

Exhibit C: General Deposition Time

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
1809	05/09/11	NB	Drafted Deposition notices for all defendants	0.10	0.10
3745	05/19/11	GMC	Email from JN re: dep notices to be served	0.10	0.10
655	05/19/11	JLN	E-mail from GC re: additional dep notices to be served	0.10	0.10
653	05/19/11	JLN	Drafted Schoolcraft deposition notices.	0.40	0.40
1816	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	0.40	0.40
893	08/13/12	JLN	Review of E-mail from SP re: scheduling AS depo	0.10	0.10
4001	08/16/12	GMC	Discussion w/ JN & JF re City's suggestion on multiple dates for depositions	0.75	0.75
4014	08/22/12	GMC	Email from JN re dep dates	0.10	0.10
4015	08/22/12	GMC	Email from Kretz re AS dep date	0.10	0.10
4024	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	0.80	0.80
923	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	0.80	0.80
2940	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	0.80	0.80
4051	09/26/12	GMC	Review of email from JN adjourning	0.10	0.10

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
			AS dep		
4049	09/26/12	GMC	Meeting w/ JN & JF & AS re adjourning dep due to father's medical emergency	0.60	0.60
954	09/26/12	JLN	E-mail from JF adjourning dep of AS	0.10	0.10
956	09/26/12	JLN	E-mail to JF adjourning dep of AS	0.10	0.10
959	09/26/12	JLN	Review of E-mail from GC adjourning AS dep	0.10	0.10
952	09/26/12	JLN	Meeting w/ JF & GC & AS re adjourning dep due to father's medical emergency	0.60	0.60
3283	09/26/12	JPF	Email from JN adjourning dep of AS re: medical issues he was having	0.10	0.10
2996	09/26/12	JPF	Meeting w/ JN & GC & AS re adjourning dep due to father's medical emergency	0.60	0.60
1953	3/23/2013	NBS	Review of motion and motion letter; research on taking high-level government employee's deposition.	1.10	3.50
1974	4/22/2013	NBS	Review of testimony in discovery	3.00	3.00
4429	05/09/13	JL	Meeting with Nat Smith to review and prepare discovery, engage investigator and prepare depositions	3.25	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.	0.60	1.80
2040	8/21/2013	NBS	Telephone conference with co-counsel; emails with opposing counsel re: discovery schedule.	0.60	1.20
4819	8/22/2013	HS	reviewed availability, called and emailed Nat Smith re: my availability for depositions	0.25	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.	4.20	4.20
2069	10/4/2013	NBS	Preparing for Marino and Mauriello	0.25	5.50

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
			examination before trial (5.0); telephone conference with co-counsel; emails with opposing counsel re: adjournment for Mauriello; review of PG & Floyd trial transcripts.		
4896	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.	5.00	5.00
4897	10/15/13	MB	Prepare medical defendants examination before trial.	5.00	5.00
4899	10/17/13	MB	Prepare medical defendants examination before trial	3.00	3.00
4901	10/21/13	MB	Prepare medical defendants examination before trial	6.00	6.00
4830	10/22/2013	HS	meeting with Nat Smith to review case	2.50	2.50
4902	10/22/13	MB	Prepare medical defendants examination before trial	5.00	5.00
2082	10/22/2013	NBS	Meeting with H. Suckle re: medical examination before trial preparation.	2.50	2.50
4903	10/23/13	MB	Prepare medical defendants examination before trial.	5.00	5.00
2092	11/4/2013	NBS	Prepare for examination before trial.	2.50	2.50
4474	11/21/13	JL	Review and produce Marino and Lauterborn video depositions; reconcile Plaintiff depositions transcript with video.	2.75	2.75
2102	11/26/2013	NBS	Drafting notices for depositions ; review of email.	1.00	1.00
4929	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.	5.00	5.00
4482	12/02/13	JL	Telephone conference with Smith and client re case status of depositions	1.50	1.50
2104	12/2/2013	NBS	Telephone conference with W. Krétz re: Mauriello; telephone	1.50	2.50

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
			emails with counsel re: status and discovery deadline.		
4934	12/05/13	MB	Write up on all deposition objection issues.	5.00	5.00
4935	12/06/13	MB	Write up on all deposition objection issues.	5.00	5.00
4494	01/02/14	JL	Telephone conference with Smith re status and schedule of depositions	0.75	0.75
2131	1/27/2014	NBS	Revising letter to website responders; sending Out same; letter to City Defendants re: examination before trial	0.60	1.20
4503	02/03/14	JL	Telephone conference with Smith re deposition schedules	0.50	0.50
2135	2/3/2014	NBS	Telephone conference with co-counsel; email reference examination before trial.	0.50	0.50
2136	2/5/2014	NBS	Telephone conference with client; emails reference examination before trial; and letter to Judge Sweet.	0.80	0.80
4967	02/07/14	MB	Meeting with Nat re: inadvertent production redaction issues; begin prep for Medical Defendants EBTs.	2.50	5.00
4968	02/08/14	MB	Prepare for Medical Defendant's EBTs; review medical chart, record, and deposition summaries; review Beiner's prior litigation testimony.	2.87	5.75
4969	02/10/14	MB	Conference with Howard Suckle re deposition prep; prep for Medical Defendants depositions.	3.12	6.25
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.	1.30	3.80
2144	2/20/2014	NBS	Email co-counsel; client review of examination before trial for motion.	2.80	2.80
4514	02/23/14	JL	Telephone conference. Smith re depositions	0.75	0.75
2146	2/23/2014	NBS	Review of examination before trial; telephone co-counsel; telephone	3.50 ¹	3.50

¹ Previous version of this chart had two entries totaling 3.50 hours, they have been combined.

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
			conference with client reference status.		
2147	2/24/2014	NBS	Review of examination before trial; email reference recording.	0.40	0.40
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	5.00
4523	03/05/14	JL	Review discovery and depositions; update case status report for client	1.25	1.25
4976	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).	4.65	4.65
4977	03/09/14	MB	Draft Memo to counsel re: City Defendants deposition objection issues.	6.66	6.66
4528	03/10/14	JL	Schoolcraft research for response to discovery and deposition issues and hearing.	3.50	3.50
4529	03/11/14	JL	Schoolcraft research and draft letter to court re: discovery and deposition issues (4.00); confer w/co-counsel (1.00)	5.00	5.00
4533	03/14/14	JL	Review scheduling for examination before trial.	0.75	.75
4982	03/14/14	MB	Draft subject matter for NYPD 30(b)(6) notices.	5.67	5.67
4535	03/17/14	JL	Review schedule of examination before trial w Smith and opposing counsel.	1.50	1.50
4539	03/24/14	JL	Prepare deposition schedules in consult with Smith and defendants counsel. Review discovery and prep motion draft.	1.87	3.75
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).	2.20	3.80
4542	03/27/14	JL	Prepare, review, and edit correspondence re 30(b)(6)	1.50	1.50

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
			examination before trial.		
2157	3/27/2014	NBS	Telephone conference with client (twice) re subject matters of numerous 30(b)(6) notices; revising same.	3.50	3.50
4543	03/28/14	JL	Finalize Plaintiff 30(b)(6) notices. Prepare examination of City 30(b)(6) witnesses	3.25	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	4.50
2181	5/2/2014	NBS	Telephone conference with Gregory Radomsile reference examination before trial; emails to opposing counsel' re: same.	0.80	0.80
4580	05/15/14	JL	Review of EBT; review case and settlement strategy with client and Smith	0.88	1.75
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)	1.50	4.50
4612	07/04/14	JL	Prepare for 30(b)(6) depositions and other JHC witnesses.	3.75	3.75
4614	07/08/14	JL	Schedule and plan remaining depositions (2.00); review final discovery productions (2.50).	2.00	4.50
4615	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.	0.87	1.75
4617	07/11/14	JL	Arrange and negotiate terms for ER MD expert witness; prepare for City examination before trial.	0.87	1.75
5027	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.	6.00	6.00
4618	07/14/14	JL	Prepare for City 30(b)(6)	2.25	2.25

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
			examination before trial.		
2222	7/14/2014	NBS	Prepare for examination before trial of City 30(b)(6) witnesses.	1.50	1.50
4619	07/15/14	JL	Conduct two City 30(b)(6) examinations before trial.	3.75	7.50
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.	3.20	3.20
4620	07/16/14	JL	Conduct two City 30(b)(6) examination before trial.	7.00	7.00
4621	07/17/14	JL	Conduct two City 30(b)(6) examination before trial.	7.00	7.00
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.	6.50	6.50
4623	07/21/14	JL	Review of discovery and depositions.	1.50	1.50
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	4.50
2237	8/3/2014	NBS	Review and revise letter to Court; research on deposition conduct re: definition of harassment.	5.80	5.80
5037	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.	3.10	3.10
4630	08/06/14	JL	Review and summarize depositions; confer w/Smith re: expert reports.	1.75	1.75
4631	08/07/14	JL	Review depositions; prepare index and summaries; confer re: expert testimony and reports.	2.50	2.50
4636	08/14/14	JL	Research and review existing material re: expert depositions and dispositive motions.	1.50	1.50
4637	08/15/14	JL	Prepare for depositions of plaintiff's experts	1.50	1.50
4638	08/16/14	JL	Telephone conference with Nat Smith re: expert report follow up	1.00	1.00

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
			and deposition.		
4639	08/18/14	JL	Respond to City Defendant letter re: expert reports; review and index depositions.	1.25	2.50
4640	08/19/14	JL	Review deposition summaries; draft correspondence re: discovery issues.	2.50	2.50
4641	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.	2.37	4.75
4643	08/22/14	JL	Confer with all expert witnesses re: schedule availability for depositions.	1.25	1.25
4646	09/02/14	JL	Confer with co-counsel on expert discovery response, schedule of depositions.	1.50	1.50
2244	9/3/2014	NBS	Email to all counsel re: schedule; telephone call with Eli Silverman.	0.70	0.70
4648	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.	1.75	3.50
4652	09/10/14	JL	Review with all counsel expert witness deposition schedule and outstanding discovery production; review research material for depositions.	1.25	2.50
4671	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).	2.50	6.25
4673	10/06/14	JL	Review of discovery correspondence and scheduling of remaining depositions.	1.50	1.50
2297	11/11/2014	NBS	Telephone conference with paralegal (JS) re: case; review of ebt summaries.	1.50	1.50
2299	11/14/2014	NBS	Review of examination before trial	1.50	1.50

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
			summaries and indexes.		
2307	12/4/2014	NBS	Revising Amended Complaint and Memo on motion to amend; began review of depositions for summary judgment motion.	2.25	4.50
2309	12/7/2014	NBS	Review of examination before trial record.	5.50	5.50
4695	12/08/14	JL	Review deposition summaries; research on motions for summary judgment; confer with Smith re preparation for opposition.	1.50	3.00
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	3.50
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.	1.83 ²	5.50
2312	12/10/2014	NBS	Review of examination before trial for preparation of motions meeting with John Lenoir re: motions.	8.50	8.50
2338	1/10/2015	NBS	Review of examinations before trial and Compstat videos.	3.75	7.50
2341	1/14/2015	NBS	Conference with client and John Lenoir; review of examination before trial and motions.	3.75	7.50
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	5.50
4105	02/08/15	GMC	Email correspondence re: videos of deps	0.25	0.25
1083	02/09/15	JLN	E-mail exchange with NS regarding setting up meeting and getting Broschart Dep and Exhibits from Maurielloi Marino Dep	0.10	0.10
4110	02/11/15	GMC	Review of deposition exhibits	3.10	3.10
1087	02/11/15	JLN	Started review of deposition exhibits	3.40	3.40
4114	02/12/15	GMC	Review of deposition exhibits	4.40	4.40

² Hours have been changed from 5.50 to 1.83 to reflect proper allocation.

	Date	Timekeeper	Journal Entry	Allocated Hours	Aggregate Hours
1092	02/12/15	JLN	Continued review of deposition exhibits	3.75	3.75
4120	02/15/15	GMC	Review of deposition exhibits	4.80	4.80
1107	02/15/15	JLN	Cont'd review of deposition exhibits	3.20	3.20
2653	02/15/15	JPF	Review of deposition exhibits & depositions	3.90	3.90
2623	02/16/15	JPF	Review of deposition exhibits & depositions	4.80	4.80
4122	02/17/15	GMC	Review of deposition exhibits	3.75	3.75
1112	02/17/15	JLN	Finished review of deposition exhibits	1.80	1.80
4738	02/19/15	JL	Review of examination before trial summaries.	1.00	1.00
2639	02/25/15	JPF	Review of Schoolcraft discovery/deps - Lamstein/Sanganetti/Marquez	4.30	4.30
4162	02/27/15	GMC	Email correspondence with NS and JN re: dep summaries, index of all exhibits, potential trial exhibits	0.40	0.40
4160	02/27/15	GMC	Review of deposition summaries by NS team	3.80	3.80
1167	02/27/15	JLN	E-mail conespodence with NS and GC re: dep summaries, index of all exhibits, potential trial exhibits	0.40	0.40
4164	03/02/15	GMC	Review of deposition summaries by NS team	1.40	1.40
1883	04/01/15	NB	Printed deps of Huffman, James, Hanlon, Halpren, Gough, Ferrara, Duncan, Caughey, Broschart, Bernier and bound	0.70	0.70
1710	08/10/15	JJM	Continue reorganizing dep nighlights	1.10	1.10
				316.4	390.18