

EXHIBIT C

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
SCHOOLCRAFT DEPOSITION				
3984	8/6/2012	GMC	Email re: meeting with Schoolcrafts	0.1
877	8/8/2012	JLN	Meeting w/ JF & GC re: upcoming meeting w/ AS in Albany for prep	1.3
3986	8/8/2012	GMC	Meeting w/ JN & JF re meeting w/ AS in Albany for prep	1.3
2838	8/8/2012	JPF	Meeting w/ JN & GC re meeting w/ AS in Albany for prep	1.3
887	8/10/2012	JLN	E-mail to JF re plaintiff's dep	0.1
889	8/10/2012	JLN	Response E-mail regarding deposition from Greg R.	0.1
3993	8/10/2012	GMC	Email correspondence re: Schoolcraft deposition	0.25
3294	8/10/2012	JPF	Email from JN re plaintiff's dep	0.1
3370	8/10/2012	JPF	Response email re deposition from Greg R.	0.1
3996	8/13/2012	GMC	Review of email from SP re: scheduling AS depo	0.1
898	8/14/2012	JLN	E-mail from JF re plaintiff's dep	0.1
899	8/14/2012	JLN	E-mail to JF re plaintiff's dep	0.1
3295	8/14/2012	JPF	Email from JN re plaintiff's dep	0.1
4000	8/15/2012	GMC	Email correspondence re: Schoolcraft deposition	0.1
906	8/16/2012	JLN	E-mail from City re plaintiff's dep	0.1
907	8/16/2012	JLN	E-mail to JF re plaintiff's dep	0.1
905	8/16/2012	JLN	Discussion w/ JF & GC re City's suggestion on multiple depositions of AS & best way to oppose same.	0.7
4002	8/16/2012	GMC	Email correspondence re: Schoolcraft deposition	0.1
3242	8/16/2012	JPF	Email from City re plaintiff's dep	0.1
3296	8/16/2012	JPF	Email from JN re plaintiff's dep	0.1
2954	8/16/2012	JPF	Discussion w/ JN & GC re City's suggestion on multiple dates for depositions	0.75
909	8/20/2012	JLN	Discussion w/ JF re AS dep prep	0.4
3050	8/20/2012	JPF	Discussion w/ JN re AS dep prep	0.4
916	8/22/2012	JLN	E-mail from City re AS dep date	0.1
917	8/22/2012	JLN	E-mail from GC re dep dates	0.1
4012	8/22/2012	GMC	Email from City re AS dep date	0.1
4013	8/22/2012	GMC	Email from Greg Rad re AS dep	0.1
3237	8/22/2012	JPF	Email from City re AS dep date	0.1
3274	8/22/2012	JPF	Email from Greg Rad re AS dep	0.1

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
3287	8/22/2012	JPF	Email from JN re dep dates	0.1
3303	8/22/2012	JPF	Email from Kretz re AS dep date	0.1
3069	8/22/2012	JPF	Meeting w/ GC & JN re Kretz's request to have an additional day to depose plaintiff	0.4
2791	9/24/2012	JPF	Meeting w/JN and GC to discuss City deficiency letter and AS dep prep	1.75
2749	9/24/2012	JPF	Prep AS fro his dep	2.3
950	9/25/2012	JLN	Meeting w/ AS & GC & JF re dep prep	2.9
949	9/25/2012	JLN	Prep AS for his dep	3.5
4048	9/25/2012	GMC	Meeting w/ AS & JF & JN re dep prep	2.9
4047	9/25/2012	GMC	Prep AS for his dep	3.5
3040	9/25/2012	JPF	Phone call with Larry Schoolcraft re AS dep	0.5
2713	9/25/2012	JPF	Meeting w/ AS & GC & JN re dep prep	2.9
969	10/11/2012	JLN	Defended AS at his deposition	7.1
4061	10/11/2012	GMC	Attended AS deposition and meeting afterwards	8.9
970	10/11/2012	JLN	Mtg. w/client to discuss his performance at today's deposition, and next steps for moving forward	1.8
973	10/12/2012	JLN	E-mail to JF re photos used at AS dep	0.1
3293	10/12/2012	JPF	Email from JN re photos used @ AS dep	0.1
1843	10/12/2012	NB	Drafted and sent letter to City requesting color copies of photographs shown at plaintiff's deposition	0.3
4817	8/7/2013	HS	read Plaintiff's depo	1.5
2037	8/15/2013	NBS	Meeting with client re: examination before trial preparation	6.5
2038	8/16/2013	NBS	Meeting with client to discuss case and deposition (7.5); travel back to NY (4.5).	9.75
4451	9/10/2013	JL	Review of documents in preparation for client's examination before trial	4.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
2062	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	5.5
4453	9/25/2013	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)	4.75
4886	9/25/2013	MB	Oral Argument; team meeting	2
2063	9/26/2013	NBS	Appearance for client; examination before trial and prepare for same.	9
4454	9/26/2013	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
4824	10/7/2013	HS	read Kretz transcript	0.5
4472	11/17/2013	JL	Review of client Schoolcraft examination before trial.	2.25
4476	11/24/2013	JL	Review of Plaintiff's depositions (1.00); review defendant Mauriello and Lauterborn depositions and produce videos (2.25); prepare status report (.75).	1
4610	7/2/2014	JL	Telephone conference with client re: deposition review and trial preparation; Adrian departs NYC via Amtrak	1
2245	9/5/2014	NBS	Review of time limitation issues for examination before trials.	1.5
2484	9/7/2014	JLL	Read Schoolcraft deposition.	2
2485	9/8/2014	JLL	Read Schoolcraft deposition	2
2486	9/9/2014	JLL	Read Schoolcraft deposition	2
2487	9/10/2014	JLL	Read Schoolcraft deposition.	2
4102	2/5/2015	GMC	Read and reviewed AS deposition	2.25
4104	2/8/2015	GMC	Read and reviewed AS deposition	3.25
1859	2/13/2015	NB	Printed various exhibits from Plaintiff's deposition	0.2

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
1122	2/19/2015	JLN	E-mailed GC summary of deposition section and noted it for prep of AS at trial	0.3
4131	2/19/2015	GMC	Emailed JN summary of deposition section and noted it for prep of AS at trial	0.3
4129	2/19/2015	GMC	Retrieved a portion of AS deposition for JN	1.25
1176	3/1/2015	JLN	Reviewed AS dep transcript Vol. I, took notes re: same	2.9
1179	3/2/2015	JLN	Reviewed AS dep Vol. II, took notes and prepared summary of most important issues raised	3.4
1181	3/3/2015	JLN	Reviewed final volume of AS transcript; notes and bullet point summary of same	2.8
2611	3/8/2015	JPF	Review of Deposition of AS with Exhibits	6.25
1260	3/23/2015	JLN	Locate and send portions of AS deposition testimony to help with GC crosses	0.2
4217	3/23/2015	GMC	Locate and send AS deposition testimony to help with JN crosses	0.25
				137.75
			Marino Deposition	
4890	10/3/2013	MB	Prepare Marino examination before trial; compile relevant discovery docs into searchable PDF; review record and prepare questions	5
4457	10/4/2013	JL	Preparing docs and audio recordings for Marino deposition; Tel Conf with Smith	2.75
4891	10/4/2013	MB	Prepare Marino examination before trial.	5
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.	5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
2070	10/7/2013	NBS	Prepared for examination before trial; conference call with co-counsel; conference with client.	1.5
4892	10/7/2013	MB	Prepare Marino examination before trial.	5
4458	10/7/2013	JL	Meeting with client and Smith re depositions of Mauriello and Marino	3.5
2071	10/8/2013	NBS	Preparing for and taking Marino's examination before trial; calls to Court on status of various motions.	9
4459	10/8/2013	JL	co-counsel w/Smith in deposition of Marino; post depo confer /Smith and client	9
4893	10/8/2013	MB	Deposition of Deputy Chief Michael Marino.	0
2073	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).	1.12
2099	11/20/2013	NBS	Prepare for Marino examination before trial.	2.5
2100	11/21/2013	NBS	Prepare for Marino examination before trial.	2.5
4479	11/29/2013	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
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.	1.3
2633	2/18/2015	JPF	Review of deposition exhibits & depositions - Marino	4.5
				59.67
			Lauterborn deposition	
951	9/25/2012	JLN	E-mail from Greg R re Lauterborn dep	0.1

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
3273	9/25/2012	JPF	Email from Greg R re Lauderborn dep	0.1
955	9/26/2012	JLN	E-mail from Kretz re Lauterborn dep	0.1
958	9/26/2012	JLN	Response from Kretz re: adj.	0.1
3304	9/26/2012	JPF	Email from Kretz re Lauderborn dep	0.1
4465	10/16/2013	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)	1.25
4468	11/1/2013	JL	Review docs and audio for Lauterborn deposition	2.75
4910	11/1/2013	MB	Prepare Lauterborn examination before trial; review record; listen to audios; compile discovery docs into searchable PDF; draft deposition questions.	5
2091	11/3/2013	NBS	Review of Lauterborn recordings and preparation for his examination before trial.	4.2
4911	11/4/2013	MB	Prepare Lauterborn examination before trial.	5
2093	11/5/2013	NBS	Review of record; prepare for Lauterborn examination before trial	4.5
4912	11/5/2013	MB	Prepare Lauterborn examination before trial	5
4913	11/6/2013	MB	Prepare Lauterborn examination before trial	5
2094	11/7/2013	NBS	Prepare for and take examination before trial of Lauterborn; conference with team; telephone call with client re: status.	9.5
4469	11/7/2013	JL	Prepare and take w/Smith examination before trial of defendant Lauterborn. Review documents and audio recordings; prepare exhibits.	9.5
4914	11/7/2013	MB	Lauterborn deposition.	0

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Number	Date	Timekeeper	Description	Hours
2301	11/19/2014	NBS	Review of examination before trial of Lauterborn and Mauriello on questions about evaluations; email client re: same.	0.8
2336	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)	4.5
2618	2/19/2015	JPF	Review of deposition exhibits & depositions - Lauderborn	5.25
				62.75
			Caughey Deposition	
4477	11/26/2013	JL	Review of depositions; prepare challenge to City Defendant obstructions; prepare for Lt. Caughey examination before trial.	2.75
4478	11/27/2013	JL	Review of examination before trial transcripts with video; prepare for Defendant Caughey examination.	2.75
2103	12/1/2013	NBS	Review of Caughey, Weiss and Hanlon recordings; prepare for Caughey examination before trial; telephone conference, re: status (left message).	1.4
2107	12/7/2013	NBS	Telephone conference with client and John Lenoir; prepare for Caughey examination before trial; prepare for opposition to Mauriello reconsideration.	0.93
2108	12/8/2013	NBS	Prepare for Caughey examination before trial.	2.5
2109	12/9/2013	NBS	Take examination before trial of Caughey.	7.5
4484	12/9/2013	JL	Prepare and 2d seat with Smith examination before trial for dfnt Caughey; meeting with Peter Kelley re potential assistance in trial prep.	7.75
1120	2/19/2015	JLN	Reviewed Lt. Caughey's Dept Advocate testimony; took notes regarding same	1.4

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Number	Date	Timekeeper	Description	Hours
2614	2/21/2015	JPF	Review of Schoolcraft discovery/deps - Caughey	5.6
				32.58
Larry Schoolcraft Deposition				
4839	11/18/2013	HS	telephone call with John Lenoir and emails re: Larry Schoolcraft deposition	1.25
2098	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	2.2
4936	12/10/2013	MB	Prepare Larry Schoolcraft examination before trial.	5
4486	12/11/2013	JL	Amtrak NYC - Albany - NYC for Larry Schoolcraft deposition (w/Bauza)	4.25
4485	12/11/2013	JL	Represent client (w/Bauza) at depo of Larry Schoolcraft--Albany [8:30 travel time]	6.5
4937	12/11/2013	MB	Larry Schoolcraft deposition in Albany, NY. (travel 6.5 hours).	12.75
1082	2/9/2015	JLN	T/c GC re: issues that came up in Adrian's Dep and Larry's Dep and possible motions <i>in limine</i>	0.4
4107	2/9/2015	GMC	Phone call JN re: issues that came up in Adrian's Dep and Larry's Dep and possible Miotions in Limine	0.4
4106	2/9/2015	GMC	Read and reviewed Larry Schoolcraft Deposition	2.75
2657	2/23/2015	JPF	Review of Schoolcraft discovery/deps - Larry Schoolcraft	3.8
1217	3/10/2015	JLN	T/c LS follow up on call and issues that arose in Larry's deposition	0.4
				39.7
Mauriello Deposition				
4456	9/30/2013	JL	Review of Mauriello examination before trial notes.	0.75
2088	10/29/2013	NBS	Preparation for examination before trial of Mauriello; review of research on video use conference with 10-10.	2.9

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Number	Date	Timekeeper	Description	Hours
2089	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)	2
4471	11/14/2013	JL	Review of hospital and NYPD files and audio recordings in preparation for examination before trial of Bernier and Mauriello.	2.75
4920	11/14/2013	MB	Prepare Mauriello examination before trial; review record; listen to audios; compile discovery docs into searchable PDF; draft deposition questions.	5
2097	11/15/2013	NBS	Prepare for Mauriello.	2.5
4921	11/15/2013	MB	Prepare Mauriello examination before trial.	5
4924	11/21/2013	MB	Prepare Mauriello examination before trial	5
2101	11/22/2013	NBS	Prepare for and appear at Mauriello examination before trial (busted by defendant).	3.5
4475	11/22/2013	JL	Mauriello terminated examination before trial preparation; review of Court's decision and additional City discovery documents provided.	2.75
4925	11/22/2013	MB	Mauriello deposition cancelled; begin Prof Rule 4.2 no contact research.	4.5
4476	11/24/2013	JL	Review of Plaintiff's depositions (1.00); review defendant Mauriello and Lauterborn depositions and produce videos (2.25); prepare status report (.75).	2.25
4940	12/16/2013	MB	Prepare Mauriello examination before trial; review documents; create searchable PDF; review depositions and record; listen to audio.	5
2110	12/17/2013	NBS	Prepare for examination before trial of Mauriello; review of recent correspondence.	3.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
4941	12/17/2013	MB	Prepare Mauriello examination before trial.	5
2111	12/18/2013	NBS	Prepare for Mauriello; conference with co-counsel, telephone call to client re: status.	4.5
4942	12/18/2013	MB	Prepare Mauriello examination before trial.	5
4487	12/18/2013	JL	Prepare for defendant Mauriello examination before trial; review of motion for reconsideration.	1.62
2112	12/19/2013	NBS	Prepare for Mauriello.	3.5
4488	12/19/2013	JL	Prepare for Mauriello examination before trial.	2.75
4943	12/19/2013	MB	Prepare Mauriello examination before trial.	5
2113	12/20/2013	NBS	Take examination before trial of Mauriello.	8.5
4489	12/20/2013	JL	Represent client with Smith at Mauriello examination before trial at Scoppetta Seiff Kretz & Abercrombie.	9.5
4944	12/20/2013	MB	Mauriello deposition.	0
5022	6/27/2014	MB	Prep for Mauriello's deposition; review prior deposition; review City defendants depo summaries.	4
2214	6/27/2014	NBS	Review of Mauriello examination before trial; telephone call to Dr. Roy Lubit; and prepare for Mauriello examination before trial.	3.5
2215	6/28/2014	NBS	Review of Mauriello examination before trial; review of Lubit affirmation in Monaco.	2.25
2216	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.	4.5
2217	7/1/2014	NBS	Prepare and take Mauriello examination before trial.	9.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
4609	7/1/2014	JL	Prepare and conduct w/Smith examination before trial for Mauriello. Review w/client and Smith.	8.5
5023	7/1/2014	MB	Mauriello Deposition.	0
2661	2/17/2015	JPF	Review of deposition exhibits & depositions - Mauriello	3.75
1175	3/1/2015	JLN	Reviewed and highlighted Mauriello EBT Volume I; took notes re: same	2.9
				131.67
Boston Deposition				
4495	1/3/2014	JL	Preparing docs and audio for Sgt Huffman and PAA Boston depositions	1.25
1061	1/3/2014	NBS	Prepare for Boston and Huffman examination before trial	2.25
4125	1/3/2014	MB	Prepare for Huffman and Boston Deposition; review discovery docs; draft questions.	2.25
2663	1/5/2014	NBS	Prepare for Boston and Huffman examination before trial.	1.85
1406	1/5/2014	MB	Prepare for Boston and Huffman Deposition.	3.02
4299	1/6/2014	NBS	Prepare for and take examination before trial of Boston and Huffman; meeting with team re: status and going forward	5.25
2120	1/6/2014	JL	co-counsel w/Smith depositions of Huffman and Boston; post EBT review w/Smith and Bauza	4.75
4599	2/18/2015	GMC	Read, reviewed and took notes of PAA Boston deposition	2.25
2492	2/28/2015	JPF	Review of Schoolcraft discovery/deps - Boston	3.75
1060	4/15/2015	JLN	Reviewed E-mail and letter regarding PAA Boston's medical condition	0.1
1898	4/15/2015	GMC	Reviewed and revised Boston outline for deposition read ins	2.25
4581	4/15/2015	GMC	Review of correspondence re: PAA Boston	0.1
				29.07
Huffman Deposition				

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Number	Date	Timekeeper	Description	Hours
4495	1/3/2014	JL	Preparing docs and audio for Sgt Huffman and PAA Boston depositions	1.25
2120	1/3/2014	NBS	Prepare for Boston and Huffman examination before trial	2.25
4951	1/3/2014	MB	Prepare for Huffman and Boston Deposition; review discovery docs; draft questions.	2.25
2121	1/5/2014	NBS	Prepare for Boston and Huffman examination before trial.	1.85
4952	1/5/2014	MB	Prepare for Boston and Huffman Deposition.	3
4955	1/6/2014	MB	Team meeting re review of Boston and Huffman depositions.	1.75
2122	1/6/2014	NBS	Prepare for and take examination before trial of Boston and Huffman; meeting with team re: status and going forward	5.25
4496	1/6/2014	JL	co-counsel w/Smith depositions of Huffman and Boston; post EBT review w/Smith and Bauza	4.75
1121	2/19/2015	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	0.5
4130	2/19/2015	GMC	Phone call JN regarding best and worst PTS from Huffman, Adrian's handling of downgrading issue at his deposition, fit for duty reports, and general issues that might come up at tomorrows meeting	0.5
4137	2/23/2015	GMC	Read, reviewed and took notes on Huffman deposition	3
2642	2/24/2015	JPF	Review of Schoolcraft discovery/deps - Huffman	4.25
				30.6
Hanlon Deposition				
2124	1/12/2014	NBS	Prepare for Hanlon examination before trial	3.5
4498	1/12/2014	JL	Prepare for Hanlon deposition; review docs and audio files	1.75

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Number	Date	Timekeeper	Description	Hours
4958	1/12/2014	MB	Prepare for Hanlon's deposition; review EMT emergency procedure and discovery documents.	4.13
2125	1/13/2014	NBS	Prepare for and take Hanlon examination before trial; conference with team re: examination before trial and case	8.5
4499	1/13/2014	JL	co-counsel w/Smith at Hanlon deposition	8.5
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.	1.3
2343	1/16/2015	NBS	Review of Hanlon examination before trial; review of cases; review of Compstat video.	2.5
1065	2/2/2015	JLN	Reviewed Dep. of Lt. Hanlon; cross-referenced PX 67 (IAB interview)	0.9
				31.08
Lamstein Deposition				
2132	1/28/2014	NBS	Prepare for Dr. Lamstein	3.5
4961	1/28/2014	MB	Prepare for Lamstein deposition; review handwritten notes in discovery docs; draft questions.	3.75
2133	1/29/2014	NBS	Prepare for Dr. Lamstein	2.3
4501	1/29/2014	JL	Preparing for Lamstein deposition	2
4962	1/29/2014	MB	Meeting Nat's Office re: review and prep for Lamstein EBT.	4
2134	1/30/2014	NBS	Prep for and take Dr. Lamstein examination before trial	9.5
4502	1/30/2014	JL	conduct as co-counsel w/Smith Lamstein deposition	8.5
4963	1/30/2014	MB	Lamstein Deposition.	10
1109	2/15/2015	JLN	Reviewed handwritten notes of Dr. Lamstein; took notes re: same	2.9
1108	2/15/2015	JLN	Reviewed and highlight Dr. Lamstein Dep; took notes re: same	3.1
4181	3/9/2015	GMC	Review of Lamstein deposition errata sheet	0.3
				49.85
Aldana-Bernier Deposition				

PLAINTIFF'S TIME CHARGES-IN CONNECTION-WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
4464	10/16/2013	JL	co-counsel at deposition Dfnt Bernier - 111 Broadway- by H. Suckle	1.75
4828	10/18/2013	HS	prep for Aldana-Bernier depo	4
4829	10/21/2013	HS	reviewed Aldana-Bernier interrogatories and further prep for depo	3.25
4831	10/24/2013	HS	prep deposition binder for Aldana-Bernier depo	10
2084	10/24/2013	NBS	Prepared for examination before trial of Dr. Bernier	5.5
4832	10/25/2013	HS	appeared for Aldana-Bernier depo and strategized with John Meg and Nat Smit	5
2085	10/25/2013	NBS	Appearance for Bernier examination before trial; wait for response from Court on video objection; meeting with team.	3.2
4467	10/25/2013	JL	Appearance in court re attorney video of deposition--Bernier	0.75
4905	10/25/2013	MB	Dr. Aldana-Berner; deposition was cancelled.	2.5
4471	11/14/2013	JL	Review of hospital and NYPD files and audio recordings in preparation for examination before trial of Bernier and Mauriello.	2.75
4841	2/9/2014	HS	call and email re: Deposition of hospital with deft counsel	0.2
4843	2/10/2014	HS	deposition preparation	2.6
4507	2/10/2014	JL	Preparing depositions of Bernier and Isakof; review NYS 9.39	1.25
2138	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)	1.4
4842	2/11/2014	HS	reviewed client's deposition questions	0.25
4844	2/11/2014	HS	prep Isakov deposition	9
2139	2/11/2014	NBS	Prepare for and attend Dr. Bernier examination before trial.	8.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
4508	2/11/2014	JL	Deposition of defendant Dr. Bernier.111 B'Way--co-counsel with Smith and Suckel	8.5
4970	2/11/2014	MB	Bernier Deposition	0
4847	4/20/2014	HS	preparation Aldana-Bernier deposition	4.5
4848	4/22/2014	HS	preparation Aldana-Bernier deposition	3
4849	4/23/2014	HS	prep and conducted Aldana-Bernier deposition	8
2174	4/23/2014	NBS	Drafting opposition to Jamaica Hospital motion for protective order; prepare for and attend examination before trial of Bernier	4.25
				90.15
Isakov Deposition				
4843	2/10/2014	HS	deposition preparation	2.6
4968	2/8/2014	MB	Prepare for Medical Defendant's EBTs; review medical chart,record, and deposition summaries; review Beiner's prior litigation testimony.	2.88
4969	2/10/2014	MB	Conference with Howard Suckle re deposition prep; prep for Medical Defendants depositions.	3.13
4507	2/10/2014	JL	Preparing depositions of Bernier and Isakof; review NYS 9.39	1.25
4842	2/11/2014	HS	reviewed client's deposition questions	0.25
4845	2/12/2014	HS	prep and conducted Isakov deposition	7.25
2140	2/12/2014	NBS	Prepare for and attend Dr. Isakov examination before trial.	9.5
4509	2/12/2014	JL	co-counsel with Smith and Suckle at deposition of Defendant Dr. Isakov.	7.5
4971	2/12/2014	MB	Isakov Deposition.	0
4510	2/13/2014	JL	Review with Smith notes and exhibits of depositions of Bernier and Isakov.	1
4973	2/20/2014	MB	Draft memo to counsel re: Dr. Isakov.	2
				37.36
Trainor Deposition				

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
4524	3/5/2014	JL	Prepare examination before trial materials for Timothy Trainor.	0.5
2161	4/4/2014	NBS	Review of medical expert decisions and affidavit; prepare for Trainor examination before trial.	1.25
2163	4/8/2014	NBS	Prepare for Trainor examination before trial.	2.8
4552	4/10/2014	JL	Prepare/conduct w co-counsel Smith examination before trial of Trainor.	8.25
2165	4/10/2014	NBS	Prepare for and take deposition of Trainor; prepare for Gough examination before trial.	4.45
1177	3/1/2015	JLN	Reviewed and highlighted EBT of Captain Trainor; Cross referenced E-mails referred to in deposition	2.2
				19.45
			Gough Deposition	
4515	2/24/2014	JL	Review file to prepare examination before trial material for Gough.	1.5
2164	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.	0.6
2165	4/10/2014	NBS	Prepare for and take deposition of Trainor; prepare for Gough examination before trial.	4.45
2166	4/11/2014	NBS	Prepare for and take Gough examination before trial	7.8
4553	4/11/2014	JL	Prepare/conduct as co-counsel w/ Smith examination before trial of Gough.	7.5
2624	2/22/2015	JPF	Review of Schoolcraft discovery/deps - Gough	4.8
1375	4/9/2015	JLN	Reviewed Dep. of William Gough; notes on same	2.1
4363	8/3/2015	GMC	Email w/NS re Gough deposition	0.1
				28.85
			Sawyer Deposition	
2176	4/25/2014	NBS	Prepare for and take deposition of Sawyer.	6.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
4560	4/25/2014	JL	Prepare/conduct w/Smith examination before trial for Sawyer.	6.25
2175	4/24/2014	NBS	Prepare for Sawyer examination before trial (3.0); revise opposition to Jamaica Hospital protective order motion.	1.75
1063	2/2/2015	JLN	Reviewed Dep. of Sgt. Sawyer; notes on same	1.7
2615	3/1/2015	JPF	Review of Schoolcraft discovery/deps - Broschart/Sawyer	5.5
				21.7
Duncan Deposition				
4517	2/26/2014	JL	Prepare examination before trial materials for Duncan.	0.5
4563	4/28/2014	JL	Prepare/conduct w/Smith examination before trial: Duncan.	7.5
2178	4/28/2014	NBS	Prepare for and take Duncan examination before trial and conference with all counsel and MJ Freeman re: settlement discussion.	7.8
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)	3
2211	6/20/2014	NBS	Draft opposition to reconsider; review of Duncan examination before trial; prepare for Duncan.	2.25
2212	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.	7.5
4603	6/23/2014	JL	Prepare for, and conduct with Smith dfnt Duncan examination before trial; review Duncan examination before trial.	7.5
2308	12/5/2014	NBS	Review of letters; review of Duncan transcripts, emails with team re: status.	1.8
2664	3/2/2015	JPF	Review of Schoolcraft discovery/deps - Sawyer/Duncan	3.75

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
2628	3/4/2015	JPF	Review of Schoolcraft discovery/deps - Duncan	4.75
1366	4/8/2015	JLN	T/c GC regarding points from Duncan deposition regarding ESU, meat cleaver and travelling to Johnstown	0.2
4284	4/8/2015	GMC	Phone call JN regarding points from Duncan deposition regarding ESU, meat cleaver and travelling to Johnstown	0.2
				46.75
Sergeant James Deposition				
4520	2/28/2014	JL	Prepare examination before trial docs for Sergeant James.	0.75
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
2184	5/11/2014	NBS	Prepare for James examination before trial.	3.5
2185	5/12/2014	NBS	Prepare for and take James examination before trial.	6.8
4575	5/12/2014	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.	3.5
1059	2/1/2015	JLN	Reviewed Dep. of Sgt. James	1.9
2677	2/26/2015	JPF	Review of Schoolcraft discovery/deps - James	3.4
				21.1
Marquez Deposition				
4518	2/27/2014	JL	Prepare examination before trial Marquez.	0.5
2187	5/14/2014	NBS	Prepare and take examination before trial of Marquez.	8.4
4578	5/14/2014	JL	EBT (w/Smith) of Marquez, EMT/JHC; prepare status report.	7.5
5004	5/14/2014	MB	EMT Jessica Marquez Deposition.	0
				16.4
Sangianetti Deposition				
4519	2/27/2014	JL	Prepare for Sangianetti.	0.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
4579	5/15/2014	JL	Preparation/conduct w/Smith EBT of Sangetti; EMT/JHC; preparation - conduct post depo-review with Smith.	5.25
2188	5/15/2014	NBS	Prepare for and take examination before trial of Sangetti (4.5); emails with client re: status and settlement (0.5).	4.5
				10.25
			Weiss Deposition	
4516	2/25/2014	JL	Prepare examination before trial materials for Weiss.	0.75
5013	5/28/2014	MB	Prepare Weiss deposition; team conference call re Weiss deposition.	4.1
4586	5/28/2014	JL	Preparation for hearing (1.50); hearing re: EBT City 30(b)(6) issues (.75); review court holdings (.75); prepare Weiss EBT (4.50).	4.5
2194	5/29/2014	NBS	Prepare for Weiss; take Weiss examination before trial; prepare for JHMC.	4.75
5015	5/29/2014	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.	3.35
2648	3/11/2015	JPF	Review of Discovery and Dpeositions - Weiss	4.1
				21.55
			Ferrara Deposition	
2173	4/22/2014	NBS	Telephone conference with Joe Ferrero.	0.5
4577	5/13/2014	JL	Drive (Lenoir's POV) from 111 Broadway, NY, NY to Long Island to meet with Lt Ferrara (ret)	1.5
4576	5/13/2014	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]	4.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
2186	5/13/2014	NBS	Travel to Holbrook and meet with Ferrara and his wife.	5.5
2198	6/4/2014	NBS	Prepare for Ferrara examination before trial; telephone conference with co-counsel re: same.	3.2
4591	6/4/2014	JL	Meeting with Smith and Ferrara to prepare for examination before trial; review EBT materials: documents and audio.	3.5
4590	6/4/2014	JL	Represent (with Smith) Ferrara at City deposition, 100 Church St	4.5
5017	6/4/2014	MB	Prepare for Ferrara Deposition.	3
2199	6/5/2014	NBS	Meeting with team and J. Ferrara; attend deposition of J. Ferrara at Law Department; drafting discovery demands for Mauriello.	4.75
5019	6/6/2014	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.	1.25
1377	4/9/2015	JLN	Reviewed Dep. of Joe Ferrara; cross-referenced w/e mail exchanges b/w JLN and JF.	0.9
				33.1
Broschart Deposition				
4521	3/3/2014	JL	Prepare examination before trial materials for Broschart.	0.75
4581	5/16/2014	JL	Prepare EBT for Broschart - review City motion to strike 30(b)(6) issues.	1.25
2208	6/17/2014	NBS	Prepare for Broschart.	3.5
2209	6/18/2014	NBS	Prepare for and take Broschart re: examination before trial.	7.8
4599	6/18/2014	JL	Prepare for and conduct (with Smith) Broschart examination before trial; review notes.	7.5
1060	2/1/2015	JLN	Reviewed Dep. of Lt. Broschart.; notes on same	1.2
				22
Lwin Deposition				

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
5024	7/2/2014	MB	Prep for Lwin deposition; review Beiner deposition notes and hospital chart.	1.5
2218	7/3/2014	NBS	Prepare and take Dr. Lwin examination before trial; meeting with team re: expert report; lunch with team.	3.8
4611	7/3/2014	JL	Prepare and review w/Smith re: Dr. Lwin's examination before trial.	3.5
2232	7/28/2014	NBS	Review of Dr. Lwin examination before trial; review letter from Jamaica Hospital.	0.6
1207	3/8/2015	JLN	Reviewed transcripts of Dr. Dhar and Dr. Lwin; took notes re: same	0.8
				10.2
Whaler Deposition			n	
4619	7/15/2014	JL	Conduct two City 30(b)(6) examinations before trial.	3.75
				3.75
Purpi Deposition				
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
5041	8/14/2014	MB	Draft response addressing 8.5.14 Letter re: Purpi's 30(b)(6) issues.	4.9
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
				15.35
Valenti Deposition				

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
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
1156	2/25/2015	JLN	E-mail exchange with GC regarding highlights from Valenti dep	0.1
4148	2/25/2015	GMC	Review of Valenti deposition	1.5
2698	2/25/2015	JPF	Review of Schoolcraft discovery/deps - Valenti	3.25
2878	2/26/2015	JPF	Review of Valenti exmanination	1.25
4403	9/9/2015	GMC	Review and update Valenti deposition	1.25
				12.1
Finnegan Deposition				
1489	7/15/2015	JLN	Reviewed Dep of K. Finnegan (30(b)(6) --Topic C and reviewed primary dep exhibit (old performance guide); took notes re same	2.4
				2.4
Cooper Deposition				
5032	7/24/2014	MB	City 30(b)(6) witness deposition, Cooper.	0
2230	7/24/2014	NBS	Prepare for and attend City 30(b)(6) (cooper); prepare for examination before trial for Dr. Patel; conference with client.	7.5
				7.5
Patel Deposition.				
5033	7/24/2014	MB	Prep for Patel deposition.	1
2231	7/25/2014	NBS	Prepare and take examination of trial of Dr. Patel; draft letter to Court on application re: Dr. Patel.	3.5
5034	7/25/2014	MB	Patel deposition.	0
2288	10/30/2014	NBS	Prepare for Patel examination before trial; research warrantless entry and search.	3.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
2289	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.	3.2
1187	3/4/2015	JLN	Reviewed dep. of Dr. Patel	0.9
				12.1
			Carrasco Deposition	
2255	9/19/2014	NBS	Prepare for and attend Carrasco ebt	5.5
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.	1.38
				6.88
			Eterno Deposition	
5019	6/6/2014	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.	1.25
2270	10/9/2014	NBS	Telephone conference with client; review of Eterno production; email re: same; review of Floyd trial.	2.25
2275	10/17/2014	NBS	Appear for and defend Eterno examination before trial; revise and file letter with court re: outstanding discovery issues.	9.5
4679	10/17/2014	JL	Examination before trial of Dr. Eterno (with Smith).	8.5
1076	2/6/2015	JLN	Reviewed Eterno's deposition; took notes re: same	2.8
1142	2/24/2015	JLN	Review of Eterno's dep; took notes regarding same	1.6
4140	2/24/2015	GMC	Review of John Eterno Deposition	1.9
5117	3/9/2015	MB	Draft Eterno Deposition Summary; team conference call.	6.9
				34.7
			Silverman Deposition	
4650	9/7/2014	JL	Review PD expert Silverman prior research.	1.5
2280	10/22/2014	NBS	Meeting with Eli Silverman to prepare for examination before trial.	3.5

PLAINTIFF'S TIME CHARGES IN CONNECTION WITH SPECIFIC DEPOSITIONS

Number	Date	Timekeeper	Description	Hours
2281	10/23/2014	NBS	Prepare for Silverman; telephone call to Silverman (2 times); review of report; draft letter rejecting Rule 68 offer.	3.25
4682	10/23/2014	JL	Prepare and review summaries of deposition transcripts; schedule remaining depositions with counsel; prepare Silverman for deposition.	1.5
2282	10/24/2014	NBS	Defend Silverman's examination before trial.	7.5
4683	10/24/2014	JL	Defend with Smith City's examination before trial of Silverman.	7.5
1080	2/8/2015	JLN	Reviewed Silvennan's deposition; took notes re same	3.2
				27.95
TOTAL SPECIFIC DEPOSITIONS				1106.31
TOTAL GENERAL OR NON-SPECIFIC				316.7
GRAND TOTAL				1423.01