

Exhibit E: Additional Deposition Time

	Date	Time-keeper	Journal Entry	Allocated Hours	Aggregate Hours
4930	11/30/13	MB	Rule 30(c)(2) research re: discoverable disciplinary records; convictions; sanctions; applying state law privileges.	5.00	5.00
4931	12/02/13	MB	Rule 30(c)(2) research.	5.00	5.00
4932	12/03/13	MB	Draft memo to counsel re: Rule 30(c)(2) research	5.00	5.00
4933	12/04/13	MB	Draft memo to counsel re: Rule 30(c)(2) research	5.00	5.00
4497	01/10/14	JL	Prepare case files and review audio records for future depositions	2.00	2.00
4570	05/07/14	JL	Prepare and review response to City Motion re: 30(b)(6) EBT.	1.00	1.00
4581	05/16/14	JL	Prepare EBT for Broschart - review City motion to strike 30(b)(6) issues.	1.25	2.50
2193	5/28/2014	NBS	Prepare for conference of motion; appear on motion before Judge Sweet (2.8); telephone call to Dr. Lubit; telephone call to the office of Eterno; conference with all counsel re: schedule and need 30-45 days; prepare for Weiss examination before trial; conference with team re: Weiss; telephone Jon Norinsberg re: locker photos.	2.80	8.50
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).	3.00	7.50
5012	05/28/14	MB	Hearing with Judge Sweet oral arguments on motion.	2.00	2.00
4642	08/21/14	JL	Telephone conference with Smith re: case scheduling with Larry Schoolcraft (.75); draft response to medical defendants re: depositions of Dr. Patel and Dr. Lwin and City Defendants re: discovery issues (1.25); complete Adrian Schoolcraft 2nd deposition summary (2.50).	1.25	4.50
				33.30	56.5

