

Exhibit B: Known Deposition Time

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			Schoolcraft Deposition		
3984	08/06/12	GMC	Email re: meeting with Schoolcrafts	0.10	0.10
877	08/08/12	JLN	Meeting w/ JF & GC re: upcoming meeting w/ AS in Albany for prep	1.30	1.30
3986	08/08/12	GMC	Meeting w/ JN & JF re meeting w/ AS in Albany for prep	1.30	1.30
2838	08/08/12	JPF	Meeting w/ JN & GC re meeting w/ AS in Albany for prep	1.30	1.30
887	08/10/12	JLN	E-mail to JF re plaintiff's dep	0.10	0.10
889	08/10/12	JLN	Response E-mail regarding deposition from Greg R.	0.10	0.10
3993	08/10/12	GMC	Email correspondence re: Schoolcraft deposition	0.25	0.25
3294	08/10/12	JPF	Email from JN re plaintiff's dep	0.10	0.10
3370	08/10/12	JPF	Response email re deposition from Greg R.	0.10	0.10
3996	08/13/12	GMC	Review of email from SP re: scheduling AS depo	0.10	0.10
898	08/14/12	JLN	E-mail from JF re plaintiff's dep	0.10	0.10
899	08/14/12	JLN	E-mail to JF re plaintiff's dep	0.10	0.10
3295	08/14/12	JPF	Email from JN re plaintiff's dep	0.10	0.10
4000	08/15/12	GMC	Email correspondence re: Schoolcraft deposition	0.10	0.10
906	08/16/12	JLN	E-mail from City re plaintiff's dep	0.10	0.10
907	08/16/12	JLN	E-mail to JF re plaintiff's dep	0.10	0.10
905	08/16/12	JLN	Discussion w/ JF & GC re City's suggestion on multiple depositions of AS & best way to oppose same.	0.70	0.70
4002	08/16/12	GMC	Email correspondence re: Schoolcraft deposition	0.10	0.10
3242	08/16/12	JPF	Email from City re plaintiff's dep	0.10	0.10
3296	08/16/12	JPF	Email from JN re plaintiff's dep	0.10	0.10
2954	08/16/12	JPF	Discussion w/ JN & GC re City's suggestion on multiple dates for depositions	0.75	0.75
909	08/20/12	JLN	Discussion w/ JF re AS dep prep	0.40	0.40
3050	08/20/12	JPF	Discussion w/ JN re AS dep prep	0.40	0.40
916	08/22/12	JLN	E-mail from City re AS dep date	0.10	0.10
917	08/22/12	JLN	E-mail from GC re dep dates	0.10	0.10
4012	08/22/12	GMC	Email from City re AS dep date	0.10	0.10
4013	08/22/12	GMC	Email from Greg Rad re AS dep	0.10	0.10

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
3237	08/22/12	JPF	Email from City re AS dep date	0.10	0.10
3274	08/22/12	JPF	Email from Greg Rad re AS dep	0.10	0.10
3287	08/22/12	JPF	Email from JN re dep dates	0.10	0.10
3303	08/22/12	JPF	Email from Kretz re AS dep date	0.10	0.10
3069	08/22/12	JPF	Meeting w/ GC & JN re Kretz's request to have an additional day to depose plaintiff	0.40	0.40
2791	09/24/12	JPF	Meeting w/JN and GC to discuss City deficiency letter and AS dep prep	1.75	1.75
2749	09/24/12	JPF	Prep AS fro his dep	2.30	2.30
950	09/25/12	JLN	Meeting w/ AS & GC & JF re dep prep	2.90	2.90
949	09/25/12	JLN	Prep AS for his dep	3.50	3.50
4048	09/25/12	GMC	Meeting w/ AS & JF & JN re dep prep	2.90	2.90
4047	09/25/12	GMC	Prep AS for his dep	3.50	3.50
3040	09/25/12	JPF	Phone call with Larry Schoolcraft re AS dep	0.50	0.50
2713	09/25/12	JPF	Meeting w/ AS & GC & JN re dep prep	2.90	2.90
969	10/11/12	JLN	Defended AS at his deposition	7.10	7.10
4061	10/11/12	GMC	Attended AS deposition and meeting afterwards	8.90	8.90
970	10/11/12	JLN	Mtg. w/client to discuss his performance at today's deposition, and next steps for moving forward	1.80	1.80
973	10/12/12	JLN	E-mail to JF re photos used at AS dep	0.10	0.10
3293	10/12/12	JPF	Email from JN re photos used @ AS dep	0.10	0.10
1843	10/12/12	NB	Drafted and sent letter to City requesting color copies of photographs shown at plaintiff's deposition	0.30	0.30
4817	8/7/2013	HS	read Plaintiff's depo	1.50	1.50
2037	8/15/2013	NBS	Meeting with client re: examination before trial preparation	6.50	6.50
2038	8/16/2013	NBS	Meeting with client to discuss case and deposition (7.5); travel back to NY (4.5).	9.75	9.75
4451	09/10/13	JL	Review of documents in preparation for client's examination before trial	4.50	4.50
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	5.50	7.50
4453	09/25/13	JL	Prepare for hearing on discovery (1.0);	4.75	6.50

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			Oral Argument re: discovery - USDC SDNY Sweet, J (.75).; consultation with client and Smith in preparation for depositions (4.75)		
4886	09/25/13	MB	Oral Argument; team meeting	2.00	4.00
2063	9/26/2013	NBS	Appearance for client; examination before trial and prepare for same.	9.00	9.00
4454	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.	9.00	9.00
4824	10/7/2013	HS	read Kretz transcript	0.50	0.50
4472	11/17/13	JL	Review of client Schoolcraft examination before trial.	2.25	2.25
4476	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).	1.00	4.00
4610	07/02/14	JL	Telephone conference with client re: deposition review and trial preparation; Adrian departs NYC via Amtrak	1.00	1.00
2245	9/5/2014	NBS	Review of time limitation issues for examination before trials.	1.50	1.50
2484	9/7/2014	JLL	Read Schoolcraft deposition.	2.00	2.00
2485	9/8/2014	JLL	Read Schoolcraft deposition	2.00	2.00
2486	9/9/2014	JLL	Read Schoolcraft deposition	2.00	2.00
2487	9/10/2014	JLL	Read Schoolcraft deposition.	2.00	2.00
4102	02/05/15	GMC	Read and reviewed AS deposition	2.25	2.25
4104	02/08/15	GMC	Read and reviewed AS deposition	3.25	3.25
1859	02/13/15	NB	Printed various exhibits from Plaintiff's deposition	0.20	0.20
1122	02/19/15	JLN	E-mailed GC summary of deposition section and noted it for prep of AS at trial	0.30	0.30
4131	02/19/15	GMC	Emailed JN summary of deposition section and noted it for prep of AS at trial	0.30	0.30
4129	02/19/15	GMC	Retrieved a portion of AS deposition for JN	1.25	1.25
1176	03/01/15	JLN	Reviewed AS dep transcript Vol. I,	2.90	2.90

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			took notes re: same		
1179	03/02/15	JLN	Reviewed AS dep Vol. II, took notes and prepared summary of most important issues raised	3.40	3.40
1181	03/03/15	JLN	Reviewed final volume of AS transcript; notes and bullet point summary of same	2.80	2.80
2611	03/08/15	JPF	Review of Deposition of AS with Exhibits	6.25	6.25
1260	03/23/15	JLN	Locate and send portions of AS deposition testimony to help with GC crosses	0.20	0.20
4217	03/23/15	GMC	Locate and send AS deposition testimony to help with JN crosses	0.25	0.25
				137.75	146.50
			Marino Deposition		
4890	10/03/13	MB	Prepare Marino examination before trial; compile relevant discovery docs into searchable PDF; review record and prepare questions	5.00	5.00
4457	10/04/13	JL	Preparing docs and audio recordings for Marino deposition; Tel Conf with Smith	2.75	2.75
4891	10/04/13	MB	Prepare Marino exination before trial.	5.00	5.00
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.	5.00	5.50
2070	10/7/2013	NBS	Prepared for examination before trial; conference call with co-counsel; conference with client.	1.50	5.50
4892	10/07/13	MB	Prepare Marino examination before trial.	5.00	5.00
4458	10/07/13	JL	Meeting with client and Smith re depositions of Mauriello and Marino	3.50	3.50
2071	10/8/2013	NBS	Preparing for and taking Marino's examination before trial; calls to Court on status of various motions.	9.00	9.50
4459	10/08/13	JL	co-counsel w/Smith in deposition of Marino; post depo confer /Smith and	9.00	9.00

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			client		
4893	10/08/13	MB	Deposition of Deputy Chief Michael Marino.	0.00	0.00
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	4.50
2099	11/20/2013	NBS	Prepare for Marino examination before trial.	2.50	2.50
2100	11/21/2013	NBS	Prepare for Marino examination before trial.	2.50	2.50
4479	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.	2.00	2.00
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.	1.30	4.50
2633	02/18/15	JPF	Review of deposition exhibits & depositions - Marino	4.50	4.50
				59.67	67.75
			Lauterborn deposition		
951	09/25/12	JLN	E-mail from Greg R re Lauterborn dep	0.10	0.10
3273	09/25/12	JPF	Email from Greg R re Lauderborn dep	0.10	0.10
955	09/26/12	JLN	E-mail from Kretz re Lauterborn dep	0.10	0.10
958	09/26/12	JLN	Response from Kretz re: adj.	0.10	0.10
3304	09/26/12	JPF	Email from Kretz re Launderborn dep	0.10	0.10
4465	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)	1.25	5.25
4468	11/01/13	JL	Review docs and audio for Lauterborn deposition	2.75	2.75
4910	11/01/13	MB	Prepare Lauterborn examination before trial; review record; listen to audios;	5.00	5.00

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			compile discovery docs into searchable PDF; draft deposition questions.		
2091	11/3/2013	NBS	Review of Lauterborn recordings and preparation for his examination before trial.	4.20	4.20
4911	11/04/13	MB	Prepare Lauterborn examination before trial.	5.00	5.00
2093	11/5/2013	NBS	Review of record; prepare for Lauterborn examination before trial	4.50	4.50
4912	11/05/13	MB	Prepare Lauterborn examination before trial	5.00	5.00
4913	11/06/13	MB	Prepare Lauterborn examination before trial	5.00	5.00
2094	11/7/2013	NBS	Prepare for and take examination before trial of Lauterborn; conference with team; telephone call with client re: status.	9.50	9.50
4469	11/07/13	JL	Prepare and take w/Smith examination before trial of defendant Lauterborn. Review documents and audio recordings; prepare exhibits.	9.50	9.50
4914	11/07/13	MB	Lauterborn deposition.	0.00	0.00
2301	11/19/2014	NBS	Review of examination before trial of Lauterborn and Mauriello on questions about evaluations; email client re: same.	0.80	0.80
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)	4.50	7.80
2618	02/19/15	JPF	Review of deposition exhibits & depositions - Lauderborn	5.25	5.25
				62.75	68.05
			Caughey Deposition		
4477	11/26/13	JL	Review of depositions; prepare challenge to City Defendant obstructions; prepare for Lt. Caughey examination before trial.	2.75	5.50
4478	11/27/13	JL	Review of examination before trial transcripts with video; prepare for	2.75	2.75

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			Defendant Caughey examination.		
2103	12/1/2013	NBS	Review of Caughey, Weiss and Hanlon recordings; prepare for Caughey examination before trial; telephone conference, re: status (left message).	1.40	2.80
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	2.80
2108	12/8/2013	NBS	Prepare for Caughey examination before trial.	2.50	2.50
2109	12/9/2013	NBS	Take examination before trial of Caughey.	7.50	7.50
4484	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.	7.75	7.75
1120	02/19/15	JLN	Reviewed Lt. Caughey's Dept Advocate testimony; took notes regarding same	1.40	1.40
2614	02/21/15	JPF	Review of Schoolcraft discovery/deps - Caughey	5.60	5.60
				32.58	36.73
			Larry Schoolcraft Deposition		
4839	11/18/2013	HS	telephone call with John Lenoir and emails re: Larry Schoolcraft deposition	1.25	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	2.20	2.20
4936	12/10/13	MB	Prepare Larry Schoolcraft examination before trial.	5.00	5.00
4486	12/11/13	JL	Amtrak NYC - Albany - NYC for Larry Schoolcraft deposition (w/Bauza)	4.25	4.25
4485	12/11/13	JL	Represent client (w/Bauza) at depo of Larry Schoolcraft--Albany [8:30 travel time]	6.50	6.50
4937	12/11/13	MB	Larry Schoolcraft deposition in Albany, NY. (travel 6.5 hours).	12.75	15.00
1082	02/09/15	JLN	T/c GC re: issues that came up in	0.40	0.40

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			Adrian's Dep and Larry's Dep and possible motions <i>in limine</i>		
4107	02/09/15	GMC	Phone call JN re: issues that came up in Adrian's Dep and Larry's Dep and possible Miotions in Limine	0.40	0.40
4106	02/09/15	GMC	Read and reviewed Larry Schoolcraft Deposition	2.75	2.75
2657	02/23/15	JPF	Review of Schoolcraft discovery/deps - Larry Schoolcraft	3.80	3.80
1217	03/10/15	JLN	T/c LS follow up on call and issues that arose in Larry's deposition	0.40	0.40
				39.70	42.45
			Mauriello Deposition		
4456	09/30/13	JL	Review of Mauriello examination before trial notes.	0.75	0.75
2088	10/29/2013	NBS	Preparation for examination before trial of Mauriello; review of research on video use conference with 10-10.	2.90	5.80
2089	10/30/2013	NBS	Telephone conference with client (1.0); email opposing counsel re: adjournment on Mauriello; review of ernails; review of Mauriello testimony in Floyd case; review of AS personnel file records for examination before trial (2.0)	2.00	4.50
4471	11/14/13	JL	Review of hospital and NYPD files and audio recordings in preparation for examination before trial of Bernier and Mauriello.	2.75	5.50
4920	11/14/13	MB	Prepare Mauriello exination before trial; review record; listen to audios;compile discovery docs into searchable PDF; draft deposition questions.	5.00	5.00
2097	11/15/2013	NBS	Prepare for Mauriello.	2.50	2.50
4921	11/15/13	MB	Prepare Mauriello exination before trial.	5.00	5.00
4924	11/21/13	MB	Prepare Mauriello examination before trial	5.00	5.00
2101	11/22/2013	NBS	Prepare for and appear at Mauriello examination before trial (busted by defendant).	3.50	3.50

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
4475	11/22/13	JL	Mauriello terminated examination before trial preparation; review of Court's decision and additional City discovery documents provided.	2.75	2.75
4925	11/22/13	MB	Mauriello deposition cancelled; begin Prof Rule 4.2 no contact research.	4.50	4.50
4476	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).	2.25	4.00
4940	12/16/13	MB	Prepare Mauriello examination before trial; review documents; create searchable PDF; review depositions and record; listen to audio.	5.00	5.00
2110	12/17/2013	NBS	Prepare for examination before trial of Mauriello; review of recent correspondence.	3.50	3.50
4941	12/17/13	MB	Prepare Mauriello examination before trial.	5.00	5.00
2111	12/18/2013	NBS	Prepare for Mauriello; conference with co-counsel, telephone call to client re: status.	4.50	4.50
4942	12/18/13	MB	Prepare Mauriello examination before trial.	5.00	5.00
4487	12/18/13	JL	Prepare for defendant Mauriello examination before trial; review of motion for reconsideration.	1.62	3.25
2112	12/19/2013	NBS	Prepare for Mauriello.	3.50	3.50
4488	12/19/13	JL	Prepare for Mauriello examination before trial.	2.75	2.75
4943	12/19/13	MB	Prepare Mauriello examination before trial.	5.00	5.00
2113	12/20/2013	NBS	Take examination before trial of Mauriello.	8.50	8.50
4489	12/20/13	JL	Represent client with Smith at Mauriello examination before trial at Scoppetta Seiff Kretz & Abercrombie.	9.50	9.50
4944	12/20/13	MB	Mauriello deposition.	0.00	0.00
5022	06/27/14	MB	Prep for Mauriello's deposition; review prior deposition; review City defendants depo summaries.	4.00	4.00

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
2214	6/27/2014	NBS	Review of Mauriello examination before trial; telephone call to Dr. Roy Lubit; and prepare for Mauriello examination before trial.	3.50	3.50
2215	6/28/2014	NBS	Review of Mauriello examination before trial; review of Lubit affirmation in Monaco.	2.25	4.50
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.	4.50	7.50
2217	7/1/2014	NBS	Prepare and take Mauriello examination before trial.	9.50	9.50
4609	07/01/14	JL	Prepare and conduct w/Smith examination before trial for Mauriello. Review w/client and Smith.	8.50	8.50
5023	07/01/14	MB	Mauriello Deposition.	0.00	0.00
2661	02/17/15	JPF	Review of deposition exhibits & depositions - Mauriello	3.75	3.75
1175	03/01/15	JLN	Reviewed and highlighted Mauriello EBT Volume I; took notes re: same	2.90	2.90
				131.67	148.45
			Boston Deposition		
4495	01/03/14	JL	Preparing docs and audio for Sgt Huffman and PAA Boston depositions	1.25	2.50
2120	1/3/2014	NBS	Prepare for Boston and Huffman examination before trial	2.25	4.50
4951	01/03/14	MB	Prepare for Huffman and Boston Deposition; review discovery docs; draft questions.	2.25	4.50
2121	1/5/2014	NBS	Prepare for Boston and Huffman examination before trial.	1.85	3.70
4952	01/05/14	MB	Prepare for Boston and Huffman Deposition.	3.02	6.02
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	10.50
4496	01/06/14	JL	co-counsel w/Smith depositions of Huffman and Boston; post EBT review w/Smith and Bauza	4.75	9.50

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
4125	02/18/15	GMC	Read, reviewed and took notes of PAA Boston deposition	2.25	2.25
2663	02/28/15	JPF	Review of Schoolcraft discovery/deps - Boston	3.75	3.75
1406	04/15/15	JLN	Reviewed E-mail and letter regarding PAA Boston's medical condition	0.10	0.10
4299	04/15/15	GMC	Reviewed and revised Boston outline for deposition read ins	2.25	2.25
4303	04/15/15	GMC	Review of correspondence re: PAA Boston	0.10	0.10
				29.07	49.67
			Huffman Deposition		
4495	01/03/14	JL	Preparing docs and audio for Sgt Huffman and PAA Boston depositions	1.25	2.50
2120	1/3/2014	NBS	Prepare for Boston and Huffman examination before trial	2.25	4.50
4951	01/03/14	MB	Prepare for Huffman and Boston Deposition; review discovery docs; draft questions.	2.25	4.50
2121	1/5/2014	NBS	Prepare for Boston and Huffman examination before trial.	1.85	3.70
4952	01/05/14	MB	Prepare for Boston and Huffman Deposition.	3.00	6.02
4955	01/06/14	MB	Team meeting re review of Boston and Huffman depositions.	1.75	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	10.50
4496	01/06/14	JL	co-counsel w/Smith depositions of Huffman and Boston; post EBT review w/Smith and Bauza	4.75	9.50
1121	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	0.50	0.50
4130	02/19/15	GMC	Phone call JN regarding best and worst PTS from Huffman, Adrian's handling of downgrading issue at his deposition, fit for duty reports, and general issues that might come up at tomorrows	0.50	0.50

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			meeting		
4137	02/23/15	GMC	Read, reviewed and took notes on Huffman deposition	3.00	3.00
2642	02/24/15	JPF	Review of Schoolcraft discovery/deps - Huffman	4.25	4.25
				30.60	51.22
			Hanlon Deposition		
2124	1/12/2014	NBS	Prepare for Hanlon examination before trial	3.50	3.50
4498	01/12/14	JL	Prepare for Hanlon deposition; review docs and audio files	1.75	1.75
4958	01/12/14	MB	Prepare for Hanlon's deposition; review EMT emergency procedure and discovery documents.	4.13	4.13
2125	1/13/2014	NBS	Prepare for and take Hanlon examination before trial; conference with team re: examination before trial and case	8.50	8.50
4499	01/13/14	JL	co-counsel w/Smith at Hanlon deposition	8.50	8.50
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.	1.30	4.50
2343	1/16/2015	NBS	Review of Hanlon examination before trial; review of cases; review of Compstat video.	2.50	7.50
1065	02/02/15	JLN	Reviewed Dep. of Lt. Hanlon; cross-referenced PX 67 (IAB interview)	0.90	0.90
				31.08	39.28
			Lamstein Deposition		
2132	1/28/2014	NBS	Prepare for Dr. Lamstein	3.50	3.50
4961	01/28/14	MB	Prepare for Lamstein deposition; review handwritten notes in discovery docs; draft questions.	3.75	3.75
2133	1/29/2014	NBS	Prepare for Dr. Lamstein	2.30	2.30
4501	01/29/14	JL	Preparing for Lamstein deposition	2.00	2.00
4962	01/29/14	MB	Meeting Nat's Office re: review and prep for Lamstein EBT.	4.00	4.00
2134	1/30/2014	NBS	Prep for and take Dr. Lamstein examination before trial	9.50	9.50

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
4502	01/30/14	JL	conduct as co-counsel w/Smith Lamstein deposition	8.50	8.50
4963	01/30/14	MB	Lamstein Deposition.	10.00	10.00
1109	02/15/15	JLN	Reviewed handwritten notes of Dr. Lamstein; took notes re: same	2.90	2.90
1108	02/15/15	JLN	Reviewed and highlight Dr. Lamstein Dep; took notes re: same	3.10	3.10
4181	03/09/15	GMC	Review of Lamstein depositions errata sheet	0.30	0.30
				49.85	49.85
			Aldana-Bernier Deposition		
4464	10/16/13	JL	co-counsel at deposition Dfnt Bernier - 111 Broadway- by H. Suckle	1.75	1.75
4828	10/18/2013	HS	prep for Aldana-Bernier depo	4.00	4.00
4829	10/21/2013	HS	reviewed Aldana-Bernier interrogatories and further prep for depo	3.25	3.25
4831	10/24/2013	HS	prep deposition binder for Aldana-Bernier depo	10.00	10.00
2084	10/24/2013	NBS	Prepared for examination before trial of Dr. Bernier	5.50	5.50
4832	10/25/2013	HS	appeared for Aldana-Bernier depo and strategized with John Meg and Nat Smit	5.00	5.00
2085	10/25/2013	NBS	Appearance for Bernier examination before trial; wait for response from Court on video objection; meeting with team.	3.20	3.20
4467	10/25/13	JL	Appearance in court re attorney video of deposition--Bernier	0.75	0.75
4905	10/25/13	MB	Dr. Aldana-Berner; deposition was cancelled.	2.50	2.50
4471	11/14/13	JL	Review of hospital and NYPD files and audio recordings in preparation for examination before trial of Bernier and Mauriello.	2.75	5.50
4841	2/9/2014	HS	call and email re: Deposition of hospital with deft counsel	0.20	0.20
4843	2/10/2014	HS	deposition preparation	2.60	5.20
4507	02/10/14	JL	Preparing depositions of Bernier and Isakof; review NYS 9.39	1.25	2.50
2138	2/10/2014	NBS	Telephone conference with the court	1.40	3.80

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			clerk reference submission on February 10, 2014; letter to court; prepare for doctor's examination before trial (2.8)		
4842	2/11/2014	HS	reviewed client's deposition questions	0.25	0.50
4844	2/11/2014	HS	prep Isakov deposition	9.00	9.00
2139	2/11/2014	NBS	Prepare for and attend Dr. Bernier examination before trial.	8.50	8.50
4508	02/11/14	JL	Deposition of defendant Dr. Bernier.111 B'Way--co-counsel with Smith and Suckel	8.50	8.50
4970	02/11/14	MB	Bernier Deposition	0.00	0.00
4847	4/20/2014	HS	preparation Aldana-Bernier deposition	4.50	4.50
4848	4/22/2014	HS	preparation Aldana-Bernier deposition	3.00	3.00
4849	4/23/2014	HS	prep and conducted Aldana-Bernier deposition	8.00	8.00
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	8.50
				90.15	103.65
			Isakov Deposition.		
4843	2/10/2014	HS	deposition preparation	2.60	5.20
4968	02/08/14	MB	Prepare for Medical Defendant's EBTs; review medical chart,record, and deposition summaries; review Beiner's prior litigation testimony.	2.88	5.75
4969	02/10/14	MB	Conference with Howard Suckle re deposition prep; prep for Medical Defendants depositions.	3.13	6.25
4507	02/10/14	JL	Preparing depositions of Bernier and Isakov; review NYS 9.39	1.25	2.50
4842	2/11/2014	HS	reviewed client's deposition questions	0.25	0.50
4845	2/12/2014	HS	prep and conducted Isakov deposition	7.25	7.25
2140	2/12/2014	NBS	Prepare for and attend Dr. Isakov examination before trial.	9.50	9.50
4509	02/12/14	JL	co-counsel with Smith and Suckle at deposition of Defendant Dr. Isakov.	7.50	7.50
4971	02/12/14	MB	Isakov Deposition.	0.00	0.00
4510	02/13/14	JL	Review with Smith notes and exhibits of depositions of Bernier and Isakov.	1.00	1.00
4973	02/20/14	MB	Draft memo to counsel re: Dr. Isakov.	2.00	2.00
				37.36	47.45

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			Trainor Deposition		
4524	03/05/14	JL	Prepare examination before trial materials for Timothy Trainor.	0.50	0.50
2161	4/4/2014	NBS	Review of medical expert decisions and affidavit; prepare for Trainor examination before trial.	1.25	2.50
2163	4/8/2014	NBS	Prepare for Trainor examination before trial.	2.80	2.80
4552	04/10/14	JL	Prepare/conduct w co-counsel Smith examination before trial of Trainor.	8.25	8.25
2165	4/10/2014	NBS	Prepare for and take deposition of Trainor; prepare for Gough examination before trial.	4.45	8.90
1177	03/01/15	JLN	Reviewed and highlighted EBT of Captain Trainor; Cross referenced E-mails referred to in deposition	2.20	2.20
				19.45	23.90
			Gough Deposition		
4515	02/24/14	JL	Review file to prepare examination before trial material for Gough.	1.50	1.50
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.	0.60	2.80
2165	4/10/2014	NBS	Prepare for and take deposition of Trainor; prepare for Gough examination before trial.	4.45	8.90
2166	4/11/2014	NBS	Prepare for and take Gough examination before trial	7.80	7.80
4553	04/11/14	JL	Prepare/conduct as co-counsel w/ Smith examination before trial of Gough.	7.50	7.50
2624	02/22/15	JPF	Review of Schoolcraft discovery/deps - Gough	4.80	4.80
1375	04/09/15	JLN	Reviewed Dep. of William Gough; notes on same	2.10	2.10
4363	08/03/15	GMC	Email w/NS re Gough deposition	0.10	0.10
				28.85	35.50
			Sawyer Deposition		
2176	4/25/2014	NBS	Prepare for and take deposition of Sawyer.	6.50	6.50
4560	04/25/14	JL	Prepare/conduct w/Smith examination	6.25	6.25

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			before trial for Sawyer.		
2175	4/24/2014	NBS	Prepare for Sawyer examination before trial (3.0); revise opposition to Jamaica Hospital protective order motion.	1.75	3.50
1063	02/02/15	JLN	Reviewed Dep. of Sgt. Sawyer; notes on same	1.70	1.70
2615	03/01/15	JPF	Review of Schoolcraft discovery/deps - Broschart/Sawyer	5.50	5.50
				21.70	23.45
			Duncan Deposition		
4517	02/26/14	JL	Prepare examination before trial materials for Duncan.	0.50	0.50
4563	04/28/14	JL	Prepare/conduct w/Smith examination before trial: Duncan.	7.50	7.50
2178	4/28/2014	NBS	Prepare for and take Duncan examination before trial and conference with all counsel and MJ Freeman re: settlement discussion.	7.80	7.80
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)	3.00	4.50
2211	6/20/2014	NBS	Draft opposition to reconsider; review of Duncan examination before trial; prepare for Duncan.	2.25	4.50
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.	7.50	7.50
4603	06/23/14	JL	Prepare for, and conduct with Smith dfnt Duncan examination before trial; review Duncan examination before trial.	7.50	7.50
2308	12/5/2014	NBS	Review of letters; review of Duncan transcripts, emails with team re: status.	1.80	1.80
2664	03/02/15	JPF	Review of Schoolcraft discovery/deps - Sawyer/Duncan	3.75	3.75
2628	03/04/15	JPF	Review of Schoolcraft discovery/deps - Duncan	4.75	4.75
1366	04/08/15	JLN	T/c GC regarding points from Duncan deposition regarding ESU, meat cleaver	0.20	0.20

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			and travelling to Johnstown		
4284	04/08/15	GMC	Phone call JN regarding points from Duncan deposition regarding ESU, meat cleaver and travelling to Johnstown	0.20	0.20
				46.75	50.5
			Sergeant James Deposition		
4520	02/28/14	JL	Prepare examination before trial docs for Sergeant James.	0.75	0.75
4573	05/10/14	JL	Consultation and correspondence with Nat Smith re: City defendants' discovery production re: 081 lockers; prepare EBT of Sgt James.	1.25	2.50
2184	5/11/2014	NBS	Prepare for James examination before trial.	3.50	3.50
2185	5/12/2014	NBS	Prepare for and take James examination before trial.	6.80	6.80
4575	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.	3.50	7.00
1059	02/01/15	JLN	Reviewed Dep. of Sgt. James	1.90	1.90
2677	02/26/15	JPF	Review of Schoolcraft discovery/deps - James	3.40	3.40
				21.10	25.85
			Marquez Deposition		
4518	02/27/14	JL	Prepare examination before trial Marquez.	0.50	0.50
2187	5/14/2014	NBS	Prepare and take examination before trial of Marquez.	8.40	8.40
4578	05/14/14	JL	EBT (w/Smith) of Marquez, EMT/JHC; prepare status report.	7.50	7.50
5004	05/14/14	MB	EMT Jessica Marquez Deposition.	0.00	0.00
				16.40	16.40
			Sangianetti Deposition		
4519	02/27/14	JL	Prepare for Sangianetti.	0.50	0.50
4579	05/15/14	JL	Preparation/conduct w/Smith EBT of Sangetti; EMT/JHC; preparation - conduct post depo-review with Smith.	5.25	5.25
2188	5/15/2014	NBS	Prepare for and take examination before trial of Sangetti (4.5); emails	4.50	5.00

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			with client re: status and settlement (0.5).		
				10.25	10.75
			Weiss Deposition		
4516	02/25/14	JL	Prepare examination before trial materials for Weiss.	0.75	0.75
5013	05/28/14	MB	Prepare Weiss deposition; team conference call re Weiss deposition.	4.10	4.10
4586	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).	4.50	7.50
2194	5/29/2014	NBS	Prepare for Weiss; take Weiss examination before trial; prepare for JHMC.	4.75	9.50
5015	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.	3.35	6.70
2648	03/11/15	JPF	Review of Discovery and Dpositions - Weiss	4.10	4.10
				21.55	27.90
			Ferrara Deposition		
2173	4/22/2014	NBS	Telephone conference with Joe Ferrero.	0.50	0.50
4577	05/13/14	JL	Drive (Lenoir's POV) from 111 Broadway, NY, NY to Long Island to meet with Lt Ferrara (ret)	1.50	1.50
4576	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]	4.50	4.50
2186	5/13/2014	NBS	Travel to Holbrook and meet with Ferrara and his wife.	5.50	5.50
2198	6/4/2014	NBS	Prepare for Ferrara examination before trial; telephone conference with co-counsel re: same.	3.20	3.20
4591	06/04/14	JL	Meeting with Smith and Ferrara to prepare for examination before trial;	3.50	3.50

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			review EBT materials: documents and audio.		
4590	06/04/14	JL	Represent (with Smith) Ferrara at City deposition, 100 Church St	4.50	4.50
5017	06/04/14	MB	Prepare for Ferrara Deposition.	3.00	3.00
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	9.50
5019	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.	1.25	2.50
1377	04/09/15	JLN	Reviewed Dep. of Joe Ferrara; cross-referenced w/e mail exchanges b/w JLN and JF.	0.90	0.90
				33.10	39.1
			Broschart Deposition		
4521	03/03/14	JL	Prepare examination before trial materials for Broschart.	0.75	0.75
4581	05/16/14	JL	Prepare EBT for Broschart - review City motion to strike 30(b)(6) issues.	1.25	2.50
2208	6/17/2014	NBS	Prepare for Broschart.	3.50	3.50
2209	6/18/2014	NBS	Prepare for and take Broschart re: examination before trial.	7.80	7.80
4599	06/18/14	JL	Prepare for and conduct (with Smith) Broschart examination before trial; review notes.	7.50	7.50
1060	02/01/15	JLN	Reviewed Dep. of Lt. Broschart.; notes on same	1.20	1.20
				22.00	23.25
			Lwin Deposition		
5024	07/02/14	MB	Prep for Lwin deposition; review Beiner deposition notes and hospital chart.	1.50	1.50
2218	7/3/2014	NBS	Prepare and take Dr. Lwin examination before trial; meeting with team re: expert report; lunch with team.	3.80	3.80
4611	07/03/14	JL	Prepare and review w/Smith re: Dr. Lwin's examination before trial.	3.50	3.50
2232	7/28/2014	NBS	Review of Dr. Lwin examination	0.60	1.20

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			before trial; review letter from Jamaica Hospital.		
1207	03/08/15	JLN	Reviewed transcripts of Dr. Dhar and Dr. Lwin; took notes re: same	0.80	1.90
				10.20	11.90
			Whaler Deposition		
4619	07/15/14	JL	Conduct two City 30(b)(6) examinations before trial.	3.75	7.50
				3.75	7.50
			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	9.50
5041	08/14/14	MB	Draft response addressing 8.5.14 Letter re: Purpi's 30(b)(6) issues.	4.90	4.90
2253	9/17/2014	NBS	Prepare for and take Purpi examination before trial.	3.50	3.50
4661	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.	0.83	2.50
4662	09/19/14	JL	With Smith: City 30(b)(6) deposition with Sgt Purpi; and City 30(b)(6) witness on gun amnesty program.	1.37	2.75
				15.35	23.15
			Valenti 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	9.50
1156	02/25/15	JLN	E-mail exchange with GC regarding highlights from Valenti dep	0.10	0.10
4148	02/25/15	GMC	Review of Valenti deposition	1.50	1.50
2698	02/25/15	JPF	Review of Schoolcraft discovery/deps - Valenti	3.25	3.25
2878	02/26/15	JPF	Review of Valenti examination	1.25	1.25

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
4403	09/09/15	GMC	Review and update Valenti deposition	1.25	1.25
				12.10	16.85
			Finnegan Deposition		
1489	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	2.40	2.40
				2.40	2.40
			Cooper Deposition		
5032	07/24/14	MB	City 30(b)(6) witness deposition, Cooper.	0.00	0.00
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.	7.50	7.50
				7.50	7.50
			Patel Deposition.		
5033	07/24/14	MB	Prep for Patel deposition.	1.00	1.00
2231	7/25/2014	NBS	Prepare and take examination of trial of Dr. Patel; draft letter to Court on application re: Dr. Patel.	3.50	3.50
5034	07/25/14	MB	Patel deposition.	0.00	0.00
2288	10/30/2014	NBS	Prepare for Patel examination before trial; research warrantless entry and search.	3.50	3.50
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.	3.20	5.50
1187	03/04/15	JLN	Reviewed dep. of Dr. Patel	0.90	0.90
				12.10	14.40
			Carrasco Deposition		
2255	9/19/2014	NBS	Prepare for and attend Carrasco ebt	5.50	5.50
4662	09/19/14	JL	With Smith: City 30(b)(6) deposition with Sgt Purpi; and City 30(b)(6) witness on gun amnesty program.	1.38	2.75
				6.88	8.25
			Eterno Deposition		
5019	06/06/14	MB	Draft summary of notes from Ferrara deposition send to counsel; team conference call with police practices	1.25	2.50

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
			experts, Eterno and Silverman re: expert report and testimony.		
2270	10/9/2014	NBS	Telephone conference with client; review of Eterno production; email re: same; review of Floyd trial.	2.25	4.50
2275	10/17/2014	NBS	Appear for and defend Eterno examination before trial; revise and file letter with court re: outstanding discovery issues.	9.50	9.50
4679	10/17/14	JL	Examination before trial of Dr. Eterno (with Smith).	8.50	8.50
1076	02/06/15	JLN	Reviewed Eterno's deposition; took notes re: same	2.80	2.80
1142	02/24/15	JLN	Review of Eterno's dep; took notes regarding same	1.60	1.60
4140	02/24/15	GMC	Review of John Eterno Deposition	1.90	1.90
5117	03/09/15	MB	Draft Eterno Deposition Summary; team conference call.	6.90	6.90
				34.70	38.2
			Silverman Deposition		
4650	09/07/14	JL	Review PD expert Silverman prior research.	1.50	1.50
2280	10/22/2014	NBS	Meeting with Eli Silverman to prepare for examination before trial.	3.50	3.50
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	6.50
4682	10/23/14	JL	Prepare and review summaries of deposition transcripts; schedule remaining depositions with counsel; prepare Silverman for deposition.	1.50	3.50
2282	10/24/2014	NBS	Defend Silverman's examination before trial.	7.50	7.50
4683	10/24/14	JL	Defend with Smith City's examination before trial of Silverman.	7.50	7.50
1080	02/08/15	JLN	Reviewed Silvennan's deposition; took notes re same	3.20	3.20
				27.95	33.2