

EXHIBIT B

PLAINTIFF'S GENERAL OR NONSPECIFIC-TIME CHARGES RELATING TO DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
1809	5/9/2011	NB	Drafted Deposition notices for all defendants	0.1
655	5/19/2011	JLN	E-mail from GC re: additional dep notices to be served	0.1
653	5/19/2011	JLN	Drafted Schoolcraft deposition notices.	0.4
3745	5/19/2011	GMC	Email from JN re: dep notices to be served	0.1
1816	5/20/2011	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	0.4
4001	8/16/2012	GMC	Discussion w/ JN & JF re City's suggestion on multiple dates for depositions	0.75
923	8/29/2012	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	0.8
4024	8/29/2012	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	0.8
2940	8/29/2012	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	0.8
4051	9/26/2012	GMC	Review of email from JN adjourning AS dep	0.1
4049	9/26/2012	GMC	Meeting w/ JN & JF & AS re adjourning dep due to father's medical emergency	0.6
954	9/26/2012	JLN	E-mail from JF adjourning dep of AS	0.1
956	9/26/2012	JLN	E-mail to JF adjourning dep of AS	0.1
959	9/26/2012	JLN	Review of E-mail from GC adjourning AS dep	0.1

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Number	Date	Timekeeper	Description	Hours
952	9/26/2012	JLN	Meeting w/ JF & GC & AS re adjourning dep due to father's medical emergency	0.6
3283	9/26/2012	JPF	Email from JN adjourning dep of AS re: medical issues he was having	0.1
2996	9/26/2012	JPF	Meeting w/ JN & GC & AS re adjourning dep due to father's medical emergency	0.6
1974	4/22/2013	NBS	Review of testimony in discovery	3
4429	5/9/2013	JL	Meeting with Nat Smith to review and prepare discovery, engage investigator and prepare depositions	3.25
2005	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.	0.6
2040	8/21/2013	NBS	Telephone conference with co-counsel; emails with opposing counsel re: discovery schedule.	0.6
4819	8/22/2013	HS	reviewed availability, called and emailed Nat Smith re: my availability for depositions	0.25
2041	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.	4.2
2069	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.	0.25

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Number	Date	Timekeeper	Description	Hours
4896	10/14/2013	MB	Prepare medical defendants examination before trial; review medical chart and record; review depositions of City defendants; review hospital policy and procedure; review MHL 9.39; draft deposition questions.	5
4897	10/15/2013	MB	Prepare medical defendants examination before trial.	5
4899	10/17/2013	MB	Prepare medical defendants examination before trial	3
4901	10/21/2013	MB	Prepare medical defendants exination before trial	6
4830	10/22/2013	HS	meeting with Nat Smith to review case	2.5
2082	10/22/2013	NBS	Meeting with H. Suckle re: medical examination before trial preparation.	2.5
4902	10/22/2013	MB	Prepare medical defendants exination before trial	5
4903	10/23/2013	MB	Prepare medical defendants exination before trial.	5
2092	11/4/2013	NBS	Prepare for examination before trial.	2.5
2102	11/26/2013	NBS	Drafting notices for depositions ; review of email.	1
4929	11/29/2013	MB	Rule 30(c)(2) research; issues include: Rule 612; the production of documents relied on during deposition; attorney-client privilege; relevancy under Rule 26.	5
4482	12/2/2013	JL	Telephone conference with Smith and client re case status of depositions	1.5
2104	12/2/2013	NBS	Telephone conference with W. Krétz re: Mauriello; telephone emails with counsel re: status and discovery deadline.	1.5
4934	12/5/2013	MB	Write up on all deposition objection issues.	5
4935	12/6/2013	MB	Write up on all deposition objection issues.	5
4494	1/2/2014	JL	Telephone conference with Smith re status and schedule of depositions	0.75

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Number	Date	Timekeeper	Description	Hours
2131	1/27/2014	NBS	Revising letter to website responders; sending Out same; letter to City Defendants re: examination before trial	0.6
4503	2/3/2014	JL	Telephone conference with Smith re deposition schedules	0.5
2135	2/3/2014	NBS	Telephone conference with co-counsel; email reference examination before trial.	0.5
2136	2/5/2014	NBS	Telephone conference with client; emails reference examination before trial; and letter to Judge Sweet.	0.8
4967	2/7/2014	MB	Meeting with Nat re: inadvertent production redaction issues; begin prep for Medical Defendants EBTs.	2.5
4969	2/10/2014	MB	Conference with Howard Suckle re deposition prep; prep for Medical Defendants depositions.	3.12
2142	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.	1.3
2144	2/20/2014	NBS	Email co-counsel; client review of examination before trial for motion.	2.8
4514	2/23/2014	JL	Telephone conference. Smith re depositions	0.75
2146	2/23/2014	NBS	Review of examination before trial; telephone co-counsel; telephone conference with client reference status.	3.25
2146	2/23/2014	NBS	Review of examination before trial; telephone co-counsel; telephone conference with client reference status.	0.25
2147	2/24/2014	NBS	Review of examination before trial; email reference recording.	0.4
2148	2/25/2014	NBS	Review of examination before trial; transcripts for discovery issues; telephone call to Walter Kretz (two times) regarding possible work out.	4.75

PLAINTIFF'S GENERAL OR NONSPECIFIC TIME CHARGES RELATING TO DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
4523	3/5/2014	JL	Review discovery and depositions; update case status report for client	1.25
4976	3/8/2014	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)).	4.65
4977	3/9/2014	MB	Draft Memo to counsel re: City Defendants deposition objection issues.	6.66
4528	3/10/2014	JL	Schoolcraft research for response to discovery and deposition issues and hearing.	3.5
4529	3/11/2014	JL	Schoolcraft research and draft letter to court re: discovery and deposition issues (4.00); confer w/co-counsel (1.00)	5
4982	3/14/2014	MB	Draft subject matter for NYPD 30(b)(6) notices.	5.67
4533	3/14/2014	JL	Review scheduling for examination before trial.	0.75
4535	3/17/2014	JL	Review schedule of examination before trial w Smith and opposing counsel.	1.5
4539	3/24/2014	JL	Prepare deposition schedules in consult with Smith and defendants counsel. Review discovery and prep motion draft.	1.87
2156	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).	2.2
4542	3/27/2014	JL	Prepare, review, and edit correspondence re 30(b)(6) examination before trial.	1.5
2157	3/27/2014	NBS	Telephone conference with client (twice) re subject matters of numerous 30(b)(6) notices; revising same.	3.5

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Number	Date	Timekeeper	Description	Hours
4543	3/28/2014	JL	Finalize Plaintiff 30(b)(6) notices. Prepare examination of City 30(b)(6) witnesses	3.25
2158	3/28/2014	NBS	Meeting with Mag reference jury instructions; telephone call with client reference 30(b)(6); revising same and serving same.	2.25
2181	5/2/2014	NBS	Telephone conference with Gregory Radomsile reference examination before trial; emails to opposing counsel' re: same.	0.8
4573	5/10/2014	JL	Consultation and correspondence with Nat Smith re: City defendants' discovery production re: 081 lockers; prepare EBT of Sgt James.	1.25
4580	5/15/2014	JL	Review of EBT; review case and settlement strategy with client and Smith	0.88
2210	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)	1.5
4612	7/4/2014	JL	Prepare for 30(b)(6) depositions and other JHC witnesses.	3.75
4614	7/8/2014	JL	Schedule and plan remaining depositions (2.00); review final discovery productions (2.50).	2
4615	7/9/2014	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.	0.87
4617	7/11/2014	JL	Arrange and negotiate terms for ER MD expert witness; prepare for City examination before trial.	0.87
5027	7/13/2014	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

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Number	Date	Timekeeper	Description	Hours
2222	7/14/2014	NBS	Prepare for examination before trial of City 30(b)(6) witnesses.	1.5
4618	7/14/2014	JL	Prepare for City 30(b)(6) examination before trial.	2.25
2223	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.	3.2
4619	7/15/2014	JL	Conduct two City 30(b)(6) examinations before trial.	3.75
4620	7/16/2014	JL	Conduct two City 30(b)(6) examination before trial.	7
2224	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.	4.75
2225	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.	6.5
4621	7/17/2014	JL	Conduct two City 30(b)(6) examination before trial.	7
4623	7/21/2014	JL	Review of discovery and depositions.	1.5
2229	7/23/2014	NBS	Prepare for examination before trial on Thursday; review of recent City production, emails with opposing counsel re: examination before trial.	2.25
2237	8/3/2014	NBS	Review and revise letter to Court; research on deposition conduct re: definition of harassment.	5.8
4630	8/6/2014	JL	Review and summarize depositions; confer w/Smith re: expert reports.	1.75
4631	8/7/2014	JL	Review depositions; prepare index and summaries; confer re: expert testimony and reports.	2.5
4636	8/14/2014	JL	Research and review existing material re: expert depositions and dispositive motions.	1.5

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Number	Date	Timekeeper	Description	Hours
5041	8/14/2014	MB	Draft response addressing 8.5.14 Letter re: Purpi's 30(b)(6) issues.	4.9
4639	8/18/2014	JL	Respond to City Defendant letter re: expert reports; review and index depositions.	1.25
4640	8/19/2014	JL	Review deposition summaries; draft correspondence re: discovery issues.	2.5
4641	8/20/2014	JL	Draft response to City Defendants letter re: 30(b)(6) witness; also renew demands for production of Marino and other discovery documents.	2.37
4643	8/22/2014	JL	Confer with all expert witnesses re: schedule availability for depositions.	1.25
4646	9/2/2014	JL	Confer with co-counsel on expert discovery response, schedule of depositions.	1.5
2244	9/3/2014	NBS	Email to all counsel re: schedule; telephone call with Eli Silverman.	0.7
4648	9/5/2014	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.	1.75
4652	9/10/2014	JL	Review with all counsel expert witness deposition schedule and outstanding discovery production; review research material for depositions.	1.25
2253	9/17/2014	NBS	Prepare for and take Purpi examination before trial.	3.5
4661	9/18/2014	JL	Prepare for City 30(b)(6) examination before trial on Friday; prepare for motion for summary judgment; defendants expert disclosure due.	0.83
4662	9/19/2014	JL	With Smith: City 30(b)(6) deposition with Sgt Purpi; and City 30(b)(6) witness on gun amnesty program.	1.37
4673	10/6/2014	JL	Review of discovery correspondence and scheduling of remaining depositions.	1.5

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Number	Date	Timekeeper	Description	Hours
4682	10/23/2014	JL	Prepare and review summaries of deposition transcripts; schedule remaining depositions with counsel; prepare Silverman for deposition.	0.5
2297	11/11/2014	NBS	Telephone conference with paralegal (JS) re: case; review of ebt summaries.	1.5
2299	11/14/2014	NBS	Review of examination before trial summaries and indexes.	1.5
2307	12/4/2014	NBS	Revising Amended Complaint and Memo on motion to amend; began review of depositions for summary judgment motion.	2.25
2309	12/7/2014	NBS	Review of examination before trial record.	5.5
4695	12/8/2014	JL	Review deposition summaries; research on motions for summary judgment; confer with Smith re preparation for opposition.	1.5
2310	12/8/2014	NBS	Drafting letter to Court re: motion to amend; review of examinations before trial for motion for summary judgment.	1.75
2311	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.	5.5
2312	12/10/2014	NBS	Review of examination before trial for preparation of motions meeting with John Lenoir re: motions.	8.5
2338	1/10/2015	NBS	Review of examinations before trial and Compstat videos.	3.75
2341	1/14/2015	NBS	Conference with client and John Lenoir; review of examination before trial and motions.	3.75
2342	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.	0.5

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Number	Date	Timekeeper	Description	Hours
2342	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.	1.4
2347	1/20/2015	NBS	Review of decision on motion to amend; review of cases on conspiracy; review of examination before trial for motion.	1.84
1083	2/9/2015	JLN	E-mail exchange with NS regarding setting up meeting and getting Broschart Dep and Exhibits from Maurielloi Marino Dep	0.1
1087	2/11/2015	JLN	Started review of deposition exhibits	3.4
4110	2/11/2015	GMC	Review of deposition exhibits	3.1
1092	2/12/2015	JLN	Continued review of deposition exhibits	3.75
4114	2/12/2015	GMC	Review of deposition exhibits	4.4
1107	2/15/2015	JLN	Cont'd review of deposition exhibits	3.2
4120	2/15/2015	GMC	Review of deposition exhibits	4.8
2653	2/15/2015	JPF	Review of deposition exhibits & depositions	3.9
2623	2/16/2015	JPF	Review of deposition exhibits & depositions	4.8
1112	2/17/2015	JLN	Finished review of deposition exhibits	1.8
4122	2/17/2015	GMC	Review of deposition exhibits	3.75
2639	2/25/2015	JPF	Review of Schoolcraft discovery/deps Lamstein/Sanganetti/Marquez	4.3
1883	4/1/2015	NB	Printed depositions of Huffman, James, Hanlon, Halpren, Gough, Ferrara, Duncan, Caughey, Broschart, Bernier and bound	0.7
1710	8/10/2015	JJM	Continue reorganizing dep nighlights	1.1
TOTAL				316.7