	05/25/12	JPF	Read and review NY Times response to Pubichas letter	0.250
1728	3945.0	05/25/12	GMC	Read and review NY Times response to SP letter	0.250
1729	3102.0	05/29/12	JPF	Email, from GC w/ proposed confidentiality stips	0.300
1730	3946.0	05/29/12	GMC	Revised City proposed AEO and Conf Stips incorporating NY Times requests	0.500
1731	847.0	05/30/12	JLN	E-mail exchange w/GC and JF re City stips and revisions	0.300
1732	3947.0	05/30/12	GMC	Email correspondence w/JN re City stips and revisions	0.300
1733	2917.0	05/31/12	JPF	Meeting w/JN and GC re: City conf. Stips	0.900
1734	3948.0	05/31/12	GMC	Meeting w/JN and JF re: City conf. Stips	0.900
1735	848.0	06/02/12	JLN	Reviewed discovery demands from JHMC	0.200
1736	3365.0	06/04/12	JPF	Letter from Kretz re discovery	0.100
1737	3949.0	06/04/12	GMC	Review of WK correspondence re: discovery	0.100
1738	849.0	06/05/12	JLN	Review of E-mail correspondence between SP and Times	0.100
1739	3245.0	06/05/12	JPF	Email from Ct. re inventory on NY Times issue	0.100
1740	3316.0	06/05/12	JPF	Email from NY Times in response	0.100
1741	3343.0	06/05/12	JPF	Email to Ct. re proposed amended complaint	0.100
1742	3950.0	06/05/12	GMC	Review of email correspondence between SP and Times	0.100
1743	850.0	06/06/12	JLN	Reviewed Confidentiality stip and proposed changes made by GC; made additional edits/suggestions	0.300
1744	851.0	06/06/12	JLN	Review of E-mail correspondence between SP and Times	0.100
1745	3247.0	06/06/12	JPF	Email from defendants re inventory	0.100
1746	3951.0	06/06/12	GMC	Review of email correspondence between SP and Times	0.100
1747	852.0	06/07/12	JLN	Reviewed final AEO Stip	0.300
1748	853.0	06/07/12	JLN	E-mail exchange w/GC re: changes to AEO stip	0.100
1749	3317.0	06/07/12	JPF	Email from NY Times re inventory	0.100
1750	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
1751	3953.0	06/07/12	GMC	Review of email correspondence between SP and Times	0.100
1752	854.0	06/08/12	JLN	E-mail from GC to SP re: redlined changes to proposed Stip.	0.100
1753	855.0	06/08/12	JLN	Read ltr from NYT counsel re: inventory of confidential materials for	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1754	3162.0	06/08/12	JPF	Email to AS re discovery VV affidavit and 1st Amendment issues	0.250
1755	3308.0	06/08/12	JPF	Email from Lee re docs in response to subpoenas outstanding	0.100
1756	3368.0	06/08/12	JPF	Read and review of Times letter re inventory	0.100
1757	3954.0	06/08/12	GMC	Email re: subpoenaed docs	0.100
1758	3955.0	06/08/12	GMC	Emailed stip to SP with revisions in track changes	0.100
1759	3956.0	06/08/12	GMC	Review of correspondence with NY Times and SP re: Schoolcraft materials	0.100
1760	856.0	06/14/12	JLN	Meet with GC and JF to discuss motion for reconsideration on 1st amendment claim	0.750
1761	857.0	06/14/12	JLN	Reviewed background search by Warren Investigators of Marino, Lauterborn and Mauriello	0.300
1762	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
1763	2702.0	06/14/12	JPF	Research on 1st Amendment cases cited in Judge's opinion	3.100
1764	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
1765	2961.0	06/14/12	JPF	Meet with JN and GC to discuss motion for reconsideration on 1st amendment claim	0.750
1766	3957.0	06/14/12	GMC	Meet with JN and JF to discuss motion for reconsideration on 1st amendment claim	0.750
1767	3958.0	06/14/12	GMC	Review of Judge Sweet re: motion to amend and motion quash subpoena	0.600
1768	3959.0	06/14/12	GMC	Phone call with Adrian and Larry re; decision	0.500
1769	3960.0	06/14/12	GMC	Email correspondence with JN re: decision	0.250
1770	2721.0	06/15/12	JPF	Draft motion for reconsideration	2.750
1771	2743.0	06/15/12	JPF	Research on prior restraint and Carcetti progeny	2.400
1772	2760.0	06/16/12	JPF	Research on prior restraint	2.250
1773	2789.0	06/16/12	JPF	Draft motion for reconsideration	1.750
1774	2670.0	06/17/12	JPF	Draft motion for reconsideration	3.500
1775	2719.0	06/17/12	JPF	Research on prior restraint	2.800
1776	859.0	06/18/12	JLN	Reviewed JF draft motion for reconsideration; made edits to same	0.400
1777	2705.0	06/18/12	JPF	Review and edit and incorporate additions suggested by JN and GC on Motion for Reconsideration	3.100
1778	2717.0	06/18/12	JPF	Draft motion for reconsideration	2.800
1779	2795.0	06/18/12	JPF	Review and edit Motion for Reconsideration	1.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1780	3358.0	06/18/12	JPF	Email w/ draft to GC & JN	0.100
1781	3961.0	06/18/12	GMC	Review of JF motion for reconsideration on motion to amend	0.750
1782	860.0	06/19/12	JLN	Meeting with Schoolcraft in Johnstown	4.800
1783	861.0	06/19/12	JLN	Travel back to NYC from Johnstown (3.5)	1.750
1784	862.0	06/19/12	JLN	Travel to Johnstown (3.5)	1.750
1785	2621.0	06/19/12	JPF	Meeting w/ Schoolcraft in Johnstown	4.800
1786	2797.0	06/19/12	JPF	Travel back to NYC from Johnstown (3.5)	1.750
1787	2798.0	06/19/12	JPF	Travel to Johnstown (3.5)	1.750
1788	3211.0	06/19/12	JPF	Correspondence w/ Adhyl Folanco	0.100
1789	3962.0	06/19/12	GMC	Meeting w/ Schoolcraft in Johnstown	4.800
1790	3963.0	06/19/12	GMC	Travel back to NYC from Johnstown (3.5)	1.750
1791	3964.0	06/19/12	GMC	Travel to Johnstown (3.5)	1.750
1792	3965.0	06/19/12	GMC	Email and phone correspondence with Adhyl Polanco re: Schoolcraft issues	0.100
1793	2855.0	06/20/12	JPF	Final edit and review of Motion for Reconsideration	1.250
1794	3966.0	06/20/12	GMC	Final edit and review of Motion for Reconsideration	0.300
1795	3967.0	06/20/12	GMC	Reviewed SP response to Stip proposal	0.300
1796	863.0	06/21/12	JLN	E-mail correspondence w/GC and JF re Schoolcraft	0.200
1797	3968.0	06/21/12	GMC	Email correspondence w/JN and JF re Schoolcraft issues	0.250
1798	3112.0	06/25/12	JPF	Phone call w/ Frank Serpico re meeting w/ Schoolcrafts	0.300
1799	864.0	06/26/12	JLN	Read Judge Sweet's order re: motion to reconsider	0.100
1800	3969.0	06/30/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1801	2928.0	07/02/12	JPF	Discussion w/ AS and Larry Schoolcraft re financial issues and possibly locating donors	0.800
1802	3970.0	07/02/12	GMC	Discussion w/ AS and Larry Schoolcraft re financial issues	0.400
1803	865.0	07/05/12	JLN	Reviewed Frankel letter opposing plaintiff motion for reconsideration of 1st Amend Claim	0.100
1804	2840.0	07/05/12	JPF	Read and review of defendant's opp to plaintiff's motion for reconsideration	1.300
1805	3105.0	07/06/12	JPF	Email to City re relevancy redaction portion of AEO & stip	0.300
1806	3971.0	07/06/12	GMC	Review of email from JF re Stips	0.100
1807	2770.0	07/08/12	JPF	Research cases cited in defendant's brief in opp in preparation of reply	2.100
1808	2722.0	07/09/12	JPF	Draft reply motion for reconsideration	2.750
1809	2834.0	07/09/12	JPF	Edit reply	1.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1810	3152.0	07/09/12	JPF	Email from GC w/ draft for Schoolcraft donation page	0.250
1811	3234.0	07/09/12	JPF	Email from City on relevancy redaction issue	0.100
1812	3339.0	07/09/12	JPF	Email to City re redaction issue	0.100
1813	3972.0	07/09/12	GMC	Researched donations to individuals	0.500
1814	3973.0	07/09/12	GMC	Drafted proposed language for Donate button on website	0.400
1815	2854.0	07/10/12	JPF	Edit reply final	1.250
1816	3974.0	07/10/12	GMC	Review of City response re Stips	0.100
1817	866.0	07/12/12	JLN	Review of Schoolcraft's recordings; prepared comprehensive timeline; sent to JF	3.800
1818	867.0	07/13/12	JLN	E-mail from City regarding tax return authorizations	0.100
1819	3243.0	07/13/12	JPF	Email from City regarding tax return authorizations	0.100
1820	3332.0	07/13/12	JPF	Email response re tax authorizations	0.100
1821	868.0	07/17/12	JLN	E-mail w/GC re: upcoming meeting in Albany with Schoolcrafts	0.100
1822	3975.0	07/17/12	GMC	Email w/JN re: meeting in Albany with Schoolcrafts	0.100
1823	869.0	07/20/12	JLN	Read Opinion of Judge Sweet denying Plaintiff's motion to reconsider	0.100
1824	2728.0	07/20/12	JPF	Research on retaliation and protected speech issue	2.750
1825	2867.0	07/20/12	JPF	Read and review judge's decision denying reconsideration	1.250
1826	3976.0	07/20/12	GMC	Review of opinion on Plaintiff's motion to reconsider	0.300
1827	2727.0	07/22/12	JPF	Research on prior restrain	2.750
1828	2841.0	07/22/12	JPF	Review of complaint for allegations conforming to plaintiff's 2nd motion to amend	1.300
1829	2862.0	07/22/12	JPF	Phone call w/ Larry Schoolcraft re meeting and outstanding discovery issues and depositions	1.250
1830	870.0	07/23/12	JLN	Discussion w/ GC & JF re: upcoming meeting w/ Schoolcrafts in Albany	0.300
1831	871.0	07/23/12	JLN	E-mail exchange w/JF & GC re: visit to Schoolcrafts in Albany	0.100
1832	2696.0	07/23/12	JPF	Research on prior restrain, retaliation, and protected speech/law enforcement under Tachler	3.250
1833	2765.0	07/23/12	JPF	Draft motion to amend	2.100
1834	3089.0	07/23/12	JPF	Discussion w/ GC & JN re meeting w/ Schoolcrafts in Albany	0.300
1835	3977.0	07/23/12	GMC	Discussion w/ JF & JN re meeting w/ Schoolcrafts in Albany	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1836	3978.0	07/23/12	GMC	Correspondence re: visiting Schoolcrafts in Albany	0.250
1837	872.0	07/24/12	JLN	E-mail from JF re Albany meeting w/ Schoolcrafts	0.100
1838	3346.0	07/24/12	JPF	Email to JN re Albany meeting w/ Schoolcrafts	0.100
1839	2942.0	07/25/12	JPF	Phone call w/ Larry Schoolcraft	0.800
1840	3979.0	07/26/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1841	873.0	07/28/12	JLN	Discussion w/ JF & GC re motion to amend to add prior restraint	0.600
1842	2718.0	07/28/12	JPF	Draft of motion to amend	2.800
1843	2983.0	07/28/12	JPF	Discussion w/ JN & GC re motion to amend to add prior restraint	0.600
1844	3980.0	07/28/12	GMC	Discussion w/ JN & JF re motion to amend to add prior restraint	0.600
1845	2766.0	07/29/12	JPF	Draft of motion to amend	2.100
1846	2735.0	07/30/12	JPF	Review and edit motion to amend	2.600
1847	874.0	07/31/12	JLN	Reviewed JF draft of letter seeking leave to amend; edits to same	0.200
1848	2916.0	08/01/12	JPF	Final review of motion to amend	0.900
1849	3240.0	08/01/12	JPF	Email from City re motion to amend	0.100
1850	3371.0	08/01/12	JPF	Response email to City re motion to amend	0.100
1851	3981.0	08/01/12	GMC	Review and revise motion to amend	0.400
1852	875.0	08/03/12	JLN	E-mail from S. Publicker re: format of document production once stip is finalized	0.100
1853	3238.0	08/03/12	JPF	Email from City re confidentiality stip	0.100
1854	3982.0	08/03/12	GMC	Email correspondence w/SP re: document production	0.250
1855	3983.0	08/04/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1856	3984.0	08/06/12	GMC	Email re: meeting with Schoolcrafts	0.100
1857	876.0	08/07/12	JLN	Read order re: plaintiffs motion to amend	0.100
1858	3985.0	08/07/12	GMC	Email correspondence re: authorizations	0.250
1859	877.0	08/08/12	JLN	Meeting w/ JF & GC re: upcoming meeting w/ AS in Albany for prep	1.300
1860	878.0	08/08/12	JLN	Review of final stips	0.500
1861	879.0	08/08/12	JLN	Printed out docs to go over with Adrian	0.200
1862	2838.0	08/08/12	JPF	Meeting w/ JN & GC re meeting w/ AS in Albany for prep	1.300
1863	3986.0	08/08/12	GMC	Meeting w/ JN & JF re meeting w/ AS in Albany for prep	1.300
1864	3987.0	08/08/12	GMC	Review of final stips	0.500
1865	3988.0	08/08/12	GMC	Printed out docs to go over with Adrian	0.250
1866	880.0	08/09/12	JLN	Meeting w/AS in Albany	5.750
1867	881.0	08/09/12	JLN	Meeting with Client in Albany with GC & JF	5.500
1868	882.0	08/09/12	JLN	Traveled from Albany back to NYC (3.0)	1.500
1869	883.0	08/09/12	JLN	Traveled to Albany to meet Client (3.0)	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1870	2612.0	08/09/12	JPF	Meeting w/ AS in Albany	5.750
1871	2815.0	08/09/12	JPF	Traveled from Albany back to NYC (3.0)	1.500
1872	2816.0	08/09/12	JPF	Traveled to Albany to meet Client (3.0)	1.500
1873	3989.0	08/09/12	GMC	Meeting w/AS in Albany	5.750
1874	3990.0	08/09/12	GMC	Traveled from Albany back to NYC (3.0)	1.500
1875	3991.0	08/09/12	GMC	Traveled to Albany to meet Client (3.0)	1.500
1876	884.0	08/10/12	JLN	E-mail correspondence re: extension of discovery	0.200
1877	885.0	08/10/12	JLN	E-mail from JF re extension of discovery	0.100
1878	886.0	08/10/12	JLN	E-mail to JF re extension of discovery	0.100
1879	887.0	08/10/12	JLN	E-mail to JF re plaintiff's dep	0.100
1880	888.0	08/10/12	JLN	E-mail w/GC re Schoolcraft breach affidavit	0.100
1881	889.0	08/10/12	JLN	Response E-mail regarding deposition from Greg R.	0.100
1882	3268.0	08/10/12	JPF	Email from GC re VV affidavit	0.100
1883	3288.0	08/10/12	JPF	Email from JN re extension of discovery	0.100
1884	3294.0	08/10/12	JPF	Email from JN re plaintiff's dep	0.100
1885	3370.0	08/10/12	JPF	Response email re deposition from Greg R.	0.100
1886	3992.0	08/10/12	GMC	Email correspondence re: extension of disco	0.250
1887	3993.0	08/10/12	GMC	Email correspondence re: Schoolcraft deposition	0.250
1888	3994.0	08/10/12	GMC	Email w/JN re Schoolcraft breach affidavit	0.100
1889	3995.0	08/12/12	GMC	Review of Schoolcraftjustice.com posts	0.100
1890	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
1891	891.0	08/13/12	JLN	Continued review of discovery produced by NYC	2.800
1892	892.0	08/13/12	JLN	E-mail from Brian Lee regarding deposition	0.100
1893	893.0	08/13/12	JLN	Review of E-mail from SP re: scheduling AS depo	0.100
1894	3229.0	08/13/12	JPF	Email from Brian Lee re deposition	0.100
1895	3996.0	08/13/12	GMC	Review of email from SP re: scheduling AS depo	0.100
1896	894.0	08/14/12	JLN	Continued review of doc production by city; highlighted & took notes re: same	3.600
1897	895.0	08/14/12	JLN	Drafted letter to defense counsel re: Schoolcraft tax returns	0.100
1898	896.0	08/14/12	JLN	E-mail from Brady re depositions	0.100
1899	897.0	08/14/12	JLN	E-mail from JF re letter to City w/ tax authorizations	0.100
1900	898.0	08/14/12	JLN	E-mail from JF re plaintiff's dep	0.100
1901	899.0	08/14/12	JLN	E-mail to JF re plaintiff's dep	0.100
1902	900.0	08/14/12	JLN	Review of correspondence re Tax returns	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1903	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
1904	3226.0	08/14/12	JPF	Email from Brady re deps	0.100
1905	3290.0	08/14/12	JPF	Email from JN re letter to City w/ tax authorizations	0.100
1906	3295.0	08/14/12	JPF	Email from JN re plaintiff's dep	0.100
1907	3997.0	08/14/12	GMC	Email web designers re: donation for Schoolcrafts button on website	0.250
1908	3998.0	08/14/12	GMC	Review of correspondence re Tax returns	0.100
1909	901.0	08/15/12	JLN	Continued review of doc production by city; took notes re: most imp. Docs.	4.200
1910	902.0	08/15/12	JLN	E-mail from B Brady re plaintiff's dep	0.100
1911	903.0	08/15/12	JLN	E-mail from B. Lee re plaintiff's dep	0.100
1912	904.0	08/15/12	JLN	E-mail from Brian Lee re subpoenaed docs	0.100
1913	3221.0	08/15/12	JPF	Email from B Brady re plaintiff's dep	0.100
1914	3223.0	08/15/12	JPF	Email from B: Lee re plaintiff's dep	0.100
1915	3230.0	08/15/12	JPF	Email from Brian Lee re subpoenaed docs	0.100
1916	3999.0	08/15/12	GMC	Email correspondence with all defendants re: subpoenaed docs	0.250
1917	4000.0	08/15/12	GMC	Email correspondence re: Schoolcraft deposition	0.100
1918	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
1919	906.0	08/16/12	JLN	E-mail from City re plaintiff's dep	0.100
1920	907.0	08/16/12	JLN	E-mail to JF re plaintiff's dep	0.100
1921	2954.0	08/16/12	JPF	Discussion w/ JN & GC re City's suggestion on multiple dates for deps	0.750
1922	3242.0	08/16/12	JPF	Email from City re plaintiff's dep	0.100
1923	3296.0	08/16/12	JPF	Email from JN re plaintiff's dep	0.100
1924	4001.0	08/16/12	GMC	Discussion w/ JN & JF re City's suggestion on multiple dates for deps	0.750
1925	4002.0	08/16/12	GMC	Email correspondence re: Schoolcraft deposition	0.100
1926	908.0	08/20/12	JLN	Discussion w/ JF & GC re amendment of the complaint to add Lt. Hanlon	0.600
1927	909.0	08/20/12	JLN	Discussion w/ JF re AS dep prep	0.400
1928	910.0	08/20/12	JLN	Reviewed City's Second Request for Docs.	0.200
1929	911.0	08/20/12	JLN	Review of E-mail from JF to City re amendment adding Lt. Hanlon	0.100
1930	2980.0	08/20/12	JPF	Discussion w/ JN & GC re additional amendment of the complaint to add Hanlon	0.600
1931	3050.0	08/20/12	JPF	Discussion w/ JN re AS dep prep	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1932	3388.0	08/20/12	JPF	Review of email from JN to City re amendment adding Hanlon	0.100
1933	4003.0	08/20/12	GMC	Discussion w/ JN & JF re additional amendment of the complaint to add Hanlon	0.600
1934	912.0	08/21/12	JLN	E-mail from Brady consenting to Amendment	0.100
1935	913.0	08/21/12	JLN	E-mail from Brady re scheduling AS dep	0.100
1936	914.0	08/21/12	JLN	E-mail from City requesting copy of complaint	0.100
1937	3029.0	08/21/12	JPF	Draft Amended Complaint adding Hanlon	0.500
1938	3225.0	08/21/12	JPF	Email from Brady consenting to Amendment	0.100
1939	3228.0	08/21/12	JPF	Email from Brady re scheduling AS dep	0.100
1940	3244.0	08/21/12	JPF	Email from City requesting copy of complaint	0.100
1941	3305.0	08/21/12	JPF	Email from Lee consenting	0.100
1942	3309.0	08/21/12	JPF	Email from Lee re scheduling AS dep	0.100
1943	3342.0	08/21/12	JPF	Email to City w/ Amended Complaint	0.100
1944	4004.0	08/21/12	GMC	Review of Amended Complaint adding Hanlon	0.500
1945	4005.0	08/21/12	GMC	Email from Brady consenting to Amendment	0.100
1946	4006.0	08/21/12	GMC	Email from Brady re scheduling AS dep	0.100
1947	4007.0	08/21/12	GMC	Email from City requesting copy of complaint	0.100
1948	4008.0	08/21/12	GMC	Email from Lee consenting	0.100
1949	4009.0	08/21/12	GMC	Email from Lee re scheduling AS dep	0.100
1950	4010.0	08/21/12	GMC	Email to City w/ Amended Complaint	0.100
1951	915.0	08/22/12	JLN	Meeting w/ GC & JF re Kretz's request to have an additional day to depose plaintiff	0.400
1952	916.0	08/22/12	JLN	E-mail from City re AS dep date	0.100
1953	917.0	08/22/12	JLN	E-mail from GC re dep dates	0.100
1954	3069.0	08/22/12	JPF	Meeting w/ GC & JN re Kretz's request to have an additional day to depose plaintiff	0.400
1955	3237.0	08/22/12	JPF	Email from City re AS dep date	0.100
1956	3274.0	08/22/12	JPF	Email from Greg Rad re AS dep	0.100
1957	3287.0	08/22/12	JPF	Email from JN re dep dates	0.100
1958	3303.0	08/22/12	JPF	Email from Kretz re AS dep date	0.100
1959	3307.0	08/22/12	JPF	Email from Lee re AS dep date	0.100
1960	4011.0	08/22/12	GMC	Meeting w/ JF & JN re Kretz's request to have an additional day to depose plaintiff	0.400
1961	4012.0	08/22/12	GMC	Email from City re AS dep date	0.100
1962	4013.0	08/22/12	GMC	Email from Greg Rad re AS dep	0.100
1963	4014.0	08/22/12	GMC	Email from JN re dep dates	0.100
1964	4015.0	08/22/12	GMC	Email from Kretz re AS dep date	0.100
1965	4016.0	08/22/12	GMC	Email from Lee re AS dep date	0.100
1966	918.0	08/23/12	JLN	Reviewed correspondence between AI Vann and Ray Kelly	0.100
1967	2730.0	08/23/12	JPF	Review of discovery provided by City defendants	2.750
1968	3227.0	08/23/12	JPF	Email from Brady re plaintiff's dep date	0.100
1969	3306.0	08/23/12	JPF	Email from Lee on plaintiff's dep dates	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1970	3310.0	08/23/12	JPF	Email from Lee re second day for AS dep	0.100
1971	4017.0	08/23/12	GMC	Review of discovery provided by City defendants	3.500
1972	4018.0	08/23/12	GMC	Email from Brady re plaintiff's dep date	0.100
1973	4019.0	08/23/12	GMC	Email from Lee on plaintiff's dep dates	0.100
1974	4020.0	08/23/12	GMC	Email from Lee re second day for AS dep	0.100
1975	919.0	08/27/12	JLN	Reviewed Supplemental Disclosures from City	0.100
1976	920.0	08/28/12	JLN	Drafted letter to Court re: extension of discovery deadline	0.400
1977	921.0	08/28/12	JLN	E-mail from GC re Chief article	0.100
1978	922.0	08/28/12	JLN	E-mail from JF to defendants enclosing responses to discovery	0.100
1979	1838.0	08/28/12	NB	Email to all counsel enclosing documents received in response to various non-party subpoenas	0.150
1980	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
1981	3258.0	08/28/12	JPF	Email from GC re Chief article	0.100
1982	3302.0	08/28/12	JPF	Email from JN to defendants enclosing responses to discovery	0.100
1983	4021.0	08/28/12	GMC	Email from JN to defendants enclosing responses to discovery	0.100
1984	4022.0	08/28/12	GMC	Email JN and JF re Chief article	0.100
1985	4023.0	08/28/12	GMC	Review of correspondence sending out Fulton County records	0.100
1986	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
1987	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
1988	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
1989	3213.0	08/29/12	JPF	Email 2 & 3 from JN re discovery to defendants	0.100
1990	3301.0	08/29/12	JPF	Email from JN to defendants enclosing discovery	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
1991	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
1992	4025.0	08/29/12	GMC	Email 2 & 3 from JN re discovery to defendants	0.100
1993	4026.0	08/29/12	GMC	Email from JN to defendants enclosing discovery	0.100
1994	925.0	09/01/12	JLN	Multiple e-mails and attachments from PO Kevin Rodriguez re: quota activity at the 52 pct.	0.300
1995	926.0	09/06/12	JLN	Reviewed grievance filed by Kevin Rodriguez	0.200
1996	927.0	09/07/12	JLN	E-mail exchange w/K.Rodriguez re: monthly performance evaluations & evidence of quotas/pressure	0.200
1997	928.0	09/10/12	JLN	Read Opinion & order from Judge Sweet on plaintiff's motion to amend	0.700
1998	929.0	09/10/12	JLN	E-mail from GC re 120 day extension of discovery deadline	0.100
1999	930.0	09/10/12	JLN	E-mail from JF re 120 extension of discovery deadline	0.100
2000	931.0	09/10/12	JLN	E-mail to JF re 120 extension of discovery deadline	0.100
2001	932.0	09/10/12	JLN	Response from City on Hanlon amend; notes re: same	0.100
2002	2868.0	09/10/12	JPF	Read and review Opinion & Order from Sweet on plaintiff's motion to amend	1.250
2003	3284.0	09/10/12	JPF	Email from JN re 120 extension of discovery	0.100
2004	3327.0	09/10/12	JPF	Email response from Brady	0.100
2005	3328.0	09/10/12	JPF	Email response from City	0.100
2006	3329.0	09/10/12	JPF	Email response from Greg Rad	0.100
2007	3330.0	09/10/12	JPF	Email response from Kretz	0.100
2008	3331.0	09/10/12	JPF	Email response from Lee	0.100
2009	3338.0	09/10/12	JPF	Email to City re Hanlon amend	0.100
2010	3378.0	09/10/12	JPF	Response from City on Hanlon amend	0.100
2011	4027.0	09/10/12	GMC	Read and review Opinion & Order from Sweet on plaintiff's motion to amend	0.750
2012	4028.0	09/10/12	GMC	Phone call with PO "FP" re Schoolcraft	0.400
2013	4029.0	09/10/12	GMC	Email from City re fax# confirmation	0.100
2014	4030.0	09/10/12	GMC	Email from JN re 120 day extension of discovery	0.100
2015	4031.0	09/10/12	GMC	Email response from Brady	0.100
2016	4032.0	09/10/12	GMC	Email response from City	0.100
2017	4033.0	09/10/12	GMC	Email response from Greg Rad	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2018	4034.0	09/10/12	GMC	Email response from Kretz	0.100
2019	4035.0	09/10/12	GMC	Email response from Lee	0.100
2020	4036.0	09/10/12	GMC	Email to City re Hanlon amend	0.100
2021	4037.0	09/10/12	GMC	Response from City on Hanlon amend	0.100
2022	933.0	09/11/12	JLN	Drafted letter seeking extension of discovery deadline until January 2013	0.400
2023	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
2024	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
2025	935.0	09/13/12	JLN	Cont'd listening to CD interviews from IAB (non-confidential) investigation	3.700
2026	3239.0	09/13/12	JPF	Email from City re fax # confirmation	0.100
2027	936.0	09/14/12	JLN	Cont'd listening to CD interviews from IAB (non-confidential) investigation	4.600
2028	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
2029	938.0	09/14/12	JLN	Reviewed production by City	0.400
2030	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
2031	2630.0	09/15/12	JPF	Reviewed/listened to IAB recordings provided by the City re: investigation into Schoolcraft matter	4.750
2032	4038.0	09/15/12	GMC	Reviewed IAB recordings provided by the City	3.800
2033	940.0	09/16/12	JLN	Reviewed records from Councilman Vallone as provided by City on 9-12	0.300
2034	941.0	09/17/12	JLN	Reviewed JF draft letter to Court regarding adding Lt. Hanlon as deft	0.100
2035	3030.0	09/17/12	JPF	Draft of letter to amend to add Hanlon to complaint	0.500
2036	4039.0	09/17/12	GMC	Review of draft letter to amend to add Hanlon to complaint	0.250
2037	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2038	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
2039	3122.0	09/18/12	JPF	Review and edit amended complaint	0.300
2040	4040.0	09/18/12	GMC	Review of order granting ext. of disco deadline	0.100
2041	4041.0	09/19/12	GMC	Received final Stips	0.100
2042	4042.0	09/21/12	GMC	Email correspondence w/Darius Charney re: Floyd	0.250
2043	944.0	09/24/12	JLN	Meeting w/GC and JF to discuss City deficiency letter and AS dep prep	1.750
2044	945.0	09/24/12	JLN	E-mail from City re: amended complaint	0.100
2045	946.0	09/24/12	JLN	E-mail response from Kretz	0.100
2046	947.0	09/24/12	JLN	E-mail response to Kretz & City	0.100
2047	948.0	09/24/12	JLN	E-mail to defendants re service of amended complaint	0.100
2048	2749.0	09/24/12	JPF	Prep AS fro his dep	2.300
2049	2791.0	09/24/12	JPF	Meeting w/JN and GC to discuss City deficiency letter and AS dep prep	1.750
2050	3032.0	09/24/12	JPF	Email from City re service of amended complaint, Lauderborn dep, & discovery deficiencies	0.500
2051	3232.0	09/24/12	JPF	Email from City	0.100
2052	3334.0	09/24/12	JPF	Email response to Kretz & City	0.100
2053	3344.0	09/24/12	JPF	Email to defendants re service of amended complaint	0.100
2054	3374.0	09/24/12	JPF	Response from B Lee	0.100
2055	3380.0	09/24/12	JPF	Response from Greg R	0.100
2056	3381.0	09/24/12	JPF	Response from Kretz	0.100
2057	3382.0	09/24/12	JPF	Response from Kretz	0.100
2058	4043.0	09/24/12	GMC	Meeting w/JN and JF to discuss City deficiency letter and AS dep prep	1.750
2059	4044.0	09/24/12	GMC	Email from City re service of amended complaint, Lauderborn dep, & discovery deficiencies	0.500
2060	4045.0	09/24/12	GMC	Email correspondence w/Darius Charney re: Floyd	0.250
2061	4046.0	09/24/12	GMC	Email correspondence re service of amended complaint	0.100
2062	949.0	09/25/12	JLN	Prep AS for his dep	3.500
2063	950.0	09/25/12	JLN	Meeting w/ AS & GC & JF re dep prep	2.900
2064	951.0	09/25/12	JLN	E-mail from Greg R re Lauterborn dep	0.100
2065	2713.0	09/25/12	JPF	Meeting w/ AS & GC & JN re dep prep	2.900
2066	3040.0	09/25/12	JPF	Phone call with Larry Schoolcraft re AS dep	0.500
2067	3273.0	09/25/12	JPF	Email from Greg R re Lauderborn dep	0.100
2068	4047.0	09/25/12	GMC	Prep AS for his dep	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2069	4048.0	09/25/12	GMC	Meeting w/ AS & JF & JN re dep prep	2.900
2070	952.0	09/26/12	JLN	Meeting w/ JF & GC & AS re adjourning dep due to father's medical emergency	0.600
2071	953.0	09/26/12	JLN	Brady E-mail re: service of process	0.100
2072	954.0	09/26/12	JLN	E-mail from JF adjourning dep of AS	0.100
2073	955.0	09/26/12	JLN	E-mail from Kretz re Lauterborn dep	0.100
2074	956.0	09/26/12	JLN	E-mail to JF adjourning dep of AS	0.100
2075	957.0	09/26/12	JLN	Response from B Lee re: adj.	0.100
2076	958.0	09/26/12	JLN	Response from Kretz re: adj.	0.100
2077	959.0	09/26/12	JLN	Review of E-mail from GC adjourning AS dep	0.100
2078	2996.0	09/26/12	JPF	Meeting w/ JN & GC & AS re adjourning dep due to father's medical emergency	0.600
2079	3283.0	09/26/12	JPF	Email from JN adjourning dep of AS re: medical issues he was having	0.100
2080	3304.0	09/26/12	JPF	Email from Kretz re Launderborn dep	0.100
2081	3369.0	09/26/12	JPF	Response email from B Brady re service of amended complaint	0.100
2082	3375.0	09/26/12	JPF	Response from B Lee	0.100
2083	3383.0	09/26/12	JPF	Response from Kretz	0.100
2084	4049.0	09/26/12	GMC	Meeting w/ JN & JF & AS re adjourning dep due to father's medical emergency	0.600
2085	4050.0	09/26/12	GMC	Brady email re: service of process	0.100
2086	4051.0	09/26/12	GMC	Review of email from JN adjourning AS dep	0.100
2087	3377.0	09/27/12	JPF	Response from City	0.100
2088	3379.0	09/27/12	JPF	Response from Greg R	0.100
2089	4052.0	09/27/12	GMC	Reviewed and signed stips	0.250
2090	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
2091	4053.0	09/28/12	GMC	Reviewed and resigned stips	0.100
2092	961.0	09/29/12	JLN	Reviewed revised amended complaint by JF; edits and revisions to same	0.700
2093	1841.0	10/01/12	NB	Multiple phone calls to Hotel Albany regarding setting up conference room for meeting with AS	0.600
2094	962.0	10/02/12	JLN	Listened to entire QAD interview of AS	3.300
2095	1842.0	10/02/12	NB	Forwarded schoolcraft justice website to JJM	0.100
2096	4054.0	10/02/12	GMC	Review of QAD interview of AS	2.250
2097	4055.0	10/03/12	GMC	Received AS new email address	0.100
2098	963.0	10/04/12	JLN	Reviewed stipulation and Protective order for Attorneys Eyes Only Signed by Judge Sweet	0.100
2099	4056.0	10/04/12	GMC	Review of IAB recordings	2.750
2100	4057.0	10/04/12	GMC	Phone call and email correspondence w/Darius Charney	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2101	4058.0	10/04/12	GMC	Review of plaintiff's responses to defendants interrogatories	0.400
2102	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
2103	2742.0	10/07/12	JPF	QAD interview review	2.400
2104	965.0	10/08/12	JLN	Prepared AS for deposition	6.400
2105	2714.0	10/08/12	JPF	Prep w/ AS for dep	2.900
2106	966.0	10/09/12	JLN	Continued prepping AS for upcoming dep on Oct. 11	7.200
2107	967.0	10/09/12	JLN	Reviewed cover Jetter w/disclosures from City	0.100
2108	2888.0	10/09/12	JPF	Prep w/ AS for AS dep	1.100
2109	968.0	10/10/12	JLN	Continued prepping AS for dep tomorrow	6.700
2110	2649.0	10/10/12	JPF	Review of IAB recordings	4.100
2111	4059.0	10/10/12	GMC	Prep Adrian for deposition	4.600
2112	4060.0	10/10/12	GMC	Review amended complaint	0.750
2113	969.0	10/11/12	JLN	Defended AS at his deposition	7.100
2114	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
2115	971.0	10/11/12	JLN	Meeting with JF, GC, AS before depo	0.500
2116	3037.0	10/11/12	JPF	Meeting with JN, GC, AS before depo	0.500
2117	4061.0	10/11/12	GMC	Attended AS deposition and meeting afterwards	8.900
2118	4062.0	10/11/12	GMC	Meeting with JN, JF, AS before depo	0.500
2119	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
2120	973.0	10/12/12	JLN	E-mail to JF re photos used at AS dep	0.100
2121	974.0	10/12/12	JLN	Email to JF to City re allowing AS access to QAD report	0.100
2122	1843.0	10/12/12	NB	Drafted and sent letter to City requesting color copies of photographs shown at plaintiff's deposition	0.300
2123	1844.0	10/12/12	NB	email exchange with S. Publicker regarding City's consent	0.200
2124	3293.0	10/12/12	JPF	Email from JN re photos used @ AS dep	0.100
2125	3300.0	10/12/12	JPF	Email from JN to City re allowing AS access to QAD report	0.100
2126	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2127	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
2128	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
2129	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
2130	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
2131	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
2132	4065.0	10/15/12	GMC	Read and reviewed Kretz motion to have extra day to depose AS	0.300
2133	978.0	10/16/12	JLN	Created chart summarizing differences b/w Marino & Lauterbome in IAB interviews.	2.100
2134	979.0	10/16/12	JLN	Listened to Caughey interview (Sides A & B); took notes re: same	1.600
2135	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
2136	981.0	10/16/12	JLN	Listened to IAB interview of Capt. Lauterbom; took notes re: same	1.400
2137	1845.0	10/16/12	NB	Emailed Mauriello letter to Judge to JLN	0.100
2138	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 Lauterbom interview & inconsistencies w/Marino & home invasion recording	3.300
2139	983.0	10/17/12	JLN	Research re: City's "Deliberative Process" Privilege claim and best cases for defeating such a claim	3.200
2140	984.0	10/17/12	JLN	Drafted letter re: opposing Mauriello's request for an additional 7 hrs to depose plaintiff.	2.400
2141	985.0	10/17/12	JLN	Listened to interview w/Sgt. Hawkins; took notes re: same; compared & contrasted with Gough & Duncan.	2.100
2142	986.0	10/17/12	JLN	Compiled list of all CD's from City Production - Still missing 3801/08	0.400
2143	987.0	10/17/12	JLN	Dicussion w/ GC & JF re City's refusal to allow AS to see QAD file	0.400

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2144	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
2145	3047.0	10/17/12	JPF	Dicussion w/ GC & JN re City's refusal to allow AS to see QAD file	0.400
2146	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
2147	4067.0	10/17/12	GMC	Dicussion w/ JF & JN re City's refusal to allow AS to see QAD file	0.400
2148	4068.0	10/17/12	GMC	Email from SP re: QAD file	0.100
2149	988.0	10/18/12	JLN	Drafted letter to Judge to modify AEO to allow AS access to confidential materials	3.200
2150	989.0	10/18/12	JLN	Listened to interviews of Det. Yeager, Lt. Delafuente & Sgt. James; took notes re same.	3.200
2151	990.0	10/18/12	JLN	Research re: City's Grand Jury privilege claim regarding ADA Jim Liander & Quuens DA investigation into Schoolcraft matter	2.600
2152	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
2153	992.0	10/18/12	JLN	Listened to interview w/Assistant Chief Gerald Nelson; took notes re:same	0.700
2154	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
2155	994.0	10/18/12	JLN	Read amended answer by City	0.100
2156	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
2157	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
2158	2971.0	10/18/12	JPF	Review and edit letter to Ct. re ASO issue & AS ability to see the QAD report	0.750
2159	3007.0	10/18/12	JPF	Review and edit letter to Ct opposing an additional day for AS dep for Mauriello lawyer	0.600
2160	3118.0	10/18/12	JPF	Read and review Answer to Amended Complaint from City	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2161	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
2162	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
2163	4070.0	10/18/12	GMC	Read and review Answer to Amended Complaint from City	0.750
2164	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
2165	4072.0	10/18/12	GMC	Email from SP re: service of newly named City defendants	0.100
2166	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
2167	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
2168	996.0	10/19/12	JLN	Listened to IAB interviews of P.O. Reyes, P.O. Visconi; notes re same	1.800
2169	997.0	10/19/12	JLN	Created chart summarizing differences b/w James & Yeager accounts of events at JHMC Med. ER.	1.700
2170	998.0	10/19/12	JLN	T/c w/ GC/JF re: Nelson, Caughey interviews	0.300
2171	999.0	10/19/12	JLN	Read answer filed by Isak Isakov	0.100
2172	2972.0	10/19/12	JPF	Review of Answer to Amended Complaint from Isacov	0.750
2173	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
2174	3253.0	10/20/12	JPF	E-mail from GC re another article AMNY	0.100
2175	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
2176	1001.0	10/21/12	JLN	listened to IAB interviews for Sgt. Scanlar, Lt. Crawford & Det. Barbara; took notes re same	1.800
2177	1847.0	10/21/12	NB	Filed Second Amended Complaint	0.600
2178	1002.0	10/22/12	JLN	Listened to IAB interview of Sgt. Glaudino (ESU), P.O. Sadowski and PAA Thomspson; took notes re same	2.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2179	1003.0	10/22/12	JLN	Listened to IAB CD of EMT Villaverde, Sgt. Conwell & P.O. Hurly; took notes re same	1.800
2180	1004.0	10/22/12	JLN	Listend to IAB interviews of DI Green (CO 104) & P.O. Deck; took notes re same.	1.600
2181	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
2182	3010.0	10/22/12	JPF	Review of Amended Complaint by Bernier	0.600
2183	4075.0	10/22/12	GMC	Review of City request to enlarge Hanlon time to respond	0.100
2184	1006.0	10/23/12	JLN	Listened to IAB CD interviews of Sgt Weber, P.O. Lewis and P.O. Reyes	2.300
2185	1007.0	10/23/12	JLN	Listened to IAB interviews of P.O.'s Astor & Santana; took notes re:	1.700
2186	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
2187	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
2188	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
2189	1010.0	10/24/12	JLN	Listened to IAB interviews of Misty Schoolcraft (AS Sister); took notes re: same.	2.100
2190	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
2191	1012.0	10/24/12	JLN	Motion to compel heard	0.500
2192	1013.0	10/24/12	JLN	Ltr from GC re: Plaintiff's Response to City's 2d Request for docs	0.100
2193	4077.0	10/24/12	GMC	Hearing on issue of extra dep time for AS	0.800
2194	4078.0	10/24/12	GMC	Travel from SDNY for conference re: trial date (.5)	0.250
2195	4079.0	10/24/12	GMC	Travel from SDNY for conference re: trial date (.5)	0.250
2196	1014.0	10/25/12	JLN	Started review of IAB docs exchanged by City in latest production	1.700
2197	1015.0	10/25/12	JLN	Reviewed Judge Sweet's endorsement of letter filed Kretz, Jr	0.100
2198	1016.0	10/26/12	JLN	Continued reviewing IAB docs from latest City exchange: notes re same	4.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2199	1017.0	10/26/12	JLN	Continued review of IAB documents; took notes of same.	3.800
2200	1018.0	10/27/12	JLN	Continued reviewing IAB docs exchanged by City	3.700
2201	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
2202	1020.0	10/28/12	JLN	Further review of IAB docs; highlighted and took notes re: same	4.800
2203	1021.0	10/29/12	JLN	Finished review of IAB files; notes re same	4.400
2204	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
2205	1023.0	10/29/12	JLN	Reviewed City's production re: Vallone docs & correspondence from third parties, notes on same.	0.900
2206	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
2207	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
2208	1026.0	10/30/12	JLN	Reviewed Prop. Clerk Invoices & NYSPIN response message.	0.200
2209	1027.0	10/31/12	JLN	Reviewed CD's re service attempts upstate; took notes re: same	1.800
2210	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
2211	1029.0	11/02/12	JLN	Review of case law sent by Lee re: medical defendants' liability	0.400
2212	1030.0	11/02/12	JLN	E-mail to GC re: Schoolcraft phone numbers	0.100
2213	4080.0	11/02/12	GMC	Review of case law sent by Lee re: medical defendants liability	0.400
2214	4081.0	11/02/12	GMC	Email from JN re: Schoolcraft phone numbers	0.100
2215	1031.0	11/07/12	JLN	E-mail w/ GC re: service of newly named defendants	0.100
2216	4082.0	11/07/12	GMC	Hearing on issue of AS able to review QAD file	0.800
2217	4083.0	11/07/12	GMC	Review of letter by SP relieving City as counsel for Mauriello	0.300
2218	4084.0	11/07/12	GMC	Travel from SDNY for conference re: trial date (.5)	0.250
2219	4085.0	11/07/12	GMC	Travel from SDNY for conference re: trial date (.5)	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2220	4086.0	11/07/12	GMC	Email w/JN re: service of newly named defendants	0.100
2221	1032.0	11/11/12	JLN	Reviewed redacted responses to Schoolcraft justice website for inclusion in discovery responses	1.100
2222	1033.0	11/12/12	JLN	Drafted response to City 2nd request for documents	1.200
2223	1034.0	11/12/12	JLN	Phone call with LS and AS re: continuing atty client relationship	0.750
2224	1848.0	11/13/12	NB	newly identified defendants; emailed JLN regarding same	0.200
2225	3086.0	11/13/12	JPF	Confirming with GC w/ AS on the phone that he is terminating representation	0.300
2226	3208.0	11/13/12	JPF	Correspondence from City re rep of AS	0.100
2227	4087.0	11/13/12	GMC	Confirming with JF w/AS on the phone that he is terminating representation	0.300
2228	4088.0	11/13/12	GMC	Various correspondence confirming termination of representation with the parties	0.250
2229	4089.0	11/13/12	GMC	Correspondence from City re rep of AS	0.100
2230	1035.0	11/14/12	JLN	Tennination letter from AS	0.100
2231	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
2232	4090.0	11/14/12	GMC	Receipt and review of letter terminating our representation of AS	0.100
2233	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
2234	4091.0	11/15/12	GMC	Review and signed letter to court informing we no longer represent AS	0.250
2235	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
2236	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2237	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
2238	219.0	11/18/12	Peter J. Gleason	Internet review of news articles relating to AS.	5.500
2239	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
2240	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
2241	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
2242	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
2243	170.0	11/19/12	Peter J. Gleason	Phone conv. with Nathaniel Smith, Esq. (NS) to discuss potentially working on this matter.	0.500
2244	4092.0	11/19/12	GMC	Review of court order prohibiting providing AS AEO material	0.100
2245	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
2246	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
2247	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
2248	185.0	11/20/12	Peter J. Gleason	Phone conv. with D2, regarding his insight into one of the named defendants.	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2249	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
2250	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
2251	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
2252	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
2253	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
2254	55.0	11/23/12	Peter J. Gleason	Travel	8.000
2255	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
2256	5174.0	11/23/12	Harvey A. Levine	TC's with RG re: issues arising during meeting with Adrian Schoolcraft (AS).	0.500
2257	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
2258	1.0	11/26/12	Peter J. Gleason	Meeting with RG regarding obtaining and scheduling picking up Schoolcraft file from prior counsel.	0.250
2259	4093.0	11/26/12	GMC	Review of correspondence to AS enclosing files	0.250
2260	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2261	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
2262	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
2263	171.0	11/27/12	Peter J. Gleason	E-mail from AS regarding the preferred method of communications.	0.125
2264	172.0	11/27/12	Peter J. Gleason	Meeting with VP regarding update on his investigation	1.500
2265	241.0	11/27/12	Vincent Parco, PI	Meeting with Atty., provided update as to information obtained from a contact.	1.500
2266	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
2267	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
2268	5176.0	11/28/12	Harvey A. Levine	Conf. with RG re: prior cc oushnel discharge "for cause" issues dispute over disbursements	0.450
2269	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
2270	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
2271	155.0	11/29/12	Peter J. Gleason	Phone conv. with RG for update on obtaining file.	0.250
2272	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
2273	91.0	11/30/12	Peter J. Gleason	Meeting with D2, to discuss Schoolcraft matter and backgrounds of named defendants.	2.500
2274	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

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2275	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
2276	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
2277	92.0	12/01/12	Peter J. Gleason	Phone conv. with AS regarding update of the investigations.	0.750
2278	126.0	12/01/12	Peter J. Gleason	Phone conv. with VP regarding meeting of previous night.	0.500
2279	242.0	12/1/12	Vincent Parco, PI	Phone call with Atty., update and strategy.	0.500
2280	2.0	12/02/12	Peter J. Gleason	Phone conv. with AS regarding status of investigations.	0.500
2281	93.0	12/02/12	Peter J. Gleason	Phone conv. with RG regarding correspondence to and conversation with AS's previous counsel.	0.500
2282	243.0	12/2/12	Vincent Parco, PI	Conversation with contact, discussed NYPD, Emergency Service Unit involvement in Schoolcraft incident.	0.500
2283	5214.0	12/2/12	Richard A. Gilbert	TC's. with PG regarding correspondence to and conversation with PC.	0.500
2284	58.0	12/03/12	Peter J. Gleason	Phone conv. with RG regarding e-mail from AS's previous counsel.	0.250
2285	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
2286	127.0	12/03/12	Peter J. Gleason	Phone conv. with VP regarding investigation.	0.125
2287	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
2288	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
2289	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
2290	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2291	95.0	12/04/12	Peter J. Gleason	Phone conv. with AS regarding all aspects of his representation.	0.750
2292	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
2293	129.0	12/05/12	Peter J. Gleason	E-mail from AS regarding previous counsel, phone conv. with RG and AS	1.250
2294	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
2295	245.0	12/5/12	Vincent Parco, PI	Spoke to contact with useful knowledge.	0.500
2296	246.0	12/5/12	Vincent Parco, PI	Phone call with Atty., update as to intel obtained.	0.500
2297	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
2298	130.0	12/06/12	Peter J. Gleason	Legal research, re: Civil Service Law, NYPD employment rights.	2.250
2299	159.0	12/06/12	Peter J. Gleason	Phone conv. with RG with update regarding VP investigation, memo to file.	1.250
2300	191.0	12/06/12	Peter J. Gleason	Phone conv. with AS regarding investigation	0.750
2301	5218.0	12/6/12	Richard A. Gilbert	Phone conv. with PG re: VP investigation update	0.250
2302	3.0	12/07/12	Peter J. Gleason	Phone conv. with AS re: NYPD employment issues	0.750
2303	156.0	12/07/12	Peter J. Gleason	Meeting with RG, re: strategy NYPD employment issue, disciplinary charges.	1.000
2304	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
2305	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
2306	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
2307	59.0	12/09/12	Peter J. Gleason	Phone conv. with VP, re: update on investigation of named defendants.	0.125
2308	247.0	12/9/12	Vincent Parco, PI	Phone call with Atty., update.	0.125

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2309	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
2310	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
2311	221.0	12/10/12	Peter J. Gleason	Meeting with VP, re: update on named defendant's investigation.	1.250
2312	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
2313	5220.0	12/10/12	Richard A. Gilbert	E-mail and TC with PG, re: file transfer/termination for cause of PC.	0.500
2314	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
2315	228.0	12/11/12	Peter J. Gleason	Travel to Albany	8.000
2316	5180.0	12/11/12	Harvey A. Levine	TCs with RG re: meeting with AS, etc. Issues & strategies moving forward	.8
2317	5221.0	12/11/12	Richard A. Gilbert	TC with PG regarding Albany meeting with AS & others; confer with HL re: same	0.500
2318	5.0	12/12/12	Peter J. Gleason	Meeting with FS's attorney to discuss FS involvement in the Schoolcraft matter.	4.000
2319	212.0	12/12/12	Peter J. Gleason	1 Police Plaza, to discuss Schoolcraft matter with NYPD Department Advocate's Office.	1.500
2320	97.0	12/13/12	Peter J. Gleason	Follow up e-mail to FS's attorney	0.125
2321	97.5	12/13/12	Peter J. Gleason	Meeting with VP, RE; Investigation	1.500
2322	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
2323	215.0	12/13/12	Peter J. Gleason	Phone conv. with FS re: Queens DA press release.	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2324	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
2325	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
2326	6.0	12/14/12	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft NYPD employment issues.	0.125
2327	98.0	12/14/12	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft NYPD employment issues.	0.125
2328	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
2329	175.0	12/14/12	Peter J. Gleason	Phone conv. With RG, re: IPP's position on AS.	0.500
2330	225.0	12/14/12	Peter J. Gleason	Travel	0.750
2331	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
2332	5223.0	12/14/12	Richard A. Gilbert	Confer with HL re: press release; TC with PG, re: IPP's position on AS.	1.000
2333	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
2334	7.0	12/15/12	Peter J. Gleason	Legal research, re: prosecutorial misconduct as a bar to overcome immunity.	2.250
2335	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
2336	8.0	12/16/12	Peter J. Gleason	E-mail from FS's atty.	0.125
2337	250.0	12/16/12	Vincent Parco, PI	Spoke to contact discussed new information.	0.500
2338	99.0	12/17/12	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft NYPD employment issues.	0.125
2339	161.0	12/17/12	Peter J. Gleason	Phone conv. with FS, follow up on conv. 12/15/12	0.500
2340	184.0	12/17/12	Peter J. Gleason	Meeting with VP re: investigation update.	1.250
2341	186.0	12/17/12	Peter J. Gleason	Legal research, re: NYS PL kidnapping.	1.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2342	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
2343	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
2344	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
2345	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
2346	5226.0	12/17/12	Richard A. Gilbert	Meeting with PG, update on securing file from PC, NYPD employment issues, investigation	2.000
2347	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
2348	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
2349	5183.0	12/18/12	Harvey A. Levine	Conf. RG & PG re: AS file transfer Begin Inventory of files	1.500
2350	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
2351	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
2352	5229.0	12/19/12	Richard A. Gilbert	TC with AS & LS update & strategy discussed.	0.700
2353	134.0	12/20/12	Peter J. Gleason	Phone conv. with John Lenoir, Esq. (JL) discussing his potention involvement in the Schoolcraft matter	0.750

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2354	162.0	12/20/12	Peter J. Gleason	E-mail and phone conv. with Professor from John Jay College.	1.250
2355	9.0	12/21/12	Peter J. Gleason	Organize and review case files.	2.500
2356	176.0	12/21/12	Peter J. Gleason	Phone conv. with AS regarding status, strategy, contents of file and investigation status.	0.750
2357	196.0	12/21/12	Peter J. Gleason	Meeting with VP regarding investigation on one of the named defendants.	1.500
2358	252.0	12/21/12	Vincent Parco, PI	Meeting with atty. Given instructions on issues to follow up on.	1.500
2359	60.0	12/22/12	Peter J. Gleason	E-mail to RG, re, amended complaint	0.125
2360	100.0	12/22/12	Peter J. Gleason	Phone conv. with FS, re: complaint	0.250
2361	5184.0	12/22/12	Harvey A. Levine	Cont. inventory of contents of file conf. w/ RG re: amended complaint	2.500
2362	5230.0	12/22/12	Richard A. Gilbert	Review of PG E-mail re, amended complaint Discuss with HL	0.200
2363	135.0	12/23/12	Peter J. Gleason	Phone conv. with AS, re update on Queens DA	0.500
2364	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
2365	187.0	12/23/12	Peter J. Gleason	Review of amended complaint, memo to file.	1.500
2366	5185.0	12/23/12	Harvey A. Levine	Complete inventfory of AS files	3.500
2367	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
2368	101.0	12/26/12	Peter J. Gleason	E-mail to and from NYPD Asst. Comm. Kearns.	0.250
2369	203.0	12/26/12	Peter J. Gleason	E-mail and follow up phone conversation with Prof. from John Jay College.	0.500
2370	5186.0	12/26/12	Harvey A. Levine	Begin comprehensive review of transferred files & notes; pleadings & discovery	6.000
2371	10.0	12/27/12	Peter J. Gleason	Review of part of Schoolcraft file: Partial review of "Attorney's eyes only" File.	3.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2372	5187.0	12/27/12	Harvey A. Levine	Continued review of AS files w/notes discovery materials	5.000
2373	178.0	12/28/12	Peter J. Gleason	Phone call from D2, re: Information on Schoolcraft matter.	0.125
2374	253.0	12/28/12	Vincent Parco, PI	Conversation with contact with source confirming outstanding issue.	0.500
2375	5188.0	12/28/12	Harvey A. Levine	Continued review of AS files w/notes discvoery materials	6.000
2376	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
2377	63.0	01/02/13	Peter J. Gleason	Phone conv. with LS, re: Update on matter.	0.250
2378	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
2379	201.0	01/02/13	Peter J. Gleason	E-mails back and forth to JL re: meeting.	0.250
2380	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
2381	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
2382	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
2383	197.0	01/03/13	Peter J. Gleason	Several phone calls with LS, Re: update	0.750
2384	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
2385	216.0	01/04/13	Peter J. Gleason	Meeting with RG and continued review of File.	4.250
2386	5190.0	1/4/13	Harvey A. Levine	Continued review of file; meeting with PG	6.000
2387	5232.0	1/4/13	Richard A. Gilbert	Continued review of file; meeting with PG	6.000
2388	223.0	01/05/13	Peter J. Gleason	Continued review of the file	4.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2389	5191.0	1/5/13	Harvey A. Levine	Memo summarizing and analyzing contents	3.500
2390	5233.0	1/5/13	Richard A. Gilbert	Continued review of file Memo to file.	3.500
2391	179.0	01/06/13	Peter J. Gleason	Completion of review of file from previous counsel, Memo to file.	6.500
2392	137.0	01/07/13	Peter J. Gleason	Meeting with VP, Re: update on investigation.	1.500
2393	254.0	1/7/13	Vincent Parco, PI	Meeting with atty. discussed investigation strategy moving forward.	1.500
2394	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
2395	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
2396	5192.0	1/8/13	Harvey A. Levine	Conf. with PG & RG reviewing analysis and Strategy going forward	3.500
2397	5234.0	1/8/13	Richard A. Gilbert	Meeting with PG, HL re: file contents strategy.	3.500
2398	132.0	01/09/13	Peter J. Gleason	Meeting with RG Re: inveistgation strategy.	0.750
2399	138.0	01/09/13	Peter J. Gleason	Phone conv. with LS, Re: status of case.	0.500
2400	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
2401	198.0	01/10/13	Peter J. Gleason	E-mail, fax and phone conv. with PBA legal counsel.	1.250
2402	104.0	01/11/13	Peter J. Gleason	Meeting with VP, re: individuals presnt at, "Hone invasion."	0.750
2403	140.0	01/11/13	Peter J. Gleason	Meeting with RG, re: PBA matter.	0.750
2404	255.0	1/11/13	Vincent Parco, PI	Meeting with atty. discussed credibility of potential witnesses.	0.750
2405	11.0	01/12/13	Peter J. Gleason	Phone conv. with NS re: updating him on veracity of matter.	0.750
2406	141.0	01/12/13	Peter J. Gleason	Phone conv. with JL, re: viability of DOJ involvement.	0.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2407	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
2408	202.0	01/13/13	Peter J. Gleason	E-mail to Pat Lynch, PBA President.	0.125
2409	105.0	01/14/13	Peter J. Gleason	Meeting with RG, re: Queens DA.	0.750
2410	142.0	01/14/13	Peter J. Gleason	E-mail from JL, Re: Schoolcraft matter.	0.125
2411	256.0	1/14/13	Vincent Parco, PI	Interview of potential witness.	0.750
2412	13.0	01/15/13	Peter J. Gleason	Phone conv. with AS re: Queens DA.	0.500
2413	143.0	01/16/13	Peter J. Gleason	Phone conv. with VP re: update, meeting to follow.	0.125
2414	257.0	1/16/13	Vincent Parco, PI	Phone call with atty. update set up meeting	0.125
2415	14.0	01/17/13	Peter J. Gleason	Meeting with VP, re: "Home Invasion," participants.	0.750
2416	258.0	1/17/13	Vincent Parco, PI	Meeting with atty. Regarding Schoolcraft residence.	0.750
2417	106.0	01/18/13	Peter J. Gleason	E-mail to PBA, re: their assistance in the matter.	0.125
2418	217.0	01/19/13	Peter J. Gleason	Review of Schoolcraft audio regardings, notes to file.	4.750
2419	218.0	01/19/13	Peter J. Gleason	Several e-mails back and forth with RG, re: draft letter to NYPD.	0.500
2420	64.0	01/20/13	Peter J. Gleason	Continued review of Schoolcraft recordings, notes to file.	4.500
2421	144.0	01/21/13	Peter J. Gleason	E-mail to and from RG, re: NYPD letter.	0.250
2422	145.0	01/21/13	Peter J. Gleason	Phone conv. with FS, re: the status of Schoolcraft matter.	0.750
2423	164.0	01/21/13	Peter J. Gleason	Phone conv. with NS, re: NYPD's handling of Schoolcraft matter.	0.750
2424	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
2425	193.0	01/22/13	Peter J. Gleason	Meeting with RG, Re: NYPD letter.	1.250
2426	16.0	01/23/13	Peter J. Gleason	Phone conv. with RG, Re: NYPD letter	0.125
2427	17.0	01/23/13	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns, re: Schoolcraft position on employment matter.	0.125

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2428	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
2429	108.0	01/25/13	Peter J. Gleason	Meeting with RG to discuss NYPD's refusal to acknowledge e-mail communications.	0.500
2430	188.0	01/26/13	Peter J. Gleason	Phone conv. with LS, re: status update.	0.500
2431	109.0	01/28/13	Peter J. Gleason	Edit and hand deliver letter to NYPD Asst. Comm. Kearns.	2.000
2432	65.0	01/29/13	Peter J. Gleason	Meeting with RG, FS atty.	1.500
2433	165.0	01/29/13	Peter J. Gleason	E-mail from Center for Constitutional Rights (CCR) review of enclosed affidavit.	0.500
2434	180.0	01/29/13	Peter J. Gleason	Meeting with VP, re: update on investigation.	1.250
2435	259.0	1/29/13	Vincent Parco, PI	Meeting with att., discussed entire investigation, home invasion, named defendants, Queens DA.	1.250
2436	18.0	01/30/13	Peter J. Gleason	Phone conc. with AS, update.	0.250
2437	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
2438	147.0	02/01/13	Peter J. Gleason	Phone conv. with CCR, re: Schoolcraft affidavit.	0.750
2439	148.0	02/02/13	Peter J. Gleason	E-mail from AS and review of documents attached, re: NYPD mediation.	0.750
2440	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
2441	110.0	02/03/13	Peter J. Gleason	Phone conv. with NS, re: decision.	0.750
2442	1928.0	02/03/13	NBS	Telephone conference with Peter Gleason; review of docket complaint and decision by J. Sweet.	2.500
2443	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
2444	66.0	02/05/13	Peter J. Gleason	E-mail to NYPD Asst. Comm. Kearns.	0.125
2445	199.0	02/05/13	Peter J. Gleason	E-mail from AS re: Authorization, print out and distribute same.	0.250
2446	5251.0	2/5/13	Richard A. Gilbert	Research memo & draft subpoena to Queens D.A.	2.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2447	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
2448	5252.0	2/6/13	Richard A. Gilbert	Organize file for transfer to PG & Nat Smith (NS)	1.000
2449	20.0	02/07/13	Peter J. Gleason	Meeting with AS, NS, & JL, re: adding lawyers to the legal team.	2.500
2450	1929.0	02/07/13	NBS	Meeting with Adrian Schoolcraft; Peter Gleason and John Lenoir re possible representation.	2.500
2451	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
2452	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
2453	157.0	02/08/13	Peter J. Gleason	Phone conv. with NS, re: joining legal team.	0.500
2454	1930.0	02/08/13	NBS	Telephone conference with Peter Gleason re taking on new case	0.300
2455	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
2456	22.0	02/10/13	Peter J. Gleason	E-mail to NS, re: deposition	0.125
2457	5254.0	2/10/13	Richard A. Gilbert	Review of file for deposition	3.000
2458	112.0	02/11/13	Peter J. Gleason	E-mail from RG, re: deposition/conf.	0.125
2459	189.0	02/11/13	Peter J. Gleason	Phone conv. with NS, re: Floyd case.	0.500
2460	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
2461	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
2462	1931.0	2/11/2013	NBS	Telephone conference with co-counsel; review of Floyd case.	0.500
2463	5255.0	2/11/13	Richard A. Gilbert	Emails to/from PG, re: deposition.	0.200

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2464	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
2465	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
2466	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
2467	5203.0	2/12/13	Harvey A. Levine	Conf. with RG re: deposition of AS	0.500
2468	5257.0	2/12/13	Richard A. Gilbert	Prep and defense of deposition of AS	6.000
2469	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
2470	260.0	2/13/13	Vincent Parco, PI	Meeting with atty. Update on new development.	0.500
2471	1933.0	2/13/2013	NBS	Telephone conference with Peter Gleason; telephone to Richard Guilbert re status.	0.500
2472	5258.0	2/13/13	Richard A. Gilbert	Phone conv. with PG & NS, re: case status.	0.500
2473	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
2474	1934.0	2/14/2013	NBS	Telephone conference with client; review of Floyd decision; meeting with client and team.	3.500
2475	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
2476	68.0	02/15/13	Peter J. Gleason	Phone conv. with NS, re: NYS CPL & file	0.250
2477	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

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2478	4415.0	02/16/13	JL	Review of case history and complaint; document preparation for presentation to DOJ	3.500
2479	113.0	02/17/13	Peter J. Gleason	E-mail correspondence between NS & JL, re: Queens DA.	0.250
2480	1936.0	2/17/2013	NBS	Review of boxes from client and Guilbert.	2.500
2481	4416.0	02/17/13	JL	Review of case files and audio recordings; document preparation to formally request DOJ intervention	3.250
2482	23.0	02/18/13	Peter J. Gleason	E-mail from JL, re: internet posting pertaining to AS, review of same.	0.500
2483	1937.0	2/18/2013	NBS	Review of decisions of file; review of production.	3.500
2484	4417.0	02/18/13	JL	Review of case timeline and document preparation for Main Justice and US Attorney presentation	4.000
2485	4418.0	02/19/13	JL	Telephone conference with EDNY Civil Rts Chief Pam Chen; document preparation.	0.750
2486	24.0	02/20/13	Peter J. Gleason	Meeting with NS, JL. Re: Queens DA subpoena	0.750
2487	149.0	02/20/13	Peter J. Gleason	E-mail to legal team, re: Sunday's meeting.	0.125
2488	1938.0	2/20/2013	NBS	Meeting with co-counsel; prepare subpoenas	0.800
2489	4419.0	02/20/13	JL	Prepare draft letters to DOJ--Main Justice and USAO, EDNY	1.500
2490	25.0	02/21/13	Peter J. Gleason	E-mail from RG, re: evidence preservation.	0.250
2491	69.0	02/21/13	Peter J. Gleason	E-mail from AS, re: Sunday's meeting.	0.125
2492	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
2493	4853.0	02/21/13	MB	Initial meeting with Peter Gleason and Jeremy Skehan	2.000
2494	5260.0	2/21/13	Richard A. Gilbert	Email to PG re: file preservation	0.250
2495	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
2496	150.0	02/22/13	Peter J. Gleason	E-mail to Pub. Advocate, re: follow up meeting.	0.125
2497	1939.0	2/22/2013	NBS	Review of emails; telephone call to co-counsel; telephone Graham Raymond (Village Voice).	0.700
2498	206.0	02/23/13	Peter J. Gleason	E-mails to JL & NS, re: update from JL.	0.125

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2499	27.0	02/24/13	Peter J. Gleason	meeting in Saugerties NY with NS, JL, AS, LS. Travel to and from Saugerties	3.500
2500	230.0	2/24/2013	Peter J. Gleason	meeting in Saugerties NY with NS, JL, AS, LS. Travel to and from Saugerties	8.500
2501	1940.0	2/24/2013	NBS	Travel with Peter Gleason to meet defendant and his father in Saugerties, NY.	5.200
2502	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
2503	29.0	02/27/13	Peter J. Gleason	Phone conv. with NS, re: service upon 5 defendants. Travel to IPP to serve summonses after law dept. refuses to accept.	2.250
2504	166.0	02/27/13	Peter J. Gleason	E-mail from MB, re: scheduling a meeting	0.125
2505	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
2506	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
2507	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
2508	30.0	02/28/13	Peter J. Gleason	Queens DA's office to serve subpoena. (travel)	2.000
2509	70.0	02/28/13	Peter J. Gleason	Review ECF notice.	0.125
2510	181.0	02/28/13	Peter J. Gleason	Prepared and file notice of appearance.	0.250
2511	190.0	02/28/13	Peter J. Gleason	Review Deposition.	1.500
2512	1942.0	2/28/2013	NBS	Review of examination before trial; prepare subpoena; prepare Notice of Appearance.	3.500
2513	71.0	03/01/13	Peter J. Gleason	ECF notices.	0.125
2514	72.0	03/01/13	Peter J. Gleason	E-mail from and to Brian Lee, Esq.	0.250
2515	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
2516	5262.0	3/1/13	Richard A. Gilbert	Review of A.S. deposition transcript	1.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2517	1944.0	3/2/2013	NBS	Review of Section 1983 and 242 issues and jury instructions for various theories of the case.	5.000
2518	1945.0	3/3/2013	NBS	Review of discovery; review of discovery plan; review of draft letter to Justice Department.	2.500
2519	31.0	03/04/13	Peter J. Gleason	E-mail from Brian Lee, Esq., re: scheduling order.	0.250
2520	73.0	03/04/13	Peter J. Gleason	E-mails back and forth with MB, to set up meeting later that day.	0.250
2521	74.0	03/04/13	Peter J. Gleason	E-mail with enclosed letter from Suzanna Publicker, Esq., review of same.	0.250
2522	32.0	03/05/13	Peter J. Gleason	E-mails to and from AS re: trip to city, purchase train ticket.	0.500
2523	75.0	03/05/13	Peter J. Gleason	Review e-mail from Suzanna Publicker, Esq.	0.125
2524	114.0	03/05/13	Peter J. Gleason	E-mail from AS, with attachment outlining examples of NYPD retaliation.	0.250
2525	1946.0	3/5/2013	NBS	Telephone conference with client re Justice letter and Chris Dunn three times; review of discovery record.	2.500
2526	4854.0	03/05/13	MB	Meeting with Peter Gleason re: coming on board the Schoolcraft team.	3.000
2527	5263.0	3/5/13	Richard A. Gilbert	TC's with PG updating status	0.200
2528	76.0	03/06/13	Peter J. Gleason	E-mail from JL, re: DOJ	0.125
2529	207.0	03/06/13	Peter J. Gleason	Reivew fax from Suzanna Publicker, Esq.	0.250
2530	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
2531	33.0	03/07/13	Peter J. Gleason	Meeting with AS & NS	3.500
2532	1948.0	3/7/2013	NBS	Review of file; meeting with client and Peter Gleason; review of new matter.	3.800
2533	200.0	03/08/13	Peter J. Gleason	ECF notice, re: Court order.	0.125
2534	77.0	03/09/13	Peter J. Gleason	Meeting with NS at his office, re; strategy/status.	3.000
2535	1949.0	3/9/2013	NBS	Meeting with co-counsel and intern in reference to status.	2.500
2536	4855.0	03/09/13	MB	Meeting with Peter and Nat re briefing of the case.	3.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2537	151.0	03/10/13	Peter J. Gleason	E-mail to Council Member Williams	0.250
2538	115.0	03/11/13	Peter J. Gleason	E-mail from AS, review attachment (transcription) forward same to NS.	0.750
2539	34.0	03/13/13	Peter J. Gleason	ECF notice and review of same. (letter to judge from City.)	0.500
2540	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
2541	167.0	03/14/13	Peter J. Gleason	E-mail from NS, re: Queens DA	0.125
2542	1950.0	3/14/2013	NBS	Emails to opposing counsel; letter to Judge Sweet in reference to motion schedule.	0.700
2543	116.0	03/15/13	Peter J. Gleason	ECF notice, re: Plaintiff letter to judge.	0.125
2544	4856.0	03/15/13	MB	Started research on admissibility of demonstrative evidence story board project.	6.000
2545	36.0	03/16/13	Peter J. Gleason	E-mail from JL, re: Letter to DOJ and strategy.	0.500
2546	37.0	03/18/13	Peter J. Gleason	E-mail from JL, re: Schoolcraft media report.	0.250
2547	78.0	03/18/13	Peter J. Gleason	ECF notice, re: Order setting date for hearing.	0.125
2548	79.0	03/18/13	Peter J. Gleason	E-mail form NS, re: edits to letter to DOJ.	0.250
2549	38.0	03/19/13	Peter J. Gleason	E-mail from NS, re: Home invasion recording.	0.125
2550	39.0	03/20/13	Peter J. Gleason	ECF notice, re: amended answer.	0.500
2551	80.0	03/20/13	Peter J. Gleason	E-mail from NS, re: final draft of DOJ letter.	0.125
2552	81.0	03/20/13	Peter J. Gleason	Phone conv. with NS, re: correspondence.	0.250
2553	117.0	03/20/13	Peter J. Gleason	Phone conv. with NS,	0.250
2554	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
2555	4421.0	03/20/13	JL	Final Draft, review and mail of letters to Main Justice and US Attorney	1.500
2556	40.0	03/21/13	Peter J. Gleason	E-mail from JL, re: Schoolcraft tapes in WSJ.	0.125
2557	82.0	03/21/13	Peter J. Gleason	E-mail form JL, re: status update.	0.125

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2558	5264.0	3/21/13	Richard A. Gilbert	TC's with PG updating status	0.300
2559	118.0	03/22/13	Peter J. Gleason	Monitor Floyd trial, re: named defendant's testimony.	4.000
2560	213.0	03/22/13	Peter J. Gleason	E-mail from NS & JL, re: Notice to Produce.	0.250
2561	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
2562	41.0	03/23/13	Peter J. Gleason	E-mail from AS, re: recording of Lt. Mascol.	0.500
2563	1953.0	3/23/2013	NBS	Review of motion and motion letter; research on taking high-level government employee's deposition.	3.500
2564	83.0	03/24/13	Peter J. Gleason	E-mail from NS, re: recording of Lt. Mascol	0.125
2565	119.0	03/25/13	Peter J. Gleason	E-mail from JL, re: Schoolcraft Google alert, review of links.	0.750
2566	152.0	03/25/13	Peter J. Gleason	E-mail from NS, re: Letter from Dept. Advocates Office dated April 5, 2011.	0.250
2567	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
2568	5265.0	3/25/13	Richard A. Gilbert	TC's with PG updating status	0.200
2569	42.0	03/26/13	Peter J. Gleason	Phone conv. with NS, re: motion.	0.500
2570	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
2571	43.0	03/27/13	Peter J. Gleason	ECF notice, re: Schoolcraft declaration	0.125
2572	44.0	03/27/13	Peter J. Gleason	Meeting with NS, MB, re: demonstrative evidence to be used at trial.	3.500
2573	84.0	03/27/13	Peter J. Gleason	ECF notice, re: Plaintiff's Memo of Law.	0.125
2574	208.0	03/27/13	Peter J. Gleason	E-mail from NS, re: final draft of reply.	0.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2575	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
2576	4857.0	03/27/13	MB	Conference with Peter, Nat, and Artist re Story Board project.	3.000
2577	45.0	03/28/13	Peter J. Gleason	E-mail from JL, re: next meeting upstate.	0.125
2578	46.0	03/28/13	Peter J. Gleason	E-mail from JL, re: confirming meeting with AS	0.125
2579	120.0	03/28/13	Peter J. Gleason	ECF notice, re: Memo of Law.	0.125
2580	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
2581	1957.0	3/28/2013	NBS	Draft supplemental memo of law.	1.500
2582	122.0	03/29/13	Peter J. Gleason	Phone conv. with NS, re: gag order.	0.500
2583	168.0	03/29/13	Peter J. Gleason	Meeting with VP, re: photos and update.	1.500
2584	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
2585	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
2586	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
2587	123.0	03/30/13	Peter J. Gleason	Meeting with legal team at NS office, re: update investigation, Deft. Ans. To amended complaint.	1.250
2588	1959.0	3/30/2013	NBS	Review of gag order cases (1.5); conference with team (1.0).	2.500
2589	1960.0	3/31/2013	NBS	Review of cases on gag order.	3.500
2590	47.0	04/01/13	Peter J. Gleason	E-mail from sound engineer containing filtered home invasion tape, review of same.	0.750
2591	153.0	04/01/13	Peter J. Gleason	E-mails between City, Hosp. & Plaintiff, re: discovery issues.	0.500
2592	1961.0	4/1/2013	NBS	Review of discovery; email reference discovery plea.	3.500
2593	4422.0	04/01/13	JL	Meeting with Peter Gleason to prepare for client meeting April 7 and court appearance April 10	1.000
2594	4858.0	04/01/13	MB	Memo to counsel re: research on prior restraint in response to motion for gag order.	6.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2595	48.0	04/02/13	Peter J. Gleason	ECF notice, re: Hospital letter to judge.	0.125
2596	49.0	04/02/13	Peter J. Gleason	Monitor Floyd trial, re: Mauriello testimony.	3.500
2597	209.0	04/02/13	Peter J. Gleason	Press inquiry, re: AS	0.125
2598	1962.0	4/2/2013	NBS	Appearance at Floyd trial to hear Mauriello testify.	3.500
2599	5266.0	4/2/13	Richard A. Gilbert	TC's with PG updating status	0.200
2600	85.0	04/03/13	Peter J. Gleason	E-mail from AS, re: NYPD employment issues.	0.125
2601	1963.0	4/3/2013	NBS	Appearance at Floyd trial to hear part of Dr. Fagan direct.	2.500
2602	50.0	04/04/13	Peter J. Gleason	(2) ECF notices, re: City's motion to quash	0.250
2603	86.0	04/04/13	Peter J. Gleason	E-mail to and from Rae Koshetz, Esq., re: NYPD employment issues.	0.250
2604	1964.0	4/4/2013	NBS	Drafting memo of law on prior restraint.	7.500
2605	51.0	04/05/13	Peter J. Gleason	ECF notice, re: motion to quash.	0.125
2606	154.0	04/05/13	Peter J. Gleason	E-mail from/to City/Hospital re: scheduled conference 4/10/13.	0.125
2607	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
2608	1965.0	4/5/2013	NBS	Revise memo of law on prior restraint.	3.800
2609	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
2610	1966.0	4/7/2013	NBS	Meeting at upstate with' team.	8.600
2611	4859.0	04/07/13	MB	Meeting with Adrian and team in Saugerties (travel to and from meeting 4 hours).	6.000
2612	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
2613	53.0	04/08/13	Peter J. Gleason	Meeting with AS & NS, re: trial prep.	1.500
2614	183.0	04/08/13	Peter J. Gleason	ECF notice, re: Hospital filing re motion to quash and letter motion re media.	0.250
2615	1967.0	4/8/2013	NBS	Meeting with client all day re prep for case and ebt	7.500
2616	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2617	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
2618	88.0	04/09/13	Peter J. Gleason	Review Google alert, Re: AS	0.125
2619	89.0	04/09/13	Peter J. Gleason	E-mail with invoice form sound engineer.	0.250
2620	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
2621	4423.0	04/09/13	JL	Meeting with Nat Smith to prepare for Hearing April 10, 2013	2.500
2622	210.0	04/10/13	Peter J. Gleason	Letter from NYPD Department Advocates Office, review of same.	0.250
2623	227.0	04/10/13	Peter J. Gleason	Court Appearance, and subsq. Meeting with legal team.	3.500
2624	1969.0	4/10/2013	NBS	Meeting with team after court appearance.	1.500
2625	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
2626	234.0	04/11/13	Peter J. Gleason	Consultation with AS, Meeting with legal team and Rae Koscheck, Esq., Follow up e-mail to Rae Koscheck, Esq., re: issues discussed at meeting. Draft response letter to NYPD re: letter received on 4/10/13. Discussed strategy with AS.	8.000
2627	1970.0	4/11/2013	NBS	Meeting with team and Rae Koscheck re: NYPD re adm trial issues.	2.500
2628	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
2629	5268.0	4/11/13	Richard A. Gilbert	Appearance SDNY oral argument	2.000
2630	235.0	04/12/13	Peter J. Gleason	Consultation with AS discussing matter purchased return ticket to Albany, meeting with VP.	4.500
2631	261.5	4/12/13	Vincent Parco, PI	Meeting with atty. and Plaintiff, discussed overall investigation.	0.500
2632	52.0	04/13/13	Peter J. Gleason	Phone conv. with NS, re: status.	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2633	1971.0	4/14/2013	NBS	Telephone conference with Peter Gleason re: status.	0.500
2634	1972.0	4/15/2013	NBS	Review of production.	2.000
2635	1973.0	4/16/2013	NBS	Review of production	2.500
2636	1974.0	4/22/2013	NBS	Review of testimony in discovery	3.000
2637	1975.0	4/23/2013	NBS	Review of PG on Marino, Mauriello, and Lauterborn; review of reports of PG by IAB.	4.500
2638	1976.0	4/24/2013	NBS	Review of AEO files.	3.500
2639	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
2640	4426.0	04/25/13	JL	Meeting with Adrian Schoolcraft and Nat Smith to prepare client for depositions; review status of case	1.250
2641	1978.0	4/26/2013	NBS	Meeting with client re: background and chronological with John Lenoir.	6.500
2642	4427.0	04/26/13	JL	Meeting with Adrian Schoolcraft and Nat Smith to prepare for depositions	5.750
2643	1979.0	4/27/2013	NBS	Meeting with client re: background with John Lenoir.	7.500
2644	4428.0	04/27/13	JL	Meeting with Schoolcraft and Nat Smith to prepare for depositions.	5.500
2645	1980.0	4/28/2013	NBS	Telephone conference with John Lenoir re: upcoming trial with NYPD.	0.200
2646	1981.0	4/29/2013	NBS	Telephone conference with with client (1.0) re: trial; research on collateral estoppel issue.	2.800
2647	1982.0	4/30/2013	NBS	Telephone conference with client; research on collateral estoppel issue.	2.800
2648	1983.0	5/1/2013	NBS	Telephone conference with Peter Gleason re: status; emails with clients re: same.	0.500
2649	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
2650	1985.0	5/3/2013	NBS	Review of cases; email letter to opposing counsel re: collateral examination before trial issue.	0.700
2651	103.0	05/05/13	Peter J. Gleason	E-mail to and from Rae Koshetz, Esq. re: scheduling meeting.	0.125
2652	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
2653	1987.0	5/8/2013	NBS	Review of recordings; prepare discovery responses.	5.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2654	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
2655	4429.0	05/09/13	JL	Meeting with Nat Smith to review and prepare discovery, engage investigator and prepare depositions	3.250
2656	1989.0	5/10/2013	NBS	Continued review of discovery.	3.500
2657	4430.0	05/12/13	JL	Review of audio recordings made by client; sort and prepare summaries.	4.500
2658	1990.0	5/13/2013	NBS	Meeting with John and Melissa re: NYPP; telephone call with client.	2.500
2659	4431.0	05/13/13	JL	Meet investigator Helena Melisi; review case re engagement as investigator	2.750
2660	1991.0	5/14/2013	NBS	Telephone conference with client re: status; review of discovery files; outline of production.	3.800
2661	1992.0	5/15/2013	NBS	Continued review of production; email opposing counsel re: status of IPP trial and Queens DA document.	2.200
2662	1993.0	5/16/2013	NBS	Review of files; telephone call to co-counsel; telephone client; call to Lisa Bland.	5.500
2663	4432.0	05/16/13	JL	Telephone call with Nat Smith and Helena Melisi re: NYPD reinstatement options for AS.	0.750
2664	4433.0	05/16/13	JL	Review of IAB reports of interviews with individual officers	2.750
2665	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
2666	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
2667	4435.0	05/17/13	JL	Review of IAB interviews of individual defendants and others; prepare notes	4.250
2668	1995.0	5/18/2013	NBS	Telephone conference with client and co-counsel.	1.200
2669	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
2670	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

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2671	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
2672	4437.0	05/21/13	JL	Meeting with Nat Smith and telephone call with James McCutcheon re: NYPD departmental trial strategy	2.250
2673	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
2674	1999.0	5/23/2013	NBS	Telephone conference with client; call to co-counsel; review of decisions; email re: status.	0.800
2675	2000.0	5/24/2013	NBS	Telephone conference with client re: status; review of emails from co-counsel re Eli Silverman.	0.400
2676	2001.0	5/30/2013	NBS	Telephone conference with client; telephone call to Lisa Bland's office.	0.500
2677	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
2678	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
2679	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
2680	4438.0	06/05/13	JL	Appearance in court; Sweet, J. redpositions and discovery status; post hearing conf w/Smith	1.750
2681	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
2682	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2683	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
2684	2007.0	6/9/2013	NBS	Preparing proposed Order to Show Cause on stay of adm proceedings	3.500
2685	4440.0	06/09/13	JL	Review and edit of Memorandum and proposed Order for filing with Court	1.000
2686	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
2687	2009.0	6/11/2013	NBS	Research on Younger abstention issues for stay motion.	5.500
2688	2010.0	6/12/2013	NBS	Review of Younger case law.	1.500
2689	2011.0	6/13/2013	NBS	Review of Younger et al decisions on stay motion.	3.500
2690	2012.0	6/14/2013	NBS	Email regarding press contracts; telephone call to client; further research on Younger issue.	3.500
2691	2013.0	6/18/2013	NBS	Drafting reply on stay; research on issues re: same.	8.500
2692	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
2693	2015.0	6/20/2013	NBS	Telephone conference with co-counsel; review of Floyd submissions.	2.500
2694	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
2695	2017.0	6/26/2013	NBS	Travel to Johnstown for meeting with client [8 hours of travel].	9.000
2696	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
2697	4443.0	06/26/13	JL	Travel for meeting with client and Nat Smith - Johnston New York Holiday Inn.	3.500
2698	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
2699	2019.0	6/29/2013	NBS	Review of stay decision on NYPD trial.	0.500
2700	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2701	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
2702	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
2703	4442.0	07/10/13	JL	Travel for meeting with client and Nat Smith--Albany	3.500
2704	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
2705	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
2706	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
2707	2025.0	7/22/2013	NBS	Telephone conference with client; re: status; review of to do list; memo to file.	1.500
2708	2026.0	7/23/2013	NBS	Telephone conference with co-counsel re: status.	0.400
2709	2027.0	7/24/2013	NBS	Telephone conference with Magdalena re: status	0.300
2710	2028.0	7/25/2013	NBS	Prepare for all counsel conference call; telephone co-counsel; telephone call client.	3.500
2711	2029.0	7/26/2013	NBS	Preparing documents for client.	0.900
2712	2030.0	7/27/2013	NBS	Meeting with T. Skinner re: case.	0.800
2713	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
2714	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
2715	4813.0	7/31/2013	HS	meeting with Nat Smith to review role and case	2.500
2716	2033.0	8/1/2013	NBS	Meeting with Magdalen re: status and case; review of case law in jury instructions.	2.800
2717	4814.0	8/1/2013	HS	emails from and/or to Nat Smith	0.250
2718	4860.0	08/01/13	MB	Meeting with Nat re: jury instructions project.	3.000
2719	4815.0	8/2/2013	HS	reviewed amended complaint	1.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2720	4861.0	08/02/13	MB	Review Complaint, record, and prior case decisions.	7.000
2721	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
2722	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
2723	4445.0	08/06/13	JL	Confirm with Tom Litwack meeting re: Expert Witness participation	0.750
2724	4816.0	8/6/2013	HS	reviewed Jamaica Hospital's doc exchange	1.500
2725	4863.0	08/06/13	MB	Jury instructions project.	5.000
2726	4446.0	08/07/13	JL	Meeting with trial illustrator (11am-1pm). Meeting with potential expert witness, Dr. Tom Litwack - (3pm-5pm).	3.500
2727	4817.0	8/7/2013	HS	read Plaintiff's depo	1.500
2728	4864.0	08/07/13	MB	Prep for meeting with illustrator re demonstrative project; meeting with potential "dangerousness expert," Tom Litwack.	7.000
2729	4865.0	08/12/13	MB	Jury instructions project.	5.000
2730	2035.0	8/13/2013	NBS	Read recent book by G. Raymond called NYPD Tapes	4.500
2731	4818.0	8/13/2013	HS	emails to and/or from Nat Smith	0.200
2732	4866.0	08/13/13	MB	Meeting with Nat at 3pm re update on projects	3.000
2733	2036.0	8/14/2013	NBS	Travel to Mayfield, NY (4.5); review of recent decision in Floyd case	4.750
2734	4867.0	08/14/13	MB	Jury instructions project.	5.000
2735	2037.0	8/15/2013	NBS	Meeting with client re: examination before trial preparation	6.500
2736	2038.0	8/16/2013	NBS	Meeting with client to discuss case and deposition (7.5); travel back to NY (4.5).	9.750
2737	4868.0	08/19/13	MB	Jury instructions project.	5.000
2738	2039.0	8/20/2013	NBS	Telephone conference with client; revised letter to court.	1.500
2739	4869.0	08/20/13	MB	Jury instructions project.	5.000
2740	2040.0	8/21/2013	NBS	Telephone conference with co-counsel; emails with opposing counsel re: discovery schedule.	1.200
2741	4870.0	08/21/13	MB	Jury instructions project.	5.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2742	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
2743	4819.0	8/22/2013	HS	reviewed availability, called and emailed Nat Smith re: my availability for depositions	0.250
2744	2042.0	8/23/2013	NBS	Meeting with Magdalena re legal research on state action; telephone call with Jon Lenoir re: status.	1.500
2745	4871.0	08/23/13	MB	Meeting with Nat at 5pm re state action research project	3.000
2746	2043.0	8/24/2013	NBS	Meeting with investigator (1.0); telephone conference with Jon Lenoir re: Paul Brown (0.3).	1.300
2747	4447.0	08/24/13	JL	Telephone conference with Smith re invest report on DCPI Brown	0.500
2748	2044.0	8/25/2013	NBS	Review of production for AEO issue (5.0); telephone call to J. Smith (photography of inspection).	5.500
2749	2045.0	8/26/2013	NBS	Continued review of production.	3.500
2750	4872.0	08/26/13	MB	Jury instructions project.	5.000
2751	2046.0	8/27/2013	NBS	Travel to Saugerties to meet client (4.5); meeting with client re: status (3.5).	5.750
2752	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
2753	4449.0	08/27/13	JL	Travel from NYC to Saugerties and return for client meeting	3.500
2754	4873.0	08/27/13	MB	Te meeting with Adrian in Saugerties. (Travel time 4.5 hours)	7.750
2755	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
2756	2048.0	8/29/2013	NBS	Review of productions; telephone call to client (0.5)	3.800
2757	4874.0	08/29/13	MB	Jury instructions project.	5.000
2758	2049.0	8/30/2013	NBS	Continued review of production	3.500
2759	4875.0	09/01/13	MB	Nat's office, listen to audios and review production.	3.000
2760	2050.0	9/3/2013	NBS	Telephone conference with client re: status.	1.500
2761	4876.0	09/03/13	MB	Jury instructions project.	5.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2762	2051.0	9/4/2013	NBS	Email to client re: status; review of status report; review of letter motion by city.	0.700
2763	4450.0	09/04/13	JL	Prepare biweekly status report for client;; review motion status and prepare case report.	1.500
2764	4820.0	9/4/2013	HS	reviewed status report	0.200
2765	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
2766	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
2767	4878.0	09/06/13	MB	Timeline Project.	5.000
2768	2053.0	9/8/2013	NBS	Drafting letter motion on AEO.	2.500
2769	2054.0	9/9/2013	NBS	Revising letter motion; emails on same.	0.800
2770	4879.0	09/09/13	MB	Timeline Project.	5.000
2771	2055.0	9/10/2013	NBS	Telephone conference with client.	0.200
2772	4451.0	09/10/13	JL	Review of documents in preparation for client's examination before trial	4.500
2773	4880.0	09/11/13	MB	Timeline Project.	5.000
2774	4881.0	09/12/13	MB	Timeline Project.	5.000
2775	4452.0	09/13/13	JL	Prepare status report for client	0.500
2776	4821.0	9/13/2013	HS	reviewed departmental action affect on case by city and emailed to group	1.750
2777	4882.0	09/13/13	MB	Meeting with Nat 4:30pm re update of current projects	3.000
2778	2056.0	9/16/2013	NBS	Email regarding status; telephone call to client.	0.500
2779	2057.0	9/18/2013	NBS	Telephone call and emails reference 81 inspection	0.500
2780	4883.0	09/18/13	MB	Meeting with Nat and Adrian	2.000
2781	2058.0	9/19/2013	NBS	Inspection at 81 with defendants, cleint, and Mag.	5.500
2782	4884.0	09/19/13	MB	Inspection of 81st Precinct	6.000
2783	2059.0	9/21/2013	NBS	Meeting with client.	3.500
2784	2060.0	9/22/2013	NBS	Review of motion letter re: AEO and personal property motion.	2.500
2785	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
2786	4885.0	09/24/13	MB	Meeting with Adrian to work on layout of Glendale apt	3.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2787	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
2788	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
2789	4886.0	09/25/13	MB	Oral Argument; team meeting	4.000
2790	2063.0	9/26/2013	NBS	Appearance for client; examination before trial and prepare for same.	9.000
2791	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
2792	2064.0	9/27/2013	NBS	Appearance for examination before trial of defendant and prepare for same.	9.000
2793	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
2794	2065.0	9/29/2013	NBS	Meeting with client re: case and next Steps.	1.500
2795	2066.0	9/30/2013	NBS	Telephone conference with co-counsel; review of emails; review of productions.	2.500
2796	4456.0	09/30/13	JL	Review of Mauriello examination before trial notes.	0.750
2797	2067.0	10/1/2013	NBS	Meeting with client re: examination before trial and inspection preparation.	3.500
2798	4822.0	10/1/2013	HS	prep for inspection of Schoolcraft home and Hosp: reviewed records & depo of pit	4.000
2799	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
2800	4823.0	10/2/2013	HS	home and hosp inspection and Scene inspection	6.250
2801	4889.0	10/02/13	MB	Jamaica Hospital inspection.	6.000
2802	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
2803	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2804	4457.0	10/04/13	JL	Preparing docs and audio recordings for Marino deposition; Tel Conf with Smith	2.750
2805	4891.0	10/04/13	MB	Prepare Marino examination before trial.	5.000
2806	2070.0	10/7/2013	NBS	Prepared for examination before trial; conference call with co-counsel; conference with client.	5.500
2807	4458.0	10/07/13	JL	Meeting with client and Smith re depositions of Mauriello and Marino	3.500
2808	4824.0	10/7/2013	HS	read Kretz transcript	0.500
2809	4892.0	10/07/13	MB	Prepare Marino examination before trial.	5.000
2810	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
2811	4459.0	10/08/13	JL	co-counsel w/Smith in deposition of Marino; post depo confer /Smith and client	9.000
2812	4893.0	10/08/13	MB	Deposition of Deputy Chief Michael Marino.	0.000
2813	2072.0	10/9/2013	NBS	Telephone conference with John Lenoir re: status.	0.500
2814	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
2815	4460.0	10/09/13	JL	Telephone conference with Smith and client re case status after Marino depo	0.500
2816	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
2817	4461.0	10/10/13	JL	Telephone conference with Smith re depositions	0.500
2818	4894.0	10/10/13	MB	Research caselaw on involuntary commitments involving private hospitals	5.000
2819	2075.0	10/11/2013	NBS	Drafting letter to Court; research on motion to amend.	3.500
2820	4895.0	10/11/13	MB	Research involuntary commitments and MHL 9.39.	5.000
2821	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
2822	4462.0	10/13/13	JL	Telephone conference with Smith and NYACLU re assistance in case	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2823	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
2824	4463.0	10/14/13	JL	Telephone conference with Smith re status of case and share of responsibilities	0.750
2825	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
2826	2078.0	10/15/2013	NBS	Revised motion and memo; emails re: same; letter to court; conference with client re: status.	3.500
2827	4825.0	10/15/2013	HS	read John L status report	0.200
2828	4826.0	10/15/2013	HS	reviewed motion papers for motions of 10/16	1.500
2829	4897.0	10/15/13	MB	Prepare medical defendants examination before trial.	5.000
2830	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
2831	4464.0	10/16/13	JL	co-counsel at deposition Dfnt Bernier - 111 Broadway- by H. Suckle	1.750
2832	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
2833	4898.0	10/16/13	MB	Judge Sweet's courtroom hearing.	3.000
2834	2080.0	10/17/2013	NBS	Telephone conference with client; emails re: status; email prior counsel re: discovery matters.	0.800
2835	4827.0	10/17/2013	HS	started review of dots from drop box invasion tape	6.000
2836	4899.0	10/17/13	MB	Prepare medical defendants examination before trial	3.000
2837	2081.0	10/18/2013	NBS	Telephone conference with client; review of medical documents responses; email opposing counsel re: status of production.	1.800
2838	4828.0	10/18/2013	HS	prep for Aldana-Bernier depo	4.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2839	4900.0	10/18/13	MB	Research involuntary commitments and due process violations; brief cases.	5.000
2840	4829.0	10/21/2013	HS	reviewed Aldana-Bernier interrogatories and further prep for depo	3.250
2841	4901.0	10/21/13	MB	Prepare medical defendants exination before trial	6.000
2842	2082.0	10/22/2013	NBS	Meeting with H. Suckle re: medical examination before trial preparation.	2.500
2843	4830.0	10/22/2013	HS	meeting with Nat Smith to review case	2.500
2844	4902.0	10/22/13	MB	Prepare medical defendants exination before trial	5.000
2845	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
2846	4466.0	10/23/13	JL	Telephone conference with Smith re PD expert report and testimony; Tel Conf w/Eterno	1.500
2847	4903.0	10/23/13	MB	Prepare medical defendants exination before trial.	5.000
2848	2084.0	10/24/2013	NBS	Prepared for examination before trial of Dr. Bernier	5.500
2849	4831.0	10/24/2013	HS	prep deposition binder for Aldana-Bernier depo	10.000
2850	4904.0	10/24/13	MB	Meeting with Nat re status on projects	3.000
2851	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
2852	4467.0	10/25/13	JL	Appearance in court re attorney video of deposition-Bernier	0.750
2853	4832.0	10/25/2013	HS	appeared for Aldana-Bernier depo and strategized with John Meg and Nat Smit	5.000
2854	4833.0	10/25/2013	HS	reviewed Nat Smith email re: discovery	0.100
2855	4905.0	10/25/13	MB	Dr. Aldana-Berner; deposition was cancelled.	2.500
2856	2086.0	10/27/2013	NBS	Research on dangerous assessment.	3.000
2857	2087.0	10/28/2013	NBS	Telephone conference with client re: status; emails re: schedule and video objections.	0.800
2858	4834.0	10/28/2013	HS	reviewed motion by medical deflt re; video depo/6 emails	3.500
2859	4835.0	10/28/2013	HS	performed research on video tape depositions	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2860	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
2861	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
2862	4836.0	10/29/2013	HS	emails to team re: motion for video dep/ research	1.000
2863	4907.0	10/29/13	MB	Research video deposition Rule 30.	5.000
2864	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
2865	4908.0	10/30/13	MB	Research video deposition Rule 30.	5.000
2866	4909.0	10/31/13	MB	Memo to counsel re; research video deposition Rule 30.	5.000
2867	2090.0	11/1/2013	NBS	Telephone conference with client; telephone call to John Lenoir re: Stop and Frisk; status.	0.500
2868	4468.0	11/01/13	JL	Review docs and audio for Lauterborn deposition	2.750
2869	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
2870	2091.0	11/3/2013	NBS	Review of Lauterborn recordings and preparation for his examination before trial.	4.200
2871	2092.0	11/4/2013	NBS	Prepare for examination before trial.	2.500
2872	4838.0	11/4/2013	HS	emails to team	0.100
2873	4911.0	11/04/13	MB	Prepare Lauterborn examination before trial.	5.000
2874	2093.0	11/5/2013	NBS	Review of record; prepare for Lauterborn examination before trial	4.500
2875	4912.0	11/05/13	MB	Prepare Lauterborn examination before trial	5.000
2876	4913.0	11/06/13	MB	Prepare Lauterborn examination before trial	5.000
2877	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
2878	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
2879	4914.0	11/07/13	MB	Lauterborn deposition.	0.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2880	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
2881	4915.0	11/08/13	MB	Review discovery, catalog, and convert to searchable PDF files.	5.000
2882	4916.0	11/09/13	MB	Review discovery, organize, and convert to searchable files.	5.000
2883	4917.0	11/11/13	MB	Review discovery, catalog, and convert to searchable PDF files.	5.000
2884	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
2885	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
2886	4837.0	11/13/2013	HS	Appeared for SDNY motion: re video depositions	1.250
2887	4919.0	11/13/13	MB	Judge Sweet's courtroom hearing.	5.000
2888	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
2889	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
2890	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
2891	2097.0	11/15/2013	NBS	Prepare for Mauriello.	2.500
2892	4921.0	11/15/13	MB	Prepare Mauriello exination before trial.	5.000
2893	4472.0	11/17/13	JL	Review of client Schoolcraft examination before trial.	2.250
2894	4473.0	11/18/13	JL	Consultation with non-party witnesses, audio recordings of IAB interviews and document review.	2.500
2895	4839.0	11/18/2013	HS	telephone call with John Lenoir and emails re: Larry Schoolcraft deposition	1.250
2896	4922.0	11/18/13	MB	Interview with Carol Stretmoyer at Midtown location (w/TerrySkinner).	3.000
2897	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
2898	2099.0	11/20/2013	NBS	Prepare for Marino examination before trial.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2899	4923.0	11/20/13	MB	Interview with Ted Stretmoyer at Glendale apt. (with Terry Skinner).	3.000
2900	2100.0	11/21/2013	NBS	Prepare for Marino examination before trial.	2.500
2901	4474.0	11/21/13	JL	Review and produce Marino and Lauterborn video depositions; reconcile Plaintiff depositions transcript with video.	2.750
2902	4924.0	11/21/13	MB	Prepare Mauriello examination before trial	5.000
2903	2101.0	11/22/2013	NBS	Prepare for and appear at Mauriello examination before trial (busted by defendant).	3.500
2904	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
2905	4925.0	11/22/13	MB	Mauriello deposition cancelled; begin Prof Rule 4.2 no contact research.	4.500
2906	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
2907	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
2908	4927.0	11/25/13	MB	Prof Rule 4.2 no contact research.	6.000
2909	2102.0	11/26/2013	NBS	Drafting notices for depositions ; review of email.	1.000
2910	4477.0	11/26/13	JL	Review of depositions; prepare challenge to City Defendant obstructions; prepare for Lt. Caughey examination before trial.	5.500
2911	4928.0	11/26/13	MB	Draft memo to counsel re: Prof Rule 4.2 no contact research.	6.000
2912	4478.0	11/27/13	JL	Review of examination before trial transcripts with video; prepare for Defendant Caughey examination.	2.750
2913	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
2914	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
2915	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2916	4930.0	11/30/13	MB	Rule 30(c)(2) research re: discoverable disciplinary records; convictions; sanctions; applying state law privileges.	5.000
2917	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
2918	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
2919	2104.0	12/2/2013	NBS	Telephone conference with W. Krétz re: Mauriello; telephone emails with counsel re: status and discovery deadline.	2.500
2920	4482.0	12/02/13	JL	Telephone conference with Smith and client re case status of depositions	1.500
2921	4931.0	12/02/13	MB	Rule 30(c)(2) research.	5.000
2922	4932.0	12/03/13	MB	Draft memo to counsel re: Rule 30(c)(2) research	5.000
2923	2105.0	12/4/2013	NBS	Letter to opposing counsel; email to opposing counsel re numerous discovery disputes.	1.500
2924	4933.0	12/04/13	MB	Draft memo to counsel re: Rule 30(c)(2) research	5.000
2925	4934.0	12/05/13	MB	Write up on all deposition objection issues.	5.000
2926	2106.0	12/6/2013	NBS	Emails re: status; prepare opposition to motion for reconsideration.	3.500
2927	4935.0	12/06/13	MB	Write up on all deposition objection issues.	5.000
2928	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
2929	4483.0	12/07/13	JL	Telephone conference with Smith re Mauriello counterclaim	0.500
2930	2108.0	12/8/2013	NBS	Prepare for Caughey examination before trial.	2.500
2931	2109.0	12/9/2013	NBS	Take examination before trial of Caughey.	7.500
2932	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
2933	4936.0	12/10/13	MB	Prepare Larry Schoolcraft examination before trial.	5.000
2934	4485.0	12/11/13	JL	Represent client (w/Bauza) at depo of Larry Schoolcraft--Albany [8:30 travel time]	6.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2935	4486.0	12/11/13	JL	Amtrak NYC - Albany - NYC for Larry Schoolcraft deposition (w/Bauza)	4.250
2936	4937.0	12/11/13	MB	Larry Schoolcraft deposition in Albany, NY. (travel 6.5 hours).	12.750
2937	4938.0	12/12/13	MB	Review discovery, organize, and convert to searchable files.	5.000
2938	4939.0	12/13/13	MB	Review discovery, organize, and convert to searchable files; listen to audio.	5.000
2939	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
2940	2110.0	12/17/2013	NBS	Prepare for examination before trial of Mauriello; review of recent correspondence.	3.500
2941	4941.0	12/17/13	MB	Prepare Mauriello examination before trial.	5.000
2942	2111.0	12/18/2013	NBS	Prepare for Mauriello; conference with co-counsel, telephone call to client re: status.	4.500
2943	4487.0	12/18/13	JL	Prepare for defendant Mauriello examination before trial; review of motion for reconsideration.	3.250
2944	4942.0	12/18/13	MB	Prepare Mauriello examination before trial.	5.000
2945	2112.0	12/19/2013	NBS	Prepare for Mauriello.	3.500
2946	4488.0	12/19/13	JL	Prepare for Mauriello examination before trial.	2.750
2947	4943.0	12/19/13	MB	Prepare Mauriello examination before trial.	5.000
2948	2113.0	12/20/2013	NBS	Take examination before trial of Mauriello.	8.500
2949	4489.0	12/20/13	JL	Represent client with Smith at Mauriello examination before trial at Scoppetta Seiff Kretz & Abercrombie.	9.500
2950	4944.0	12/20/13	MB	Mauriello deposition.	0.000
2951	4945.0	12/22/13	MB	Meeting with Adrian Schoolcraft re: demonstrative evidence project.	3.000
2952	2114.0	12/24/2013	NBS	Meeting with client and John Lenoir re: status and possible settlement demand.	3.200
2953	4490.0	12/24/13	JL	Telephone conference with Smith and client re case status and possible settlement range	0.750
2954	4946.0	12/24/13	MB	Meeting with Team and Adrian Schoolcraft.	3.000
2955	4491.0	12/26/13	JL	Meeting with Smith, Bauza and client to review Mauriello EBT; review settlement parameters	2.000
2956	4947.0	12/26/13	MB	Meeting with Adrian re demonstrative evidence project; joined by John Lenoir.	3.000
2957	4948.0	12/27/13	MB	Meeting with Adrian Schoolcraft re demonstrative evidence project.	3.000
2958	2115.0	12/29/2013	NBS	Meeting with client to review various tape recording.	4.500
2959	4492.0	12/29/13	JL	Meeting with client, Smith and Bauza re status and go-forward; review audio recordings	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2960	4949.0	12/29/13	MB	Meeting at Nat's office w/ Adrian; review audio and record.	4.000
2961	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
2962	4493.0	12/30/13	JL	Confer with John Curran re Stroz Friedberg analysis of recording device and audio enhancement	1.250
2963	4950.0	12/30/13	MB	Meeting at Nat's office w/ Adrian; review audio and record.	3.000
2964	2117.0	12/31/2013	NBS	Review of production; research on compstat.	1.800
2965	2118.0	1/1/2014	NBS	Review of Silverman and Eterno book	4.500
2966	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
2967	4494.0	01/02/14	JL	Telephone conference with Smith re status and schedule of depositions	0.750
2968	2120.0	1/3/2014	NBS	Prepare for Boston and Huffman examination before trial	4.500
2969	4495.0	01/03/14	JL	Preparing docs and audio for Sgt Huffman and PAA Boston depositions	2.500
2970	4951.0	01/03/14	MB	Prepare for Huffman and Boston Deposition; review discovery docs; draft questions.	4.500
2971	2121.0	1/5/2014	NBS	Prepare for Boston and Huffman examination before trial.	3.700
2972	4952.0	01/05/14	MB	Prepare for Boston and Huffman Deposition.	6.020
2973	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
2974	4496.0	01/06/14	JL	co-counsel w/Smith depositions of Huffman and Boston; post EBT review w/Smith and Bauza	9.500
2975	4955.0	01/06/14	MB	Team meeting re review of Boston and Huffman depositions.	1.750
2976	2123.0	1/8/2014	NBS	Letter to Court; email re: scheduling	0.200
2977	4840.0	1/8/2014	HS	email to John Lenoir	0.100
2978	4497.0	01/10/14	JL	Prepare case files and review audio records for future depositions	2.000
2979	4956.0	01/10/14	MB	Review and catalog discovery production at Nat's office; listen to Hanlon audio.	7.000
2980	2124.0	1/12/2014	NBS	Prepare for Hanlon examination before trial	3.500
2981	4498.0	01/12/14	JL	Prepare for Hanlon deposition; review docs and audio files	1.750
2982	4957.0	01/12/14	MB	Analyze NYPD emergency protocol; review NYPD Patrol guide.	2.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
2983	4958.0	01/12/14	MB	Prepare for Hanlon's deposition; review EMT emergency procedure and discovery documents.	4.130
2984	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
2985	4499.0	01/13/14	JL	co-counsel w/Smith at Hanlon deposition	8.500
2986	2126.0	1/15/2014	NBS	Appearance in court; conference with co-counsel; email re: status	2.300
2987	4500.0	01/15/14	JL	Appearance in court, Sweet, J. re discovery; confer with Smith and Bauza re status	1.500
2988	4960.0	01/15/14	MB	Hearing with Judge Sweet re discovery issues; team meeting re status of case.	2.000
2989	2127.0	1/16/2014	NBS	Review of production; review of report on crime reporting; emails re: status of examination before trial	3.500
2990	2128.0	1/17/2014	NBS	Review of documents produced; review of report of crime reporting; review of prior discovery demands	3.500
2991	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
2992	2130.0	1/24/2014	NBS	Produce documents	0.400
2993	2131.0	1/27/2014	NBS	Revising letter to website responders; sending Out same; letter to City Defendants re: examination before trial	1.200
2994	2132.0	1/28/2014	NBS	Prepare for Dr. Lamstein	3.500
2995	4961.0	01/28/14	MB	Prepare for Lamstein deposition; review handwritten notes in discovery docs; draft questions.	3.750
2996	2133.0	1/29/2014	NBS	Prepare for Dr. Lamstein	2.300
2997	4501.0	01/29/14	JL	Preparing for Lamstein deposition	2.000
2998	4962.0	01/29/14	MB	Meeting Nat's Office re: review and prep for Lamstein EBT.	4.000
2999	2134.0	1/30/2014	NBS	Prep for and take Dr. Lamstein examination before trial	9.500
3000	4502.0	01/30/14	JL	conduct as co-counsel w/Smith Lamstein deposition	8.500
3001	4963.0	01/30/14	MB	Lamstein Deposition.	10.000
3002	2135.0	2/3/2014	NBS	Telephone conference with co-counsel; email reference examination before trial.	0.500
3003	4503.0	02/03/14	JL	Telephone conference with Smith re deposition schedules	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3004	4964.0	02/03/14	MB	Research inadvertent production and ethics on production obligation; search files and remove discovery documents in question.	6.080
3005	4504.0	02/04/14	JL	Prepare and review discovery demands.	1.500
3006	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
3007	2136.0	2/5/2014	NBS	Telephone conference with client; emails reference examination before trial; and letter to Judge Sweet.	0.800
3008	4505.0	02/05/14	JL	Conference with Smith re: discovery demands.	1.750
3009	4966.0	02/05/14	MB	Draft memo to counsel re: inadvertent production research.	6.050
3010	4506.0	02/06/14	JL	Conference call with client re: discovery.	1.000
3011	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
3012	4967.0	02/07/14	MB	Meeting with Nat re: inadvertent production redaction issues; begin prep for Medical Defendants EBTs.	5.000
3013	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
3014	4841.0	2/9/2014	HS	call and email re: Deposition of hospital with deft counsel	0.200
3015	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
3016	4507.0	02/10/14	JL	Preparing depositions of Bernier and Isakof; review NYS 9.39	2.500
3017	4843.0	2/10/2014	HS	deposition preparation	5.200
3018	4969.0	02/10/14	MB	Conference with Howard Suckle re deposition prep; prep for Medical Defendants depositions.	6.250
3019	2139.0	2/11/2014	NBS	Prepare for and attend Dr. Bernier examination before trial.	8.500
3020	4508.0	02/11/14	JL	Deposition of defendant Dr. Bernier. 111 B'Way--co-counsel with Smith and Suckel	8.500
3021	4842.0	2/11/2014	HS	reviewed client's deposition questions	0.500
3022	4844.0	2/11/2014	HS	prep Isakov deposition	9.000
3023	4970.0	02/11/14	MB	Bernier Deposition	0.000
3024	2140.0	2/12/2014	NBS	Prepare for and attend Dr. Isakov examination before trial.	9.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3025	4509.0	02/12/14	JL	co-counsel with Smith and Suckle at deposition of Defendant Dr. Isakov.	7.500
3026	4845.0	2/12/2014	HS	prep and conducted Isakov deposition	7.250
3027	4971.0	02/12/14	MB	Isakov Deposition.	0.000
3028	4510.0	02/13/14	JL	Review with Smith notes and exhibits of depositions of Bernier and Isakov.	1.000
3029	4846.0	2/14/2014	HS	researched statutory duty	2.100
3030	2141.0	2/16/2014	NBS	Telephone conference with John Lenoir and client reference status; review of privilege issues.	1.700
3031	4511.0	02/16/14	JL	Telephone conference with client and Smith re case status and way ahead	1.250
3032	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
3033	4512.0	02/18/14	JL	Review of discovery demands with counsel and client.	1.500
3034	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
3035	4513.0	02/19/14	JL	Review of correspondence re: discovery demands. tel conf client and Smith re discovery	1.750
3036	2144.0	2/20/2014	NBS	Email co-counsel; client review of examination before trial for motion.	2.800
3037	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
3038	4973.0	02/20/14	MB	Draft memo to counsel re: Dr. Isakov.	2.000
3039	2145.0	2/21/2014	NBS	Review of cited psychiatric journals.	2.500
3040	2146.0	2/23/2014	NBS	Review of examination before trial; telephone co-counsel; telephone conference with client reference status.	3.500
3041	4514.0	02/23/14	JL	Telephone conference. Smith re depositions	0.750
3042	2147.0	2/24/2014	NBS	Review of examination before trial; email reference recording.	0.400
3043	4515.0	02/24/14	JL	Review file to prepare examination before trial material for Gough.	1.500
3044	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3045	4516.0	02/25/14	JL	Prepare examination before trial materials for Weiss.	0.750
3046	4517.0	02/26/14	JL	Prepare examination before trial materials for Duncan.	0.500
3047	2149.0	2/27/2014	NBS	Drafting letters to court re outstanding discovery disputes by plaintiff and by defendants	3.500
3048	4518.0	02/27/14	JL	Prepare examination before trial Marquez.	0.500
3049	4519.0	02/27/14	JL	Prepare for Sangianetti.	0.500
3050	2150.0	2/28/2014	NBS	Letter motion regarding discovery issue.	6.500
3051	4520.0	02/28/14	JL	Prepare examination before trial docs for Sergeant James.	0.750
3052	2151.0	3/3/2014	NBS	Review of emails and letters	0.500
3053	4521.0	03/03/14	JL	Prepare examination before trial materials for Broschart.	0.750
3054	2152.0	3/4/2014	NBS	Prepare for and attend meeting to confer; emails reference status same.	1.500
3055	4522.0	03/04/14	JL	Counsel conference call. Smith re status and strategy. Needs for trial preparation.	1.500
3056	4974.0	03/04/14	MB	Conference call with City defendants; team conference re trial prep status.	1.500
3057	4523.0	03/05/14	JL	Review discovery and depositions; update case status report for client	1.250
3058	4524.0	03/05/14	JL	Prepare examination before trial materials for Timothy Trainor.	0.500
3059	4525.0	03/07/14	JL	Draft, review and edit correspondence re: discovery.	1.250
3060	4526.0	03/07/14	JL	Research re: NYS CPL 190.25(4).	0.750
3061	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
3062	2153.0	3/8/2014	NBS	Review of letters on discovery motions; email to team reference response.	1.200
3063	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
3064	4527.0	03/09/14	JL	Review research re: response to City Defendants non-production.	1.000
3065	4977.0	03/09/14	MB	Draft Memo to counsel re: City Defendants deposition objection issues.	6.660
3066	4528.0	03/10/14	JL	Schoolcraft research for response to discovery and deposition issues and hearing.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3067	4978.0	03/10/14	MB	Research defendants assertion of privilege for grand jury subpoenas.	5.230
3068	2154.0	3/11/2014	NBS	Meeting with team John Lenoir and Mag Bauza; drafting letter to court.	2.300
3069	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
3070	4979.0	03/11/14	MB	Review and comment Letter to Judge Sweet; team meeting re discovery issues.	3.360
3071	4530.0	03/12/14	JL	Schoolcraft preparation for Hearing re: discovery.	2.500
3072	4980.0	03/12/14	MB	Catalogue and review new discovery at Nat's office.	6.500
3073	4981.0	03/12/14	MB	Letter to counsel re: search for missing discovery files.	1.000
3074	4531.0	03/13/14	JL	Hearing and conference. SDNY Sweet, J., re discovery status	0.750
3075	4532.0	03/13/14	JL	Schoolcraft preparation fr Hearing re: discovery.	2.500
3076	4533.0	03/14/14	JL	Review scheduling for examination before trial.	0.750
3077	4982.0	03/14/14	MB	Draft subject matter for NYPD 30(b)(6) notices.	5.670
3078	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
3079	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
3080	4534.0	03/16/14	JL	Update case status report; Prep plaintiff demands in discovery and re-schedule depositions.	2.000
3081	4985.0	03/16/14	MB	Research and draft NYPD proposed jury instructions; draft conspiracy and state action charges.	5.880
3082	4535.0	03/17/14	JL	Review schedule of examination before trial w Smith and opposing counsel.	1.500
3083	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3084	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
3085	4986.0	03/19/14	MB	Draft NYPD proposed jury instructions; continue state action research re: Medical Defendants.	6.430
3086	4538.0	03/21/14	JL	Review City Defendants' correspondence re: discovery demands.	0.750
3087	4987.0	03/21/14	MB	Research state action re: City defendants section 1983 conspiracy liability.	7.800
3088	2155.0	3/24/2014	NBS	Meeting with team; telephone call with client.	3.500
3089	4539.0	03/24/14	JL	Prepare deposition schedules in consult with Smith and defendants counsel. Review discovery and prep motion draft.	3.750
3090	4540.0	03/25/14	JL	Review City Defendants' supplemental discovery demands.	0.750
3091	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
3092	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
3093	2157.0	3/27/2014	NBS	Telephone conference with client (twice) re subject matters of numerous 30(b)(6) notices; revising same.	3.500
3094	4542.0	03/27/14	JL	Prepare, review, and edit correspondence re 30(b)(6) examination before trial.	1.500
3095	4988.0	03/27/14	MB	Draft subject matter for JHMC 30(b)(6) notices.	5.250
3096	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
3097	4543.0	03/28/14	JL	Finalize Plaintiff 30(b)(6) notices. Prepare examination of City 30(b)(6) witnesses	3.250
3098	4989.0	03/28/14	MB	Meeting with Nat re: NYPD proposed jury instructions draft.	6.250
3099	4544.0	03/30/14	JL	Review jury instructions with Magdalena.	1.000
3100	2159.0	3/31/2014	NBS	Telephone conference with client; review of discovery; emails reference settlement.	1.800
3101	4545.0	03/31/14	JL	Consultation re: settlement context strategy and demands. (Smith and client)	1.500
3102	2160.0	4/1/2014	NBS	Telephone conference with City re: settlement; telephone conference with client; conference with team re: same.	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3103	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
3104	4547.0	04/02/14	JL	Prepare draft trial memorandum.	1.500
3105	4990.0	04/02/14	MB	Research re: possible medical experts.	6.500
3106	4548.0	04/03/14	JL	Review terms and strategy re: settlement negotiations. Smith and client.	1.500
3107	4991.0	04/03/14	MB	Memo to counsel re: possible medical expert Dr. Peter Stastny, MD.	5.530
3108	2161.0	4/4/2014	NBS	Review of medical expert decisions and affidavit; prepare for Trainor examination before trial.	2.500
3109	4549.0	04/04/14	JL	Review correspondence to Court re: referral to Magistrate; consult re: settlement strategy.	1.000
3110	4992.0	04/04/14	MB	Research medical experts; review Roy Lubit's filings.	6.850
3111	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
3112	4550.0	04/07/14	JL	Review filings (ECF posts) and correspondence.	1.500
3113	2163.0	4/8/2014	NBS	Prepare for Trainor examination before trial.	2.800
3114	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
3115	4551.0	04/09/14	JL	Review settlement strategy with client; Hearing .	2.250
3116	2165.0	4/10/2014	NBS	Prepare for and take deposition of Trainor; prepare for Gough examination before trial.	8.900
3117	4552.0	04/10/14	JL	Prepare/conduct w co-counsel Smith examination before trial of Trainor.	8.250
3118	2166.0	4/11/2014	NBS	Prepare for and take Gough examination before trial	7.800
3119	4553.0	04/11/14	JL	Prepare/conduct as co-counsel w/ Smith examination before trial of Gough.	7.500
3120	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3121	4994.0	04/12/14	MB	Continue proposed jury instructions for case against Medical Defendants; draft neg per say charges.	5.000
3122	2167.0	4/13/2014	NBS	Prepare for and meet with potential expert (Roy Lubit).	4.500
3123	4554.0	04/13/14	JL	Meet possible Psychiatric expert Dr. Lubit; review case and discuss Dr. Lubit's participation.	2.750
3124	4995.0	04/13/14	MB	Team meeting with potential expert, Roy Lubit.	4.250
3125	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
3126	4555.0	04/14/14	JL	Telephone conference with client, Smith and MJ Freeman re: settlement demands and discovery issues.	1.500
3127	4996.0	04/14/14	MB	Team conference call with Adrian re status and settlement.	0.660
3128	4997.0	04/14/14	MB	Continue drafting proposed jury instructions Medical Defendants; draft medical malpractice and other state claims.	4.550
3129	2169.0	4/15/2014	NBS	Telephone conference with H. Suckle re: status and settlement.	0.300
3130	4556.0	04/15/14	JL	Review ECF filing by JHC defendant.	0.500
3131	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
3132	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
3133	4998.0	04/16/14	MB	Conference call with Adrian re trial issues and settlement; team conference to confer.	2.500
3134	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
3135	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3136	4999.0	04/17/14	MB	Team conference call re progress on settlement issues.	1.250
3137	2172.0	4/18/2014	NBS	Various telephone calls with John Lenoir; telephone client; review of decisions on involuntary hospital and damages.	3.500
3138	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
3139	4847.0	4/20/2014	HS	preparation Aldana-Bernier deposition	4.500
3140	2173.0	4/22/2014	NBS	Telephone conference with Joe Ferrero.	0.500
3141	4848.0	4/22/2014	HS	preparation Aldana-Bernier deposition	3.000
3142	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
3143	4849.0	4/23/2014	HS	prep and conducted Aldana-Bernier deposition	8.000
3144	2175.0	4/24/2014	NBS	Prepare for Sawyer examination before trial (3.0); revise opposition to Jamaica Hospital protective order motion.	3.500
3145	5000.0	04/24/14	MB	Research re: jury awards of damages.	4.170
3146	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
3147	2176.0	4/25/2014	NBS	Prepare for and take deposition of Sawyer.	6.500
3148	4560.0	04/25/14	JL	Prepare/conduct w/Smith examination before trial for Sawyer.	6.250
3149	4561.0	04/26/14	JL	Telephone conference with client and Smith re: settlement.	1.000
3150	5002.0	04/26/14	MB	Draft memo to counsel re: state action research.	5.230
3151	2177.0	4/27/2014	NBS	Preparing reply to Mauriello opposition	2.800
3152	4562.0	04/27/14	JL	Telephone conference with client re: settlement and trial strategy re: medical defendants and PTS.	1.500
3153	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
3154	4563.0	04/28/14	JL	Prepare/conduct w/Smith examination before trial: Duncan.	7.500
3155	2179.0	4/29/2014	NBS	Review of state motion cases; meeting with co-counsel; call to client.	2.500
3156	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3157	2180.0	4/30/2014	NBS	Appearance in court on JHMC motion for protective order and Adrian's motion to strike Mauriello counterclaims reference (2.2); prepare for same; lunch meeting with team and colleague of John's re: case.	3.800
3158	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
3159	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
3160	2181.0	5/2/2014	NBS	Telephone conference with Gregory Radomsile reference examination before trial; emails to opposing counsel' re: same.	0.800
3161	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
3162	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
3163	4568.0	05/05/14	JL	Telephone conference with Smith re proposed mtn to compel	0.500
3164	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
3165	4570.0	05/07/14	JL	Prepare and review response to City Motion re: 30(b)(6) EBT.	1.000
3166	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3167	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
3168	4572.0	05/09/14	JL	Review hospital records; City production re: 081 lockers; prepare status report.	1.250
3169	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
3170	2184.0	5/11/2014	NBS	Prepare for James examination before trial.	3.500
3171	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
3172	2185.0	5/12/2014	NBS	Prepare for and take James examination before trial.	6.800
3173	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
3174	2186.0	5/13/2014	NBS	Travel to Holbrook and meet with Ferrara and his wife.	4.500
3175	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
3176	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
3177	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
3178	2187.0	5/14/2014	NBS	Prepare and take examination before trial of Marquez.	8.400
3179	4578.0	05/14/14	JL	EBT (w/Smith) of Marquez, EMT/JHC; prepare status report.	7.500
3180	5004.0	05/14/14	MB	EMT Jessica Marquez Deposition.	0.000
3181	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3182	4579.0	05/15/14	JL	Preparation/conduct w/Smith EBT of Sangetti; EMT/JHC; preparation - conduct post depo-review with Smith.	5.250
3183	4580.0	05/15/14	JL	Review of EBT; review case and settlement strategy with client and Smith	1.750
3184	4581.0	05/16/14	JL	Prepare EBT for Broschart - review City motion to strike 30(b)(6) issues.	2.500
3185	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
3186	4582.0	05/19/14	JL	Prepare for meeting with client and full status review of discovery; settlement and trial strategy.	2.250
3187	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
3188	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
3189	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
3190	5005.0	05/20/14	MB	Trip to Johnstown to meet with Adrian (6.5 hours of travel time).	8.250
3191	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
3192	2191.0	5/22/2014	NBS	Drafting opposition to City motion for protective order and cross-motion for documents, research on same.	8.500
3193	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
3194	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
3195	5008.0	05/24/14	MB	Review and catalog new discovery production.	3.980

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3196	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
3197	5010.0	05/26/14	MB	Draft writeup on blue wall of silence research.	6.230
3198	4585.0	05/27/14	JL	Research and outreach re: potential Law Enforcement expert(s) research re: damages and settlement issues.	2.000
3199	5011.0	05/27/14	MB	Create Medical defendants evaluation timeline in the ER, psyche ER, and psyche ward.	5.980
3200	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
3201	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
3202	5012.0	05/28/14	MB	Hearing with Judge Sweet oral arguments on motion.	2.000
3203	5013.0	05/28/14	MB	Prepare Weiss deposition; team conference call re Weiss deposition.	4.100
3204	2194.0	5/29/2014	NBS	Prepare for Weiss; take Weiss examination before trial; prepare for JHMC.	9.500
3205	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
3206	2195.0	5/30/2014	NBS	Prepare for and take examination before trial of Jamaica Hospital (Maffia)	4.500
3207	4587.0	05/30/14	JL	Review w/co-counsel EBT Jamaica Hospital 30(b)(6); Skype conference with client (:30).	1.500
3208	4588.0	05/31/14	JL	Skype conference with client to review discovery, etc.	1.000
3209	2196.0	6/2/2014	NBS	Telephone conference with client; emails with opposing counsel re: discovery; reviewing production for index.	1.800
3210	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3211	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
3212	2198.0	6/4/2014	NBS	Prepare for Ferrara examination before trial; telephone conference with co-counsel re: same.	3.200
3213	4590.0	06/04/14	JL	Represent (with Smith) Ferrara at City deposition, 100 Church St	4.500
3214	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
3215	5017.0	06/04/14	MB	Prepare for Ferrara Deposition.	3.000
3216	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
3217	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
3218	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
3219	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
3220	2201.0	6/8/2014	NBS	Revising discovery demand for Mauriello counterclaim.	1.200
3221	2202.0	6/9/2014	NBS	Telephone conference with client re: status of case.	2.000
3222	4593.0	06/09/14	JL	Telephone conference with client; preparation and review discovery and settlement issues.	2.000
3223	5020.0	06/09/14	MB	Team conference call w/ Adrain re trial prep and update.	1.500
3224	2203.0	6/10/2014	NBS	Drafting demands on Mauriello; drafting letter to court re: amended discovery schedules.	0.800
3225	2204.0	6/11/2014	NBS	Travel to Rhode Island and meet with Dr. Dan re: ER expert.	6.500
3226	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

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3227	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
3228	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
3229	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
3230	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
3231	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
3232	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
3233	2207.0	6/16/2014	NBS	Review of city letter re: supplemental discovery; conference with co-counsel.	0.800
3234	4598.0	06/16/14	JL	Prepare status report for client; draft trial memo	1.750
3235	2208.0	6/17/2014	NBS	Prepare for Broschart.	3.500
3236	2209.0	6/18/2014	NBS	Prepare for and take Broschart re: examination before trial.	7.800
3237	4599.0	06/18/14	JL	Prepare for and conduct (with Smith) Broschart examination before trial; review notes.	7.500
3238	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
3239	4600.0	06/19/14	JL	Status update on discovery schedule for client and trial team.	1.000
3240	2211.0	6/20/2014	NBS	Draft opposition to reconsider; review of Duncan examination before trial; prepare for Duncan.	4.500
3241	4601.0	06/20/14	JL	Telephone conference with co-counsel re: law enforcement experts; draft retainer agreements.	2.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3242	4602.0	06/21/14	JL	Draft and review law enforcement expert retainer agreement.	0.500
3243	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
3244	4603.0	06/23/14	JL	Prepare for, and conduct with Smith dfnt Duncan examination before trial; review Duncan examination before trial.	7.500
3245	4604.0	06/25/14	JL	Telephone conference with party counsel and co-counsel re:discovery scheduling.	1.000
3246	2213.0	6/26/2014	NBS	Emails with opposing counsel re: schedule; conference with co-counsel re: same.	0.500
3247	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
3248	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
3249	4606.0	06/27/14	JL	Meeting (telephone conference) with client; co-counsel and expert re: evaluation by psychiatric expert.	2.500
3250	5022.0	06/27/14	MB	Prep for Mauriello's deposition; review prior deposition; review City defendants depo summaries.	4.000
3251	2215.0	6/28/2014	NBS	Review of Mauriello examination before trial; review of Lubit affirmation in Monaco.	4.500
3252	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
3253	4607.0	06/29/14	JL	Telephone conference with client; co-counsel and expert (Lubit) re: scheduling of evaluation meeting.	1.000
3254	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
3255	2217.0	7/1/2014	NBS	Prepare and take Mauriello examination before trial.	9.500
3256	4609.0	07/01/14	JL	Prepare and conduct w/Smith examination before trial for Mauriello. Review w/client and Smith.	8.500
3257	5023.0	07/01/14	MB	Mauriello Deposition.	0.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3258	4610.0	07/02/14	JL	Telephone conference with client re: deposition review and trial preparation; Adrian departs NYC via Amtrak	1.000
3259	5024.0	07/02/14	MB	Prep for Lwin deposition; review Beiner deposition notes and hospital chart.	1.500
3260	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
3261	4611.0	07/03/14	JL	Prepare and review w/Smith re: Dr. Lwin's examination before trial.	3.500
3262	4612.0	07/04/14	JL	Prepare for 30(b)(6) depositions and other JHC witnesses.	3.750
3263	2219.0	7/6/2014	NBS	Prepare for Jamaica Hospital ebt (Dhar) on policy issue.	3.800
3264	2220.0	7/7/2014	NBS	Take and prepare for Jamaica Hospital examination before trial.	7.500
3265	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
3266	4614.0	07/08/14	JL	Schedule and plan remaining depositions (2.00); review final discovery productions (2.50).	4.500
3267	2221.0	7/9/2014	NBS	Telephone conference with police experts.	0.800
3268	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
3269	4616.0	07/10/14	JL	Consultation and negotiation with psych and law enforcement experts; revise retainer agreements.	2.250
3270	4617.0	07/11/14	JL	Arrange and negotiate terms for ER MD expert witness; prepare for City examination before trial.	1.750
3271	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
3272	2222.0	7/14/2014	NBS	Prepare for examination before trial of City 30(b)(6) witnesses.	1.500
3273	4618.0	07/14/14	JL	Prepare for City 30(b)(6) examination before trial.	2.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3274	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
3275	4619.0	07/15/14	JL	Conduct two City 30(b)(6) examinations before trial.	7.500
3276	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
3277	4620.0	07/16/14	JL	Conduct two City 30(b)(6) examination before trial.	7.000
3278	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
3279	4621.0	07/17/14	JL	Conduct two City 30(b)(6) examination before trial.	7.000
3280	2226.0	7/18/2014	NBS	Review of prior arguments and submissions discussions outstanding; conference with Dr. Halpern and team.	3.500
3281	4622.0	07/18/14	JL	Prepare, do, and review telephone call with MD expert; client and co-counsel.	2.500
3282	5030.0	07/18/14	MB	Team conference call with expert Dr. Halpren.	2.000
3283	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
3284	4623.0	07/21/14	JL	Review of discovery and depositions.	1.500
3285	2228.0	7/22/2014	NBS	Telephone conference with client and team; prepare letter.	2.500
3286	4624.0	07/22/14	JL	Status conference with Smith and client.	1.250
3287	5031.0	07/22/14	MB	Research re City's application of subsequent remedial measure; team conference call re status.	3.650
3288	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
3289	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
3290	5032.0	07/24/14	MB	City 30(b)(6) witness deposition, Cooper.	0.000
3291	5033.0	07/24/14	MB	Prep for Patel deposition.	1.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3292	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
3293	5034.0	07/25/14	MB	Patel deposition.	0.000
3294	2232.0	7/28/2014	NBS	Review of Dr. Lwin examination before trial; review letter from Jamaica Hospital.	1.200
3295	2233.0	7/29/2014	NBS	Emails and telephone conference with client and re: experts; review of letters to Court.	1.200
3296	2234.0	7/30/2014	NBS	Telephone conference with John and Eli re: expert report.	0.800
3297	4625.0	07/30/14	JL	Telephone conference with Smith and LE experts re repost	0.750
3298	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
3299	4626.0	07/31/14	JL	Preparing letter to Court; tel conf w/Smith and LE experts	1.500
3300	5035.0	07/31/14	MB	Analyze potential withdrawal of claims.	2.150
3301	5036.0	07/31/14	MB	Team conference call with experts, Halpern-Ruder and Dr. Lubit.	1.500
3302	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
3303	4627.0	08/01/14	JL	Draft case status report; update Trial Memorandum.	1.500
3304	2237.0	8/3/2014	NBS	Review and revise letter to Court; research on deposition conduct re: definition of harassment.	5.800
3305	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
3306	4628.0	08/04/14	JL	Telephone conference with LE experts; Eterno and Silverman with Nat Smith.	1.000
3307	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
3308	2239.0	8/5/2014	NBS	Revise letter to Court on 3 motions; draft second letter re: video objection.	3.200
3309	4629.0	08/05/14	JL	Discovery review; review letter to Court re: outstanding issues: finalize status report.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3310	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
3311	4630.0	08/06/14	JL	Review and summarize depositions; confer w/Smith re: expert reports.	1.750
3312	5038.0	08/06/14	MB	Conference call with Nat re: defendant's objection to video; new assignments.	0.500
3313	2241.0	8/7/2014	NBS	Review of report; telephone call to John Eterno re: same	1.200
3314	4631.0	08/07/14	JL	Review depositions; prepare index and summaries; confer re: expert testimony and reports.	2.500
3315	2242.0	8/8/2014	NBS	Review of reports of experts (police and ER); review of record from psychiatric experts.	3.500
3316	4632.0	08/08/14	JL	Review depositions; index and summarize; plan expert report submission and prepare for depositions.	2.250
3317	4633.0	08/09/14	JL	Confer w/Smith re: expert reports; conference call with LE experts.	2.000
3318	5039.0	08/09/14	MB	Review and analyze Dr. Lubit's expert report.	3.130
3319	4634.0	08/10/14	JL	Review expert reports; conference calls with psychiatric expert.	2.500
3320	4850.0	8/10/2014	HS	reviewed expert report and emailed team re: expert report	1.500
3321	5040.0	08/10/14	MB	Team conference call with Dr. Lubit re testimony.	1.250
3322	4635.0	08/11/14	JL	Plaintiff's expert disclosure due; prepare packages and send.	4.250
3323	4636.0	08/14/14	JL	Research and review existing material re: expert depositions and dispositive motions.	1.500
3324	5041.0	08/14/14	MB	Draft response addressing 8.5.14 Letter re: Purpi's 30(b)(6) issues.	4.900
3325	4637.0	08/15/14	JL	Prepare for depositions of plaintiff's experts.	1.500
3326	4638.0	08/16/14	JL	Telephone conference with Nat Smith re: expert report follow up and deposition.	1.000
3327	4639.0	08/18/14	JL	Respond to City Defendant letter re: expert reports; review and index depositions.	2.500
3328	4640.0	08/19/14	JL	Review deposition summaries; draft correspondence re: discovery issues.	2.500
3329	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3330	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
3331	4643.0	08/22/14	JL	Confer with all expert witnesses re: schedule availability for depositions.	1.250
3332	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
3333	4645.0	08/29/14	JL	Review Court Order re: discovery; confer with Smith.	1.500
3334	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
3335	4646.0	09/02/14	JL	Confer with co-counsel on expert discovery response, schedule of depositions.	1.500
3336	2244.0	9/3/2014	NBS	Email to all counsel re: schedule; telephone call with Eli Silverman.	0.700
3337	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
3338	5042.0	09/04/14	MB	Search for missing case citations for Dr. Lubit's prior expert testimony.	2.320
3339	2245.0	9/5/2014	NBS	Review of time limitation issues for examination before trials.	1.500
3340	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
3341	4649.0	09/06/14	JL	Review process of summarizing deposition transcripts; confidentiality agreement, billing procedures,	3.500
3342	2484.0	9/7/2014	JLL	Read Schoolcraft deposition.	2.000
3343	4650.0	09/07/14	JL	Review PD expert Silverman prior research.	1.500
3344	2485.0	9/8/2014	JLL	Read Schoolcraft deposition	2.000
3345	4651.0	09/08/14	JL	Confer with co-counsel re: expert discovery; schedule and deposition strategy; review Monel law and facts..	2.750
3346	2486.0	9/9/2014	JLL	Read Schoolcraft deposition	2.000
3347	2246.0	9/10/2014	NBS	Telephone conference with all counsel.	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3348	2487.0	9/10/2014	JLL	Read Schoolcraft deposition.	2.000
3349	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
3350	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
3351	2248.0	9/12/2014	NBS	Travel to Upstate, NY to meet with client; meeting with client	4.500
3352	2249.0	9/12/2014	NBS	Prepare for meeting with client; outline summary judgment motions; causes of action.	2.500
3353	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
3354	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
3355	5043.0	09/12/14	MB	Team Meeting weekend in Mayfield, NY (including travel time of 4 hours).	6.000
3356	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
3357	4655.0	09/13/14	JL	Meeting with client at Bunker Hill, Mayfield, NY.	7.500
3358	5044.0	09/13/14	MB	Team Meeting weekend in Mayfield, NY.	7.500
3359	2251.0	9/14/2014	NBS	Meeting with client; return travel to New York	5.500
3360	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
3361	4657.0	09/14/14	JL	Meeting with client in Mayfield, NY. for trial prep with trial team.	4.000
3362	5045.0	09/14/14	MB	Team Meeting weekend in Mayfield, NY (including travel time of 4 hours).	6.000
3363	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
3364	2252.0	9/16/2014	NBS	Telephone conference with experts; conference with co-counsel; emails re: schedule with all counsel.	1.800
3365	2488.0	9/16/2014	JLL	Ferrara summary deposition	2.000
3366	4659.0	09/16/14	JL	Review and consult re: expert discovery.	2.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3367	2253.0	9/17/2014	NBS	Prepare for and take Purpi examination before trial.	3.500
3368	2489.0	9/17/2014	JLL	Ferrara summary deposition.	2.000
3369	4660.0	09/17/14	JL	Prepare for Hearing; hearing with Judge Sweet courtroom at 500 Pearl Street, NYC.	3.000
3370	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
3371	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
3372	2255.0	9/19/2014	NBS	Prepare for and attend Carrasco ebt	5.500
3373	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
3374	2256.0	9/20/2014	NBS	Review of medical expert reports by Jamaica Hospital Medical Center; Bernier and Isakov.	2.200
3375	5046.0	09/20/14	MB	Review Medical defendants expert reports; review expert Tancredo's deposition transcripts.	4.620
3376	2257.0	9/21/2014	NBS	Meeting with John Lenoir and Mag Bauza; meeting with Lubit re: examination before trial preparation.	3.500
3377	4663.0	09/21/14	JL	Prepare ER expert for examination before trial; confer w/Smith re med experts.	2.750
3378	5047.0	09/21/14	MB	Team meeting with Dr. Lubit re: deposition prep.	4.000
3379	2258.0	9/22/2014	NBS	Email regarding schedule; telephone call with John Eterno.	0.400
3380	4664.0	09/22/14	JL	ER and Psych Expert deposition preparation (2.00); review defendants' expert reports (2.00).	4.500
3381	2259.0	9/23/2014	NBS	Prep for and attend examination before trial of Roy Lubit; call to court re: schedule.	8.000
3382	2490.0	9/23/2014	JLL	Ferrara summary deposition	8.000
3383	4665.0	09/23/14	JL	Expert deposition with Dr. Lubit at MCB 220 East 42nd Street, NYC.	7.500
3384	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
3385	2491.0	9/24/2014	JLL	Ferrara and Broschart summary deposition.	8.000
3386	4666.0	09/24/14	JL	Expert deposition: Review Lubit deposition; review defendants' expert reports; prepare for LE experts.	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3387	2261.0	9/25/2014	NBS	Drafting opposition to discover motion.	3.500
3388	2492.0	9/25/2014	JLL	Broschart summary deposition	8.000
3389	4667.0	09/25/14	JL	Discuss and prepare documentation for LE Expert depositions.	2.000
3390	2262.0	9/26/2014	NBS	Review of production for motion to compel; telephone call with co-counsel; message from Dr. Lubit.	2.200
3391	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
3392	4668.0	09/29/14	JL	Prepare (w/Smith) Dr. Halpern-Rudger for examination before trial at 330 East 42nd Street, NYC.	2.000
3393	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
3394	2493.0	9/30/2014	JS	Reading, taking notes and discussing the Schoolcraft depositions	5.500
3395	2494.0	9/30/2014	JS	Reading, taking notes and discussing the Schoolcraft depositions.	5.500
3396	4669.0	09/30/14	JL	Expert deposition with Dr. Halpern-Ruder at MCB.	7.500
3397	2495.0	10/1/2014	JS	Reading and taking notes on "NYPD Tapes."	1.500
3398	2496.0	10/1/2014	JS	Reading and taking notes on NYPD tapes	3.500
3399	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
3400	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
3401	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
3402	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
3403	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
3404	5048.0	10/02/14	MB	Team conference call re: trial prep.	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3405	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
3406	2499.0	10/3/2014	Is	Trainor summary deposition.	5.000
3407	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
3408	5049.0	10/03/14	MB	Team meeting Nat's office re upcoming motion papers; conference w/Adrian.	3.000
3409	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
3410	2500.0	10/6/2014	JS	Reading, taking notes, and discussing the Schoolcraft depositions.	1.000
3411	4673.0	10/06/14	JL	Review of discovery correspondence and scheduling of remaining depositions.	1.500
3412	2268.0	10/7/2014	NBS	Draft motion on discovery.	4.500
3413	2501.0	10/7/2014	JS	Reading and taking notes and discussing the Schoolcraft depositions.	2.500
3414	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
3415	2502.0	10/8/2014	LS	Trainor summary deposition	5.000
3416	2503.0	10/8/2014	JLL	Mauriello deposition summary - session 2 with errata sheet.	3.000
3417	2506.0	10/8/2014	LS	Trainor summary deposition.	5.000
3418	2270.0	10/9/2014	NBS	Telephone conference with client; review of Eterno production; email re: same; review of Floyd trial.	4.500
3419	2504.0	10/9/2014	JS	Reading, taking notes and discussing the Schoolcraft depositions.	2.000
3420	2505.0	10/9/2014	JS	Reading, taking notes, and discussing the Schoolcraft depositions	1.750
3421	2507.0	10/9/2014	JLL	Drafting deposition summary - session 2 with errata sheet.	2.000
3422	2509.0	10/9/2014	LS	Trainor summary deposition.	2.000
3423	2271.0	10/10/2014	NBS	Review of Floyd transcripts and decision.	4.500
3424	2508.0	10/10/2014	JS	Reading, taking notes and discussing the Schoolcraft depositions	1.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3425	4674.0	10/10/14	JL	Tel Conference with Lubit and Silverman re: schedule and prepare for deposition.	1.000
3426	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
3427	2510.0	10/14/2014	JS	Reading and taking notes.	3.000
3428	2511.0	10/14/2014	JS	Reading and taking notes on the Schoolcraft depositions.	3.000
3429	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 dor Dr. Eterno for examination before trial. [mtg:2:30] [travel: 2:00]	2.500
3430	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
3431	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
3432	2512.0	10/15/2014	JS	Reading and discussing the Schoolcraft depositions.	2.000
3433	4677.0	10/15/14	JL	Conference w/Smith re: City Defendants settlement proposal; prepare counter proposal.	2.000
3434	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
3435	2513.0	10/16/2014	JLL	Mauriello deposition summary - session 2 with errata sheet.	8.000
3436	4678.0	10/16/14	JL	Conference with client and Smith re: settlement options and trial strategy.	1.500
3437	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
3438	2514.0	10/17/2014	JLL	Mauriello deposition summary - session 2 with errata sheet.	4.000
3439	4679.0	10/17/14	JL	Examination before trial of Dr. Eterno (with Smith).	8.500
3440	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3441	5050.0	10/18/14	MB	Research Rule 68; review letter to Adrian re settlement offer.	4.000
3442	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
3443	2515.0	10/19/2014	JLL	Shantel James deposition summary.	3.000
3444	5051.0	10/19/14	MB	Conference call w/ team re Rule 68 Offer.	2.250
3445	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
3446	2516.0	10/20/2014	JLL	Shantel James deposition summary.	2.000
3447	4680.0	10/20/14	JL	Meeting (conference call) with client and Smith re City settlement possibilities	0.750
3448	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
3449	2517.0	10/21/2014	LS	Gough deposition summary.	4.000
3450	2519.0	10/21/2014	LS	Gough deposition summary.	4.000
3451	2280.0	10/22/2014	NBS	Meeting with Eli Silverman to prepare for examination before trial.	3.500
3452	2518.0	10/22/2014	JLL	Kurt Duncan deposition summary.	5.000
3453	4681.0	10/22/14	JL	Review of 2nd Amended Complaint; research for proposed 3rd Amendment.	1.500
3454	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
3455	2520.0	10/23/2014	JLL	Kurt Duncan deposition summary.	3.000
3456	2521.0	10/23/2014	JS	Listening to radio police calls on disc 10, 22 and Schoolcraft surveillance videos.	4.000
3457	4682.0	10/23/14	JL	Prepare and review summaries of deposition transcripts; schedule remaining depositions with counsel; prepare Silverman for deposition.	3.500
3458	5052.0	10/23/14	MB	Create claims "cheat sheet" from proposed jury instructions.	5.890
3459	5053.0	10/23/14	MB	Review/comment re: Letter Rejecting Rule 68 Offer.	1.000
3460	2282.0	10/24/2014	NBS	Defend Silverman's examination before trial.	7.500
3461	2522.0	10/24/2014	LS	Sawyer deposition summary	4.000
3462	4683.0	10/24/14	JL	Defend with Smith City's examination before trial of Silverman.	7.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3463	2283.0	10/25/2014	NBS	Research on criminal standard for exigent circumstances.	3.000
3464	2284.0	10/26/2014	NBS	Revise letter re: rejection of Rule 68 offer.	1.000
3465	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
3466	2523.0	10/27/2014	LS	Sawyer deposition summary.	4.000
3467	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
3468	2524.0	10/28/2014	LS	Sawyer deposition summary.	4.000
3469	4684.0	10/28/14	JS	Review discovery issues outstanding and preparation for hearing 10/29/2014.	2.000
3470	2287.0	10/29/2014	NBS	Prepare for court; appear in court; conference with client and John Lenoir re: status.	4.500
3471	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
3472	4685.0	10/29/14	JL	Hearing before Judge Sweet.	1.000
3473	2288.0	10/30/2014	NBS	Prepare for Patel examination before trial; research warrantless entry and search.	3.500
3474	2526.0	10/30/2014	LS	Sawyer deposition summary.	3.000
3475	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
3476	2527.0	10/31/2014	LS	Gough deposition summary	4.000
3477	2290.0	11/1/2014	NBS	Research on exigent circumstances case law.	3.500
3478	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
3479	2528.0	11/3/2014	LS	Summarize Gough deposition transcript.	3.000
3480	4686.0	11/03/14	JL	Telephone conference with Smith re: 3rd Amended Complaint.	0.750
3481	2292.0	11/4/2014	NBS	Drafting motion to amend; letter to court re: page limit; email client re: status.	3.500
3482	2293.0	11/5/2014	NBS	Drafting motion to amend.	3.500
3483	2294.0	11/6/2014	NBS	Telephone conference with client re: amending complaint.	2.500
3484	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3485	2295.0	11/7/2014	NBS	Meeting with S. Korenbaum; emails re: status; telephone call with Dr. Lubit.	2.200
3486	2529.0	11/7/2014	LS	Summarize Marquez deposition transcript.	4.500
3487	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
3488	2530.0	11/10/2014	LS	Summarize Marquez deposition transcript.	4.500
3489	4688.0	11/10/14	JL	Defend with Smith Lubit examination before trial	4.000
3490	2297.0	11/11/2014	NBS	Telephone conference with paralegal (JS) re: case; review of ebt summaries.	1.500
3491	2531.0	11/12/2014	LS	Summarize Marquez deposition transcript.	5.000
3492	2298.0	11/13/2014	NBS	Appear and defend Dr. Lubit; conference re: examination before trial with witness.	5.500
3493	2532.0	11/13/2014	LS	Summarize deposition of Sangetti.	4.000
3494	4689.0	11/13/14	JL	Lubit deposition continued (defend plaintiff psych expert with Smith).	5.500
3495	2299.0	11/14/2014	NBS	Review of examination before trial summaries and indexes.	1.500
3496	2533.0	11/14/2014	LS	Summarized deposition of Larry Schoolcraft.	2.000
3497	2534.0	11/14/2014	LS	Summarize deposition of Sangetti	4.000
3498	2300.0	11/16/2014	NBS	Revise complaint; email re: same.	1.000
3499	2535.0	11/16/2014	LS	Summarize deposition of Sangetti	2.000
3500	4690.0	11/16/14	JL	Review draft of 3rd Amended Complaint.	1.750
3501	2536.0	11/17/2014	LS	Summarize deposition of Sangetti	4.000
3502	4691.0	11/18/14	JL	Review of legal assistant's work in summarizing deposition transcripts.	1.000
3503	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
3504	2302.0	11/20/2014	NBS	Review of file in Azira case on Blue Wall.	1.500
3505	2537.0	11/20/2014	JLL	Summarized deposition of Larry Schoolcraft.	5.000
3506	4692.0	11/20/14	JL	Follow up re: Lubit deposition and prep materials for trial testimony.	1.000
3507	2303.0	11/21/2014	NBS	Emails re: Lubit; review of Azira files	2.500
3508	2538.0	11/23/2014	JLL	Summarize deposition of Larry Schoolcraft.	5.000
3509	2539.0	11/24/2014	LS	Summarize deposition of Dr. Patel	4.000
3510	2541.0	11/24/2014	LS	Summarize deposition of Dr. Patel.	3.000
3511	2540.0	11/25/2014	JLL	Summarize deposition of Larry Schoolcraft.	5.000
3512	2542.0	11/26/2014	JLL	Summarize deposition of Larry Schoolcraft.	5.000
3513	2543.0	11/28/2014	LS	Summarize deposition of Purpi	3.500
3514	2544.0	11/28/2014	JLL	Summarize deposition of Steven Mauriello.	2.000
3515	2547.0	11/28/2014	LS	Summarize deposition of Purpi.	3.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3516	2545.0	11/29/2014	JLL	Summarize deposition Steven Mauriello	1.000
3517	2546.0	11/30/2014	JLL	Summarize deposition of Steven Mauriello.	2.000
3518	2304.0	12/1/2014	NBS	Revising motion to amend	2.500
3519	2548.0	12/1/2014	LS	Summarize deposition of Dr. Patel	2.000
3520	2549.0	12/1/2014	LS	Summarize deposition of Purpi.	1.000
3521	2550.0	12/1/2014	JLL	Summarize deposition of Steven Mauriello,	4.000
3522	5054.0	12/01/14	MB	Review 2nd Amended Complaint track proposed changes.	4.700
3523	2305.0	12/2/2014	NBS	Revise memo re: motion to amend.	3.500
3524	2551.0	12/2/2014	JLL	Summarize deposition of Steven Mauriello.	6.000
3525	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
3526	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
3527	2306.0	12/3/2014	NBS	Revising 3rd Amended Complaint and Memo Of Law In Support Of Motion To Amend.	3.500
3528	4693.0	12/03/14	JL	Review draft of 3rd Amended Complaint; review plaintiff motion for Summary Judgment and dismiss Mauriello counterclaim.	3.000
3529	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
3530	5058.0	12/03/14	MB	Review final draft Third Amended Complaint; review final draft Memo in Support.	5.250
3531	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
3532	2552.0	12/4/2014	JLL	Summarize deposition of Steven Mauriello.	4.000
3533	4694.0	12/04/14	JL	Review draft of 3rd Amended Complaint and motion v. Mauriello.	1.500
3534	2308.0	12/5/2014	NBS	Review of letters; review of Duncan transcripts, emails with team re: status.	1.800
3535	2553.0	12/5/2014	LS	Summarize deposition of Dr. Lwin.	3.000
3536	2554.0	12/6/2014	LS	Summarize deposition of Dhar.	4.000
3537	2555.0	12/6/2014	LS	Summarize deposition of Dr. Lwin.	1.000
3538	2309.0	12/7/2014	NBS	Review of examination before trial record.	5.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3539	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
3540	2556.0	12/8/2014	LS	Summarize deposition of Dhar.	4.000
3541	4695.0	12/08/14	JL	Review deposition summaries; research on motions for summary judgment; confer with Smith re preparation for opposition.	3.000
3542	4851.0	12/8/2014	HS	researched statutory standard and emailed team with research	4.250
3543	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
3544	2557.0	12/9/2014	LS	Summarize deposition of Dhar.	4.000
3545	2558.0	12/9/2014	JLL	Summarize deposition of Dominick Valenti.	1.000
3546	4696.0	12/09/14	JL	Research review for motion for summary judgment and opposition to Mauriello counterclaim.	2.000
3547	2312.0	12/10/2014	NBS	Review of examination before trial for preparation of motions meeting with John Lenoir re: motions.	8.500
3548	2559.0	12/10/2014	LS	Summarize deposition of Carrasco.	4.000
3549	2560.0	12/10/2014	JLL	Summarize deposition of Dominick Valenti	8.000
3550	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
3551	2561.0	12/11/2014	LS	Summarize deposition of Dhar.	2.000
3552	2562.0	12/11/2014	JLL	Summarize deposition of Kevin Finnegan.	3.000
3553	5059.0	12/11/14	MB	Meeting Nat's office re: NYPD and Medical Defendants summary judgment claims.	5.250
3554	2314.0	12/12/2014	NBS	Review of record for summary judgment motion.	3.500
3555	2563.0	12/12/2014	JLL	Summarize deposition of Kevin Finnegan.	3.000
3556	2315.0	12/13/2014	NBS	Research on exig. cir. exception.	3.500
3557	2564.0	12/13/2014	JLL	Summarize deposition of Bernard Whalen.	2.500
3558	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
3559	2317.0	12/15/2014	NBS	Research on Mauriello counterclaims.	3.800
3560	2565.0	12/15/2014	LS	Summarize deposition of Cooper.	3.000
3561	2318.0	12/16/2014	NBS	Drafting summary judgment motion.	7.500
3562	2566.0	12/16/2014	LS	Summarize deposition of Cooper	4.000
3563	5060.0	12/16/14	MB	Draft summary judgment issues: analyze Fourth Amendment search and seizure Second Circuit summary judgment decisions.	7.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3564	2319.0	12/17/2014	NBS	Drafting summary judgment motion.	10.500
3565	2567.0	12/17/2014	LS	Summarize deposition of Cooper.	3.000
3566	2320.0	12/18/2014	NBS	Drafting summary judgment motion.	12.000
3567	2568.0	12/18/2014	LS	Summarize deposition of Cooper	2.000
3568	5061.0	12/18/14	MB	Mauriello's Counterclaim issue; analyze tortious interference w/prospective advantage summary judgment decisions.	8.800
3569	2321.0	12/19/2014	NBS	Drafting motion for summary judgment.	10.500
3570	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
3571	2322.0	12/20/2014	NBS	Drafting summary judgment memo.	9.500
3572	5063.0	12/20/14	MB	Summary judgment motion; review MHL statute provisions, JHMC hospital chart and record.	5.400
3573	2323.0	12/21/2014	NBS	Drafting summary judgment motion.	7.500
3574	2569.0	12/21/2014	LS	Summarize deposition of Maffia.	3.000
3575	4697.0	12/21/14	JL	Draft and Review plaintiff motion summary judgment.	2.000
3576	5064.0	12/21/14	MB	Summary judgment memo in support draft; track comments and caselaw support.	7.400
3577	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
3578	2570.0	12/22/2014	LS	Summarize deposition of Maffia.	3.000
3579	4698.0	12/22/14	JL	Review plaintiff motion for summary judgment.	1.500
3580	5065.0	12/22/14	MB	Review Summary judgment memo in support draft; track comments and changes.	6.500
3581	5066.0	12/22/14	MB	Review final draft Summary judgment Memo in Support.	3.700
3582	2325.0	12/23/2014	NBS	Revising and filing paper; review of paper.	7.500
3583	2326.0	12/24/2014	NBS	Preparing motion papers	3.500
3584	2571.0	12/24/2014	LS	Summarized Lubit deposition.	4.000
3585	2572.0	12/26/2014	LS	Summarized Lubit deposition.	3.000
3586	2573.0	12/27/2014	LS	Summarized Lubit deposition	4.000
3587	2574.0	12/28/2014	LS	Summarized Lubit deposition	4.000
3588	2327.0	12/29/2014	NBS	Drafting Reply Memo on motion to amend.	5.500
3589	2575.0	12/29/2014	LS	Summarized Lubit deposition.	4.000
3590	2328.0	12/30/2014	NBS	Researching motion for summary judgment.	2.500
3591	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
3592	2576.0	12/30/2014	LS	Summarize Halpren-Ruder deposition.	3.500
3593	2330.0	12/31/2014	NBS	Draft opposition to summary judgment.	7.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3594	2471.0	12/31/2014	JM	Office meeting	1.500
3595	2331.0	1/1/2015	NBS	Review of motions by defendants.	5.500
3596	2577.0	1/1/2015	LS	Summarize Halpren-Ruder deposition.	3.500
3597	2578.0	1/2/2015	LS	Summarize Halpren-Ruder deposition.	4.000
3598	2332.0	1/3/2015	NBS	Reading City motion and case law.	5.500
3599	2579.0	1/3/2015	LS	Summarize Lauterborn deposition.	3.000
3600	2580.0	1/3/2015	LS	Summarize Halpren-Ruder deposition	1.000
3601	4699.0	01/03/15	JL	Meeting with Nat Smith re: Summary Judgment motion.	1.750
3602	2333.0	1/4/2015	NBS	Reading Mauriello and JHMC motions and case law.	8.200
3603	5067.0	01/04/15	MB	Review City defendants summary judgment motions; research caselaw cited.	4.000
3604	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
3605	2581.0	1/5/2015	LS	Summarize Lauterborn deposition.	3.000
3606	4700.0	01/05/15	JL	Review of summary judgment motion; prepare response.	4.500
3607	5068.0	01/05/15	MB	Review Medical defendants summary judgment motions; research cited caselaw; conference with Nat re: motions.	6.000
3608	2335.0	1/7/2015	NBS	Reviewing motions; meeting with John Lenoir; J. Mck; J.S re: Compstat videos.	4.500
3609	2582.0	1/7/2015	LS	Summarize Marino deposition transcript.	3.000
3610	4701.0	01/07/15	JL	Meeting with Nat Smith and James McCutcheon re: review of Compstat DVD's.	1.500
3611	5069.0	01/07/15	MB	Prepare for opposition papers; draft Medical Defendants' summary judgment issues; analyze cited caselaw.	6.500
3612	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
3613	2583.0	1/8/2015	LS	Summarize Marino deposition transcript.	3.000
3614	4702.0	01/08/15	JL	Review and index CompStat DVD's (4.50); prepare response to summary judgment motion (4.00).	8.500
3615	5070.0	01/08/15	MB	Meeting with Nat re: Medical Defendants summary judgment issues; conduct research on issues.	5.500
3616	2337.0	1/9/2015	NBS	Emails re: status; conference with team; conference call with client.	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3617	2584.0	1/9/2015	LS	Summarize Marino deposition transcript.	2.000
3618	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
3619	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
3620	2338.0	1/10/2015	NBS	Review of examinations before trial and Compstat videos.	7.500
3621	2472.0	1/10/2015	JM	Review of CompStat videos	4.000
3622	4704.0	01/10/15	JL	Review CompStat DVD's; prep index.	7.500
3623	2339.0	1/11/2015	NBS	Review of examination before trial and Compstat videos; conference with group on Compstat videos.	7.500
3624	2473.0	1/11/2015	JM	Review of CompStat videos	2.000
3625	2474.0	1/11/2015	JM	Discussions of Compstat and Schoolcraft materials.	0.750
3626	4705.0	01/11/15	JL	Review CompStat DVD's; telephone call re: CompStat DVD's; review CompStat DVD's.	8.250
3627	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
3628	2585.0	1/12/2015	LS	Summarized Lubit deposition	4.000
3629	4706.0	01/12/15	JL	CompStat DVD review.	6.500
3630	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
3631	2340.0	1/13/2015	NBS	Compstat vide review	5.500
3632	2586.0	1/13/2015	LS	Summarized Lubit deposition	4.000
3633	4707.0	01/13/15	JL	Review and index CompStat DVD's.	6.000
3634	2341.0	1/14/2015	NBS	Conference with client and John Lenoir; review of examination before trial and motions.	7.500
3635	2475.0	1/14/2015	JM	Review of CompStat videos.	3.000
3636	2587.0	1/14/2015	LS	Summarized Lubit deposition	2.000
3637	4708.0	01/14/15	JL	Meeting re: summary judgment motion (2.00); CompStat DVD review (4.50).	6.500
3638	5074.0	01/14/15	MB	Research Medical Defendant's summary judgment motion issues; respondeat superior. vicarious liability; apparent authority.	5.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3639	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
3640	4709.0	01/15/15	JL	Review and index CompStat DVD's.	6.750
3641	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
3642	2343.0	1/16/2015	NBS	Review of Hanlon examination before trial; review of cases; review of Compstat video.	7.500
3643	2476.0	1/16/2015	JM	Review of CompStat videos.	11.000
3644	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
3645	2344.0	1/17/2015	NBS	Review of examination before trial; prepare summary judgment oppositions.	7.500
3646	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
3647	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
3648	2477.0	1/19/2015	JM	Telephone conference discussing Schoolcraft and CompStat.	0.590
3649	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
3650	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
3651	4711.0	01/20/15	JL	Review defendants Order re: TAC; prepare Summary Judgment Response Mauriello.	3.500
3652	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
3653	4712.0	01/21/15	JL	Research, review and drafting portions of plaintiff SJ mtn	7.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3654	5077.0	01/21/15	MB	Continue research on defendants summary judgment issues; conspiracy/joint activity state action liability.	7.000
3655	1036.0	01/22/15	JLN	Call from LS re: reentering case as lead counsel	0.750
3656	2349.0	1/22/2015	NBS	Drafting memo in opposition; telephone call to Walter Kretz; emails re: schedule.	7.500
3657	2588.0	1/22/2015	LS	Summarized Lubit deposition.	1.000
3658	4713.0	01/22/15	JL	Draft and research for Responses to Mauriello Summary Judgment motion.	7.500
3659	5078.0	01/22/15	MB	Research re: intracorporate conspiracy doctrine.	6.750
3660	1037.0	01/23/15	JLN	T/c with Adrian re: potentially taking over as lead counsel for trial	1.200
3661	1038.0	01/23/15	JLN	F/u call w/GC and JF about taking over case again	0.800
3662	1039.0	01/23/15	JLN	T/c w/GC re: potentially re-entering case & taking over for trial	0.700
3663	1040.0	01/23/15	JLN	Reviewed R. 68 from Oct. 2014	0.200
3664	2350.0	1/23/2015	NBS	Research and draft Response to Mauriello summary judgment motion.	9.000
3665	2925.0	01/23/15	JPF	Call w/GC and JN about taking over case again	0.800
3666	4094.0	01/23/15	GMC	Call w/JN and JF about taking over case again	0.800
3667	4714.0	01/23/15	JL	Review CompStat DVD's; prepare Summary Judgment Response Statement of motion and facts.	3.000
3668	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
3669	2351.0	1/24/2015	NBS	Review of record; research on cases cited by defendants summary judgment motion.	6.500
3670	4715.0	01/24/15	JL	Research and draft Responses to defendant Mauriello Summary Judgment motion.	3.500
3671	2352.0	1/25/2015	NBS	Review of record for summary judgment motion opposition.	7.500
3672	4716.0	01/25/15	JL	Research and Drafting in collab with Smith plaint SJ mtn	4.000
3673	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
3674	2353.0	1/26/2015	NBS	Drafting opposition papers; research on probable cause.	7.500
3675	4717.0	01/26/15	JL	Client conference call (1.50); research and drafting re: summary judgment defendant Mauriello (7.00).	8.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3676	5079.0	01/26/15	MB	Research re: intracorporate doctrine; draft memo to counsel re: intra-Corporate doctrine.	6.420
3677	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
3678	1044.0	01/27/15	JLN	Researched case law re: MHL 9.39; 9.40; 9.41	2.800
3679	1045.0	01/27/15	JLN	Reviewed Plaintiff's Memo of law for Partial SJ; notes on same	0.750
3680	1046.0	01/27/15	JLN	Reviewed City Memo of Law for SJ; took notes re same	0.700
3681	2354.0	1/27/2015	NBS	Meeting with John and Mag re: summary judgment motion; draft opposition; research on St amendment issues.	9.500
3682	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
3683	5080.0	01/27/15	MB	Draft memo to counsel re: intracorporate doctrine.	4.500
3684	5081.0	01/27/15	MB	Meeting with Nat re: opposition issues; 1st amendment issue.	4.500
3685	1047.0	01/28/15	JLN	Legal research re: JHMC arg. for exclusion of emergency med. expert Dr. Halpren Ruder	1.600
3686	1048.0	01/28/15	JLN	Reveiwed all SMF ("Statement of Material Facts") exhibits in support of Mauriello's motion.	1.400
3687	1049.0	01/28/15	JLN	Reviewed JHMC motion for SJ	0.800
3688	1050.0	01/28/15	JLN	Reviewed Mauriello's motion for SJ	0.600
3689	1051.0	01/28/15	JLN	Reviewed plaintiff's motion to Amend Second complaint & Reply Mem. re: same	0.400
3690	4719.0	01/28/15	JL	Research and draft; prepare for summary judgment response Mauriello.	10.500
3691	5082.0	01/28/15	MB	Research First Amendment issues; analyze recent development in the law limiting Garcetti (Lane, Griffin, Hagan).	7.000
3692	1052.0	01/29/15	JLN	Reviewed Dr. Bernier's motion for summary judgment; notes on same.	0.600
3693	1053.0	01/29/15	JLN	Reviewed Isakov's motion for summary judgment; notes on same	0.500
3694	1851.0	01/29/15	NB	Read deposition transcript of Mauriello; digested same	2.400
3695	2589.0	1/29/2015	LS	Silverman deposition summary for expert witness.	5.000
3696	2590.0	1/29/2015	JS	Reviewing and taking notes on CompStat meeting videos.	6.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3697	4720.0	01/29/15	JL	Mauriello response and research, record, and draft.	4.750
3698	5083.0	01/29/15	MB	Research intentional infliction of emotional distress claim.	4.700
3699	5084.0	01/29/15	MB	Continue IIED research; IIED claim not duplicative of the other claims issue.	3.400
3700	1054.0	01/30/15	JLN	Reviewed Callan Declaration & Exhibits in Support of Motion	1.600
3701	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
3702	2591.0	1/30/2015	LS	Silverman deposition summary for expert witness.	4.000
3703	4721.0	01/30/15	JL	Summary Judgment response, research, and draft.	2.000
3704	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
3705	1057.0	01/31/15	JLN	Reviewed revised Suppl Decl. of RS adding add'l docs in support of City SJ motion	0.200
3706	2478.0	1/31/2015	JM	Email communication of summary judgment City response.	0.090
3707	4722.0	01/31/15	JL	Prepare, research, write draft for response to Mauriello summary judgment.	8.500
3708	1058.0	02/01/15	JLN	Rev'd Plaintiff's exhibits in support of SJ motion; notes re: same	2.400
3709	1059.0	02/01/15	JLN	Reviewed Dep. of Sgt. James	1.900
3710	1060.0	02/01/15	JLN	Reviewed Dep. of Lt. Broschart.; notes on same	1.200
3711	1061.0	02/01/15	JLN	Read Curtis Boston Dep.; notes on same	0.600
3712	1062.0	02/01/15	JLN	Read Rasheena Huffman Dep.; took notes re: same	0.500
3713	2355.0	2/1/2015	NBS	Drafting opposition to motions.	5.500
3714	2479.0	2/1/2015	JM	Email of summary judgment City response.	0.090
3715	4723.0	02/01/15	JL	Confer with Smith in final draft: Mauriello Summary Judgment Response and review.	4.500
3716	5085.0	02/01/15	MB	Memo to counsel re: IIED research.	6.830
3717	1063.0	02/02/15	JLN	Reviewed Dep. of Sgt. Sawyer; notes on same	1.700
3718	1064.0	02/02/15	JLN	Further discussion w/ GC & JF rejoining team to represent AS for trial	1.300
3719	1065.0	02/02/15	JLN	Reviewed Dep. of Lt. Hanlon; cross-referenced PX 67 (IAB interview)	0.900
3720	1066.0	02/02/15	JLN	Reviewed Dep. of Dr. Halpren Rudit	0.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3721	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
3722	2592.0	2/2/2015	LS	Silverman deposition summary for expert witness.	4.000
3723	2594.0	2/2/2015	LS	Silverman deposition summary for expert witness.	5.000
3724	2831.0	02/02/15	JPF	Discussion w/ GC & JN re representing AS again for trial	1.300
3725	4095.0	02/02/15	GMC	Discussion w/ JF & JN re representing AS again for trial	1.300
3726	4096.0	02/02/15	GMC	Phone conversation w/JN re AS wants to rehire us	0.300
3727	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
3728	5086.0	02/02/15	MB	Research First Amendment issues; Monell research.	8.000
3729	1852.0	02/03/15	NB	Printed Amended Complaint and Docket sheet for JLN review	0.100
3730	1853.0	02/03/15	NB	Downloaded and printed all memorandums of law filed by defendants	0.600
3731	2357.0	2/3/2015	NBS	Review of Monell case law for motion; review of supplemental papers filed by all defendants.	3.500
3732	2480.0	2/3/2015	JM	Email correspondence of City response	0.090
3733	2593.0	2/3/2015	JS	Reviewing and taking notes on CompStat meeting videos.	6.000
3734	4725.0	02/03/15	JL	Meeting with Nat re: summary judgment motion; summary judgment Mauriello research.	3.500
3735	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
3736	1067.0	02/04/15	JLN	Reviewed 1st 112 of Mauriello's dep; took notes re: same	1.700
3737	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
3738	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3739	1070.0	02/04/15	JLN	Review of E-mail from AS re: QAD memo from Sgt. Scott	0.400
3740	1071.0	02/04/15	JLN	Reviewed docket sheet	0.300
3741	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
3742	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
3743	1074.0	02/04/15	JLN	E-mail from NS acknowledging Adrian Schoolcraft e-mail and suggesting mtg of entire team	0.100
3744	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
3745	2595.0	2/4/2015	LS	Silverman deposition summary for expert witness.	2.000
3746	2596.0	2/4/2015	JS	Reviewing and taking notes on CompStat meeting videos	2.000
3747	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
3748	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
3749	3216.0	02/04/15	JPF	Email AS confirming our rep w/ current counsel	0.100
3750	3311.0	02/04/15	JPF	Email from Nat Smith re logistics of representation	0.100
3751	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
3752	4098.0	02/04/15	GMC	Review of email from AS re: QAD memo from Sgt. Scott	0.400
3753	4099.0	02/04/15	GMC	Read and reviewed email from AS re: rehiring us	0.300
3754	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
3755	4101.0	02/04/15	GMC	Review of email from Nat Smith ("NS") acknowledging and logistics of representation	0.100
3756	4726.0	02/04/15	JL	Meeting with Nat re: summary judgment motions.	1.000
3757	5088.0	02/04/15	MB	Memo to counsel re: Monell research.	6.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3758	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
3759	1854.0	02/05/15	NB	Read deposition transcript of Bernier; digested same	1.900
3760	2359.0	2/5/2015	NBS	Drafting opposition brief.	7.500
3761	2481.0	2/5/2015	JM	Email of summary judgment on City reponse	0.090
3762	2597.0	2/5/2015	JS	Reviewing and taking notes on CompStat meeting videos	6.000
3763	2598.0	2/5/2015	LS	Summarized Adrian Schoolcraft deposition transcript.	4.000
3764	4102.0	02/05/15	GMC	Read and reviewed AS deposition	2.250
3765	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
3766	4727.0	02/05/15	JL	Research and draft response to defendant Mauriello motion for summary judgment; Mauriello summary judgment motion reponse.	7.500
3767	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
3768	1076.0	02/06/15	JLN	Reviewed Eterno's deposition; took notes re: same	2.800
3769	1077.0	02/06/15	JLN	Reviewed 2nd amended complaint for refreshing mem. regarding core factual allegations, notes re: same	0.700
3770	1855.0	02/06/15	NB	Read deposition transcript of Cooper; digested same	1.300
3771	2360.0	2/6/2015	NBS	Drafting opposition papers.	9.500
3772	2482.0	2/6/2015	JM	Email regarding summary judgment to City reponse	0.090
3773	2599.0	2/6/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
3774	4728.0	02/06/15	JL	Research and draft Summary judgment motion.	7.500
3775	5090.0	02/06/15	MB	Draft opposition to Medical Defendants summary judgment arguments.	5.600
3776	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
3777	2361.0	2/7/2015	NBS	Drafting opposition to Jamaica Hospital and doctor motion.	7.800
3778	4729.0	02/07/15	JL	Review and draft Summary Judgment Motions.	6.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3779	5091.0	02/07/15	MB	Draft opposition to Medical Defendants summary judgment arguments.	7.500
3780	1079.0	02/08/15	JLN	Cont'd review of 56.1 statements and supporting docs	3.700
3781	1080.0	02/08/15	JLN	Reviewed Silvennan's deposition; took notes re same	3.200
3782	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
3783	4104.0	02/08/15	GMC	Read and reviewed AS deposition	3.250
3784	4105.0	02/08/15	GMC	Email correspondence re: videos of deps	0.250
3785	4730.0	02/08/15	JL	Preparation in opposition to defendants summary judgment motion.	8.500
3786	5092.0	02/08/15	MB	Call with Nat discuss current status on JHMC opposition issues.	0.500
3787	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
3788	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
3789	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
3790	1856.0	02/09/15	NB	Read deposition transcript of Finnegan; digested same	1.100
3791	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
3792	2600.0	2/9/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
3793	4106.0	02/09/15	GMC	Read and reviewed Larry Schoolcraft Deposition	2.750
3794	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
3795	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
3796	5093.0	02/09/15	MB	Call with Nat re: progress on research Medical defendants issues.	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3797	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
3798	1085.0	02/10/15	JLN	E-mail correspondence w/AS, GC re: Defendants request to adjourn trial	0.200
3799	1086.0	02/10/15	JLN	E-mail correspondence w/AS, GC re: Defendants request to adjourn trial	0.200
3800	2364.0	2/10/2015	NBS	Opposition motion ; telephone conference with Ryan Shaffer; telephone call with Jon Norinsberg, email client.	12.500
3801	2601.0	2/10/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
3802	2602.0	2/10/2015	JLL	Summary of Whittman deposition transcript.	1.000
3803	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
3804	3220.0	02/10/15	JPF	Email from AS re thoughts on adjournment	0.100
3805	3233.0	02/10/15	JPF	Email from City defendants re moving the trial date back two weeks	0.100
3806	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
3807	4109.0	02/10/15	GMC	Email correspondence w/AS, JN re: Defendants request to adjourn trial	0.250
3808	4732.0	02/10/15	JL	Prepare memorandum in opposition to defendant's motions for summary judgment and Rule 56.1 Statement.	8.500
3809	5094.0	02/10/15	MB	Draft opposition to JHMC summary judgment arguments.	4.600
3810	5095.0	02/10/15	MB	Draft opposition to JHMC summary judgment motions.	2.800
3811	1087.0	02/11/15	JLN	Started review of deposition exhibits	3.400
3812	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
3813	1089.0	02/11/15	JLN	Review of witness/exhibit list from JF and discuss with GC	1.300
3814	1090.0	02/11/15	JLN	Reviewed JHMC memo in opp to SJ	0.300
3815	1091.0	02/11/15	JLN	Review of E-mail from AS regarding trial	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3816	1857.0	02/11/15	NB	Read deposition transcript of Caughey; digested same	1.700
3817	2603.0	2/11/2015	JLL	Summarize Whittman deposition transcript.	2.000
3818	2604.0	2/11/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
3819	2827.0	02/11/15	JPF	Review of declarations from City, Berniers, Isacov, & JHMC w/ accompanying exhibits	1.400
3820	2844.0	02/11/15	JPF	Review of witness/exhibit list from JN and discuss with GC	1.300
3821	2924.0	02/11/15	JPF	Berniers counter 56.1 statement	0.800
3822	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
3823	4110.0	02/11/15	GMC	Review of deposition exhibits	3.100
3824	4111.0	02/11/15	GMC	Review of summary judgment motions and exhibits	2.500
3825	4112.0	02/11/15	GMC	Review of witness/exhibit list from JN and discuss with JF	1.300
3826	4113.0	02/11/15	GMC	Review of email from AS	0.100
3827	4733.0	02/11/15	JL	Review and edit of opposition to defendant's summary judgment motion.	6.500
3828	5096.0	02/11/15	MB	Review and track proposed changes on first draft of Motion in Opposition.	5.650
3829	5097.0	02/11/15	MB	Review/edit second draft of Motion in Opposition.	3.750
3830	1092.0	02/12/15	JLN	Continued review of deposition exhibits	3.750
3831	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
3832	1094.0	02/12/15	JLN	E-mail exchange with NS regarding schedule change for trial and clients consent.	0.100
3833	1095.0	02/12/15	JLN	T/c client regarding update on schedule, new materials he sent me, overall trial strategy	0.100
3834	1858.0	02/12/15	NB	Read deposition transcript of Duncan; digested same	0.600
3835	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
3836	2483.0	2/12/2015	JM	Email exchange for summary judgment for City response.	0.090
3837	2605.0	2/12/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3838	2685.0	02/12/15	JPF	Review of Memo of Law in Opp to plaintiff's motion for SJ	3.300
3839	2753.0	02/12/15	JPF	Review of 56.1 counter statements from JHMC, City, Mauriello, & Isacov	2.300
3840	2952.0	02/12/15	JPF	Affidavit of Mauriello	0.750
3841	3352.0	02/12/15	JPF	Email to JN re proposed email	0.100
3842	4114.0	02/12/15	GMC	Review of deposition exhibits	4.400
3843	4115.0	02/12/15	GMC	Review of NOA for Howard Scheiner	0.100
3844	4734.0	02/12/15	JL	Telephone conference with co-counsel; review of summary judgment motions by defendants.	2.500
3845	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
3846	1097.0	02/13/15	JLN	Reviewed Bernier Opp to PH. SJ motion	0.500
3847	1098.0	02/13/15	JLN	Reviewed City Memo of Law in opp to Pl. Mot; took notes re same	0.400
3848	1099.0	02/13/15	JLN	Reviewd Mauriello Aff. In Opp; notes on same	0.300
3849	1100.0	02/13/15	JLN	Reviewed JHMC Mem. of Law in opp to Pl. mot for SJ	0.300
3850	1101.0	02/13/15	JLN	T/c NS regarding missing evidence (Appeal file, EIU file, locker contents & Digital recorder)	0.300
3851	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
3852	1103.0	02/13/15	JLN	Review of order setting trial date to April 20, 2015	0.100
3853	1859.0	02/13/15	NB	Printed various exhibits from Plaintiff's deposition	0.200
3854	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
3855	2606.0	2/13/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	4.000
3856	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
3857	4117.0	02/13/15	GMC	Meeting w/JN to discuss which witnesses I would be responsible for at trial	1.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3858	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
3859	4119.0	02/13/15	GMC	Review of order setting trial date to April 20, 2015	0.100
3860	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
3861	5098.0	02/13/15	MB	Review all defendants motions in opposition submissions; Meeting with Nat to discuss submissions.	6.000
3862	1104.0	02/14/15	JLN	Reviewed exhibit books volumes 1-3; read and highlight Dept. Adv. Interviews or Marino and Mauriello	4.900
3863	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
3864	1106.0	02/14/15	JLN	Finished review of Plaintiff omnibus response to all motions	1.800
3865	5100.0	02/14/15	MB	Draft issues re: reply to Mauriello opposition motion.	5.230
3866	1107.0	02/15/15	JLN	Cont'd review of deposition exhibits	3.200
3867	1108.0	02/15/15	JLN	Reviewed and highlight Dr. Lamstein Dep; took notes re: same	3.100
3868	1109.0	02/15/15	JLN	Reviewed handwritten notes of Dr. Lamstein; took notes re: same	2.900
3869	1110.0	02/15/15	JLN	Reviewed Mauriello's Mem. in Opp. To Pl. Mot. For SJ	0.500
3870	2653.0	02/15/15	JPF	Review of deposition exhibits & depositions	3.900
3871	4120.0	02/15/15	GMC	Review of deposition exhibits	4.800
3872	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
3873	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
3874	2607.0	2/16/2015	LS	Summarize Adrian Schoolcraft deposition transcript.	3.000
3875	2608.0	2/16/2015	JLL	Summarize Milone deposition transcript.	1.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3876	2623.0	02/16/15	JPF	Review of deposition exhibits & depositions	4.800
3877	4121.0	02/16/15	GMC	Review of summary judgment motions and exhibits	3.100
3878	5102.0	02/16/15	MB	Reply to Mauriello opposition motion; research defamation and damages.	4.300
3879	1112.0	02/17/15	JLN	Finished review of deposition exhibits	1.800
3880	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
3881	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
3882	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
3883	2367.0	2/17/2015	NBS	Review of files on summary judgment papers.	2.500
3884	2609.0	2/17/2015	JLL	Summarize Milone deposition transcript.	3.500
3885	2610.0	2/17/2015	LS	Summarize Adrian Schoolcraft in Floyd deposition transcript.	3.000
3886	2661.0	02/17/15	JPF	Review of deposition exhibits & depositions - Mauriello	3.750
3887	4122.0	02/17/15	GMC	Review of deposition exhibits	3.750
3888	4123.0	02/17/15	GMC	Listened and took notes of PAA Boston IAB interviews and reviewed Scott interview memos	1.600
3889	4736.0	02/17/15	JL	Review of defendant Mauriello's motion and prepare plaintiff reply.	2.500
3890	5103.0	02/17/15	MB	Draft portion of reply to Mauriello opposition motion.	6.220
3891	1116.0	02/18/15	JLN	Continued working on outline, inserting specific facts with citations to the record	2.100
3892	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
3893	1860.0	02/18/15	NB	Printed and bound deps of Mauriello and Valenti	0.200
3894	2633.0	02/18/15	JPF	Review of deposition exhibits & depositions - Marino	4.500
3895	4124.0	02/18/15	GMC	Began cross examination draft of PAA Boston	2.300
3896	4125.0	02/18/15	GMC	Read, reviewed and took notes of PAA Boston deposition	2.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3897	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
3898	4737.0	02/18/15	JL	Review and research on plaintiff reply memorandum to defendant Mauriello's response motion.	3.000
3899	1118.0	02/19/15	JLN	Reviewed and tabbed w/ notes Mauriello Dep pp. 4/06/71	2.700
3900	1119.0	02/19/15	JLN	Reviewed IAB summary of witness statements; took notes regarding same	1.800
3901	1120.0	02/19/15	JLN	Reviewed Lt. Caughey's Dept Advocate testimony; took notes regarding same	1.400
3902	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
3903	1122.0	02/19/15	JLN	E-mailed GC summary of deposition section and noted it for prep of AS at trial	0.300
3904	1123.0	02/19/15	JLN	E-mail exchange with GC regarding points in Mauriello's motion papers	0.100
3905	1861.0	02/19/15	NB	Read deposition transcript of Dhar; digested same	0.600
3906	1862.0	02/19/15	NB	same	1.600
3907	1863.0	02/19/15	NB	Printed various exhibits from depositions of Mauriello, Lauterborn and Floyd	0.200
3908	2618.0	02/19/15	JPF	Review of deposition exhibits & depositions - Lauterborn	5.250
3909	4127.0	02/19/15	GMC	Drafted Boston Cross outline	2.300
3910	4128.0	02/19/15	GMC	Reviewed Mauriello's motion for SMJ and opposition to plaintiff's motion for SMJ	1.400
3911	4129.0	02/19/15	GMC	Retrieved a portion of AS deposition for JN	1.250
3912	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 tomorrow's meeting	0.500
3913	4131.0	02/19/15	GMC	Emailed JN summary of deposition section and noted it for prep of AS at trial	0.300
3914	4738.0	02/19/15	JL	Review of examination before trial summaries.	1.000
3915	5104.0	02/19/15	MB	Draft reply to Mauriello opposition motion.	4.230

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3916	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
3917	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
3918	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
3919	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
3920	1128.0	02/20/15	JLN	T/c GC regarding summary of today's meeting	0.200
3921	1129.0	02/20/15	JLN	Read E-mail from AS regarding indemnification for Mauriello's counterclaim	0.100
3922	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
3923	2672.0	02/20/15	JPF	Meeting w/ TEAM to discuss trial strategy, division of labor, motions	3.500
3924	2905.0	02/20/15	JPF	Meeting w/ JN and GC before meeting with Nat Smith to discuss how we are going to proceed at meeting	1.000
3925	3144.0	02/20/15	JPF	Email from AS re indemnification issue w/ Mauriello	0.250
3926	4132.0	02/20/15	GMC	Meeting w/ TEAM to discuss trial strategy, division of Labor, motions	3.500
3927	4133.0	02/20/15	GMC	Drafted Boston cross outline	1.500
3928	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
3929	4135.0	02/20/15	GMC	Phone call JN regarding summary of today's meeting	0.200
3930	4136.0	02/20/15	GMC	Review of letter AS wishes to send to Zachary Carter re indemnification from Mauriello claim	0.100
3931	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
3932	5105.0	02/20/15	MB	Team meeting; meet with Norinsberg and new team.	4.500
3933	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3934	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
3935	2614.0	02/21/15	JPF	Review of Schoolcraft discovery/deps - Caughey	5.600
3936	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
3937	1133.0	02/22/15	JLN	Continued developing opening outline and global case summary	2.600
3938	1134.0	02/22/15	JLN	Read and highlighted transcript of Lt. Joe Ferrara; took notes regarding same	1.600
3939	1135.0	02/22/15	JLN	E-mail exchange AS regarding clients request for indemnification from city for Mauriello's counterclaim	0.200
3940	2624.0	02/22/15	JPF	Review of Schoolcraft discovery/deps - Gough	4.800
3941	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
3942	1137.0	02/23/15	JLN	Reviewed second set of filings by all defendants (responses); took notes re: same	1.300
3943	1138.0	02/23/15	JLN	Follow up t/c with AS & LS re: summary of meeting with NS, points of agreement and disagreements, overall trial strategy	1.100
3944	1139.0	02/23/15	JLN	T/c GC regarding transcription of IAB tapes and obtaining remaining tapes from Smith today	0.100
3945	2369.0	2/23/2015	NBS	Meeting with John Lenoir re: reply to Mauriello.	2.500
3946	2657.0	02/23/15	JPF	Review of Schoolcraft discovery/deps - Larry Schoolcraft	3.800
3947	3249.0	02/23/15	JPF	Email from GC & NS re IAB file	0.100
3948	3321.0	02/23/15	JPF	Email from Scott Korenbaum ("SK") re motion in lim prep	0.100
3949	4137.0	02/23/15	GMC	Read, reviewed and took notes on Huffman deposition	3.000
3950	4138.0	02/23/15	GMC	Follow-up email with NS re: meeting	0.250
3951	4740.0	02/23/15	JL	Review of Mauriello summary judgment motion response; research and review documents for summary judgment reply.	3.000
3952	5107.0	02/23/15	MB	Draft issues re: reply to Medical defendants memo in opp.	7.000

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3953	1140.0	02/24/15	JLN	Continued adding critical facts to case summary and opening statement	2.700
3954	1141.0	02/24/15	JLN	Continued drafting preliminary stages of Mauriello cross, focusing on false statements in 1st and second affidavits	1.800
3955	1142.0	02/24/15	JLN	Review of Eterno's dep; took notes regarding same	1.600
3956	1143.0	02/24/15	JLN	Reviewed Mauriello's EBT tx in Floyd; took notes re: same	1.400
3957	1144.0	02/24/15	JLN	Continued working on opening and case summary, continued adding critical facts to case summary	1.100
3958	1145.0	02/24/15	JLN	E-mail to JF re motion <i>in limine</i> issues to be covered	0.200
3959	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
3960	1147.0	02/24/15	JLN	E-mail exchange with NS regarding additional discipl. Records for Mauriello and Marino	0.100
3961	2642.0	02/24/15	JPF	Review of Schoolcraft discovery/deps - Huffman	4.250
3962	2875.0	02/24/15	JPF	Review of Huffman cross examination outline	1.250
3963	2957.0	02/24/15	JPF	Discussion with GC re: Huffman cross	0.750
3964	3156.0	02/24/15	JPF	Email from JN re motion in lim issues to be covered	0.250
3965	4139.0	02/24/15	GMC	Drafted Huffman cross examination outline	3.400
3966	4140.0	02/24/15	GMC	Review of John Eterno Deposition	1.900
3967	4141.0	02/24/15	GMC	Listened and isolated points of 10/31 day tour recording from cross outline	1.250
3968	4142.0	02/24/15	GMC	Listened to Huffman IAB interviews and reviewed Scott memo re same	1.100
3969	4143.0	02/24/15	GMC	Discussion with JF re: Huffman cross	0.750
3970	4144.0	02/24/15	GMC	Email correspondence w/NS re confidentiality	0.250
3971	4145.0	02/24/15	GMC	Review of email from JN to NS re missing docs needed for crosses	0.250
3972	4741.0	02/24/15	JL	Review discovery to draft response to Mauriello motion opposition.	2.500
3973	5106.0	02/24/15	MB	reply to Medical defendants memo in opp.	7.200
3974	1148.0	02/25/15	JLN	Reviewed Marino's Dept. Adv. Trial Tx; highlight same for extraction of excerpts onto my outline	1.100
3975	1149.0	02/25/15	JLN	Highlighted Mauriello's Dept Adv. testimony for incorporation into cross x outline	0.700
3976	1150.0	02/25/15	JLN	Reviewed dep of 30 (b) (6) witness Valenti. highlighted same	0.600

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
3977	1151.0	02/25/15	JLN	Reviewed Lauterborn excerpts from Dept. Adv. transcript; added to cross x outline	0.400
3978	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
3979	1153.0	02/25/15	JLN	E-mail correspondence re: major points for Valenti w/GC	0.300
3980	1154.0	02/25/15	JLN	Reviewed AEO & confidentiality order, signed same for NS office	0.200
3981	1155.0	02/25/15	JLN	E-mail exchange with client regarding his mauriello/kress time line	0.100
3982	1156.0	02/25/15	JLN	E-mail exchange with GC regarding highlights from Valenti dep	0.100
3983	1864.0	02/25/15	NB	Read deposition transcript of Ferrara; digested same	1.200
3984	1865.0	02/25/15	NB	same	0.400
3985	1866.0	02/25/15	NB	Reade deposition transcript of Hanlon; digested same	0.400
3986	2639.0	02/25/15	JPF	Review of Schoolcraft discovery/deps - Lamstein/Sanganetti/Marquez	4.300
3987	2698.0	02/25/15	JPF	Review of Schoolcraft discovery/deps - Valenti	3.250
3988	3066.0	02/25/15	JPF	Email from AS re counterclaim	0.400
3989	4146.0	02/25/15	GMC	Drafted Huffman cross examination outline	3.400
3990	4147.0	02/25/15	GMC	Drafted Valenti examination outline	2.400
3991	4148.0	02/25/15	GMC	Review of Valenti deposition	1.500
3992	4149.0	02/25/15	GMC	Review of patrol guide procedures re sick leave and AWOL	0.900
3993	4150.0	02/25/15	GMC	Review of email from AS re timeline	0.400
3994	4151.0	02/25/15	GMC	Email correspondence re: major points to hit with Valenti	0.300
3995	4742.0	02/25/15	JL	Draft and research for reply to Mauriello summary judgment response motion.	2.000
3996	5106.0	02/25/15	MB	Research sham affidavit doctrine.	3.820
3997	1157.0	02/26/15	JLN	Worked on developing additional points for Marino cross	1.300
3998	1158.0	02/26/15	JLN	Meeting w/GC and JF re: outstanding items we need from trial from NS	1.100
3999	1159.0	02/26/15	JLN	Read e-mail from NS regarding new 2d Cir. 1st Amend. Decision (Matthews); read & highlighted decision	0.600
4000	1160.0	02/26/15	JLN	T/c GC regarding plaintiff's conversation with Huffman, recording of same and making transcripts of other recordings.	0.400
4001	1161.0	02/26/15	JLN	Phone call w/GC and Merry Soeto re: IAB and DAO recording	0.300

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4002	1162.0	02/26/15	JLN	E-mail conespodence w/NS and GC re: IAB recorded interviews	0.200
4003	1163.0	02/26/15	JLN	Sent client summary of new <u>Matthews</u> decision and its impact on our case	0.200
4004	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
4005	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
4006	2677.0	02/26/15	JPF	Review of Schoolcraft discovery/deps - James	3.400
4007	2878.0	02/26/15	JPF	Review of Valenti exmanination	1.250
4008	2884.0	02/26/15	JPF	Meeting w/JN and GC re: outstanding items we need from trial from NS	1.100
4009	3023.0	02/26/15	JPF	Discussion with GC re: Valenti examination	0.500
4010	4152.0	02/26/15	GMC	Drafted Valenti examination	3.400
4011	4153.0	02/26/15	GMC	Review of all recordings inventory and identifying recordings that are missing	1.800
4012	4154.0	02/26/15	GMC	Meeting w/JN and JF re: outstanding items we need from trial from NS	1.100
4013	4155.0	02/26/15	GMC	Discussion with JF re: Valenti exmanination	0.500
4014	4156.0	02/26/15	GMC	Email w/NS team re: missing recordings	0.400
4015	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
4016	4158.0	02/26/15	GMC	Phone call w/JN and Merry Soeto re: IAB and DAO recording	0.300
4017	4159.0	02/26/15	GMC	Email correspondence w/NS and JN re: IAB recorded interviews	0.250
4018	4743.0	02/26/15	JL	Review of Rule 56.1 Mauriello.	2.500
4019	5108.0	02/26/15	MB	Memo to counsel re; sham affidavit doctrine research.	4.300
4020	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
4021	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
4022	1168.0	02/27/15	JLN	E-mail exchange toNS 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
4023	1169.0	02/27/15	JLN	Reviewed preliminary list of exhibits and Indexes provided by NS	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4024	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
4025	2370.0	2/27/2015	NBS	Preparing reply papers.	5.500
4026	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
4027	4160.0	02/27/15	GMC	Review of deposition summaries by NS team	3.800
4028	4161.0	02/27/15	GMC	Email and phone correspondence w/Veritext re: transcribing IAB recordings	1.250
4029	4162.0	02/27/15	GMC	Email correspondence with NS and JN re: dep summaries, index of all exhibits, potential trial exhibits	0.400
4030	4163.0	02/27/15	GMC	Emailed confidentiality stip to Veritext for transcribers to sign	0.250
4031	5109.0	02/27/15	MB	Research re: inadmissibility of hearsay on summary judgment motions.	4.700
4032	1171.0	02/28/15	JLN	Revised cross-x for Mauriello adding sections from Dept. Adv. Transcript	2.800
4033	1172.0	02/28/15	JLN	Revised Marino cross-x draft incorporating in testimony from Dept. Adv. Transcript	2.750
4034	1173.0	02/28/15	JLN	Revised Lauterbom cross-x draft, adding all sections and points from Dept. Adv. Transcript	2.600
4035	2663.0	02/28/15	JPF	Review of Schoolcraft discovery/deps - Boston	3.750
4036	4744.0	02/28/15	JL	Review of Mauriello Rule 56.1.	1.500
4037	5110.0	02/28/15	MB	Draft issues re: reply to City memo in opposition.	6.080
4038	1174.0	03/01/15	JLN	Continued working on global case summary and opening statement outline	4.200
4039	1175.0	03/01/15	JLN	Reviewed and highlighted Mauriello EBT Volume I; took notes re: same	2.900
4040	1176.0	03/01/15	JLN	Reviewed AS dep transcript Vol. I, took notes re: same	2.900
4041	1177.0	03/01/15	JLN	Reviewed and highlighted EBT of Captain Trainor; Cross referenced E-mails referred to in deposition	2.200
4042	1178.0	03/01/15	JLN	Reviewed NYPD patrol guidelines for AWOL procedures and EDP's; took notes regarding same	0.700
4043	2615.0	03/01/15	JPF	Review of Schoolcraft discovery/deps - Broschart/Sawyer	5.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4044	1179.0	03/02/15	JLN	Reviewed AS dep Vol. II, took notes and prepared summary of most important issues raised	3.400
4045	1180.0	03/02/15	JLN	Continued adding to case summary and opening outline	3.200
4046	2664.0	03/02/15	JPF	Review of Schoolcraft discovery/deps - Sawyer/Duncan	3.750
4047	4164.0	03/02/15	GMC	Review of deposition summaries by NS team	1.400
4048	4745.0	03/02/15	JL	Review and draft summary judgment motion; reply to defendant's motion.	2.250
4049	5111.0	03/02/15	MB	Research re: collective knowledge doctrine.	4.000
4050	1181.0	03/03/15	JLN	Reviewed final volume of AS transcript; notes and bullet point summary of same	2.800
4051	1182.0	03/03/15	JLN	Worked on Mauriello cross-x incorporating sections from Volume II of deposition	1.100
4052	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
4053	1867.0	03/03/15	NB	E-mail Marino deposition to JLN	0.100
4054	2371.0	3/3/2015	NBS	Drafting reply.	7.500
4055	3109.0	03/03/15	JPF	Letter to Ct. from Kretz correcting 56.1 statement errors	0.300
4056	4165.0	03/03/15	GMC	Review and revise Huffman cross examination outline	1.800
4057	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
4058	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
4059	5112.0	03/03/15	MB	Memo to counsel re: collective knowledge doctrine research.	5.160
4060	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
4061	1185.0	03/04/15	JLN	Started reviewed of Bernier's dep. highlighted and took notes re same	2.100
4062	1186.0	03/04/15	JLN	Worked on adding deposition testimony into Lauterborn cross	1.600
4063	1187.0	03/04/15	JLN	Reviewed dep. of Dr. Patel	0.900
4064	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
4065	1189.0	03/04/15	JLN	Phone and E-mail w/GC re: witness list	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4066	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
4067	1191.0	03/04/15	JLN	E-mail exchange GC regarding Velez PBA transcript, copy of same	0.100
4068	1192.0	03/04/15	JLN ⁴	E-mail exchange with GC regarding identity of other IAB investigator	0.100
4069	1193.0	03/04/15	JLN	E-mail to GC with revised witness list	0.100
4070	2372.0	3/4/2015	NBS	Drafting reply.	10.500
4071	2628.0	03/04/15	JPF	Review of Schoolcraft discovery/deps - Duncan	4.750
4072	2751.0	03/04/15	JPF	Research of racial comments & exclusion for motion in lim	2.300
4073	4167.0	03/04/15	GMC	Review and revise Huffman cross examination outline	2.300
4074	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
4075	4169.0	03/04/15	GMC	Phone and email call w/JN re: witness list	0.300
4076	4170.0	03/04/15	GMC	E-mail exchange JN regarding Velez PBA transcript, copy of same	0.100
4077	4171.0	03/04/15	GMC	E-mail exchange with JN regarding identity of other IAB investigator	0.100
4078	4172.0	03/04/15	GMC	E-mail from JN with revised witness list	0.100
4079	4747.0	03/04/15	JL	Review of case file and research for summary judgment motion reply brief.	7.250
4080	1194.0	03/05/15	JLN	Continued working on cross of Lauterborn	3.750
4081	1195.0	03/05/15	JLN	Continued working on Lauerborn cross-x	3.600
4082	1196.0	03/05/15	JLN	Continued working on Lauterborn cross	2.100
4083	1197.0	03/05/15	JLN	Reviewed veritext transcript for Lauterborn and LS	0.300
4084	2373.0	3/5/2015	NBS	Drafting reply.	10.500
4085	2704.0	03/05/15	JPF	Research on prior litigiousness exclusion	3.100
4086	4173.0	03/05/15	GMC	Received and reviewed (for accuracy) transcribed IAB recordings from Veritext	2.750
4087	4748.0	03/05/15	JL	Draft, discuss and review summary judgment motion.	8.500
4088	5113.0	03/05/15	MB	Review and track proposed changes to Reply motion draft.	5.500
4089	1198.0	03/06/15	JLN	Continued working on Marino cross; all relevent text from deposition incorporated into cross	4.200
4090	1199.0	03/06/15	JLN	Continued working on Marino cross	3.700

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4091	1200.0	03/06/15	JLN	Continued working on Marino cross	1.600
4092	1201.0	03/06/15	JLN	Discussion w/ JF & GC re proposed witnesses	0.600
4093	1202.0	03/06/15	JLN	E-mail exchange with client and LS regarding witness list and case update	0.100
4094	2374.0	3/6/2015	NBS	Drafting reply.	9.500
4095	2771.0	03/06/15	JPF	Research on limitations of witness examinations	2.100
4096	2948.0	03/06/15	JPF	Review of email from AS w/ witness suggestions	0.800
4097	2984.0	03/06/15	JPF	Discussion w/ JN & GC re proposed witnesses	0.600
4098	4174.0	03/06/15	GMC	Review of defendants Reply memorandums for SMJ	2.250
4099	4175.0	03/06/15	GMC	Discussion w/JN & JF re proposed witnesses	0.600
4100	4176.0	03/06/15	GMC	Review of AS proposed witness list	0.300
4101	4749.0	03/06/15	JL	Review and edit of summary judgment reply.	3.500
4102	5114.0	03/06/15	MB	Final review/edit of Reply papers.	4.000
4103	1203.0	03/07/15	JLN	Continued working on case summary and opening outline, incorporated all important facts for same	3.250
4104	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
4105	2695.0	03/07/15	JPF	Research on press & statements made by counsel	3.250
4106	5115.0	03/07/15	MB	Prepare police expert Prof. Eterno deposition summary.	5.050
4107	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
4108	1206.0	03/08/15	JLN	Continued reviewing Dr. Isakov's dep and extracting important points for use in opening statement.	2.400
4109	1207.0	03/08/15	JLN	Reviewed transcripts of Dr. Dhar and Dr. Lwin; took notes re: same	1.900
4110	2611.0	03/08/15	JPF	Review of Deposition of AS with Exhibits	6.250
4111	5116.0	03/08/15	MB	Prepare police expert Prof. Eterno's deposition summary.	7.050
4112	1208.0	03/09/15	JLN	Review of plaintiffs consolidated 56.1	1.000
4113	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

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4114	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
4115	1211.0	03/09/15	JLN	T/c NS regarding R. 56 admissions; impressions of Lamstein; striking Lamstein affidavit; IAB recordings on Marino/Lautemom, and meeting on Thursday	0.400
4116	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
4117	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
4118	1868.0	03/09/15	NB	Printed Plaintiff's Rule 56.1 Statement for JLN to review	0.100
4119	2375.0	3/9/2015	NBS	Research on new evidence issue; telephone conference with team; revising letter to Court on Matthews.	4.500
4120	2668.0	03/09/15	JPF	Review of reply memo & supporting docs filed by all defendants	3.600
4121	2726.0	03/09/15	JPF	Research on IAB conclusions & admissibility	2.750
4122	4177.0	03/09/15	GMC	Review of plaintiff's consolidated 56.1	1.000
4123	4178.0	03/09/15	GMC	Review of Marino deposition	0.800
4124	4179.0	03/09/15	GMC	Phone call w/NS re consolidated 56.1	0.400
4125	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
4126	4181.0	03/09/15	GMC	Review of Lamstein deposition errata sheet	0.300
4127	4750.0	03/09/15	JL	Research and draft letter to Court re: Matthews.	2.500
4128	5117.0	03/09/15	MB	Draft Eterno Deposition Summary; team conference call.	6.900
4129	1214.0	03/10/15	JLN	Continued working on Mauriello cross-x	1.800
4130	1215.0	03/10/15	JLN	Reviewed NS' Rule 56.1 Statement global summary of all facts admitted; took notes re: same	1.400
4131	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
4132	1217.0	03/10/15	JLN	T/c LS follow up on call and issues that arose in Larry's deposition	0.400
4133	2376.0	3/10/2015	NBS	Review of cases on s/i; review of reply submission.	3.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4134	2697.0	03/10/15	JPF	Research on ultimate issue, bolstering w/ prior litigation for Bernier	3.250
4135	2807.0	03/10/15	JPF	Discussion with GC to help outline AS direct examination	1.500
4136	4182.0	03/10/15	GMC	Began drafting AS direct examination	4.800
4137	4183.0	03/10/15	GMC	Discussion with JF to help outline AS direct examination	1.500
4138	4184.0	03/10/15	GMC	Email and phone correspondence w/NS team re Schoolcraft recordings of 10/31	0.600
4139	4751.0	03/10/15	JL	Telephone conference with Nat.	0.500
4140	5118.0	03/10/15	MB	Draft Prof. Eterno deposition summary.	5.920
4141	1218.0	03/11/15	JLN	Continued working on Mauriello cross-x	3.700
4142	1219.0	03/11/15	JLN	Continued working on Mauriello cross-x	2.600
4143	1220.0	03/11/15	JLN	E-mail exchange with NS regarding Mauriello meds & Marino steroid trial	0.100
4144	1221.0	03/11/15	JLN	E-mail w/NS and GC re: exhibits and meeting	0.100
4145	1869.0	03/11/15	NB	same	1.800
4146	2648.0	03/11/15	JPF	Review of Discovery and Depositions - Weiss	4.100
4147	4185.0	03/11/15	GMC	Draft AS direct examination, review depositions, audios	5.500
4148	4186.0	03/11/15	GMC	Email w/NS and JN re: exhibits and meeting	0.100
4149	4752.0	03/11/15	JL	Meeting with Nat Smith re: Matthews letter and response; trial strategy.	2.500
4150	5119.0	03/11/15	MB	Prepare Prof. Eterno deposition summary.	6.100
4151	1222.0	03/12/15	JLN	Mauriello cross-x continued	3.500
4152	1223.0	03/12/15	JLN	Meeting w/ GC, JF, NS, and JL re trial, motions	2.400
4153	1224.0	03/12/15	JLN	Meeting w/ GC to follow up with specific issues discussed at today's meeting	0.750
4154	1870.0	03/12/15	NB	Read deposition transcript of James; digested same	0.750
4155	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
4156	2377.0	3/12/2015	NBS	Research on new evidence and new arguments on reply; meeting with team.	6.500
4157	2741.0	03/12/15	JPF	Meeting w/ GC, JN, NS, and Jon Lenoir ("JL") re trial, motions	2.400
4158	3031.0	03/12/15	JPF	Email from AS re additional witnesses for trial	0.500
4159	4187.0	03/12/15	GMC	Meeting w/ JF, JN, NS, and Jon L re trial, motions	2.400
4160	4188.0	03/12/15	GMC	Draft AS direct examination, review depositions, audios	2.250
4161	4189.0	03/12/15	GMC	Email from AS re: witness list	0.100

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4162	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
4163	5120.0	03/12/15	MB	Prepare Prof. Eterno deposition summary.	4.830
4164	5121.0	03/12/15	MB	Meeting with Team re new issues on reply.	3.000
4165	5122.0	03/12/15	MB	Revise NYPD jury instructions; distribute revised charges to counsel.	1.700
4166	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
4167	1226.0	03/13/15	JLN	Review of proposed jury instructions from SK	0.500
4168	1227.0	03/13/15	JLN	E-mail to GC re: case theory	0.200
4169	2378.0	3/13/2015	NBS	Meeting with team re: trial preparation; drafting letter to Court.	2.800
4170	2892.0	03/13/15	JPF	Review jury instructions from NS team	1.100
4171	4190.0	03/13/15	GMC	Draft AS direct examination, review deps, audios	4.300
4172	4191.0	03/13/15	GMC	Review of proposed jury instructions drafted by NS team	0.400
4173	4192.0	03/13/15	GMC	Review of email from JN re:	0.250
4174	4754.0	03/13/15	JL	Smith meeting at 111 Broadway for review of trial strategy and responsibilities with new team.	2.500
4175	5123.0	03/13/15	MB	Meeting Nat's office with new team re division of upcoming work.	4.000
4176	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
4177	1229.0	03/14/15	JLN	Continued revising and editing Lauterborn cross	2.750
4178	1230.0	03/14/15	JLN	Added relevant quotes from home invasion into Marino cross-x; continued revising & editing Marino cross	2.400
4179	2645.0	03/14/15	JPF	Draft motion in lim	4.200
4180	2665.0	03/14/15	JPF	Draft motion in lim	3.600
4181	1231.0	03/15/15	JLN	Continued Revising and editing Lauterborn cross	3.900
4182	1232.0	03/15/15	JLN	Continued revising and editing Lauterborn cross	3.750
4183	2379.0	3/15/2015	NBS	Research on motion to strike.	4.500
4184	1233.0	03/16/15	JLN	Continued revising and editing Mauriello cross	3.100
4185	2380.0	3/16/2015	NBS	Drafting motion to strike.	7.500
4186	2796.0	03/16/15	JPF	Review of Direct Examinaiton Outline for AS	1.750
4187	2832.0	03/16/15	JPF	Discussion with GC re: AS direct examination and points to cover, strategy	1.300
4188	4193.0	03/16/15	GMC	Draft AS direct examination, spoke to AS on phone, developed ideas re points to cover	3.400

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4189	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
4190	4195.0	03/16/15	GMC	Discussion with JF re: AS direct examination and points to cover, strategy	1.300
4191	4196.0	03/16/15	GMC	Drafted and sent email to NS team re: missing documents	0.300
4192	4755.0	03/16/15	JL	Review motion response re: Lamstein Affidavit and reply to attorney motion.	2.500
4193	5124.0	03/16/15	MB	Review Defendants Reply memos.	3.000
4194	5125.0	03/16/15	MB	Draft Prof. Eterno's direct examination for trial.	2.100
4195	1234.0	03/17/15	JLN	Reviewed appeal meeting and also IAB interview of Gough, Sawyer and Dunch	1.900
4196	1235.0	03/17/15	JLN	Continued working on Lauterborn cross	1.600
4197	1236.0	03/17/15	JLN	Review of interview memo of Stretmoyers	0.200
4198	2381.0	3/17/2015	NBS	Drafting motion to strike Lamstein Declaration.	5.500
4199	2640.0	03/17/15	JPF	Draft motion in lim	4.250
4200	4197.0	03/17/15	GMC	Draft AS direct examination, reviewed docs, memos, recordings	6.250
4201	4198.0	03/17/15	GMC	Review of interview memo of Stretmoyers	0.300
4202	5126.0	03/17/15	MB	Review/comment March 17 Letter to the court.	1.200
4203	1237.0	03/18/15	JLN	Continued working on Lauterborn cross	1.700
4204	1238.0	03/18/15	JLN	Reviewed facts in SJ motions for use in opening outline; took notes regarding same	1.400
4205	1239.0	03/18/15	JLN	E-mail w/GC re Schoolcraft direct	0.200
4206	1240.0	03/18/15	JLN	E-mail exchange with NS regarding subpoenas and points for Lamstein cross	0.100
4207	1872.0	03/18/15	NB	Read deposition transcript of Lamstein; digested same	1.600
4208	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
4209	4199.0	03/18/15	GMC	Began Draft James cross examination, reviewed docs, memos, hospital records	5.400
4210	4200.0	03/18/15	GMC	Drafted and emailed subpoenas of City defendants to NS	0.750
4211	4201.0	03/18/15	GMC	Email w/JN re Schoolcraft direct	0.250
4212	4202.0	03/18/15	GMC	Review of NS striking Lamstein report	0.250
4213	4756.0	03/18/15	JL	Review of trial; prepare exhibits.	0.500
4214	5127.0	03/18/15	MB	Draft Prof. Eterno's direct examination for trial.	6.500

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4215	1241.0	03/19/15	JLN	Continued reviewing PES records; reviewed file and handwritten notes of Dr. Lamstein; took notes re: same	3.700
4216	1242.0	03/19/15	JLN	Started review of NYPD Psychological Evaluation Section ("PES") file for AS; notes on same.	2.100
4217	1243.0	03/19/15	JLN	Continued work on Mauriello cross	1.700
4218	1244.0	03/19/15	JLN	Review of NS verdict sheet; made edits revisions to same	0.400
4219	1245.0	03/19/15	JLN	E-mail comments and feedback re: verdict sheet	0.300
4220	1246.0	03/19/15	JLN	E-mail exchange with GC regarding Jamaica	0.100
4221	2680.0	03/19/15	JPF	Draft motion in lim	3.300
4222	2775.0	03/19/15	JPF	Review of James Cross outline	2.100
4223	2958.0	03/19/15	JPF	Discussion with GC re: James cross examinaiton	0.750
4224	4203.0	03/19/15	GMC	Draft James cross examination, reviewed docs, memos, hospital records	3.900
4225	4204.0	03/19/15	GMC	Discussion with JF re: James cross examinaiton	0.750
4226	4205.0	03/19/15	GMC	Review of NS verdict sheet	0.250
4227	5128.0	03/19/15	MB	Draft Prof. Eterno's direct examination for trial.	4.300
4228	1247.0	03/20/15	JLN	Continued working on Mauriello cross-x	4.600
4229	1248.0	03/20/15	JLN	Continued working on Mauriello cross	2.900
4230	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
4231	1873.0	03/20/15	NB	Read deposition transcript of Lauterborn; digested same	2.100
4232	2383.0	3/20/2015	NBS	Telephone conference with Walter Kretz re: Kickstarter movie; email with trial team re; inquiry.	0.500
4233	3176.0	03/20/15	JPF	Research on the "movie" project referenced in Kretz's email	0.250
4234	3314.0	03/20/15	JPF	Email from NS re a movie about AS that Kretz wants discovery on	0.100
4235	3372.0	03/20/15	JPF	Response email to NS	0.100
4236	4206.0	03/20/15	GMC	Began Draft Sawyer cross examination, reviewed docs, memos, hospital records, audio	4.800
4237	4207.0	03/20/15	GMC	Email re Kretz finding Schoolcraft	0.250
4238	5129.0	03/20/15	MB	Draft Prof. Eterno's direct examination for trial.	3.600
4239	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4240	1250.0	03/22/15	JLN	Continued working on Mauriello cross	3.700
4241	1251.0	03/22/15	JLN	Continued working on Mauriello cross	2.600
4242	1252.0	03/22/15	JLN	Mauriello cross-x continued	2.100
4243	1253.0	03/22/15	JLN	Review of NS letter re Lamstein and E-mailed comments	0.400
4244	2385.0	3/22/2015	NBS	Review of exhibits for JPTO; revise letter to Court.	3.500
4245	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
4246	4208.0	03/22/15	GMC	Review of NS letter re Lamstein and emailed comments	0.400
4247	4757.0	03/22/15	JL	Trial exhibits preparation.	1.500
4248	1254.0	03/23/15	JLN	Continued working on Mauriello cross	3.900
4249	1255.0	03/23/15	JLN	Meeting with GC regarding important points of Sgt/ James and Sgt. Sawyer's testimony	0.400
4250	1256.0	03/23/15	JLN	Phone call w/GC re: James call to Lauterborn from hospital	0.400
4251	1257.0	03/23/15	JLN	Phone correspondence w/ GC re: AS discussion of Home Invasion	0.300
4252	1258.0	03/23/15	JLN	E-mail correspondence re: Schoolcraft film	0.200
4253	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
4254	1260.0	03/23/15	JLN	Locate and send portions of AS deposition testimony to help with GC crosses	0.200
4255	1261.0	03/23/15	JLN	Review of Kretz supplemental interrogatories re Schoolcraft movie	0.200
4256	1262.0	03/23/15	JLN	E-mail exchange with NS with NS regarding Kretz's new interogatories for Adrian regarding Schoolcraft movie	0.100
4257	1263.0	03/23/15	JLN	E-mail to GC portion ofLauterbom cross re: Sgt. James	0.100
4258	1874.0	03/23/15	NB	Downloaded, printed and bound second set of filings by all defendants for JLN to review	0.400
4259	1875.0	03/23/15	NB	Printed Huffman QAD for JLN	0.100
4260	2386.0	3/23/2015	NBS	Prepare witness and exhibit list; rewrite letter to Court.	4.500
4261	2829.0	03/23/15	JPF	Review of Sawyer cross examaintion outline	1.400
4262	2991.0	03/23/15	JPF	Discussion with GC re: Sawyer points for cross examination	0.600
4263	3078.0	03/23/15	JPF	Reciept and review of Kretz's demands re: the student "movie" about AS	0.400
4264	4209.0	03/23/15	GMC	Draft Sawyer cross examination, reviewed docs, memos, hospital records, audio	2.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4265	4210.0	03/23/15	GMC	Discussion with JF re: Sawyer points for cross examination	0.600
4266	4211.0	03/23/15	GMC	Various email correspondence w/NS re: verdict sheet, Lamstein letter and exhibit list/chart	0.500
4267	4212.0	03/23/15	GMC	Meeting with JN regarding important points of Sgt/James and Sgt. Sawyer's testimony	0.400
4268	4213.0	03/23/15	GMC	Phone call w/JN re: James call to Lauterborn	0.400
4269	4214.0	03/23/15	GMC	Phone correspondence w/ JN re: AS discussion of Home Invasion	0.300
4270	4215.0	03/23/15	GMC	Email correspondence re: Schoolcraft short film	0.250
4271	4216.0	03/23/15	GMC	Email to NS team re: PO Miller IAB tape	0.250
4272	4217.0	03/23/15	GMC	Locate and send AS deposition testimony to help with JN crosses	0.250
4273	4218.0	03/23/15	GMC	Review of Kretz supplemental interrogatories re Schoolcraft movie	0.250
4274	4219.0	03/23/15	GMC	Email from JN w/portion of Lauterborn cross re James	0.100
4275	4220.0	03/23/15	GMC	Email to NS re: Sawyer memo book	0.100
4276	4758.0	03/23/15	JL	Meeting with Nat MSith at 100 Wall Street; prepare trial exhibits and witness list.	4.500
4277	1264.0	03/24/15	JLN	Continued working on Mauriello cross	3.900
4278	1265.0	03/24/15	JLN	Continued work on Mauriello cross	1.700
4279	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
4280	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
4281	1268.0	03/24/15	JLN	E-mail exchange with SK regarding issues requiring special jury charges	0.200
4282	4221.0	03/24/15	GMC	Updated Huffman cross examination w/roll call recordings, QAD findings	1.750
4283	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
4284	4223.0	03/24/15	GMC	Email and phone correspondence w/JN re: Huffman QAD connection	0.300
4285	4759.0	03/24/15	JL	Draft/prepare jury verdict sheet template. Research re jury instruction re elements of complaint.	4.500
4286	1269.0	03/25/15	JLN	Continued working on Mauriello cross-x (attack counterclaim)	3.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4287	1270.0	03/25/15	JLN	Continued working on Mauriello cross-x (attack counterclaim)	2.900
4288	1271.0	03/25/15	JLN	Continued working on Mauriello cross-x	2.100
4289	1272.0	03/25/15	JLN	T/c with clients regarding strategy for trial and next steps for moving forward	0.900
4290	1273.0	03/25/15	JLN	E-mail correspondence w/GC and NS regarding regular meetings	0.200
4291	1274.0	03/25/15	JLN	E-mail exchange with team regarding Yeager (retired) and setting up meeting for Fridays	0.100
4292	1876.0	03/25/15	NB	Read deposition transcript of Silverman; digested same	0.600
4293	1877.0	03/25/15	NB	Printed, reviewed and signed confidentiality agreement for myself; had JLN review and sign same	0.200
4294	1878.0	03/25/15	NB	E-mailed Confidentiality agreement to Merry Soelanto signed by JLN and myself	0.100
4295	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
4296	3020.0	03/25/15	JPF	Discussion w/ SK re motions in lim	0.500
4297	4224.0	03/25/15	GMC	Drafted email to NS team re: locating points of AS Audio recordings	0.250
4298	4225.0	03/25/15	GMC	Email correspondence w/JN and NS regarding regular meetings	0.250
4299	4760.0	03/25/15	JL	Review of of trial preparation - especially Lubit Direct Outline.	2.500
4300	4852.0	3/25/2015	HS	prepared request to charge	1.250
4301	5130.0	03/25/15	MB	Conference call w/ Nat re: status and assignments moving forward.	0.500
4302	1275.0	03/26/15	JLN	Finished cross-x outline of Mauriello (counterclaim)	4.600
4303	1276.0	03/26/15	JLN	Continued cross-x of Mauriello	3.900
4304	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
4305	1278.0	03/26/15	JLN	E-mail correspondence w/AS re Kretz letter	0.100
4306	1279.0	03/26/15	JLN	E-mail to GC re: medical records	0.100
4307	1280.0	03/26/15	JLN	Review of Kretz letter re film	0.100
4308	1281.0	03/26/15	JLN	Reviewed letter from Kress regarding Supplemental Interrogatories on Schoolcraft movie and e-mail exchange regarding same	0.100
4309	2388.0	3/26/2015	NBS	Review of production (discs & cd's) for plaintiff's trial exhibit.	5.500
4310	4226.0	03/26/15	GMC	Updated AS direct examination	3.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4311	4227.0	03/26/15	GMC	Review of AS medical records from JHMC, Sure, Luell, Forrest Hills	2.300
4312	4228.0	03/26/15	GMC	Email correspondence w/AS re Kretz Jetter	0.100
4313	4229.0	03/26/15	GMC	Email from JN re: medical records	0.100
4314	4230.0	03/26/15	GMC	Review of Kretz letter re film	0.100
4315	5131.0	03/26/15	MB	Team meeting at Nat's new office; review Prof. Eterno's direct examination outline.	5.000
4316	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
4317	1283.0	03/27/15	JLN	Reviewed and edited opening statements	1.700
4318	1284.0	03/27/15	JLN	Phone conference with GC, NS, JL	1.000
4319	1285.0	03/27/15	JLN	Various E-mail correspondence GC and NS re: meeting and missing IAB Lauterborn recording	0.400
4320	1286.0	03/27/15	JLN	Review of Sgt. Chu and Scott memo	0.300
4321	1287.0	03/27/15	JLN	E-mail correspondence between GC and Merry Soete re: AS Audio Clips	0.100
4322	1288.0	03/27/15	JLN	E-mail to GC regarding conference call for assorted trial issues today	0.100
4323	1289.0	03/27/15	JLN	T/c GC regarding preparing for conference call with NS today and using Veritext software	0.100
4324	1879.0	03/27/15	NB	Converted Schoolcraft opening statement to MS Word	0.100
4325	2389.0	3/27/2015	NBS	Review of production for JPTO; emails to opposing counsel; emails to co-counsel re: status.	5.500
4326	2631.0	03/27/15	JPF	Draft motion in lim	4.600
4327	2682.0	03/27/15	JPF	Research on motion in lim re IAB doc admission & opinions in them	3.300
4328	2762.0	03/27/15	JPF	Review of Draft Direct Examination of AS from GC	2.250
4329	2908.0	03/27/15	JPF	Phone conference with JN, GC, NS, JL	1.000
4330	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
4331	4232.0	03/27/15	GMC	Phone conference with JN, NS, JF, John Lenoir ("JL")	1.000
4332	4233.0	03/27/15	GMC	Review of documents produced by Graham Raymond	0.500
4333	4234.0	03/27/15	GMC	Various email correspondence JN and NS re: Meeting missing IAB Lauterborn recording	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4334	4235.0	03/27/15	GMC	Review of Sgt. Chu and Scott memo	0.300
4335	4236.0	03/27/15	GMC	Review of emails w/City re subpoenas	0.250
4336	4237.0	03/27/15	GMC	Email correspondence w/Merry Soetano re: AS audio clips	0.100
4337	4238.0	03/27/15	GMC	Phone call JN regarding preparing for conference call with NS today and using Veritext software	0.100
4338	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
4339	1290.0	03/28/15	JLN	Reviewed highlighted sections from Lamstein Dep.; cross-referenced with PES file and Lamstein notes on Schoolcraft	3.200
4340	1291.0	03/28/15	JLN	Reviewed GC's rough draft of AS direct	1.400
4341	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
4342	1293.0	03/28/15	JLN	Reviewed IAB Summary on Dr. Lamstein's interview; took notes re: same	0.400
4343	2686.0	03/28/15	JPF	Draft motion in lim	3.250
4344	2772.0	03/28/15	JPF	Research on motion in lim conclusions re credibility admissibility	2.100
4345	4239.0	03/28/15	GMC	Emailed JN and NS rough draft of AS direct	0.100
4346	4762.0	03/28/15	JL	Update Trial Memo	1.500
4347	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
4348	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
4349	1295.0	03/29/15	JLN	Reviewed Veritext transcripts and recordings from Home Invasion, began creating audio clips for trial	1.750
4350	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
4351	1297.0	03/29/15	JLN	Reviewed Dr. Halpren's Ruder's report; highlighted same	0.300
4352	2390.0	3/29/2015	NBS	Review of discovery record for JPTO and witness cross.	7.500
4353	4240.0	03/29/15	GMC	Review of AS email, timeline, records	0.400
4354	4763.0	03/29/15	JL	Prepare expert witness direct; draft jury instruction round up.	4.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4355	5133.0	03/29/15	MB	Draft proposed jury instructions for Medical Defendants; draft state false imprisonment charge.	5.700
4356	5134.0	03/29/15	MB	Make changes to diagram of the Glendale apt.	1.700
4357	1298.0	03/30/15	JLN	Reviewed, revised and edited Lauterbom cross-x	3.700
4358	1299.0	03/30/15	JLN	Added sections to opening statement	1.900
4359	1300.0	03/30/15	JLN	Phone call w/GC re: Citys request to adjourn	0.300
4360	1301.0	03/30/15	JLN	T/c GC & JF regarding admissibility of tape recorded statements of persons interviewed by IAB	0.300
4361	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
4362	1303.0	03/30/15	JLN	E-mail from city re amendment opposition	0.100
4363	1304.0	03/30/15	JLN	E-mail from GC w/AB report	0.100
4364	1880.0	03/30/15	NB	Printed IAB Documents for JLN; bound & collated same	0.400
4365	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
4366	2634.0	03/30/15	JPF	Draft motion in lim	4.400
4367	3113.0	03/30/15	JPF	Phone call with JN & GC regarding admissibility of tape recorded statements of persons interviewed by IAB	0.300
4368	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
4369	4241.0	03/30/15	GMC	Began Draft Broschart cross examination, reviewed docs, memos, audio	4.500
4370	4242.0	03/30/15	GMC	Phone call JN & JF regarding admissibility of tape recorded statements of persons interviewed by IAB	0.300
4371	4243.0	03/30/15	GMC	Phone call w/JN re: Citys request to adjourn	0.300
4372	4244.0	03/30/15	GMC	Review of AS letter requesting conference	0.250
4373	4245.0	03/30/15	GMC	Email from JN w/IAB report	0.100
4374	4764.0	03/30/15	JL	Trial preparation; expect witness direct - Eterno, Lubit, Halpren-Ruder.	6.000
4375	5135.0	03/30/15	MB	Call with Nat re: Glendale diagram/jury charges.	0.500
4376	1305.0	03/31/15	JLN	Continued working on various new sections on opening statement outline	3.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4377	1306.0	03/31/15	JLN	Continued highlighting, revising and editing Lauterborn cross, integrated newly found info from 2nd IAB interview	2.800
4378	1307.0	03/31/15	JLN	E-mail correspondence w/NS and GC re trial witnesses and exhibits	0.200
4379	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
4380	1881.0	03/31/15	NB	Printed and bound Caughey and Weiss Interviews	0.200
4381	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
4382	2650.0	03/31/15	JPF	Draft motion in lim	3.900
4383	4246.0	03/31/15	GMC	Draft Broschart cross examination, reviewed docs, memos, audio	3.500
4384	4247.0	03/31/15	GMC	Email correspondence w/NS and JN re trial witnesses and exhibits	0.250
4385	4765.0	03/31/15	JL	Prepare trial examination - Eterno, Lubit, and Halpren-Ruder.	6.500
4386	5136.0	03/31/15	MB	Draft proposed jury instructions Medical Defendants; draft corporate negligence charge.	5.500
4387	1309.0	04/01/15	JLN	Continued working on opening statement	2.500
4388	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
4389	1311.0	04/01/15	JLN	E-mail exchange regarding setting up meeting for tomorrow with trial team	0.100
4390	1312.0	04/01/15	JLN	E-mail re: meeting w/GC, and NS team	0.100
4391	1882.0	04/01/15	NB	Printed and bound exhibit list and witness list for Court	0.200
4392	1883.0	04/01/15	NB	Printed deps of Huffman, James, Hanlon, Halpren, Gough, Ferrara, Duncan, Caughey, Broschart, Bernier and bound	0.700
4393	1884.0	04/01/15	NB	Compiled, sorted, copied and collated multiple trial exhibits	0.600
4394	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
4395	2658.0	04/01/15	JPF	Draft motion in lim	3.750
4396	4248.0	04/01/15	GMC	Reviewed and revised Broschart cross examination	3.900

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4397	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
4398	4250.0	04/01/15	GMC	Email re: meeting w/JN, and NS team	0.100
4399	4766.0	04/01/15	JL	Prepare expert witness testimony and trial notebook.	6.500
4400	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
4401	1313.0	04/02/15	JLN	Working on revising and edits Marino's cross-x	3.700
4402	1314.0	04/02/15	JLN	Resumed working on Marino cross-x	2.600
4403	1315.0	04/02/15	JLN	Meeting with GC and NS team	1.900
4404	1316.0	04/02/15	JLN	Continued work on opening statement	1.700
4405	1317.0	04/02/15	JLN	Drafted and sent follow up E-mails w/NS team and GC after meeting re: exhibits	0.500
4406	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
4407	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
4408	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
4409	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
4410	1322.0	04/02/15	JLN	T/c with JF regarding area of expertise and scope of testimony for Eterno	0.100
4411	1885.0	04/02/15	NB	Printed, collated and bound AS direct outline	0.200
4412	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
4413	2616.0	04/02/15	JPF	Draft motion in lim	5.250
4414	2777.0	04/02/15	JPF	Meeting with JN and NS team	1.900
4415	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4416	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
4417	3366.0	04/02/15	JPF	Phone call with JN regarding area of expertise and scope of testimony for Eterno	0.100
4418	4251.0	04/02/15	GMC	Meeting with JN and NS team	1.900
4419	4252.0	04/02/15	GMC	Drafted and sent follow up emails w/NS team and JN after meeting re: exhibits	0.500
4420	4253.0	04/02/15	GMC	Review of SK jury instructions along with email re: same	0.300
4421	4254.0	04/02/15	GMC	Email and phone correspondence with veritext re: Lauterborn audio	0.250
4422	4255.0	04/02/15	GMC	Phone call w/NS re IAB transcripts	0.250
4423	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
4424	4767.0	04/02/15	JL	Meeting with trial team; research expert testimony for direct testimony and prep for cross.	5.000
4425	5138.0	04/02/15	MB	Trial Team meeting re trial prep, jury instructions.	0.100
4426	1323.0	04/03/15	JLN	E-mail rough draft from JF and reviewed	4.400
4427	1324.0	04/03/15	JLN	Continued working on Marino's cross-x outline	4.250
4428	1325.0	04/03/15	JLN	Worked on several more sections of opening statement	3.700
4429	1326.0	04/03/15	JLN	Reviewed Final IAB report; took notes re: same	2.400
4430	1327.0	04/03/15	JLN	Worked on opening statement; adding new section on QAD findings	1.750
4431	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
4432	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
4433	1330.0	04/03/15	JLN	Review of revised SK jury instructions	0.200
4434	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
4435	1332.0	04/03/15	JLN	E-mail to GC including AS performance report	0.100
4436	2395.0	4/3/2015	NBS	Prepare for cross of Bernier; review of chart and examination before trial.	5.500
4437	2637.0	04/03/15	JPF	Review and edit motion in lim	4.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4438	3202.0	04/03/15	JPF	Phone call with JN regarding progress on motion in limine and clarification of certain factual issues	0.200
4439	3335.0	04/03/15	JPF	Email rough draft of Mot. In Lim. to JN for review	0.100
4440	4257.0	04/03/15	GMC	Updated revised and drafted Broschart cross examination outline	5.500
4441	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
4442	4259.0	04/03/15	GMC	Review of revised Scott Korenbaum ("SK") jury instructions along with email re: same	0.250
4443	4260.0	04/03/15	GMC	Review email from JN including AS performance report	0.100
4444	4768.0	04/03/15	JL	Research and prepare expert witness; direct and cross	4.500
4445	5139.0	04/03/15	MB	Combine NYPD and Medical Defendants Jury Instructions.	3.950
4446	1333.0	04/04/15	JLN	Reviewed revised verdict sheet and revised exhibit list sent by NS	0.400
4447	2396.0	4/4/2015	NBS	Prepare cross of Bernier; review of trial exhibits; review of draft jury instructions.	6.500
4448	2683.0	04/04/15	JPF	Review and edit motion in lim	3.300
4449	4261.0	04/04/15	GMC	Email from NS re: revised exhibit list	0.250
4450	4262.0	04/04/15	GMC	Review of revised verdict sheet from NS	0.100
4451	4769.0	04/04/15	JL	Trial memo preparation.	2.000
4452	1334.0	04/05/15	JLN	Continued working on Marino cross	4.400
4453	1335.0	04/05/15	JLN	E-mail correspondence w/GC and NS re revised exhibit list	0.200
4454	1336.0	04/05/15	JLN	E-mail to JF re edits to motion	0.200
4455	1337.0	04/05/15	JLN	E-mail to GC including AS W2's	0.100
4456	2397.0	4/5/2015	NBS	Prepare of Isakov cross; review of examination before trial and chart.	4.500
4457	3155.0	04/05/15	JPF	Email from JN re edits to motion	0.250
4458	3385.0	04/05/15	JPF	Response to email	0.100
4459	4263.0	04/05/15	GMC	Email correspondence w/JN and NS re revised exhibit list	0.250
4460	4264.0	04/05/15	GMC	Review email from JN including AS W2s	0.100
4461	1338.0	04/06/15	JLN	Continued working on Marino cross-x outline	3.800
4462	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
4463	1340.0	04/06/15	JLN	Reviewed JF MIL; edits to same	1.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4464	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
4465	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
4466	1343.0	04/06/15	JLN	Phone call w/GC and NS re: trial exhibits	0.500
4467	1344.0	04/06/15	JLN	Reviewed GC's draft direct of plaintiff, made notes on same	0.500
4468	1345.0	04/06/15	JLN	Read NS edits to MIL	0.300
4469	1346.0	04/06/15	JLN	E-mail to rest of team regarding specific comments and suggestions on verdict sheet	0.200
4470	1347.0	04/06/15	JLN	E-mail from JF re: draft Motion in Limine ("MIL")	0.100
4471	1348.0	04/06/15	JLN	E-mail to rest of team regarding additional exhibits that should be added to list	0.100
4472	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
4473	1350.0	04/06/15	JLN	Read e-mail and letter from defense counsel regarding application for adjournment	0.100
4474	1351.0	04/06/15	JLN	Reviewed e-mail exchange between GC and NS regarding PBA letter from AS to Stu London	0.100
4475	2398.0	4/6/2015	NBS	Email team; telephone call to Scott Korenbaum re: jury change; prepare Isakov cross.	2.500
4476	2734.0	04/06/15	JPF	Review and edit motion in lim	2.600
4477	2895.0	04/06/15	JPF	Review of NS comments	1.100
4478	2923.0	04/06/15	JPF	Review of revised SK jury instructions	0.900
4479	3324.0	04/06/15	JPF	Email motion to team for review	0.100
4480	4265.0	04/06/15	GMC	Review and revised JF MIL	1.250
4481	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
4482	4267.0	04/06/15	GMC	Phone call w/JN and NS re: trial exhibits	0.500
4483	4268.0	04/06/15	GMC	Review of audio clips from NS	0.400
4484	4269.0	04/06/15	GMC	Review of revised SK jury instructions along with email re: same	0.250
4485	4270.0	04/06/15	GMC	Email from NS re Audio clips	0.100
4486	4271.0	04/06/15	GMC	Review of City letter request for extension	0.100
4487	4272.0	04/06/15	GMC	Review of email correspondence re Alan Scheiner ("AS") request for adjournment	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4488	4770.0	04/06/15	JL	Prepare expert trial testimony for Eterno; review examination before trial for Eterno.	3.500
4489	5140.0	04/06/15	MB	Combine NYPD and Medical Defendants Jury Instructions.	6.330
4490	1352.0	04/07/15	JLN	Finished cross-x outline of Chief Marino	4.250
4491	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
4492	1354.0	04/07/15	JLN	Reviewed changes to verdict sheet; additional edits and revisions to same	0.200
4493	1355.0	04/07/15	JLN	T/c GC & NS regarding best strategy for handling City's request for adjournment	0.200
4494	1356.0	04/07/15	JLN	E-mail from JF re: receiving everyone's input on MIL and incorporating changes	0.100
4495	1357.0	04/07/15	JLN	E-mail from JF to NS re: edits to letter	0.100
4496	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
4497	1359.0	04/07/15	JLN	E-mail from SK detailing comments on JF's draft MIL	0.100
4498	1360.0	04/07/15	JLN	Read City reply letter regarding adjournment	0.100
4499	1361.0	04/07/15	JLN	Review of SK comments on JF MIL draft	0.100
4500	1362.0	04/07/15	JLN	Reviewed letter to Court opposing City application; t/c with GC regarding same	0.100
4501	1363.0	04/07/15	JLN	Reviewed NS draft letter to Court re: adjourning trial at City's request	0.100
4502	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
4503	2893.0	04/07/15	JPF	Review motion in lim based on comments	1.100
4504	3074.0	04/07/15	JPF	Phone call w/ SK re final corrections to motion in limine	0.400
4505	3079.0	04/07/15	JPF	Response email to team re comments on motion in lim	0.400
4506	3082.0	04/07/15	JPF	Review of JL's comments	0.400
4507	3084.0	04/07/15	JPF	Review of SK's comments	0.400
4508	3110.0	04/07/15	JPF	Making corrections to motion in lim	0.300
4509	3179.0	04/07/15	JPF	Review edit NS to Ct. re our opp to defendant's letter	0.250
4510	3336.0	04/07/15	JPF	Email team w/ revisions to motion in lim	0.100
4511	4273.0	04/07/15	GMC	Began Draft Duncan cross examination, reviewed docs, memos, audio	3.500
4512	4274.0	04/07/15	GMC	Review of revised JF MIL	0.500
4513	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4514	4276.0	04/07/15	GMC	Review of Jury Instructions from Magdalena Bauza ("MB")	0.300
4515	4277.0	04/07/15	GMC	Phone call JN & NS regarding best strategy for handling City's request for adjournment	0.200
4516	4278.0	04/07/15	GMC	Phone call with JN regarding City's application for adjournment	0.100
4517	4279.0	04/07/15	GMC	Review of SK comments on JF MIL draft	0.100
4518	4771.0	04/07/15	JL	Prepare trial testimony for Halpren-Ruder; review jury instructions and motion.	4.250
4519	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
4520	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
4521	1366.0	04/08/15	JLN	T/c GC regarding points from Duncan deposition regarding ESU, meat cleaver and travelling to Johnstown	0.200
4522	1367.0	04/08/15	JLN	T/c NS and GC rewriting a supplemental letter to Court regarding trial date issues	0.200
4523	1368.0	04/08/15	JLN	E-mail exchanges amongst counsel re: availability for Comt conf. on 4/13	0.100
4524	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
4525	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
4526	1371.0	04/08/15	JLN	E-mail from NS re: proposing team meeting for this Friday	0.100
4527	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
4528	1373.0	04/08/15	JLN	E-mail NS Confirming Court conference for 4/13 and advising of his new address	0.100
4529	1374.0	04/08/15	JLN	E-mail response suggesting meeting take place after conference on Monday	0.100
4530	1886.0	04/08/15	NB	Read deposition transcript of Lwin; digested same	1.600
4531	2400.0	4/8/2015	NBS	Drafting cross - outlines; letter to court; conference with trial team.	5.800
4532	2856.0	04/08/15	JPF	Final edits and corrections to motion in Lim	1.250
4533	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4534	3357.0	04/08/15	JPF	Email to team final motion	0.100
4535	4280.0	04/08/15	GMC	Draft Duncan cross examination, reviewed docs, memos, audio	3.800
4536	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
4537	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
4538	4283.0	04/08/15	GMC	Final review of MIL	0.300
4539	4284.0	04/08/15	GMC	Phone call JN regarding points from Duncan deposition regarding ESU, meat cleaver and travelling to Johnstown	0.200
4540	4285.0	04/08/15	GMC	Phone call NS and JN re writing a supplemental letter to Court regarding trial date issues	0.200
4541	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
4542	5141.0	04/08/15	MB	Revise jury instructions Medical Defendants incorporating Nat's edits; conference w/ team.	5.800
4543	1375.0	04/09/15	JLN	Reviewed Dep. of William Gough; notes on same	2.100
4544	1376.0	04/09/15	JLN	Reviewed Dep. of Kurt Duncan; took notes re: same	1.800
4545	1377.0	04/09/15	JLN	Reviewed Dep. of Joe Ferrara; cross-referenced w/e mail exchanges b/w JLN and JF.	0.900
4546	1887.0	04/09/15	NB	Read deposition transcript of Marino; digested same	1.800
4547	2401.0	4/9/2015	NBS	Prepare for trial - jury verdict sheets and cross examination outlines of witnesses	7.500
4548	4286.0	04/09/15	GMC	Draft Duncan cross examination, reviewed docs, memos, audio	4.100
4549	4287.0	04/09/15	GMC	Emailed JN a portion of Duncan cross	0.100
4550	4288.0	04/09/15	GMC	Emailed NS for BNIU exhibits for inclusion on JPTO	0.100
4551	4773.0	04/09/15	JL	Expert trial preparation for Eterno; outline direct and prepare exhibits.	4.500
4552	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4553	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
4554	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
4555	1381.0	04/10/15	JLN	E-mail NS to GC re: 2 other changes to transcript for home invasions	0.100
4556	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
4557	1383.0	04/10/15	JLN	T/c w/ client regarding updates on trial status	0.100
4558	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
4559	4774.0	04/10/15	JL	Prepare expert trial testimony for Halpre-Ruder; expert witness preparation for Lubit.	4.250
4560	5142.0	04/10/15	MB	Call with Nat re: progress on current projects.	0.750
4561	1384.0	04/11/15	JLN	Finished review of QAD Repmt; 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
4562	1385.0	04/11/15	JLN	Started to review final QAD Report and attachments; took notes re same	2.400
4563	1386.0	04/11/15	JLN	Continued to review final QAD Report	2.100
4564	1387.0	04/11/15	JLN	E-mail correspondence w/ GC and NS re: trial date and schedule	0.200
4565	1388.0	04/11/15	JLN	E-mail w/NS re Home Invasion Transcript	0.100
4566	4289.0	04/11/15	GMC	Email correspondence w/JN and NS re: trial date and schedule	0.250
4567	4290.0	04/11/15	GMC	Email w/NS re Home Invasion Transcript	0.100
4568	4775.0	04/11/15	JL	Prepare Eterno direct, with exhibits	2.500
4569	1389.0	04/12/15	JLN	Compiled list of all trial exhibits to be used on my section of trial.	0.700
4570	2403.0	4/12/2015	NBS	Prepare for Harlon cross (3.0); review of Lauterborn transcript.	4.000
4571	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
4572	1391.0	04/13/15	JLN	Conference before Judge Sweet regarding adjournment of trial and next steps for moving forward	1.000
4573	1392.0	04/13/15	JLN	Meeting w/ GC and JF re new trial date	0.500

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4574	1393.0	04/13/15	JLN	E-mail w/ veritext re: changes to Home Invasion transcript	0.200
4575	1394.0	04/13/15	JLN	E-mail from NS to RS re: Lauterborn's PG & missing half of interview	0.100
4576	1888.0	04/13/15	NB	Printed crime reporting review documents	0.200
4577	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
4578	2900.0	04/13/15	JPF	Conf. on trial date - case adjourned	1.000
4579	3034.0	04/13/15	JPF	Meeting w/JN and GC re new trial date	0.500
4580	3193.0	04/13/15	JPF	Travel from SDNY for conference re: trial date (.5)	0.250
4581	3200.0	04/13/15	JPF	Travel to SDNY for conference re: trial date (.5)	0.250
4582	4291.0	04/13/15	GMC	Update and revise Duncan cross examination,	2.100
4583	4292.0	04/13/15	GMC	Conf. on trial date- case adjourned	1.000
4584	4293.0	04/13/15	GMC	Meeting w/JN and JF re new trial date	0.500
4585	4294.0	04/13/15	GMC	Email w/veritext re: changes to Home Invasion transcript	0.250
4586	4295.0	04/13/15	GMC	Travel from SDNY for conference re: trial date (.5)	0.250
4587	4296.0	04/13/15	GMC	Travel to SDNY for conference re: trial date (.5)	0.250
4588	4297.0	04/13/15	GMC	Email correspondence w/RS and NS re: Lauterborn interview	0.100
4589	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
4590	5143.0	04/13/15	MB	Conference with Judge Sweet; team conference.	2.500
4591	1395.0	04/14/15	JLN	Reviewed e-mails and attachments from SK regarding latest versions of jury charges	0.200
4592	1396.0	04/14/15	JLN	T/c w/ SK regarding adjournment of trial and status of jury charges	0.200
4593	1889.0	04/14/15	NB	Read deposition transcript of Patel; digested same	1.100
4594	4298.0	04/14/15	GMC	Email correspondence with SK re: Jury instructions	0.100
4595	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
4596	1398.0	04/15/15	JLN	Review of newly produced Lamstein notes	0.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4597	1399.0	04/15/15	JLN	E-mail & attached letter re: illness to PO Boston & unavailability for trial	0.100
4598	1400.0	04/15/15	JLN	E-mail from NS relaying another call from Scheiner re: city agreeing to pay for mediator	0.100
4599	1401.0	04/15/15	JLN	E-mail from NS to team forwarding Lamstein's "newly discovered" draft notes	0.100
4600	1402.0	04/15/15	JLN	E-mail from NS to team recapping his call with Scheiner requesting adjournment to November date	0.100
4601	1403.0	04/15/15	JLN	E-mailed wiGC and NS re mediation offer from the City	0.100
4602	1404.0	04/15/15	JLN	Letter from Scheiner to NS re: draft document from Lamstein	0.100
4603	1405.0	04/15/15	JLN	Phone call w/ GC re Boston unavailability	0.100
4604	1406.0	04/15/15	JLN	Reviewed E-mail and letter regarding PAA Boston's medical condition	0.100
4605	1890.0	04/15/15	NB	Read deposition transcript of Sangenti; digested same	0.600
4606	2405.0	4/15/2015	NBS	Telephone conference with Alan Scheiner re: settlement and trial date; emails re: discovery and Boston.	1.500
4607	4299.0	04/15/15	GMC	Reviewed and revised Boston outline for deposition read ins	2.250
4608	4300.0	04/15/15	GMC	Review of newly produced Lamstein notes	0.250
4609	4301.0	04/15/15	GMC	Emailed w/JN and NS re mediation offer from the City	0.100
4610	4302.0	04/15/15	GMC	Phone call w/JN re Boston unavailability	0.100
4611	4303.0	04/15/15	GMC	Review of correspondence re: PAA Boston	0.100
4612	4777.0	04/15/15	JL	Review of additional discovery by City Defendants re: Lamstein.	1.500
4613	1891.0	04/16/15	NB	Read deposition transcript of AS; digested same	3.100
4614	1892.0	04/16/15	NB	Read deposition transcript of AS (Volume II); digested same	2.900
4615	1893.0	04/16/15	NB	Read deposition transcript of AS (Volume III); digested same	2.500
4616	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
4617	1408.0	04/17/15	JLN	Conference call with team re: best strategy for responding to City latest "offer"	0.500
4618	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 CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4619	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
4620	1411.0	04/17/15	JLN	E-mail from NS relating exact terms of last settlement demand	0.100
4621	1412.0	04/17/15	JLN	E-mail from Scheiner to NS re: locating complete copy of Lauterborn type	0.100
4622	1413.0	04/17/15	JLN	E-mail to NS responding to City's "offer" re: mediation & adjusting adjourning trial	0.100
4623	1414.0	04/17/15	JLN	Reviewed e-mail from NS describing City's "offer" to mediate and response to same	0.100
4624	1894.0	04/17/15	NB	Read deposition transcript of LS; digested same	1.400
4625	2406.0	4/17/2015	NBS	Telephone conference with Alan Scheiner and team re: settlement demand email.	1.200
4626	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
4627	3017.0	04/17/15	JPF	Conference call with team re: best strategy for responding to City latest "offer"	0.500
4628	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
4629	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
4630	4305.0	04/17/15	GMC	Conference call with team re: best strategy for responding to City latest "offer"	0.500
4631	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
4632	4307.0	04/17/15	GMC	Email from RS re Lauterborn audios	0.100
4633	4778.0	04/17/15	JL	Review of City Proposal for settlement; telephone call to Schoolcraft re: City Settlement offer.	1.500
4634	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
4635	1416.0	04/21/15	JLN	E-mail from NS to team re: City's letter to Court	0.100
4636	1417.0	04/21/15	JLN	Review of letter from City requesting more time for MIL	0.100
4637	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4638	4308.0	04/21/15	GMC	Review of letter from City requesting more time for MIL	0.250
4639	1419.0	04/22/15	JLN	E-mail exchanges re: NS letter response to City latest request to adjourn trial	0.100
4640	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
4641	4779.0	04/24/15	JL	Telephone conference with Nat Smith re possible settlement strategy	0.500
4642	1421.0	04/27/15	JLN	E-mail from Scheiner re: City latest disclosures	0.100
4643	1895.0	04/27/15	NB	Read deposition transcript of Trainor; digested same	0.400
4644	1896.0	04/27/15	NB	Read deposition transcript of Valenti; digested same	1.100
4645	4309.0	04/27/15	GMC	Email correspondence with City re: Lauterborn Audio	0.250
4646	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
4647	1897.0	04/28/15	NB	Read deposition transcript of Weiss; digested same	1.300
4648	4780.0	04/28/15	JL	Telephone conference with Nat Smith; call to Roy Lubit re: trial schedule.	1.250
4649	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
4650	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
4651	4310.0	04/29/15	GMC	Email with NS re trial issues and AS	0.250
4652	1898.0	05/01/15	NB	Read deposition transcript of Broschart; digested same	2.100
4653	4781.0	05/01/15	JL	Telephone conference with Nat Smith re trial responsibilities, tactics and overall strategy	0.750
4654	1899.0	05/04/15	NB	Read deposition transcript of Duncan; digested same	0.700
4655	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
4656	1425.0	05/05/15	JLN	Discussion w/GC and JF re SJ decision	0.500
4657	1426.0	05/05/15	JLN	E-mail w/GC re Judge Sweet's Summary Judgment opinion	0.100
4658	1900.0	05/05/15	NB	Read deposition transcript of Sawyer; digested same	0.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4659	2408.0	5/5/2015	NBS	Review of review of decision on summary judgment motion.	0.700
4660	2693.0	05/05/15	JPF	Read and review Ct's Opinion on SJ	3.250
4661	3021.0	05/05/15	JPF	Discussion WJN and GC re SMJ	0.500
4662	4311.0	05/05/15	GMC	Read and review Ct's Opinion on SJ	1.400
4663	4312.0	05/05/15	GMC	Discussion w/JN and JF re SMJ	0.500
4664	4313.0	05/05/15	GMC	Email w/JN re SMJ opinion	0.100
4665	4782.0	05/05/15	JL	Review / discussion of court's 200 page Opinion re: Summary Judgment Motions.	3.000
4666	5144.0	05/05/15	MB	Review of Court's Opinion re: summary judgment motions.	1.000
4667	1901.0	05/06/15	NB	Read deposition transcript of Marquez; digested same	0.600
4668	4783.0	05/06/15	JL	Review and discuss with Smith plaintiff response re court's Opinion.	2.500
4669	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
4670	1427.0	05/08/15	JLN	Discussion w/ GC & JF re SJ decision and impact on trial and motion in limine	0.800
4671	2410.0	5/8/2015	NBS	Telephone conference with trial team re: status.	0.300
4672	2411.0	05/08/15	NBS	Review of decision; email team	1.800
4673	2929.0	05/08/15	JPF	Discussion w/ GC & JN re decision and impact on trial and motion in lim	0.800
4674	3315.0	05/08/15	JPF	Email from NS wanting to schedule team meeting prior to 5/12/15 conf.	0.100
4675	4314.0	05/08/15	GMC	Discussion w/ JF & JN re decision and impact on trial and motion in lim	0.800
4676	1428.0	05/10/15	JLN	Listened to Lauterborn's 2nd GO interview; notes re: same	0.900
4677	2412.0	5/11/2015	NBS	Review of decision on summary judgment; prepare for conference with court.	1.500
4678	4784.0	05/11/15	JL	Prepare for hearing re: Court's Opinion/Order re: dispositive motions.	2.500
4679	1429.0	05/12/15	JLN	Meeting w/NS team GC and JF pre-conf	1.500
4680	1430.0	05/12/15	JLN	Team meeting following conf.	1.250
4681	1431.0	05/12/15	JLN	Conference before Judge Sweet regarding setting new trial date and schedule for pre-trial filings	1.000
4682	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
4683	2810.0	05/12/15	JPF	Meeting w/NS team JN and GC pre-conf	1.500
4684	2879.0	05/12/15	JPF	Team meeting following conf.	1.250

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4685	2901.0	05/12/15	JPF	Conf. trial adjourned to Oct. 19	1.000
4686	3199.0	05/12/15	JPF	Travel to SDNY for conf. (.5)	0.250
4687	4315.0	05/12/15	GMC	Meeting w/NS team JN and JF pre-conf	1.500
4688	4316.0	05/12/15	GMC	Team meeting following conf.	1.250
4689	4317.0	05/12/15	GMC	Conf. trial adjourned to Oct. 19	1.000
4690	4318.0	05/12/15	GMC	Travel from SDNY for conf. (.5)	0.250
4691	4319.0	05/12/15	GMC	Travel to SDNY for conf. (.5)	0.250
4692	4785.0	05/12/15	JL	Meeting with full trial team re: hearing; status conference with Judge Sweet.	1.750
4693	5145.0	05/12/15	MB	Conference with Judge Sweet; Trial team meeting re status.	3.500
4694	1432.0	05/13/15	JLN	T/c client regarding updates on yesterday's status/pretrial conference with Judge Sweet	1.200
4695	1433.0	05/13/15	JLN	E-mail correspondence w/SK re conference	0.100
4696	1902.0	05/13/15	NB	Read deposition transcript of Purpi; digested same	0.750
4697	1903.0	05/13/15	NB	Calendared dates for JPTO, MIL, Jury Charge, Voir Dire,	0.100
4698	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
4699	4320.0	05/13/15	GMC	Email correspondence w/SK re conference	0.100
4700	1434.0	05/14/15	JLN	E-mail correspondence amongst all parties re: pretrial submissions schedule	0.100
4701	1435.0	05/14/15	JLN	E-mail from Alan Sheiner re: proposed briefing schedule for motions <i>in limine</i>	0.100
4702	1436.0	05/14/15	JLN	E-mail re: pretrial submissions schedule	0.100
4703	4321.0	05/14/15	GMC	Email correspondence all parties re: pretrial submissions schedule	0.100
4704	1437.0	05/15/15	JLN	Further e-mail w/ all parties re: pretrial submissions schedule	0.100
4705	2415.0	5/15/2015	NBS	Emails re: schedule on motions in limine; review of recent EDP decision.	0.700
4706	4322.0	05/15/15	GMC	Email correspondence all parties re: pretrial submissions schedule	0.100
4707	1438.0	05/18/15	JLN	Review of letter motion filed by City re: JPTO dates	0.100
4708	4323.0	05/18/15	GMC	Review of letter motion titled by City re JPTO dates	0.100
4709	1439.0	05/21/15	JLN	E-mail from NS re settlement offer from City	0.100
4710	2416.0	5/21/2015	NBS	Telephone conference with A. Schiener; email team re: settlement.	0.800
4711	3160.0	05/21/15	JPF	Email from NS re City's overture on discussing settlement	0.250
4712	4324.0	05/21/15	GMC	Email NS resettlement offer from City	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4713	1440.0	05/22/15	JLN	T/c with clients re: update on settlement	0.750
4714	2417.0	5/22/2015	NBS	Review of recent EDP decision.	0.500
4715	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
4716	1441.0	05/28/15	JLN	E-mail GC re Veritext bill	0.100
4717	2418.0	5/28/2015	NBS	Review of memo re: reconsideration; telephone call with John Lenoir and email with MG re: same.	0.500
4718	4325.0	05/28/15	GMC	Email JN re Veritext bill	0.100
4719	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
4720	1442.0	05/29/15	JLN	E-mail w/GC and NS re: City bifurcation request	0.200
4721	1443.0	05/29/15	JLN	E-mail exchange w/ all parties re: pretrial submissions schedule	0.100
4722	2419.0	5/29/2015	NBS	Prepare reconsideration letter.	1.500
4723	4326.0	05/29/15	GMC	Email w/JN and NS re: City bifurcation request	0.250
4724	4327.0	05/29/15	GMC	Email correspondence all parties re: pretrial submissions schedule	0.100
4725	5148.0	05/31/15	MB	Memo to counsel re: post-suspension retaliation claim.	4.780
4726	1444.0	06/01/15	JLN	Reviewed NS draft reconsideration	0.400
4727	1445.0	06/01/15	JLN	Reviewed draft of Plaintiffs motion for Reconsideration	0.200
4728	2420.0	6/1/2015	NBS	Drafting letter to court on reconsideration motion.	3.500
4729	4328.0	06/01/15	GMC	Review and comment on NS draft reconsideration	0.400
4730	4786.0	06/01/15	JL	Research and draft letter motion re: reconsideration of order re: modified complaint.	5.750
4731	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
4732	1446.0	06/02/15	JLN	Read City's motion to reconsider bifurcation on <u>Monell</u> claim	0.300
4733	1447.0	06/02/15	JLN	Read memo of law in Support of defendant Mauriello's motion for Reconsideration	0.300
4734	1448.0	06/02/15	JLN	Review of city's motion to bifurcate	0.200
4735	1904.0	06/02/15	NB	Read deposition transcript of Milone; digested same	0.750

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4736	1905.0	06/02/15	NB	Read deposition transcript of Carrasco; digested same	0.900
4737	2421.0	6/2/2015	NBS	Revising and drafting reconsideration motion.	3.000
4738	4329.0	06/02/15	GMC	Review of city's motion to bifurcate	0.250
4739	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
4740	5150.0	06/02/15	MB	Memo to counsel re: qualified immunity and "clearly established" law doctrine.	4.250
4741	1449.0	06/03/15	JLN	Review of E-mail correspondence w/court re motions	0.200
4742	1450.0	06/03/15	JLN	Reviewed plaintiff's motion for reconsideration as filed	0.200
4743	4330.0	06/03/15	GMC	Review of email correspondence w/court re motions	0.250
4744	1451.0	06/04/15	JLN	Reviewed Mauriello's motion for reconsideration	0.500
4745	1906.0	06/04/15	NB	same	0.600
4746	4331.0	06/04/15	GMC	Review of Mauriello's motion for reconsideration	0.500
4747	1452.0	06/05/15	JLN	Reviewed Request for Extension	0.100
4748	1907.0	06/05/15	NB	Read deposition transcript of Halpren-Ruder; digested same	0.800
4749	1908.0	06/05/15	NB	Read deposition transcript of Lubit; digested same	1.100
4750	1453.0	06/06/15	JLN	T/c with AS & LS re: case update, next Court filings & general strategy going forward	0.100
4751	1454.0	06/09/15	JLN	Order granting extension of time	0.100
4752	1455.0	06/10/15	JLN	Phone call with Schoolcrafts and GC re: Mauriello recon. and bifurcation	0.800
4753	4332.0	06/10/15	GMC	Phone call with Schoolcrafts and JN	0.800
4754	2422.0	6/15/2015	NBS	Review of calendar; telephone call to John Lenoir re: status.	0.300
4755	1456.0	06/16/15	JLN	E-mail from NS requesting assistance in responding to City's reconsideration motion	0.100
4756	1909.0	06/17/15	NB	Printed and emailed defendants memoranda of law for reconsideration for JLN	0.200
4757	1910.0	06/17/15	NB	emailed defendants memoranda of law for reconsideration of AS	0.100
4758	2423.0	6/19/2015	NBS	Review of motion by City and authorities.	1.500
4759	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
4760	1458.0	06/22/15	JLN	Another e-mail from NS re: responding to City's Motion for Reconsideration	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4761	1459.0	06/22/15	JLN	E-mail exchange between NS & W. Kretz re: respective dates to respond to motions	0.100
4762	1460.0	06/22/15	JLN	E-mail from NS to defense counsel seeking an additional week for opposition to reconsider	0.100
4763	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
4764	4333.0	06/22/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.250
4765	4788.0	06/22/15	JL	Discussion re: opposition to city & summary motions to reconsideration (Nat Smith).	0.750
4766	1461.0	06/23/15	JLN	E-mail from NS to team regarding Scheiner's e-mail on bifurcation reconsideration	0.100
4767	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
4768	2425.0	6/23/2015	NBS	Email team re: schedule; telephone call to city counsel re: same; email all counsel re: same.	0.600
4769	4334.0	06/23/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.100
4770	4335.0	06/23/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.100
4771	4789.0	06/23/15	JL	Discussion with Nat Smith re: opposition to consideration motions.	0.500
4772	1463.0	06/24/15	JLN	E-mail & attached letter to Judge Sweet re: adjusting briefing schedule	0.100
4773	1464.0	06/24/15	JLN	Review of E-mail correspondence w SK re: motion schedules	0.100
4774	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
4775	4336.0	06/24/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.100
4776	4337.0	06/24/15	GMC	Review of email correspondence w SK re: motion schedules	0.100
4777	4790.0	06/24/15	JL	Prepare opposition response re bifurcation.	1.500
4778	1465.0	06/25/15	JLN	E-mail exchanges w/ all counsel re: adjustment to briefing schedule	0.100
4779	1466.0	06/25/15	JLN	E-mail from NS enclosing letter to Court w/ agreed upon dates	0.100
4780	2427.0	6/25/2015	NBS	Emails with counsel re: status; letter to court re: schedule; review of trial exhibit folder.	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4781	4791.0	06/25/15	JL	Draft and research re: bifurcation issue.	7.500
4782	2428.0	6/26/2015	NBS	Review of draft portion of opposition to bifurcation	0.500
4783	4792.0	06/26/15	JL	Research and draft plaintiff opposition to bifurcation of Monell claim.	4.500
4784	4793.0	06/27/15	JL	Further research and draft of plaintiff opposition to bifurcation motion; finalize draft of opposition to bifurcation.	4.000
4785	2429.0	6/28/2015	NBS	Review of draft memo; revise same.	1.200
4786	1467.0	06/29/15	JLN	E-mail & draft memo of law on bifurcation	0.200
4787	1468.0	06/29/15	JLN	E-mail from JF to team adding case law to oppose bifurcation	0.100
4788	1469.0	06/29/15	JLN	E-mail to NS /JL adding case law for opposing bifurcation	0.100
4789	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
4790	4338.0	06/29/15	GMC	Review of NS motion opposing bifurcation	0.250
4791	2431.0	6/30/2015	NBS	Review of motions, memo, and case law on reconsideration motions by City and Mauriello.	3.500
4792	2432.0	7/1/2015	NBS	Review of reconsideration motion.	1.800
4793	1470.0	07/02/15	JLN	E-mail from Scheiner to all counsel re: City's latest doc production	0.100
4794	1471.0	07/02/15	JLN	Letter from Scheiner to NS re: latest City productions	0.100
4795	1472.0	07/02/15	JLN	Request to NS to put City's new materials on disc.	0.100
4796	1473.0	07/03/15	JLN	E-mail from NS forwarding City's latest production	0.100
4797	1474.0	07/03/15	JLN	E-mail to Scheiner from NS confirming that City new production consists of 511 pages	0.100
4798	2433.0	7/3/2015	NBS	Review of recent production from City Defendants; review of reconsideration motions.	3.500
4799	2434.0	7/4/2015	NBS	Drafting opposition to reconsideration motions.	3.800
4800	2435.0	7/5/2015	NBS	Drafting opposition to reconsideration motions.	4.000
4801	1475.0	07/06/15	JLN	Review of opposition to defendants' reconsideration motions	0.700
4802	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
4803	1477.0	07/06/15	JLN	E-mail exchanges re: writing to Court & clarifying correct due date	0.100
4804	1478.0	07/06/15	JLN	E-mail from NS to Scheiner requesting explanation as to where new City docs came from	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4805	1479.0	07/06/15	JLN	Letter from Scheiner re: correcting typo in previous Bates number correspondence	0.100
4806	2436.0	7/6/2015	NBS	Revising opposition papers; email co-counsel; emails to opposing counsel.	2.500
4807	4339.0	07/06/15	GMC	Review of opposition motions to defendants reconsideration motions	0.750
4808	4340.0	07/06/15	GMC	Review of email correspondence between all parties	0.100
4809	4794.0	07/06/15	JL	Review draft of opposition memo for reconsideration.	0.750
4810	1480.0	07/07/15	JLN	E-mail from Scheiner re: ECF filing errors	0.100
4811	1481.0	07/07/15	JLN	E-mail request from Scheiner seeking to adjourn City's Reply on Monell	0.100
4812	1482.0	07/07/15	JLN	Review of E-mail correspondence between NS team re Eterno & Silvennan	0.100
4813	2437.0	7/7/2015	NBS	Review of schedule; review of emails.	0.500
4814	4341.0	07/07/15	GMC	Review of email correspondence between NS team re Eterno	0.100
4815	4342.0	07/07/15	GMC	Review of email correspondence re: opposition to reconsideration motions	0.100
4816	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
4817	2438.0	7/8/2015	NBS	Review of recent and prior productions by the City	7.500
4818	4343.0	07/08/15	GMC	Review of email correspondence between all parties	0.100
4819	4795.0	07/08/15	JL	Research re: production of plaintiff PD expert to city defendants.	2.500
4820	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
4821	1484.0	07/10/15	JLN	Read Reply in Further Support of motion for Bifurcation filed by City	0.100
4822	1485.0	07/11/15	JLN	T/c wl 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
4823	1486.0	07/13/15	JLN	Review of JHMC to NS motion for recon	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4824	1487.0	07/13/15	JLN	Read opposition brief to Plaintiff's motion for Reconsideration filed by JHMC	0.100
4825	1488.0	07/13/15	JLN	Reviewed NS letter so ordered by Judge Sweet re: a modification to briefing schedule	0.100
4826	4344.0	07/13/15	GMC	Review of JHMC to NS motion for recon	0.300
4827	4797.0	07/13/15	JL	Response to city defendants request for additional discovery re: PD experts.	2.500
4828	4798.0	07/14/15	JL	Review / research of JHMC Opposition Memo re: Halpren-Ruder.	0.200
4829	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
4830	1490.0	07/15/15	JLN	E-mail response from NS to all counsel re: adjourn filing dates but keep JPTO date	0.100
4831	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
4832	4345.0	07/15/15	GMC	Review of email correspondence between all parties	0.100
4833	4799.0	07/15/15	JL	Prepare response to defendant JHMC Memo in Opposition to motion for reconsideration re: expert Halpren-Ruder.	5.500
4834	1491.0	07/16/15	JLN	Read City's letter motion for more time on motions for Reconsideration	0.100
4835	1492.0	07/17/15	JLN	E-mail exchange between JL and NS re: John Eterno	0.200
4836	1493.0	07/17/15	JLN	Sent GC E-mail correspondence between myself and NS re: John Eterno	0.100
4837	1494.0	07/17/15	JLN	Reviewed Judge Sweet's order granting the City's motion	0.100
4838	2440.0	7/17/2015	NBS	Telephone conference with John Lenoir; review of CompStat clips; review of emails.	1.200
4839	4346.0	07/17/15	GMC	Review of Email correspondence between JL and NS re: John Eterno	0.250
4840	4800.0	07/17/15	JL	Discussion and review re: Compstat Records; PD expert disclosure.	1.250
4841	1495.0	07/18/15	JLN	T/c w/ AS & LS re: JHMC opp & City's bifurcation argument & anticipated reply arguments	1.200
4842	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
4843	1497.0	07/20/15	JLN	Sent GC E-mail correspondence between Myself and NS re: John Eterno	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4844	4347.0	07/20/15	GMC	Review of Email correspondence between JN and NS re: John Eterno	0.100
4845	4801.0	07/20/15	JL	Draft opposition to JHMC Memorandum re Medical Expert Halpren-Ruder.	5.000
4846	1498.0	07/21/15	JLN	Started reading "NYPD Tapes" (book on Schoolcraft case) for additional facts & evidence & themes to use at trial.	2.400
4847	1499.0	07/21/15	JLN	E-mail exchanges amongst team re: setting up next meeting for trial team	0.100
4848	2441.0	7/21/2015	NBS	Preparing memo in reply on reconsideration.	1.500
4849	1500.0	07/22/15	JLN	Watched new Schoolcraft documentary (Eterno appears)	0.300
4850	1501.0	07/22/15	JLN	E-mail re: new Schoolcraft "documentary"	0.100
4851	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
4852	4802.0	07/22/15	JL	Prepare Response to JHMC Opposition to Plaintiff Medical Expert.	4.250
4853	1502.0	07/23/15	JLN	Cont'd reading NYPD Tapes; took notes re: same	3.250
4854	1503.0	07/23/15	JLN	Review of reply memo for AS	0.700
4855	1504.0	07/23/15	JLN	Review of City Defendants' reply affirmations recon motions	0.500
4856	1505.0	07/23/15	JLN	Read City's Reply Memo of Law in Support of motion for Reconsideration	0.200
4857	1506.0	07/23/15	JLN	Read Kretz' reply affirmation for Reconsideration of Judge Sweet's Order	0.100
4858	1507.0	07/23/15	JLN	Reviewed AS letter requesting Extension of time	0.100
4859	2443.0	7/23/2015	NBS	Drafting reply; review of witness list and exhibit trial list for JPTO	5.500
4860	4348.0	07/23/15	GMC	Review of reply memo for AS	0.750
4861	4349.0	07/23/15	GMC	Review of City Defendants reply affirmations recon motions	0.500
4862	4803.0	07/23/15	JL	Research and draft Memo In Response to JHMC opposition memo;	7.500
4863	1508.0	07/24/15	JLN	Meeting with rest of trial team regarding various strategic issues and timeline for pre-trial filings	2.900
4864	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
4865	1510.0	07/24/15	JLN	Reviewed reply memorandum from Mauriello; took notes re: same	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4866	1511.0	07/24/15	JLN	Follow up e-mail to trial team retrieval docs	0.300
4867	1512.0	07/24/15	JLN	Reviewed reply memorandum from City in further support SJ; took notes re: same	0.300
4868	1513.0	07/24/15	JLN	Post meeting discussion with JF and GC regarding issues raised during today's meeting	0.250
4869	1514.0	07/24/15	JLN	Reviewed NS reply memo of law in Support of motion for Reconsideration	0.200
4870	1515.0	07/24/15	JLN	E-mail exchanges re: JPTO deadline	0.100
4871	2716.0	07/24/15	JPF	Schoolcraft team meeting	2.900
4872	2894.0	07/24/15	JPF	Review of draft witness list from NS: notes taken	1.100
4873	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
4874	4350.0	07/24/15	GMC	Schoolcraft team meeting	2.900
4875	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
4876	4352.0	07/24/15	GMC	Follow up email Schoolcraft team re trial docs	0.300
4877	4804.0	07/24/15	JL	Meeting with trial team re JPTO etc. at 100 Wall Street.	2.250
4878	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
4879	1517.0	07/25/15	JLN	E-mail exchange from NS re: adding Polanco to JPTO	0.100
4880	1518.0	07/26/15	JLN	Cont'd reading NYPD Tapes; took notes re: same	2.100
4881	1519.0	07/27/15	JLN	E-mail w/ MS re: master exhibit list	1.750
4882	1520.0	07/27/15	JLN	E-mail GC re Polanco as witness	1.700
4883	1521.0	07/27/15	JLN	Read NS letter motion for extension on JPTO	0.100
4884	4353.0	07/27/15	GMC	Email JN re Polanco as witness	0.100
4885	4354.0	07/27/15	GMC	Email w MS re: master exhibit list	0.100
4886	4805.0	07/27/15	JL	Review documentary film on client with Eterno.	0.750
4887	1522.0	07/28/15	JLN	Reviewed revised Jury Charges from SK; made notes re: same	0.600
4888	1523.0	07/28/15	JLN	Reviewed revised witness list; made edits/revisions to same	0.200
4889	2978.0	07/28/15	JPF	Review of updated jury instructions	0.750
4890	4355.0	07/28/15	GMC	Review of updated jury instructions	0.400
4891	1524.0	07/29/15	JLN	E-mails with Schoolcraft team re: settlement	0.100
4892	4356.0	07/29/15	GMC	Emails with Schoolcraft team re: settlement	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4893	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
4894	1526.0	07/30/15	JLN	Phone call w/GC and NS re settlement	0.400
4895	1527.0	07/30/15	JLN	T/c GC regarding settlement position & response to City's settlement overtures	0.400
4896	1528.0	07/30/15	JLN	Read City's joint letter to Com1 re: striking plaintiff's reply memo of law	0.100
4897	1529.0	07/30/15	JLN	Read letter motion to strike reply by City	0.100
4898	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
4899	4358.0	07/30/15	GMC	Phone call w/JN and NS re settlement	0.400
4900	4359.0	07/30/15	GMC	Emails with Schoolcraft team re: settlement	0.100
4901	1530.0	07/31/15	JLN	T/c conference with defense counsel	0.500
4902	1531.0	07/31/15	JLN	Reviewed Notice of Appearance by Kavin Thadani on behalf of City	0.100
4903	4360.0	07/31/15	GMC	Emails with Schoolcraft team re: settlement	0.100
4904	1532.0	08/01/15	JLN	Finished NYPD Tapes; incorporated notes of additional facts & salient themes into case summary	1.800
4905	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
4906	1700.0	08/03/15	JJM	Mtg. w/ Jon L. Norinsberg re: new role in schoolcraft case	0.500
4907	1701.0	08/03/15	JJM	Watch documentary on Schoolcraft case to get feel for case & issues	0.300
4908	1702.0	08/03/15	JJM	Begin prelim cross outline of Sgt. Weiss	1.400
4909	4361.0	08/03/15	GMC	Review and revise Gough cross	3.300
4910	4362.0	08/03/15	GMC	Review and revise Duncan cross	2.750
4911	4363.0	08/03/15	GMC	Email w/NS re Gough deposition	0.100
4912	1534.0	08/04/15	JLN	Meeting with AS to discuss case & best strategy for moving forward & preparing for trial	4.750
4913	1535.0	08/04/15	JLN	Travel back to NYC from Johnstown 3.40	1.750
4914	1536.0	08/04/15	JLN	Traveled to Johnstown to meet client 3.50	1.700
4915	1537.0	08/04/15	JLN	Phone call w/GC re: witness list and exhibit list	0.400
4916	1538.0	08/04/15	JLN	Review of NS revised witness and exhibit list	0.300
4917	1539.0	08/04/15	JLN	T/c GC regarding discussion with NS	0.200
4918	1703.0	08/04/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 1)	3.200
4919	1704.0	08/04/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 2)	3.400
4920	2444.0	8/4/2015	NBS	Preparing JPTO draft section.	4.500
4921	4364.0	08/04/15	GMC	Phone call w/JN re: witness list and exhibit list	0.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4922	4365.0	08/04/15	GMC	Review of NS revised witness and exhibit list	0.300
4923	1540.0	08/05/15	JLN	Continued conversations with NS regarding exhibits & witnesses	1.000
4924	1541.0	08/05/15	JLN	Multiple phone calls w/ GC & NS regarding JPTO exhibits and witnesses	0.900
4925	1542.0	08/05/15	JLN	Preliminary review of City's JPTO and hospital JPTO	0.300
4926	1543.0	08/05/15	JLN	E-mail from NS re: reaching him when he is out of town next week	0.100
4927	1705.0	08/05/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 3)	5.600
4928	1911.0	08/05/15	NB	Printed City's draft JPTO	0.100
4929	2445.0	8/5/2015	NBS	Preparing JPTO section; telephone call with team re: same.	5.500
4930	4366.0	08/05/15	GMC	Phone calls with JN and NS re: exhibit and witness list	1.000
4931	1544.0	08/06/15	JLN	Continued review of JPTO submissions by all parties; took notes re: same	0.600
4932	1706.0	08/06/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 4)	2.600
4933	1707.0	08/06/15	JJM	Continue prelim cross outline of Sgt. Weiss (part 5)	4.800
4934	1912.0	08/06/15	NB	JPTO	0.100
4935	1545.0	08/07/15	JLN	T/c with GC, JL & NS regarding multiple issues in defendants' respective JPTO's	1.000
4936	1546.0	08/07/15	JLN	E-mail from NS enclosing Mauriello's production (Docs# 61-362); reviewed same	0.700
4937	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
4938	1548.0	08/07/15	JLN	E-mail exchange with NS regarding City's latest "offer"	0.100
4939	1549.0	08/07/15	JLN	E-mail from NS re: Bernier & Isakov JPTO	0.100
4940	1550.0	08/07/15	JLN	E-mail from NS re: getting a response to City latest "offer"	0.100
4941	1551.0	08/07/15	JLN	E-mail to NS seeking confirmation of exact terms of City's new offer	0.100
4942	1552.0	08/07/15	JLN	NS e-mail explaining City's "new" back pay offer (extending it to Dec. 2015)	0.100
4943	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4944	4367.0	08/07/15	GMC	Phone call with JN, JL & NS regarding multiple issues in defendants' respective JPTO's	1.000
4945	4368.0	08/07/15	GMC	Review of Bernier and Jsakov proposed JPTO sections	0.500
4946	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
4947	1553.0	08/08/15	JLN	"offer"	0.900
4948	1554.0	08/08/15	JLN	Reviewed Mauriello's production; notes re: same	0.600
4949	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
4950	1556.0	08/09/15	JLN	E-mail correspondence re: JPTO and motion deadlines	0.100
4951	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
4952	4369.0	08/09/15	GMC	Review of email correspondence re: JPTO and motion deadlines	0.100
4953	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
4954	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
4955	1559.0	08/10/15	JLN	Continued highlighting Trainor's Dep for cross-x excerpts	1.200
4956	1560.0	08/10/15	JLN	E-mail correspondence re: JPTO and motion deadlines	0.100
4957	1561.0	08/10/15	JLN	E-mail response from NS re: my recap of conversation with AS	0.100
4958	1562.0	08/10/15	JLN	E-mail to NS recapping discussion w/ AS this past weekend	0.100
4959	1708.0	08/10/15	JJM	Start Caughey prelim cross outline	1.600
4960	1709.0	08/10/15	JJM	Start MS OneNote Tab - reorganize dep highlights on Caughey prelim cross outline	3.500
4961	1710.0	08/10/15	JJM	Continue reorganizing dep nighlights	1.100
4962	1913.0	08/10/15	NB	Made multiple formatting changes to final S&C; prepared civil cover sheet and summons for same	0.700
4963	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4964	4370.0	08/10/15	GMC	Review of email correspondence re: JPTO and motion deadlines	0.100
4965	1563.0	08/11/15	JLN	Made revisions and edits to base cross-x outline for Sgt. Weiss	2.100
4966	1564.0	08/11/15	JLN	Review of City defendants JPTO	0.600
4967	1565.0	08/11/15	JLN	Review of new discovery served by City	0.200
4968	1566.0	08/11/15	JLN	E-mail from NS to all counsel w/ consolidated shell of JPTO; reviewed same	0.100
4969	1567.0	08/11/15	JLN	E-mail from Scheiner with two additional docs inadvertently omitted from previous disclosures	0.100
4970	1711.0	08/11/15	JJM	continue prelim cross outline of Caughey (Pt. 2)	1.400
4971	1712.0	08/11/15	JJM	Add allegations to prelim cross outline of Caughey	4.300
4972	1914.0	08/11/15	NB	Printed, collated and stapled multiple discovery documents from City sent to JLN via email	0.200
4973	2449.0	8/11/2015	NBS	Revising JPTO; review defendant's depositions; objections to exhibits.	3.500
4974	4371.0	08/11/15	GMC	Draft Yeager examination - review records, listen to audio and work of transcription	2.400
4975	4372.0	08/11/15	GMC	Review of City defendants JPTO	0.750
4976	4373.0	08/11/15	GMC	Review of new discovery served by City	0.250
4977	1568.0	08/12/15	JLN	Reviewed portion of opening outline regarding treatment in ER & interactions with James & Sawyer and Yeager	0.700
4978	1569.0	08/12/15	JLN	Reviewed NYPD memo re: Amnendment to Quota bill	0.300
4979	1713.0	08/12/15	JJM	Continue prelim cross outline of Caughey (Pt. 3)	3.300
4980	1714.0	08/12/15	JJM	Meeting with Jln re: Caughey signing memobooks	0.500
4981	1715.0	08/12/15	JJM	Add memobook impeachment to Caughey prelim cross outline	1.250
4982	1716.0	08/12/15	JJM	Conlinue prelim cross outline of Caughey	2.100
4983	4374.0	08/12/15	GMC	Add to and revise Yeager examination	3.400
4984	4375.0	08/12/15	GMC	Update and revise Gough examination	2.500
4985	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
4986	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
4987	1572.0	08/13/15	JLN	E-mail from Scheiner w/ spreadsheet re: City JPTO objections	0.100
4988	1573.0	08/13/15	JLN	Read order of Judge Sweet granting plaintiffs extgension parties	0.100
4989	1574.0	08/13/15	JLN	Review of correspondence all parties re: JPTO	0.100
4990	1575.0	08/13/15	JLN	Reviewed Judge Sweet's order Defendants' motion to strike Plaintiffs reply	0.100
4991	1576.0	08/13/15	JLN	Reviewed NS letter motion to Court for extension	0.100
4992	1717.0	08/13/15	JJM	Reviewed additional transcript for Caughey; highlighted same	1.200
4993	1718.0	08/13/15	JJM	Add new dep highlights into existing prelim cross outline	2.900
4994	1719.0	08/13/15	JJM	Re-organize prelim cross outline to account for additional transcript	2.250
4995	1720.0	08/13/15	JJM	Continue to add new deposition highlights into existing prelim cross outline	2.700
4996	1915.0	08/13/15	NB	Printed spreadsheet from A. Scheiner with City's objections to plaintiffs JPTO	0.100
4997	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
4998	4376.0	08/13/15	GMC	Reviewed and updated Sawyer examination	3.750
4999	4377.0	08/13/15	GMC	Update and revise James cross examination	2.900
5000	4378.0	08/13/15	GMC	Review of correspondence all parties re: JPTO	0.100
5001	1577.0	08/14/15	JLN	Reviewed consolidated JPTO; made notes re: same	0.700
5002	1578.0	08/14/15	JLN	Review of Lauterborn's transcribed audio interview; 2nd IAB interview took notes re: same	0.600
5003	1579.0	08/14/15	JLN	Reviewed multiple E-mail exchanges between NS and counsel regarding JPTO and best way to proceed	0.300
5004	1580.0	08/14/15	JLN	E-mail from NS asking team for input in responding to Scheiner's letter JPTO	0.100
5005	1581.0	08/14/15	JLN	E-mail re: City filing JPTO without our input	0.100
5006	1582.0	08/14/15	JLN	E-mails among team re: MIL due date	0.100
5007	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
5008	1584.0	08/14/15	JLN	Read City's letter to Court re: Defendants' JPTO	0.100
5009	1585.0	08/14/15	JLN	Review of letter to Court filed by Scheiner re: Defendants' JPTO (w/o plaintiff's portion)	0.100
5010	1721.0	08/14/15	JJM	Continue Caughey prelim cross outline (Pt 5)	3.200

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5011	1722.0	08/14/15	JJM	Continue Caughey prelim cross outline (Pt 6)	3.100
5012	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
5013	4379.0	08/14/15	GMC	Review and update cross examination drafts to date and emailed all to team	4.800
5014	4380.0	08/14/15	GMC	Review of Lauterborn transcribed audio interview and emailed to team	0.600
5015	4381.0	08/14/15	GMC	Review of City's email re JPTO	0.250
5016	4382.0	08/14/15	GMC	Email re: City filing JPTO without our input	0.100
5017	4807.0	08/14/15	JL	Meeting with Smith re JPTO	1.000
5018	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
5019	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
5020	1588.0	08/16/15	JLN	Started work on Sgt. Weiss cross-x outline	4.600
5021	1589.0	08/16/15	JLN	Internet research re: rifle identified by City (9 MM Carines).	1.900
5022	1590.0	08/16/15	JLN	Reviewed defendants JPTO filing; took notes re: same	0.600
5023	2452.0	8/16/2015	NBS	Review of Plaintiff's Trial Exhibits; review of objections.	2.800
5024	1591.0	08/17/15	JLN	Continued Weiss cross-x outline	5.600
5025	1592.0	08/17/15	JLN	Continued working on Sgt. Weiss cross-x outline	4.250
5026	1593.0	08/17/15	JLN	Reviewed additional Patrol Guide sections disclosed by City (15147-15170); took notes re: same	1.400
5027	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
5028	1723.0	08/17/15	JJM	Continue Caughey prelim cross outline (incorporate part 1 of IAB transcript into cross) (Pt 7)	2.400

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5029	1724.0	08/17/15	JJM	Continue Caughey prelim cross outline (incorporate part 2 of IAB transcript into cross) (Pt 8)	1.800
5030	1725.0	08/17/15	JJM	Continue Caughey prelim cross outline (incorporate part 3 of IAB transcript into cross) (Pt 9)	2.300
5031	1726.0	08/17/15	JJM	Continue Caughey prelim cross outline (incorporate part 4 of IAB transcript into cross) (Pt 10)	2.100
5032	2453.0	8/17/2015	NBS	Review of JPTO; telephone call with Kretz; review of letter to court from city.	2.500
5033	1595.0	08/18/15	JLN	Phone call and e-mail w/ GC re Huffman	0.300
5034	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
5035	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
5036	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
5037	1599.0	08/18/15	JLN	Reviewed NS letter reply to motions for extension of time	0.100
5038	1600.0	08/18/15	JLN	Reviewed NS reply to City's letter JPTO	0.100
5039	1727.0	08/18/15	JJM	Finished Caughey prelim cross outline, reorganized and edited same	2.700
5040	1728.0	08/18/15	JJM	Added part headings to Caughey prelim cross outline	2.400
5041	1729.0	08/18/15	JJM	Finish Caughey prelim cross outline	0.900
5042	2454.0	8/18/2015	NBS	Letter to court in reply on JPTO adjournment.	1.500
5043	4383.0	08/18/15	GMC	Phone call and email w/JN re Huffman	0.300
5044	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
5045	1730.0	08/19/15	JJM	Begin Trainor prelim cross outline (part 1)	2.900
5046	1731.0	08/19/15	JJM	Continue Trainor prelim cross outline (part 2)	2.300
5047	1732.0	08/19/15	JJM	Continue Trainor prelim cross outline (part 3)	1.700
5048	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
5049	1602.0	08/20/15	JLN	Reviewed City's latest disclosure (Office of Mgt Analysis & Planning Reference Guide); took notes re same.	1.800

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5050	1603.0	08/20/15	JLN	Read NS e-mail to Scheiner re: his misleading submission to Court	0.100
5051	1604.0	08/20/15	JLN	Reviewed NS letter to Court re: JPTO	0.100
5052	1605.0	08/20/15	JLN	Scheiner e-mail rejecting service by fax	0.100
5053	1606.0	08/20/15	JLN	Scheiner re: e-mail responding to NS "misleading submission"	0.100
5054	1733.0	08/20/15	JJM	Continue Trainor prelim cross outline (part 4)	3.700
5055	1734.0	08/20/15	JJM	Finish Trainor prelim cross outline (part 4)	2.600
5056	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
5057	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
5058	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
5059	1609.0	08/21/15	JLN	E-mail all parties re MIL due date	0.100
5060	1610.0	08/21/15	JLN	Read Alan Sheiner's letter to Court regarding striking plaintiff's JPTO	0.100
5061	1611.0	08/21/15	JLN	Read various e-mails amongst counsel regarding motion <i>in limine</i> schedule	0.100
5062	1612.0	08/21/15	JLN	Scheiner letter to Court attaching City's response to August 20th letter by NS	0.100
5063	1613.0	08/21/15	JLN	Sent NS summary exhibit that we created regarding Schoolcrafts performance in 2008	0.100
5064	1735.0	08/21/15	JJM	Continue Trainor prelim cross outline (part 5)	3.300
5065	1736.0	08/21/15	JJM	Continue Trainor prelim cross outline (part 6)	4.700
5066	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
5067	4384.0	08/21/15	GMC	Sent updated crosses to team	0.250
5068	4385.0	08/21/15	GMC	Email all parties re MIL due date	0.100
5069	4808.0	08/21/15	JL	Draft letter to court re experts at trial.	1.000
5070	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
5071	4386.0	08/22/15	GMC	Updated AS examination and sent to team	2.900
5072	1615.0	08/24/15	JLN	Reviewed GC's cross-x outline on Gough; took notes re: same	0.700

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5073	1616.0	08/24/15	JLN	Reviewed GS's cross outline on Yeager; took notes re: same	0.400
5074	1617.0	08/24/15	JLN	Review of NS e-mail re upstate visits to AS	0.200
5075	1618.0	08/24/15	JLN	NS e-mail re: receipt of my crosses & dates when he will exchange Bernier & Isakov crosses	0.100
5076	1619.0	08/24/15	JLN	Sent GC cross outlines for review	0.100
5077	1737.0	08/24/15	JJM	Continue Trainor prelim cross outline (part 7)	3.100
5078	1738.0	08/24/15	JJM	Continue Trainor prelim cross outline (part 8)	3.700
5079	2458.0	8/24/2015	NBS	Preparing focus sheets; email co-counsel re: mental patient gun rights.	1.300
5080	4387.0	08/24/15	GMC	Reviewed JN cross outlines and updated witness examinations	1.750
5081	4388.0	08/24/15	GMC	Drafted points to discuss w/JN	0.400
5082	4389.0	08/24/15	GMC	Review of NS email re upstate visits to AS	0.250
5083	4390.0	08/24/15	GMC	Received JN cross examinations	0.100
5084	4809.0	08/24/15	JL	Review of trial exhibits, expert rpts and EBTs; prepare expert trial witness outlines.	6.500
5085	1620.0	08/25/15	JLN	Reviewed JPTO; edits and revisions to same	0.600
5086	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
5087	1622.0	08/25/15	JLN	Reviewed filing by NS responding to various arguments by defendants on JPTO exhibits and witnesses	0.100
5088	1739.0	08/25/15	JJM	Add part hearings to parts 1 - 4 and reorganize Trainor prelim cross outline	2.600
5089	1740.0	08/25/15	JJM	Add part hearings to parts 5 - 8 and reorganize Trainor prelim cross outline	3.100
5090	1741.0	08/25/15	JJM	Begin prelim cross outline of Lamstein (Part I)	3.700
5091	1916.0	08/25/15	NB	Printed JPTO for JLN review	0.100
5092	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
5093	1918.0	08/25/15	NB	Printed, bound, sorted and tabbed Lauterborn Cross	0.600
5094	1919.0	08/25/15	NB	Printed, bound, sorted and tabbed Marino Cross	0.800
5095	1920.0	08/25/15	NB	Printed, bound, sorted and tabbed Carter Cross	0.500
5096	1921.0	08/25/15	NB	Printed, bound, sorted and tabbed Weiss Cross	0.600
5097	1922.0	08/25/15	NB	Printed, bound, sorted and tabbed Mauriello Cross	0.800
5098	2459.0	8/25/2015	NBS	Review of various recordings listed on JPTO; letter to court in opposition to motions.	5.000

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5099	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
5100	1623.0	08/26/15	JLN	Began work on Trainor Cross-x outline using JM preliminary outline	2.700
5101	1624.0	08/26/15	JLN	Reviewed GC draft cross of Det. Yeager & Boston; highlighted & made edits to same	1.400
5102	1625.0	08/26/15	JLN	Drafted points to discuss w/GC re: trial strategy	0.700
5103	1626.0	08/26/15	JLN	Sent GC more cross outlines for review	0.100
5104	1742.0	08/26/15	JJM	Continue prelim cross outline of Lamstein (Part 2)	3.200
5105	1743.0	08/26/15	JJM	Continue prelim cross outline of Lamstein (Part 3)	3.400
5106	4391.0	08/26/15	GMC	Reviewed JN cross outlines and updated my own witness examinations	3.300
5107	4392.0	08/26/15	GMC	Drafted points to discuss w/JN	0.750
5108	4811.0	08/26/15	JL	Prepare witness trial outlines.	3.500
5109	1627.0	08/27/15	JLN	Continued working on Trainor cross-x	6.400
5110	1628.0	08/27/15	JLN	Continued working on Trainor cross-x	4.800
5111	1744.0	08/27/15	JJM	Continue prelim cross outline of Lamstein (Part 4)	2.800
5112	1745.0	08/27/15	JJM	Continue prelim cross outline of Lamstein (Part 5)	2.200
5113	4393.0	08/27/15	GMC	Reviewed JN cross outlines and updated my own witness examinations	2.500
5114	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
5115	1630.0	08/28/15	JLN	Reviewed GC draft of Duncan cross; edits & revisions to same	1.800
5116	1631.0	08/28/15	JLN	Reviewed GC draft cross of Sgt. Sawyer; highlights, edits, revisions to same	1.300
5117	1632.0	08/28/15	JLN	Sent GC cross outlines for review	0.100
5118	1746.0	08/28/15	JJM	Discussion with JLN about format of prelim cross outline of Lamstein	0.300
5119	2740.0	08/28/15	JPF	Draft additional sections to motions in lim re rifle pictures, Queens DA & prior complaints made by AS	2.400
5120	1633.0	08/29/15	JLN	Reviewed GC draft cross of Lt. Broschart; edits/revisions to same	1.900
5121	1634.0	08/29/15	JLN	Reviewed GC's draft Valenti cross; edits/revisions to same	0.600

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5122	1635.0	08/30/15	JLN	Continued working on cross-x of Capt. Trainor; cross-referenced BNIU file for several additional points	6.750
5123	1636.0	08/30/15	JLN	Started working on Lt. Caughey cross-x	4.250
5124	1637.0	08/30/15	JLN	Reviewed GC draft of Gough cross; edits/revisions to same	1.900
5125	2890.0	08/30/15	JPF	Review and edit motion in lim	1.100
5126	1638.0	08/31/15	JLN	Continued working on cross-x of Lt. Caughey	6.400
5127	1639.0	08/31/15	JLN	Reviewed GC draft of Sgt. James cross; edits to same & extracted relevant points for opening statement	2.400
5128	1640.0	08/31/15	JLN	F/u telecon with NS re: schedule	0.400
5129	1641.0	08/31/15	JLN	Conference call w/ all counsel to clerk re: pending motions	0.300
5130	1923.0	08/31/15	NB	Printed Amended Complaint and emailed to JLN	0.100
5131	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
5132	3218.0	08/31/15	JPF	Email final motion to team	0.100
5133	4394.0	08/31/15	GMC	Review of JF MIL with additional points	0.500
5134	1642.0	09/01/15	JLN	Continued working on Caughey cross-x	8.200
5135	1643.0	09/01/15	JLN	Sent GC cross outlines for review	0.100
5136	4395.0	09/01/15	GMC	Reviewed JN cross outlines and updated my own witness examinations	2.800
5137	1644.0	09/02/15	JLN	Cross outline of Lt. Caughey	7.600
5138	1645.0	09/02/15	JLN	Continued working on Trainor cross-x	1.400
5139	1747.0	09/02/15	JJM	Continue lambstein prelim cross outline (Part 6)	3.700
5140	1748.0	09/02/15	JJM	Continue lambstein prelim cross outline (Part 7)	2.300
5141	2461.0	9/2/2015	NBS	Telephone conference with W. Kretz re status	0.300
5142	3133.0	09/02/15	JPF	Corrections from SK	0.250
5143	4396.0	09/02/15	GMC	Drafted points to discuss w/JN	1.400
5144	1646.0	09/03/15	JLN	Review of City letter re: JPTO schedule	0.200
5145	1647.0	09/03/15	JLN	NS response to Scheiner re: request for telecon	0.100
5146	1648.0	09/03/15	JLN	Request from Scheiner to have telecon re: settlement	0.100
5147	1924.0	09/03/15	NB	Printed City letter re: JPTO schedule for JLN review	0.100
5148	4397.0	09/03/15	GMC	Review of City letter re: JPTO schedule	0.250
5149	1649.0	09/04/15	JLN	Continued working on Caughey cross-x	4.600
5150	1650.0	09/04/15	JLN	Continued working on Trainor cross-x	4.600
5151	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

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5152	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
5153	1653.0	09/04/15	JLN	Reviewed City letter to Court re: Court's failure to decide pending motions	0.100
5154	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
5155	3313.0	09/04/15	JPF	Email from NS adjusting motion in lim filing deadline to 9/21/15 motion	0.100
5156	1654.0	09/05/15	JLN	t/c with AS and LS regarding City's latest settlement offer	0.700
5157	1925.0	09/05/15	NB	Prepared Schoolcraft Trial Folder	0.200
5158	1926.0	09/05/15	NB	Gathered and Prepared Folder of Supplies for Schoolcraft Trial	0.250
5159	1655.0	09/06/15	JLN	Finished Trainor cross-x	7.100
5160	1656.0	09/06/15	JLN	T/c w/ LS regarding City's settlement offer and requirements for resolving matter	0.750
5161	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
5162	1657.0	09/07/15	JLN	Continued working on Caughey cross-x	6.250
5163	2464.0	9/7/2015	NBS	Preparing for trial; preparing cross examinaiton outlines and focus sheets for witnesses set to testify or likely to testify for various witness assignments fro trial team	4.500
5164	1658.0	09/08/15	JLN	T/c with JF & GC recapping discussion with defense counsel and clients over the weekend	0.600
5165	1659.0	09/08/15	JLN	T/c with NS, GC and JF regarding best strategy for handing settlement discussions with the City	0.600
5166	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
5167	1661.0	09/08/15	JLN	T/c with NS & Alan Sheiner following up on City's offer and discussions earlier today	0.400
5168	1662.0	09/08/15	JLN	Phone call w/GC re Schoolcrafts	0.300
5169	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
5170	1664.0	09/08/15	JLN	E-mail from Scheiner re: getting back to him on City's settlement proposal	0.100
5171	1665.0	09/08/15	JLN	E-mail from Scheiner seeking plaintiff's response to latest City offer	0.100
5172	1749.0	09/08/15	JJM	Continue lambstein prelim cross outline (Part 8)	2.900
5173	1750.0	09/08/15	JJM	Continue lambstein prelim cross outline (Part 9)	2.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5174	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
5175	3003.0	09/08/15	JPF	Phone call with JN & GC recapping discussion with defense counsel and clients over the weekend	0.600
5176	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
5177	4398.0	09/08/15	GMC	Update and revise Schoolcraft direct examination	3.400
5178	4399.0	09/08/15	GMC	Phone call with Adrian Schoolcraft re: trial	0.750
5179	4400.0	09/08/15	GMC	Phone call with JN & JF recapping discussion with defense counsel and clients over the weekend	0.600
5180	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
5181	4402.0	09/08/15	GMC	Phone call w/JN re Schoolcrafts	0.300
5182	1666.0	09/09/15	JLN	Started work on cross-x Lamstein	1.700
5183	1667.0	09/09/15	JLN	E-mail from Scheiner to NS & JN re: following up on settlement	0.100
5184	1751.0	09/09/15	JJM	Add part headings and reorganize Lamstein prelim cross outline	3.700
5185	1752.0	09/09/15	JJM	Continued to reorganize lamstein prelim cross outline	2.800
5186	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
5187	4403.0	09/09/15	GMC	Review and update Valenti deposition	1.250
5188	1668.0	09/10/15	JLN	Reviewed Lamstein's PES file & her handwritten notes for incorporation into cross	2.600
5189	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
5190	1670.0	09/10/15	JLN	Reviewed Lamstein's IAB interview compared w/ dep testimony for developing grounds to explore in cross	1.800
5191	1671.0	09/10/15	JLN	Reviewed Lamstein VM to AS on 10-31-09 to incorporate into cross	0.300

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5192	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
5193	1673.0	09/10/15	JLN	NS e-mail describing disability options	0.100
5194	1674.0	09/10/15	JLN	NS response to GC's e-mail re: summary plan	0.100
5195	1675.0	09/10/15	JLN	Reviewed Court's endorsement of plaintiffs letters dated August 18, 2015 and August 21, 2015	0.100
5196	2863.0	09/10/15	JPF	Phone Call with AS re: settlement	1.250
5197	4404.0	09/10/15	GMC	Update Huffman cross examination	2.750
5198	1676.0	09/11/15	JLN	Continued working on Lamstein cross-x	3.200
5199	1677.0	09/11/15	JLN	T/c w/ AS & LS re: City latest offer & pros and cons of same	0.900
5200	1678.0	09/11/15	JLN	Phone calls with NS and GC re City settlement offer	0.800
5201	1679.0	09/11/15	JLN	Telecon with NS & Scheiner City is willing to increase offer for P&S	0.800
5202	1680.0	09/11/15	JLN	E-mail from NS & Scheiner re: our availability to speak later this a.m.	0.100
5203	1681.0	09/11/15	JLN	E-mail from NS to Scheiner re: conference call for today at 11:00 am	0.100
5204	1682.0	09/11/15	JLN	E-mail to GC re Schoolcraft timeline	0.100
5205	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
5206	4405.0	09/11/15	GMC	Review of email time line from Schoolcraft	0.900
5207	4406.0	09/11/15	GMC	Phone calls with NS and JN re City settlement offer	0.800
5208	4407.0	09/11/15	GMC	Email w/JN re Schoolcraft timeline	0.100
5209	1683.0	09/12/15	JLN	Continued working on Lamstein cross-x	4.250
5210	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
5211	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
5212	2912.0	09/12/15	JPF	Adding a new section on Bernier's naval yard disaster testimony	0.900
5213	3192.0	09/12/15	JPF	Travel from SDNY for conf. (.5)	0.250
5214	1685.0	09/13/15	JLN	Continued working on Lamstein cross-x	2.800
5215	1686.0	09/14/15	JLN	E-mail from Scheiner cannot speak today - but can tomorrow	0.100
5216	1687.0	09/14/15	JLN	E-mail to Scheiner from NS re: setting up time to speak	0.100

EXHIBIT A -- SCHOOLCRAFT TIME CHARGES (LISTED CHRONOLOGICALLY)

	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5217	1688.0	09/15/15	JLN	Continued working on Lamstein cross-x	3.200
5218	1689.0	09/15/15	JLN	T/c with NS re: conversation w/ Scheiner	0.400
5219	1690.0	09/15/15	JLN	Reviewed NS settlement memo to client	0.200
5220	1691.0	09/15/15	JLN	E-mail from NS re: Draft version of JPTO & extending dates to respond to MIL's	0.100
5221	1692.0	09/15/15	JLN	E-mail from Scheiner to NS & JN re: setting time to speak re: settlement	0.100
5222	1693.0	09/15/15	JLN	Sent GC more cross outlines for review	0.100
5223	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
5224	4408.0	09/15/15	GMC	Reviewed JN cross outlines and updated my own witness examinations	2.300
5225	5151.0	09/15/15	MB	Review cross examination of defendants outlines; review/comment on client memo.	4.500
5226	1694.0	09/16/15	JLN	Review of NS cross examination outlines; notes re: same	1.400
5227	1695.0	09/16/15	JLN	T/c with GC & NS re: settlement status	0.700
5228	1696.0	09/16/15	JLN	Review of new Rule 68 offer	0.500
5229	1697.0	09/16/15	JLN	Review of NS memo to Schoolcraft re settlement	0.300
5230	1698.0	09/16/15	JLN	E-mail w/ NS re memo and settlement	0.200
5231	1699.0	09/16/15	JLN	Review of NS e-mail to Schoolcraft resettlement	0.100
5232	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 client re settlement	2.800
5233	4409.0	09/16/15	GMC	Review of NS cross examination outlines	3.600
5234	4410.0	09/16/15	GMC	Phone call w/Schoolcraft re settlement	0.800
5235	4411.0	09/16/15	GMC	Review of new Rule 68 offer	0.500
5236	4412.0	09/16/15	GMC	Review of NS memo to Schoolcraft re settlement	0.300
5237	4413.0	09/16/15	GMC	Email w NS re memo and settlement	0.250
5238	4414.0	09/16/15	GMC	Review of NS email to Schoolcraft resettlement	0.100
5239	4812.0	09/16/15	JL	Confer with trial team re City R 68 offer of jmt;	2.500
5240	5152.0	09/16/15	MB	Research Rule 68 issue; research offset issue; general obligations law 15-108.	2.250

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	A	B	C	D	E
1	No.	Date	Timekeeper	Description	Hours
5241	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.	
5242				TOTAL	9279.09