IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

Jennifer Gilmore Plaintiff v. Joe Beveridge, et al Defendants	2:22-cv-02032-HLT-RES Plaintiff's Motion for Attorney Fees

COMES NOW Plaintiff Jennifer Gilmore, as prevailing party in the above captioned 42 U.S.C. § 1983 matter, requests an award of reasonable attorney fees, expenses, and costs, under Fed. R. Civ. P. 54(d) and 42 U.S.C. § 1988(b). For reasons stated herein, the Court should award Ms. Gilmore her attorney's fees, expenses, and costs.[1]

ARGUMENT

"The purpose of § 1988 is to ensure effective access to the judicial process for persons with civil rights grievances. Accordingly, a prevailing plaintiff should ordinarily recover an attorney's fee unless special circumstances would render such an award unjust." *Hensley v. Eckerhart*, 461 U.S. 424, 429 (1983). The "special circumstances" exception is inapplicable here. "Congress enacted [Section] 1988 specifically because it found that the private market for legal services failed to provide many victims of civil rights violations with effective access to the judicial process." *City of Riverside v. Rivera*, 477 U.S. 561, 576 (1986). "These victims ordinarily cannot afford to purchase legal services at the rates set by the private market." *Id*. Thus, "they are unable to present their cases to the courts." *Id*. She is a prevailing party under that

[1] A bill of costs in the amount of $1,310.23 for filing fees, subpoena, and mediation costs will be filed separately after judgment is entered.

statute. A "plaintiff who wins nominal damages is a prevailing party." *Hall v. W. Prod. Co.,* 988 F.2d 1050, 1055 (10th Cir. 1993); *Farrar v. Hobby*, 506 U.S. 103 (1992) ("not all nominal damages awards are de minimis. Nominal relief does not necessarily a nominal victory make"). As such, Section 1988 serves as "a tool that ensures the vindication of important rights, even when large sums of money are not at stake, by making attorney's fees available under a private attorney general theory." *Farrar*, 506 U.S. at 122 (O'Connor, J., concurring).

Justice O'Connor suggested that when determining whether attorney's fees are warranted in a nominal-damages case, courts should consider "[1] the extent of relief, [2] the significance of the legal issue on which the plaintiff prevailed, and [3] the public purpose served by the litigation." *Id.* at 122 (O'Connor, J., concurring). In filing this lawsuit, Ms. Gilmore always had one aim: to establish that the Board policy was unconstitutional and that her suppression of her speech violated the Constitution. Her "viewpoint discrimination claim [was] her primary claim." ECF 119, p.9.

Absent from the trial strategy here was any demand for monetary damages: Gilmore declined to ask for any actual monetary losses at trial. Instead, the focus of Gilmore's civil rights claim was squarely on the vindication of her, as well as other parents', constitutional right to speak on a matter of public concern at the Olathe School Board meetings. The recovery of a large sum of money was neither the theme, the trial strategy, nor the goal of Gilmore's case against Joe Beveridge.

Her suit first resulted in the defendants changing their speaking policy. Defendants admit the change was "remedial." Because Gilmore failed to provide any evidence of actual damages, the jury's award of just nominal damages is perfectly

understandable. The jury's favorable nominal damage verdict, which underscores that Beveridge and the School District is liable to Gilmore for Beveridge's unconstitutional viewpoint discrimination, is exactly the relief Gilmore was seeking. *See Farrar*, 506 U.S. at 121 (O'Connor, J. concurring) (An "award of nominal damages can represent a victory in the sense of vindicating rights even though no actual damages are proved"). Gilmore got what she wanted: a change in the unconstitutional policy and judgment against Beveridge saying Beveridge had violated her constitutional rights. This factor weighs in favor of Gilmore's request for attorney fees.

The second factor to consider is "the significance of the legal issue on which the plaintiff prevailed." *Id.* at 122. The constitutional right that is the subject of Gilmore's constitutional claim is the right to free speech. The Olathe speaking policy was unconstitutional. Beveridge's viewpoint discrimination was also unconstitutional. Gilmore succeeded on two significant legal issues: the policy and the viewpoint discrimination of the Board president. Accordingly the second factor of Justice O'Connor's concurrence in *Farrar* weighs in favor of granting Gilmore's request for attorney's fees.

The final factor to consider is whether the litigation served a public purpose, as opposed to simply vindicating Gilmore's individual rights. Gilmore's "success might be considered material if it also accomplished some public goal other than occupying the time and energy of counsel, court, and client." *Farrar*, 506 U.S. at 121–22 O'Connor, J., concurring). The change in the Olathe speaking policy benefited all public speakers. The jury's finding sends a message to the current Olathe School Board president and to every municipal and county boards who conduct open meetings with public speakers

that they cannot turn a blind eye to facially viewpoint discriminatory policies and unconstitutional behavior by those presiding over public meetings. This is particularly true when these policies and presiding officer's behaviors threatens fundamental rights to assemble and address grievances to these governmental bodies without fear of retaliation.

Although the monetary award for Beveridge's constitutional violation is nominal, the change in the policy and the verdict against him for Gilmore's constitutional violation is massive. And, it will likely reverberate across school, municipal, and county boards in the state of Kansas for years to come with the resounding message that speaking policies cannot be viewpoint based nor can they be enforced arbitrarily to suppress viewpoints the government does not value or appreciate. Gilmore's lawsuit and civil rights claim against Beveridge serves an important public purpose, this factor also weighs in favor of Gilmore's request for attorney's fees. So, all of Justice O'Connor's considerations favor a conclusion that Gilmore is entitled to an award of attorney fees. The question then becomes the amount.

Gilmore is entitled to an award for attorney's fees in the amount of $317,300.00

Attorney	Hours	Rate	Total
Linus L. Baker	792.85[2]	$400	$317,300.00

In determining an attorney's fee award under § 1988, the "starting point" is the "lodestar," which is calculated by multiplying the number of hours reasonably

[2] Many hours were not recorded – for example clerical tasks and motion practice related to defendants McMullen and Kiger.

expended by reasonable hourly rates. *Kerner v. City & Cty. of Denver*, 733 F. App'x 934, 936 (10th Cir. 2018). There are twelve factors. *In re Market Center E. Retail Prop., Inc.,* 730 F.3d 1239, 1247 (10th Cir. 2013). Although the Court considers all of the factors, they need not be strictly applied in every case inasmuch as all of the factors are not always applicable. *Id.* at 1250.

a. the time and labor expended

This consideration weighs in favor of granting Gilmore's petition for attorney's fees. A "fee applicant bears the burden of … documenting the appropriate hours expended and hourly rates." *Hensley*, 461 U.S. at 437. "Where the documentation of hours is inadequate, the district court may reduce the award accordingly." *Id*. at 433.

During the nearly two years her lawsuit was pending, counsel submitted significant briefing on several complex and important constitutional legal issues that go to the heart of the protections guaranteed by the First Amendment, developed an extensive factual record identified, interviewed a series of fact witnesses, and zealously represented Gilmore over four days of jury trial. In just two years there were 187 ECF filings in this case. The pretrial and trial work was voluminous, extensive, and laborious. Counsel also participated in two mediations. Gilmore has not sought compensation for considerable time that would otherwise ordinarily be billable in the course of representation to a private client, such as time for communications including telephone conferences with opposing counsel, regular correspondence or all emails with opposing counsel. "Plaintiff's counsel, of course, is not required to record in great detail how each minute of his time was expended. But at least counsel should identify the general subject matter of his time expenditures."

Hensley, 461 U.S. at 437. Counsel has met that burden.

b. the novelty and difficulty of the questions raised

This consideration also weighs in favor of granting Gilmore's request for attorney's fees. Proving that Beveridge was liable for a constitutional violation against Gilmore was particularly demanding. Nevertheless, although difficult, Gilmore's counsel overcame Beveridge's qualified immunity and other motion for summary judgment claims and convinced the jury to find Beveridge had violated Gilmore's constitutional rights.

c. the skill required to properly perform the legal services rendered

This factor weighs in favor of the Court's granting Gilmore's motion for attorney fees. This was an especially difficult and complex case. And, she was successful, in large part, thanks to her highly skilled attorney.

d. the attorney's opportunity costs in pressing the instant litigation

This factor weighs in favor of Gilmore's fee request. Given the amount of time counsel expended on this case, a total of 792.85 hours, it is obvious counsel worked on this case virtually at the exclusion of others. And, because Gilmore's counsel took this case on a contingent basis, there was no guarantee of the amount of payment, if any, he would receive in payment. Consequently, Gilmore's counsel's opportunity costs as a solo practioner was quite high.

e. the customary fee for like work

This factor favors Gilmore's request. As a general rule, a reasonable hourly rate is the prevailing market rate, that is, the ordinary rate for similar work in the community where the case has been litigated. *Starlight Int'l, Inc. v. Herlihy*, 190

F.R.D. 587, 592 (D. Kan. 1999). In deciding upon the appropriate rate, courts may draw on their own experience and knowledge of prevailing market rates. *Fox v. Pittsburg State Univ.,* 258 F. Supp. 3d 1243, 1263–64 (D. Kan. 2017). But the prevailing market rate is only a starting point. The rate charged should also consider the experience, skill, and expertise of the attorneys as well as the complexity, significance, and undesirability of the case.

As shown in his declaration accompanying this motion, Mr. Baker, has practiced law for over 27 years and has litigated cases concentrating on representing plaintiffs in First Amendment, personal injury, and EEOC employment-related matters. Courts affirm fee awards even if the fee request exceeds the verdict. *See City of Riverside, et al., v. Rivera*, 477 U.S. 561, 106 S. Ct. 2686 (1986). In that case, the Court affirmed a fee award of $245,456.25 on damages of $33,500, relying on the fact that successful Section 1983 litigants "vindicate important civil and constitutional rights that cannot be valued solely in monetary terms." *Id.* at 574.

f. the attorney's expectations at the outset of the litigation

This factor favors the granting of Gilmore's attorney fee request. Counsel took this case with complete uncertainty as to the outcome and aware that few cases survive summary judgment and are successfully tried to verdict under 42 U.S.C. § 1983. But, this one did. That should be a credit to Gilmore's counsel.

g. the time limitations imposed by the client or circumstances

This factor is inapplicable to the facts of this case.

h. the amount in controversy and the results obtained

This factor favors Gilmore. Gilmore never asked for a particular amount of

money for her constitutional claim against Beveridge. Instead, she sought to have her claim for the harm done to her be acknowledged. And it was, with both the change in policy and a unanimous jury verdict finding a constitutional violation by Beveridge.

i. the experience, reputation and ability of the attorney

This factor favors the granting of Gilmore's motion as to both the number of hours billed and the rate requested. Counsel did not have the benefit of co-counsel, or an army of a jury consultant, or an administrative assistant armed with three laptops at trial. The Court can review the many papers that Gilmore's counsel submitted to the Court, heard his arguments, and closely observed his conduct at trial and his mastery of the subject matter.

j. the undesirability of the case within the legal community in which the suit arose

This consideration weighs in Gilmore's favor. This case has all of the marks of an undesirable case. *See Gillespie v. Brewer*, 602 F. Supp. 218, 229-230 (N.D.W. Va. 1985) (lodestar adjusted upward in civil rights lawsuit to compensate for undesirability of case). A governmental agency covered by insurance has unlimited resources. The facts that had to be proven were ultimately for a jury. Although Gilmore argued in her complaint she had been emotionally harmed she had no medical bills to support her claim. Only a few very skilled group of attorneys would take on a case such as this, and even fewer would not only survive a motion for summary judgment, but also persist to go to trial win a verdict on the constitutional claim.

k. the nature and length of the professional relationship between attorney and client

This factor has no bearing on the Court's consideration of Gilmore's motion. The

relationship between Gilmore and her counsel commenced because of her need for representation in this matter. There is no indication that, with the end of this case, their relationship will continue.

l. attorney's fees awards in similar cases

This factor weighs in favor of Gilmore's requested rate and the number of hours charged. The Court can consider its own experience in complex and difficult matters such as this. In *Mercer v. Duke University*, 301 F. Supp. 2d 454 (M.D.N.C. 2004), the district court awarded the plaintiff $349,243.96 in attorney fees, *id*. at 470, although she received "only one dollar in compensatory damages." *Id*. at 457. Adjusted for inflation, that $349,243.96 would equal $567,314.00 in today's dollars.[3]

Given the change in policy and the wrongdoing proven in this case, it is extremely important that cases such as this be filed which benefits the public at large. The Court heard testimony that defendants wanted to make Ms. Gilmore an example. And, "although [Beveridge] had the right to play hardball in contesting [Gilmore's]claims, it is also appropriate that [Beveridge] bear the cost of [his unsuccessful] strategy." *Burgess v. Premier Corp.*, 727 F.2d 826, 841 (9th Cir. 1984). A party "cannot litigate tenaciously and then be heard to complain about the time necessarily spent ... in response." *City of Riverside v. Rivera*, 477 U.S. 561, 580 n. 11 (1986).

Hourly Rate of $400 is Reasonable

Mr. Baker was admitted to the Missouri and Kansas Bars in 1996 & 1997. He

[3]https://data.bls.gov/cgibin/cpicalc.pl?cost1=349%2C243.96&year1=200103&year2=202302, Jan.2004 to February 2023 (last visited March 29, 2023).

has been associated with Alliance Defending Freedom for years which focuses on First Amendment cases. *See* Exs. 1 & 3.

Statement Regarding Consultation

Plaintiff has submitted a bill of costs to the defendants. Plaintiff has indirectly consulted with defendant's counsel through mediation with the Magistrate regarding the fee request. Pursuant to Local Rule 54.2, the plaintiff will again initiate that consultation promptly after filing of this motion. After giving defendant a reasonable opportunity to review all of the billing records and the motion, plaintiff will provide the Court with a notice describing the outcome of that consultation as soon as possible.

WHEREFORE, Plaintiff moves the Court to grant the relief and rulings requested above and provide such other and further relief the Court believes is just and proper.

/s/Linus L. Baker
Linus L. Baker, KS 18197
6732 West 185th Terrace
Stilwell, KS 66085-8922
Telephone: 913.486.3913
Fax: 913.232.8734
E-Mail: linusbaker@prodigy.net
Attorney for the plaintiff

Certificate of Service

The above was provided notice to all parties entitled to such notice pursuant to the Court's electronic filing system.
/s/Linus L. Baker
Attorney for the plaintiff

EXHIBIT

1

DECLARATION OF ATTORNEY LINUS L. BAKER

I, Linus L. Baker, state the following:

1. I am counsel for Plaintiff and I offer this declaration in support of the reasonableness of the attorney fees and expenses the plaintiff seeks.

2. I graduated from the University of Missouri Kansas City law school in 1996 and I have been licensed to practice law in state and federal courts of Missouri and Kansas since November 1996 / 1997 in those states respectively. I am also admitted in the 11th, 10th, 8th, and 7th courts of appeal in which I have appeared in briefs and in oral argument.

3. I work with and have cases referred to me by the Alliance Defending Freedom organization which is a non-profit, public interest legal organization that provides strategic planning, training, funding, and litigation services to protect Americans' constitutional rights.

4. I have been a solo practioner and have obtained favorable outcomes for my clients through trials, dispositive motions, and settlements.

5. I have represented, pro bono and through contingency fee agreements, numerous clients, including employees, students, churches, and other religious based organizations, based upon First Amendment claims and violations. Relatively speaking, few cases survive summary judgment and are successfully tried to verdict under 42 U.S.C.§ 1983. Counsel was dedicated to the notion that if Ms. Gilmore was successful, the speaking policy would change and a finding of a 42 U.S.C. § 1983 violation against Beveridge was well worth the uncertainty of the outcome.

6. Section 1988 provides that this Court may allow the prevailing party to receive reasonable attorney's fees and expenses. This case began in January of 2022 and went to trial in late October 2023 – nearly two years later.

7. The matter was mediated twice – before and after the Court's summary judgment order (ECF 119). The Court also referred the matter to the magistrate for further settlement considerations after trial. The Olathe Board was itself divided on settlement with the majority refusing to settle and, according to one board member, wanted to make Ms. Gilmore an example.

8. This lawsuit was not a series of discrete claims but rather focused on the same core facts and the First Amendment. Claims are interrelated where they "involve a common core of facts" or are "based on related legal theories," and where counsel's time is "devoted generally to the litigation as a whole, making it difficult to divide the hours expended on a claim-by-claim basis." **HENSLEY, 461 U.S. AT 435**; "When claims

are interrelated in this manner, the district court is not required to sort out the hours devoted to successful claims from those expended on fruitless efforts." **MCKNIGHT V. CIR. CITY STORES, INC., 14 F. APP'X 147, 153 (4TH CIR. 2001)**. Instead, "the district court should focus on the significance of the overall relief obtained by the plaintiff in relation to the hours reasonably expended on the litigation." **HENSLEY, 461 U.S. AT 435**. *See* **GARRITY V. SUNUNU, 752 F.2D 727 (1984)** ("Where, as here, plaintiffs have won a federal claim for which attorneys' fees are allowed to a prevailing party, the question becomes whether the claims on which they lost in the same suit were unrelated to the successful ones (in which event no fees may be awarded for work on the unsuccessful claims), or whether, instead, the losing claims included 'a common core of facts,' or were 'based on related legal theories,' linking them to the successful claim.") (citing **HENSLEY**).

9. This matter began as complex as it involved the intersection of important issues of constitutional law regarding free speech at school boards and how, if at all, employment law would or could apply such as the "same decision" defense applicable in employment cases. It became more complex once new counsel entered the case and interjected new theories about the defendants' defenses.

10. "Where a plaintiff has obtained excellent results, his attorney should recover a fully compensatory fee." **HENSLEY V. ECKERHART, 461 U.S. 424, 435 (1983)**.[1] To be sure, Ms. Gilmore obtained an outstanding result, securing the core relief she sought in this litigation: the revision of the Olathe Board public speaking policy and her right to speak on a matter of public concern at her public school open meetings. Defendants admit they changed their public speaking policy because of Ms. Gilmore's suit repeatedly calling their change to policy "remedial."

11. Defendants intentionally swapped horses after suit and after the injunction was brought hoping to moot the case by its change to the unconstitutional policy which included unconstitutional prohibitions involving "personal attacks." But that policy change counts in favor of the plaintiff's success in bringing the lawsuit as it was the moving force for that change. That change benefits all parent speakers in the Olathe School District.

---

[1]

> Many civil rights cases will present only a single claim. In other cases the plaintiff's claims for relief will involve a common core of facts or will be based on related legal theories. Much of counsel's time will be devoted generally to the litigation as a whole, making it difficult to divide the hours expended on a claim-by-claim basis. Such a lawsuit cannot be viewed as a series of discrete claims. Instead the district court should focus on the significance of the overall relief obtained by the plaintiff in relation to the hours reasonably expended on the litigation.

HENSLEY, 461 U.S. 435.

12. The facts of this case were connected to every First Amendment legal theory the plaintiff presented. Each was intertwined and interconnected on the same core facts. A "fee award should not be reduced simply because the plaintiff failed to prevail on every contention raised in the lawsuit." *Id.* It is the result of the litigation that matters. In "successful litigation, fees should not ordinarily be reduced for unsuccessful procedural, discovery, or other motions." **ALBA CONTE, ATTORNEY FEE AWARDS § 4:18 (3D ED. 2013)**. *See* **WEBB V. SLOAN, 330 F.3D 1158, 1169 (9TH CIR. 2003)** (holding plaintiffs entitled to time spent on unsuccessful summary judgment motion when they ultimately succeeded on some claims therein, and all claims arose from common core of facts); **CRUZ V. TOWN OF CICERO, 275 F.3D 579, 592 (7TH CIR. 2001)** (dismissing argument that plaintiff could not obtain fees for unsuccessful preliminary injunction motion, court remarked that "it is the ultimate outcome of the litigation that determines whether a plaintiff is a prevailing party, not his or her success as to each motion filed in the case"); **KITCHEN V. TTX CO., NO. 97 C 5271, 2001 WL 40803, AT *3 (N.D. ILL. JAN. 17, 2001)** (declining to exclude time spent on unsuccessful preliminary injunction motion because a "losing argument in support of a successful claim for relief is fully compensable time").

13. The **JOHNSON** factors bolster the Lodestar analysis. (**JOHNSON V. GEORGIA HIGHWAY EXPRESS, INC., 488 F.2D 714 (1974)**). The plaintiff had a contingency fee agreement with me.

14. This case was not a desirable one for lawyers in the Kansas City legal community. Few attorneys are familiar with the First Amendment free speech area of the law and even fewer are willing to take on such cases with no guarantee of payment or even the prospect of obtaining a percentage of a substantial damage award.

15. My work advocating for plaintiff's civil rights makes it highly unlikely that business clientele would hire me. It has been recognized that civil rights plaintiff work is oftentimes undesirable, and that civil rights plaintiff's attorneys are economically impacted by their decision to help civil rights litigants. **JOHNSON AT 719** ("civil rights attorneys face hardships in their communities because of their desire to help the civil rights litigant"); **STOKES V. CITY OF MONTGOMERY, 706 F. SUPP. 811, 815 (M.D. ALA. 1988)**, **AFF'D, 891 F.2D 905 (11TH CIR. 1989)** ("civil rights litigation … [is] seen as very undesirable because it stigmatizes an attorney as a 'civil rights lawyer' and thus tends to deter fee-paying clients, particularly high-paying commercial clients, from seeking assistance from that lawyer"); **CHALMERS V. CITY OF LOS ANGELES, 676 F. SUPP. 1515, 1524 (C.D. CAL. 1987)** (upward adjustment to lodestar was appropriate in case against city to compensate for risk that attorney would be paid almost nothing for work in prosecuting lawsuit); **GILLESPIE V. BREWER, 602 F. SUPP. 218, 229-230 (N.D.W. VA. 1985)** (lodestar adjusted upward in civil rights lawsuit to compensate for undesirability of case); **JONES V. FEDERATED DEPT. STORES, INC., 527 F. SUPP. 912, 917-18 (D.C. CIR. 1981)** (lodestar enhanced due to undesirability of

civil rights case and contingency factor). Thus, the "undesirability of the case" factor weighs in favor of an upward adjustment of Plaintiff's fee award.

16. Regarding rates, private practice, particularly solo private practice, is much different from "bulk, guaranteed paid legal work" that defense firms are accustomed to. **RAMSEK V. BESHEAR, NO. 3:20-CV-00036-GFVT, 2022 WL 3591827 AT *8 (E.D. KY. AUG. 22, 2022)** (finding an August 2022, hourly rate of $400 was reasonable).

17. In civil rights actions, the nature and length of the professional relationship with a client do not factor into the fee analysis.

18. This case was not about money or damages but the need for relief that would allow Ms. Gilmore and others the right to speak on matters of public concern and for the defendants to admit their wrongdoing. She did not seek compensatory damages, nor was she entitled to receive any. Ms. Gilmore obtained all the practical relief she sought in this litigation through the changing of the policy and the jury verdict announcing that wrongdoing – attorney fees are appropriate as a vindication of those great successes.

19. The **MARSHALL / CLARKE PENNSBURY** lawsuit, (2:21-cv-04336) lasted a year and contained 90 ECF events. It was very similar to this case ("you're done") which also contained a viewpoint discriminatory policy. The policy was changed and the parties settled agreeing to pay plaintiff's attorney fees of $300,000 and $17.91 in nominal damages. Georgetown University Free Speech Project https://tinyurl.com/mryr6dd9; https://tinyurl.com/yn4r5smd

20. Because of the importance of constitutional rights, federal courts routinely award appropriate fee amounts to litigants who vindicate these and other federal rights. *See, e.g.,* **VEASEY V. ABBOTT, NO. 2:13- CV-193, 2020 WL 9888360, AT *12 (S.D. TEX. MAY 27, 2020)** (awarding $6,790,333.31 in attorney fees and expenses in protracted civil rights litigation).

21. Defendants vigorously defended the case throughout the litigation, from the outset until final judgment, despite Ms. Gilmore's constant efforts to find a resolution akin to the result she finally received. Pursuing and obtaining this relief for Ms. Gilmore required significant legal research, detailed pleadings, sufficient evidence, and substantial briefing, all of which had to be done timely to be of any use to Ms. Gilmore.

22. The preclusion of other employment is one that weighs heavily in favor of a solo practitioner's requested hourly rate. Because I am a solo practioner, taking on a case of Ms. Gilmore's magnitude precluded me from accepting other cases, which happened, as a result of my representation in this matter.

23. In just two years there were 187 ECF filings in this case. The pretrial and trial work was voluminous, extensive, and laborious. As the Court noted, this case presented far more nuances than a straightforward employment speech discrimination case. There were no model jury instructions for this kind of First Amendment case. These kinds of school board / free speech cases had some precedent but not in all respects. In many ways, the Court was plowing new ground on many issues. The short of that required this counsel to invest in extended research and briefing – and many hours in which were not billed.

24. This case was a nominal damages case – meaning my compensation was dependent not on a damage award but an award of fees. These kinds of cases present a far higher risk of less reward than a typical personal injury or wrongful death contingency fee case.

25. I used billing judgment to not bill at all for any tasks that would normally be done by a paralegal or administrative assistant. I did not bill for non-legal tasks that did not require a lawyer's skill such as organization, retrieving documents, scheduling meetings, or creating binders, the assembly and binding of trial exhibits, the assembling of electronic records for trial in my two laptops.

26. My billing identifying drafting, researching, and editing specific documents which are sufficient to describe the work performed, particularly given the inherently intertwined nature of those tasks.

27. Gilmore has not sought compensation for considerable time that would otherwise ordinarily be billable in the course of representation to a private client, such as time for all communications including telephone conferences with opposing counsel, regular correspondence or all emails with opposing counsel.

28. The emails or telephonic conferences between counsel were necessary particularly with the multiple defense attorneys, who, depending on who was assigned to what, would then respond and, given the complexity of this case, those communications between counsel were necessary and not excessive.

29. My experience, reputation and ability was on display throughout the litigation. Despite being met with the two law firm's insurance paid resources of Norris Kepplinger and Spencer Fane, this solo practioner was able to migrate through each litigation phase against multiple 2 & 3 simultaneously attorneys hitched to the single defense wagon with success. There is "something to be said for solo practioners and very small firms that avoid the often duplicative billing that is found when junior and senior attorneys work together." **FINCH V. NEW YORK STATE OFFICE OF CHILDREN AND FAMILY SERVICES, 861 F. SUPP.2D 145, 153-54 (S.D.N.Y. 2012)**. The **FINCH** Court also pointed out that the fact of a solo practice will also buoy the hourly rate from slipping too far in the other direction due to the value it affords clients.

30. Because 1983 is a fee-shifting statute, Plaintiff's counsel contemporaneously keeps records of hours worked in this case. Exhibit 2 is a true and correct copy of the Excel spreadsheet with its detailing the fees and expenses incurred by Ms. Gilmore.

31. As of December 1, 2023, the plaintiff expended over 792.85 hours of professional time. This represents the total number of hours reasonably expended by counsel after the exercise of billing judgment. In reviewing counsel's billing records, counsel did not charge for 143.15 hours of professional time. Ex. 2. The dollar amount sought is $317,300.00. As of November 29, 2023, the defendants had paid $415,803.38 in attorney fees.

32. Attorney Baker maintains a litigation docket. There was a strong incentive to not spend more time on Ms. Gilmore's case other than what was necessary because of other cases that require attention. Plaintiff engaged in numerous required but highly efficient email communications with opposing counsel or his client. Those events were billed in the lowest billing increment of *.1*. All the hours and expenses incurred by Ms. Gilmore were necessary to obtain the outcome attained in defeating summary judgment and in obtaining a trial verdict.

33. After suit was brought and the motion for preliminary injunction filed, the defendants then modified their public speaking guidelines to remove unconstitutional parts that Joe Beveridge relied upon – i.e. personal attacks. Defendants admit this because they claim the revising of the policy was remedial.

34. The Court heard testimony that defendants wanted to make Ms. Gilmore an example. Contrary to the defendants' practice, the plaintiff reduced fees associated with the case by having only one lawyer attend a deposition and trial, and having just one lawyer involved in responding to the summary judgment motion.

35. The issues in the trial presented sophisticated legal questions that had to be proven to both the Court and communicated to the jury. At each turn, Plaintiff was successful. The hours expended in this case were much greater than they otherwise would have been because the views of the parties were so vastly different – particularly after new defense counsel entered the case. It was a highly contested case because of the nuances and novel issues presented to the Court.

36. The Court succinctly set out a roadmap in the summary judgment order (ECF 119) but the efforts to settle this case after that summary judgment proved unavailing.

37. In the contingency fee agreement with Ms. Gilmore, she agreed to my hourly rate of $400.00 per hour. As a lawyer with over 27 years of experience practicing litigation, I have knowledge of reasonable hourly rates for attorneys. There are recent high

inflation rates to now consider that reasonably raises the hourly rates of attorneys. Annual increases in an attorney's billing rates are typical. See **ALMANZA V. BARR, NO. 3:15-CV-389-TAV-HBG, 2019 U.S. DIST. LEXIS 241963, AT *14-15 (E.D. TENN. AUG. 5, 2019)**. Annual increases between three percent (3%) and five percent (5%) are common. **WILLIAMSON V. RECOVERY LTD. P'SHIP, NO. 2:06-CV-292, 2013 U.S. DIST. LEXIS 88962, AT *28 (S.D. OHIO JUNE 25, 2013)**.

38. I consulted with other lawyers, including counsel in other cases. I reviewed publications such as Missouri Lawyers Media, Billing Rates 2022, November 2022 and the USAO Attorneys' Fees Matrix for 2020-2021 ("USAO Matrix"). True and correct copies of the Missouri Lawyers Media, Billing Rates 2022, November 2022 and the USAO Matrix, are attached as exhibit 3 to Plaintiff's motion.

39. For hourly work, I am requesting the rate of $400 per hour which is the rate I have been charging since 2020. This rate is well within published rates for lawyers in the Kansas City market. Ex. 2 at 4.

40. I made reasonable efforts to identify the description of the work in the billing records. "Trial courts need not, and indeed should not, become green-eyeshade accountants." **FOX V. VICE, 563 U.S. 826, 838 (2011)**. Billing records should not be deemed vague if they offer sufficient detail and probative value for the court to determine the legitimacy of the hours expended. *See* **IMWALLE V. RELIANCE MED. PRODS., 515 F.3D 531, 553-54 (6TH CIR. 2008)** (finding time entries such as "conference with," research," "review file," "review documents," etc. sufficiently descriptive when read in context of whole billing statement and the timeline of the litigation). Plaintiff's time records are consistent with these standards.

41. Attorney Baker agreed to handle this case on a contingency fee basis. Attorney Baker bears the risk of not be paid anything for either attorneys' fees or expenses incurred. The fees and expenses incurred by Ms. Gilmore were reasonable and necessary to prevail on her First Amendment claim.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on: December 5, 2023.

/s/ Linus L. Baker

EXHIBIT 2

Rate	N/C	Hours Charged	Amount	Description	Date
400.00		0.50	200.00	phone Gilmore, Consultation on matter/client agreement to represent	1/17/2022
400.00		0.10	40.00	email Gilmore, Consultation with client educating on issues responding to questions	1/17/2022
400.00	5.50		0.00	Research 1983 first amendment school board speakers	1/17/2022
400.00		2.50	1000.00	Research RECAP complaints first amendment	1/17/2022
400.00		0.10	40.00	Email from Gilmore-Olathe School Board	1/17/2022
400.00		0.05	20.00	email Gilmore, Representation	1/18/2022
400.00	4.50			Research RECAP complaints	
400.00		0.10	40.00	email Gilmore, questions	1/20/2022
400.00	0.10		0.00	email Gilmore, Questions / answers speakers	1/20/2022
400.00	0.10		0.00	email Gilmore, Questions / answers speakers	1/20/2022
400.00		0.10	40.00	email Gilmore, Questions / answers speakers	1/20/2022
400.00		0.10	40.00	email Gilmore, policy? Questions video	1/20/2022
400.00		2.30	920.00	RECAP Anderson Elmbrook Wisconson school board case complaint review notes	1/20/2022
400.00		0.10	40.00	email Gilmore	1/20/2022
400.00	0.10		0.00	email Gilmore	1/20/2022
400.00		2.00	800.00	Research RECAP on case law school board notes	1/20/2022
400.00		2.30	920.00	RECAP ISON case complaint SJ ruling 6th circuit ruling TRO motion	1/20/2022
400.00		0.10	40.00	Email to Judge Schwartz and Kliem- Court-Revised 22-2032-HLT (Gilmore) PTO documents	1/20/2022
400.00		0.10	40.00	Email to Gimore-great case recent	1/20/2022
400.00		0.10	40.00	Email to Gilmore-viewpoint discrimination	1/20/2022
400.00		0.10	40.00	Email from Gilmore-Olathe School Board	1/20/2022
400.00		0.10	40.00	Email to Gilmore-Olathe School Board	1/20/2022
400.00		0.10	40.00	Email to Gilmore-Olathe School Board	1/20/2022
400.00		0.10	40.00	Email from Gilmore-Olathe School Board	1/20/2022
400.00		0.10	40.00	Email to Gilmore-Olathe School Board	1/20/2022
400.00		0.10	40.00	Email from Gilmore-Olathe School Board	1/20/2022
400.00		0.10	40.00	Email to Gilmore-Request to speak	1/20/2022
400.00	0.10		0.00	email Gilmore	1/21/2022
400.00	0.10		0.00	email Gilmore	1/21/2022
400.00		0.10	40.00	email Gilmore	1/21/2022
400.00		1.30	520.00	Research Olathe school board policies BCBI	1/21/2022

400.00		0.10	40.00	Email to Snider-draft complaint	1/21/2022
400.00		0.10	40.00	Email to Gilmore-Olathe School Board	1/21/2022
400.00		0.10	40.00	Email to Gilmore-Olathe School Board	1/21/2022
400.00		0.10	40.00	Email to Gilmore-Olathe School Board-livestream	1/21/2022
400.00		0.10	40.00	Email to Gilmore-Olathe School Board policies	1/21/2022
400.00		2.70	1080.00	RECAP Amuso Penn case TRO brief affidavit attached exhibits	1/22/2022
400.00		0.10	40.00	email	1/22/2022
400.00		0.10	40.00	email	1/22/2022
400.00		0.10	40.00	email	1/22/2022
400.00	0.10		0.00	email	1/22/2022
400.00	0.10		0.00	email	1/22/2022
400.00	0.10		0.00	email	1/22/2022
400.00		1.30	520.00	Complaint build Amuso ISON	1/22/2022
400.00	0.10		0.00	email	1/22/2022
400.00	0.10		0.00	email	1/22/2022
400.00		0.10	40.00	email	1/22/2022
400.00	0.10		0.00	email	1/22/2022
400.00	0.10		0.00	email	1/22/2022
400.00		0.10	40.00	email	1/22/2022
400.00		1.00	400.00	Review of file; preparation of complaint	1/23/2022
400.00		0.10	40.00	email Gilmore	1/23/2022
400.00	0.10		0.00	email Gilmore	1/23/2022
400.00	0.10		0.00	email Gilmore	1/23/2022
400.00		0.10	40.00	email Gilmore	1/23/2022
400.00		1.60	640.00	Revise complaint	1/23/2022
400.00		0.10	40.00	Begin draft PI motion	1/23/2022
400.00		2.00	800.00	Review youtube transcribe into complain	1/23/2022
400.00	0.10		0.00	email, draft	1/23/2022
400.00		0.10	40.00	email, draft edits	1/23/2022
400.00	0.10		0.00	email, draft	1/23/2022
400.00	0.10		0.00	email, draft edits	1/23/2022
400.00		1.00	400.00	Review of file; preparation of complaint, research	1/23/2022
400.00		0.10	40.00	cover sheet designation of trial	1/23/2022
400.00		0.10	40.00	Upload complaint cover sheet designation of trial	1/23/2022
400.00	0.10		0.00	email, notify	1/23/2022

400.00	0.10		0.00	email, explain	1/23/2022
400.00	0.10		0.00	email, explain	1/23/2022
400.00		0.10	40.00	email Gilmore, lawsuit questions	1/23/2022
400.00		1.50	600.00	Downloading stories Gilmore / other school board speaking cases	1/23/2022
400.00		0.10	40.00	Email to Snider,Gilmore-Federal case filed:doc 1	1/23/2022
400.00		0.10	40.00	Email to Gilmore-complete draft complaint	1/23/2022
400.00		2.00	800.00	research pacer - search terms "school board" "expel" "vague"; Blick Ann Arbor 516	1/24/2022
400.00		0.10	40.00	email, Questions sworn statement	1/24/2022
400.00		1.60	640.00	Review Gilmore speech; Randall email to cedar reek; Norris letter to Gilmore; Agenda 1/13/2022 5.01	1/24/2022
400.00		0.10	40.00	email, Gilmore explanations	1/24/2022
400.00		0.10	40.00	email, questions	1/24/2022
400.00	0.10		0.00	email, questions	1/24/2022
400.00	0.10		0.00	phone JOCO law library, Anderson Marshall westlaw	1/24/2022
400.00		0.10	40.00	Summons Olathe	1/24/2022
400.00		0.10	40.00	Summons Beveridge	1/24/2022
400.00	0.10		0.00	email, Clerk summons	1/24/2022
400.00	0.10		0.00	email, Clerk response summons	1/24/2022
400.00	0.10		0.00	email, Clerk summons	1/24/2022
400.00	0.10		0.00	email, Clerk summons change	1/24/2022
400.00	0.10		0.00	email, Clerk summons	1/24/2022
400.00	0.10		0.00	Revise summons	1/24/2022
400.00		0.10	40.00	email, Clerk with revised summons	1/24/2022
400.00		0.10	40.00	email, Gilmore press relationship and lawsuit	1/24/2022
400.00		0.05	20.00	email, Clerk summons Beveridge	1/24/2022
400.00		0.05	20.00	email, Gilmore buy election issue	1/24/2022
400.00	0.10		0.00	email, Gilmore buy election issue	1/24/2022
400.00	0.10		0.00	Calendar interview	1/24/2022
400.00		0.10	40.00	Email to 'ksd_clerks_kansascity@ksd.uscourts.gov'-request for summons	1/24/2022
400.00		0.10	40.00	Email from Kittilstad-FOX 4 News - Jennifer Gilmore Interview Request	1/24/2022
400.00		0.10	40.00	Email to Kittilstad-FOX 4 News - Jennifer Gilmore Interview Request	1/24/2022
400.00		0.10	40.00	Email from Gilmore-USD No. 233/Public Comment Policies	1/24/2022
400.00		0.10	40.00	Email from Gilmore-Board Meeting 1/13/2022	1/24/2022
400.00		0.10	40.00	Email from Gilmore-Pete and KC Star article	1/24/2022
400.00		0.10	40.00	Email to kctv5-olathe school board federal lawsuit	1/24/2022

400.00		0.10	40.00	Email to KC Star-olathe school board federal lawsuit	1/24/2022
400.00		0.10	40.00	Email to fox4kc-olathe school board federal lawsuit	1/24/2022
400.00		0.10	40.00	Email to KMBC news-olathe school board federal lawsuit	1/24/2022
400.00		0.10	40.00	Email to Gilmore-Federal case filed	1/24/2022
400.00		0.10	40.00	Email from Gilmore-Federal case filed	1/24/2022
400.00		0.10	40.00	Email to Gilmore-Federal case filed	1/24/2022
400.00		0.10	40.00	Email from Bateman-request for summons	1/24/2022
400.00		0.10	40.00	Email to Bateman-request for summons	1/24/2022
400.00		0.10	40.00	Email to Bateman-request for summons	1/24/2022
400.00		0.10	40.00	Email from Bateman-request for summons	1/24/2022
400.00		0.10	40.00	Email to Bateman-request for summons	1/24/2022
400.00	0.10		0.00	Email to Kittilstad-FOX 4 News - Jennifer Gilmore Interview Request	1/24/2022
400.00	0.10		0.00	Email from Kittilstad-FOX 4 News - Jennifer Gilmore Interview Request	1/24/2022
400.00	0.10		0.00	Email to Kittilstad-FOX 4 News - Jennifer Gilmore Interview Request	1/24/2022
400.00		0.10	40.00	Email to Gilmore-interview	1/24/2022
400.00		0.10	40.00	Email from Gilmore-interview	1/24/2022
400.00		0.10	40.00	Email to Gilmore-interview	1/24/2022
400.00	0.10		0.00	Email to Gilmore-meeting with pete	1/24/2022
400.00	0.10		0.00	Email from Gilmore-meeting with pete	1/24/2022
400.00	0.10		0.00	Email from Ritter-Olathe school board federal lawsuit	1/24/2022
400.00	0.10		0.00	Email to Ritter-Olathe school board federal lawsuit	1/24/2022
400.00	0.10		0.00	Email to Ritter-Olathe school board federal lawsuit	1/24/2022
400.00	0.10		0.00	Email from fox4kc news-Olathe school board federal lawsuit	1/24/2022
400.00	0.10		0.00	Email to fox4kc news-Olathe school board federal lawsuit	1/24/2022
400.00	0.10		0.00	Email from Ritter-Olathe school board federal lawsuit	1/24/2022
400.00		0.10	40.00	Email from Gilmore-USD No. 233/Public Comment Policies	1/24/2022
400.00		0.10	40.00	Email to Gilmore-USD No. 233/Public Comment Policies	1/24/2022
400.00		0.10	40.00	Email to Gilmore-USD No. 233/Public Comment Policies	1/24/2022
400.00		2.20	880.00	Exhibits Preliminary Injunction; Find, review, analyze, notes	1/25/2022
400.00		0.50	200.00	Updated sworn statement after input	1/25/2022
400.00		0.50	200.00	RECAP case review injunction	1/25/2022
400.00		0.80	320.00	Prepare TRO motion and memorandum draft sync to petition allegations	1/25/2022
400.00		1.60	640.00	TRO memorandum in support work up; research KS injunctive law re: KPRFA and common law	1/25/2022
400.00		0.10	40.00	Read / cite Greater Phila	1/25/2022

400.00	0.10			Suarez Corp. Indus	1/25/2022
400.00	0.10			Roberts v. United States Jaycees	1/25/2022
400.00	0.05			Hodes & Nauser	1/25/2022
400.00	0.05			Christian Legal Soc'y	1/25/2022
400.00	0.05			Summum v. Callaghan	1/25/2022
400.00	0.05			Cornelius v. NAACP Legal	1/25/2022
400.00	0.10			Rosenberger v. Rector	1/25/2022
400.00	0.05			Monteiro v. City of Elizabeth	1/25/2022
400.00	0.05			N.Y. Times Co. v. Sullivan	1/25/2022
400.00	0.05			Minn. Voters All	1/25/2022
400.00	0.10			Matal v. Tam	1/25/2022
400.00	0.10			Hill v. Colorado	1/25/2022
400.00		3.10	1240.00	Preparation of exhibits; draft motion and memo	1/25/2022
400.00		1.00	400.00	Binding exhibit books	1/25/2022
400.00		0.10	40.00	" Sypniewski v. Warren Hills Reg'l	1/25/2022
400.00		0.10	40.00	" registration card language	1/25/2022
400.00	0.10		0.00	"Pac. Frontier v. Pleasant	1/25/2022
400.00	0.10		0.00	" Marshall	1/25/2022
400.00	0.10		0.00	" Ison	1/25/2022
400.00	0.10		0.00	email Gilmore, Sign sworn	1/25/2022
400.00		1.00	400.00	Finalized P Injunction motion and mem	1/25/2022
400.00		0.05	20.00	email Gilmore, Input mem	1/25/2022
400.00		0.05	20.00	Email Gilmore, Input edit mem	1/25/2022
400.00		0.05	20.00	email, Question mem	1/25/2022
400.00		0.10	40.00	Email, Sworn statement	1/25/2022
400.00		0.10	40.00	Listened to Gilmore interview	1/25/2022
400.00		0.10	40.00	email Gilmore, Other instances of Beveridge meeting	1/25/2022
400.00		0.10	40.00	email, Other instances of Beveridge meeting	1/25/2022
400.00		0.10	40.00	email Gilmore, Additional sworn statements	1/25/2022
400.00	0.10		0.00	Upload Motion	1/25/2022
400.00	0.10		0.00	Upload Mem exhibits	1/25/2022
400.00		0.05	20.00	email Gilmore, Send filed mem motion statement	1/25/2022
400.00		2.00	800.00	Research RECAP reading complaints theories first amendment qualified immunity	1/25/2022
400.00		0.05	20.00	email Gilmore, Question on injunction	1/25/2022
400.00		0.10	40.00	Email from Gilmore-Another parent interrupted by Joe	1/25/2022

400.00		0.10	40.00	Email from Shay LaVanier-JOCO BOCC	1/25/2022
400.00		0.10	40.00	Email to Gilmore-Doc.6	1/25/2022
400.00		0.10	40.00	Email from Gilmore-Mundo interview is up	1/25/2022
400.00		0.10	40.00	Email to Gilmore-Another parent interrupted by Joe	1/25/2022
400.00		0.10	40.00	Email to Gilmore-sworn statement	1/25/2022
400.00		0.10	40.00	Email from Gilmore-sworn statement	1/25/2022
400.00		0.10	40.00	Email to Gilmore-sworn statement	1/25/2022
400.00		0.10	40.00	Email from Gilmore-donor for campaign	1/25/2022
400.00		0.10	40.00	Email to Tung-Memorandum for injunction	1/25/2022
400.00		0.10	40.00	Email to Gilmore-memordium in support	1/25/2022
400.00		0.10	40.00	Email to Gilmore-dates in December	1/25/2022
400.00		0.10	40.00	Email from 'dosborne@goldsteinlp.com'-kansas fed case similar	1/26/2022
400.00		0.10	40.00	Email to Shay LaVanier-JOCO BOCC	1/26/2022
400.00		0.10	40.00	Email from Shay LaVanier-JOCO BOCC	1/26/2022
400.00		0.10	40.00	Email from Osborne-kansas fed case similar	1/26/2022
400.00		0.10	40.00	Email to Osborne-kansas fed case similar	1/26/2022
400.00		0.10	40.00	Email to Osborne-kansas fed case similar	1/26/2022
400.00		0.10	40.00	Email to Osborne-kansas fed case similar	1/26/2022
400.00		2.70	1080.00	Review youtube notes questions	1/28/2022
400.00		0.10	40.00	email Gilmore, Question injunction testimony	2/3/2022
400.00		0.20	80.00	Review 2/3 board meeting	2/3/2022
400.00		0.10	40.00	Email from Gilmore-Checking in	2/3/2022
400.00	0.10		0.00	Email to Gilmore-checking in	2/3/2022
400.00	0.10		0.00	email Gilmore, Board meeting analysis	2/4/2022
400.00	0.10		0.00	email, Board meeting analysis	2/4/2022
400.00	0.10		0.00	Check KSD local rules	2/4/2022
400.00		0.05	20.00	email, Gilmore explanation hallway	2/4/2022
400.00		0.10	40.00	Email to Gilmore-Olathe BOE Mtg 2/3/22	2/4/2022
400.00		0.10	40.00	Email from Gilmore-Olathe BOE Mtg 2/3/22	2/4/2022
400.00		0.10	40.00	Email to Gilmore-Olathe BOE Mtg 2/3/22	2/4/2022
400.00		0.10	40.00	email, Tung request	2/10/2022
400.00		0.05	20.00	email, “ response ask client	2/10/2022
400.00		0.10	40.00	Email to Tung-response date for preliminary injunction	2/10/2022
400.00		0.10	40.00	email, Gilmore list of speakers and subjects	2/13/2022
400.00		0.10	40.00	email, Gilmore Beveridge statement KASB spring hill	2/13/2022

400.00		0.10	40.00	Email from Gilmore-Olathe School Board Speakers	2/13/2022
400.00		0.05	20.00	email, Tung extension	2/14/2022
400.00		0.05	20.00	email, Response to Tung	2/14/2022
400.00		0.05	20.00	email, Tung extension	2/14/2022
400.00		0.05	20.00	email, Gilmore response extension	2/14/2022
400.00		3.10	1240.00	Answer review – list admitted analyze affirmative defenses exhibits policy public registration card and language notes issue of Olathe official capacity	2/14/2022
400.00		2.00	800.00	Review opposition to mem Prelim Injunction with Scroggins cite and research	2/14/2022
400.00		0.10	40.00	email, Review exhibits attached to opp	2/14/2022
400.00		0.10	40.00	Email from Tung-position on motion for preliminary injunction	2/14/2022
400.00		0.10	40.00	Email to Tung-position on motion for preliminary injunction	2/14/2022
400.00		0.10	40.00	Email from Tung-position on motion for preliminary injunction	2/14/2022
400.00		0.10	40.00	Email to Tung-position on motion for preliminary injunction	2/14/2022
400.00		0.10	40.00	Email from Tung-Motion for Preliminary Injunction	2/14/2022
400.00		0.10	40.00	Email to Tung-Motion for Preliminary Injunction	2/14/2022
400.00		0.10	40.00	Email to Tung-Motion for Preliminary Injunction	2/14/2022
400.00		0.10	40.00	Email from Gilmore-Spring Hill KASB advises editing public participation revision allowing comments	2/14/2022
400.00		0.10	40.00	Email to Gilmore-Spring Hill KASB advises editing public participation revision allowing comments	2/14/2022
400.00	0.10		0.00	email, Forward filings Gilmore	2/15/2022
400.00		0.10	40.00	email, Board policy changes Gilmore	2/15/2022
400.00		3.50	1400.00	Research on mootness RECAP motions memorandum old versus new policies	2/15/2022
400.00		0.05	20.00	email, Request summons Beveridge Clerk	2/15/2022
400.00		0.05	20.00	email, Forward filings Gilmore	2/15/2022
400.00		0.05	20.00	email, Summons from clerk	2/15/2022
400.00	0.10		0.00	email, KOMA Gilmore	2/15/2022
400.00		0.05	20.00	email, Gilmore comments on olathe arguments	2/15/2022
400.00		0.05	20.00	email, Explanation to Gilmore comments on olathe arguments	2/15/2022
400.00		0.05	20.00	email, Gilmore comments on olathe arguments	2/15/2022
400.00		0.05	20.00	email, Gilmore individual capacity Beveridge	2/15/2022
400.00		0.05	20.00	email, Gilmore threat of fees	2/15/2022
400.00		0.10	40.00	Email to Snider and Gilmore-Answer of Defendant doc.	2/15/2022
400.00		0.10	40.00	Email from Gilmore-Answer of Joe	2/15/2022
400.00		0.10	40.00	Email to 'ksd_clerks_kansascity@ksd.uscourts.gov'-request for summons	2/15/2022

400.00		0.10	40.00	Email to 'ksd_clerks_kansascity@ksd.uscourts.gov'-request for summons	2/15/2022
400.00		0.10	40.00	Email from Gilmore-Preliminary Injuntion	2/15/2022
400.00		0.10	40.00	Email to Bateman-request for summons	2/15/2022
400.00		0.10	40.00	Email from Bateman-request for summons	2/15/2022
400.00		0.10	40.00	Email from Snider-KOMA complaint	2/15/2022
400.00		0.10	40.00	Email to Snider,Gilmore-Document 7,7-1,8-2	2/15/2022
400.00		0.10	40.00	Email from Gilmore-KOMA complaint	2/15/2022
400.00		0.10	40.00	Email from Snider-gilmore response	2/15/2022
400.00		0.10	40.00	Email to Snider,Gilmore-gilmore response	2/15/2022
400.00	0.10		0.00	Email from Snider-KOMA complaint	2/15/2022
400.00		0.10	40.00	Email to Gilmore-Preliminary Injuntion	2/15/2022
400.00	0.10		0.00	Email from Snider-Preliminary Injuntion	2/15/2022
400.00		1.00	400.00	email, Law library westlaw research case citation	2/16/2022
400.00	0.10		0.00	email, Story of parent booted from school board similar	2/16/2022
400.00		0.10	40.00	Email to Gilmore-mask school board	2/16/2022
400.00		0.10	40.00	Email to Gilmore-mask school board	2/16/2022
400.00	0.10		0.00	email, Another parent boot Virginia	2/17/2022
400.00			880.00	draft reply, Reply Scroggins research study request to speak open mike ejection;	
		2.20		Pickering Connick test	2/17/2022
400.00	0.10		0.00	Email to Snider-kicked out school board	2/17/2022
400.00		0.10	40.00	Email to Gilmore-kicked out school board	2/17/2022
400.00		0.10	40.00	Email from Gilmore-kicked out school board	2/17/2022
400.00		0.05	20.00	Mesa v White download	2/18/2022
400.00		0.05	20.00	Farnsworth v. City of Mulvane download	2/18/2022
400.00		0.05	20.00	Iancu v. Brunetti download	2/18/2022
400.00		0.10	40.00	Review springhill vague youtube Kansas Association board	2/18/2022
400.00		0.50	200.00	Notes from youtube springhill review	2/18/2022
400.00	0.50		0.00	Norman Rockwell's "Freedom of Speech" notes	2/19/2022
400.00		0.10	40.00	Video school parent booted	2/19/2022
400.00		1.00	400.00	2nd video parent booted; Stories and links on public comment rules	2/19/2022
400.00	4.00			Recap research free speech boards	2/19/2022
400.00		0.10	40.00	Review Snyder v. Phelps	2/19/2022
400.00	0.10		0.00	Kiger McMullen summons draft	2/20/2022
400.00		0.05	20.00	email, Summons request clerk	2/21/2022
400.00		1.80	720.00	Further draft on reply	2/21/2022

400.00		0.05	20.00	email, Gilmore meeting	2/21/2022
400.00		2.00	800.00	Complete reply and edit cites and re-read reply and editing check links	2/21/2022
400.00	0.10		0.00	Email to KSD_Clerks_KansasCity-request for summons:Kiger,McMullen	2/21/2022
400.00		0.10	40.00	Email to Gilmore,Snider-reply to their opposition to the motion for preliminary injunction	2/21/2022
400.00		0.10	40.00	Email from Gilmore-reply to their opposition to the motion for preliminary injunction	2/21/2022
400.00	0.10		0.00	Email from Snider-reply to their opposition to the motion for preliminary injunction	2/21/2022
400.00	0.10		0.00	Email from Snider-reply to their opposition to the motion for preliminary injunction	2/21/2022
400.00		0.10	40.00	Email to Gilmore-reply to their opposition to the motion for preliminary injunction	2/21/2022
400.00		0.10	40.00	Email to Gilmore-reply to their opposition to the motion for preliminary injunction doc.	2/21/2022
400.00	0.10		0.00	Email from KSD_Clerks_KansasCity-request for summons:Kiger,McMullen	2/22/2022
400.00	0.10		0.00	Email to KSD_Clerks_KansasCity-request for summons:Kiger,McMullen	2/22/2022
400.00		0.10	40.00	Email to Tung-client's deposition in March	2/22/2022
400.00		0.10	40.00	Email to Tung-client's deposition	2/22/2022
400.00		0.10	40.00	Email Misti Deaton PI hearing	2/24/2022
400.00		0.05	20.00	Email Misti Deaton PI hearing OK	2/24/2022
400.00		0.10	40.00	Email from Deaton-scheduling evidentiary hearing/oral argument	2/24/2022
400.00		0.10	40.00	Email to Deaton-scheduling evidentiary oral/hearing argument	2/24/2022
400.00		0.10	40.00	Email from Gilmore-scheduling evidentiary hearing/oral argument	2/24/2022
400.00		0.10	40.00	Email from Gilmore-USD No. 233/Public Comment Policies	2/24/2022
400.00		0.05	20.00	Email Tung April 13 date	2/25/2022
400.00	0.10		0.00	Email Tung cleared with judge?	2/25/2022
400.00	0.10		0.00	Email Tung cleared with judge? Not yet	2/25/2022
400.00		0.10	40.00	Email to Gilmore-Beveridge brief in opposition to Plaintiff's motion for Preliminary injuction	2/25/2022
400.00		0.10	40.00	Email from Gilmore-scheduling evidentiary oral/hearing argument	2/25/2022
400.00		0.10	40.00	Email to Gilmore-scheduling evidentiary oral/hearing argument	2/25/2022
400.00	0.10		0.00	Email to Snider-agenda and minutes	2/25/2022
400.00		0.10	40.00	Email from Gilmore-agenda and minutes	2/25/2022
400.00		0.10	40.00	Email to Gilmore-agenda and minutes	2/25/2022
400.00		0.10	40.00	Email from Gilmore-agenda and minutes	2/25/2022

400.00		0.10	40.00	Email to Gilmore-agenda and minutes	2/25/2022
400.00		0.05	20.00	Email Tung to Misti	2/28/2022
400.00	0.10		0.00	Email Misti to Tung no	2/28/2022
400.00	0.10		0.00	Email Baker to Misti dates for hearing?	2/28/2022
400.00		0.05	20.00	Email Misti dates for hearing	2/28/2022
400.00		0.10	40.00	Email Misti check calendar dates provided	2/28/2022
400.00		0.10	40.00	Email to Deaton-scheduling evidentiary hearing/oral argument	2/28/2022
400.00		0.10	40.00	Email from Deaton-scheduling evidentiary hearing/oral argument	2/28/2022
400.00		0.10	40.00	Email to Deaton-scheduling evidentiary hearing/oral argument	2/28/2022
400.00		0.10	40.00	Email to Gilmore-USD No. 233/Public Comment Policies	2/28/2022
400.00		0.10	40.00	Email from Gilmore-Board Meeting 1/13/2022	2/28/2022
400.00		0.10	40.00	Email to Gilmore-USD No. 233/Public Comment Policies	2/28/2022
400.00		0.10	40.00	Email from Gilmore-Olathe School Board Meeting Live link	3/3/2022
400.00		0.10	40.00	Email from Gilmore-Update Koma Complaint JOCO DA	3/3/2022
400.00		0.10	40.00	Email to Gilmore-Update Koma Complaint JOCO DA	3/3/2022
400.00	0.10		0.00	Email from Snider-Update Koma Complaint JOCO DA	3/3/2022
400.00		0.10	40.00	Email to Gilmore-Update Koma Complaint JOCO DA	3/3/2022
400.00		0.05	20.00	Review minute order reassigning case	3/7/2022
400.00		0.10	40.00	Email Misti dates from defendants needed	3/7/2022
400.00		0.10	40.00	Email from Deaton-scheduling evidentiary hearing/oral argument	3/7/2022
400.00		0.05	20.00	Email Tung to Misti more dates	3/8/2022
400.00		0.05	20.00	Email Misti to Tung Baker dates	3/8/2022
400.00		0.10	40.00	Email from Tung-scheduling evidentiary hearing/oral argument	3/8/2022
400.00		0.10	40.00	Email from Deaton-scheduling evidentiary hearing/oral argument	3/8/2022
400.00	0.10		0.00	Review NOTICE of Hearing PI	3/9/2022
400.00	0.10		0.00	Calendar PI hearing	3/9/2022
400.00		0.50	200.00	Event Chronology Prep for Hearing Deadlines Calendar	3/9/2022
400.00		0.05	20.00	Email Baker to misti dates	3/9/2022
400.00		0.05	20.00	Email Gilmore Baker dates for hearing	3/9/2022
400.00		0.05	20.00	Email Baker to Misti dates for hearing that work	3/9/2022
400.00		0.50	200.00	Email Gilmore how public speaker recordings live streaming	3/9/2022
400.00		0.05	20.00	Email Baker to Gilmore on public speaking	3/9/2022
400.00		0.10	40.00	Email Gilmore to Baker new vote how public speaking currently works	3/9/2022
400.00		0.05	20.00	Email Tung to Misti dates	3/9/2022
400.00		0.05	20.00	Email Baker to Gilmore new dates	3/9/2022

400.00		0.05	20.00	Email Misti to Tung dates	3/9/2022
400.00		0.05	20.00	Email Tung to Baker dates	3/9/2022
400.00		0.05	20.00	Email Baker to Tung yes dates work	3/9/2022
400.00		0.10	40.00	Email Misti set hearing April 27 calendar	3/9/2022
400.00	0.10		0.00	ECF notification 11	3/9/2022
400.00		0.10	40.00	Email from Tung-scheduling evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email to Tung- scheduling evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email to Tung- forward message from deaton concerning scheduling evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email from Deaton- scheduling evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email to Deaton- scheduling evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email to Tung- forward message from deaton concerning scheduling evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email from Tung- proposed dates for evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email from Gilmore-scheduling evidentiary oral/hearing argument	3/9/2022
400.00		0.10	40.00	Email to Gilmore-scheduling evidentiary oral/hearing argument	3/9/2022
400.00		0.10	40.00	Email from Gilmore-scheduling evidentiary oral/hearing argument	3/9/2022
400.00		0.10	40.00	Email to Gilmore-scheduling evidentiary oral/hearing argument	3/9/2022
400.00		0.10	40.00	Email from Gilmore-scheduling evidentiary oral/hearing argument	3/9/2022
400.00		0.10	40.00	Email to Gilmore-scheduling evidentiary oral/hearing argument	3/9/2022
400.00		0.10	40.00	Email from Gilmore-evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email to Gilmore-evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email from Gilmore-evidentiary hearing/oral argument	3/9/2022
400.00		0.10	40.00	Email from Gilmore- scheduling	3/9/2022
400.00		0.10	40.00	Email to Gilmore- scheduling	3/9/2022
400.00	0.10		0.00	Email to Gilmore-jim McMullen	3/10/2022
400.00	0.10		0.00	Email from Gilmore-jim McMullen	3/10/2022
400.00	0.10		0.00	Email to Gilmore-jim McMullen	3/10/2022
400.00	0.10		0.00	Email to Gilmore-jim McMullen info	3/10/2022
400.00		0.10	40.00	Email Tung to Baker request for witnesses and exhibits	3/18/2022
400.00		0.05	20.00	Email Tung to Misti requesting conference	3/18/2022
400.00		0.05	20.00	Email Misti to Tung Baker teleconference	3/18/2022
400.00		0.05	20.00	Email Baker to Tung witnesses	3/18/2022
400.00		0.05	20.00	Email Tung to Baker witnesses and exhibits	3/18/2022
400.00		0.05	20.00	Email Baker to Tung witnesses	3/18/2022

400.00		0.05	20.00	Email Norris to Baker witnesses	3/18/2022
400.00		0.05	20.00	Email Baker to Norris witnesses	3/18/2022
400.00		0.05	20.00	Email Norris to Baker witnesses	3/18/2022
400.00		0.10	40.00	Email to Tung- to request for witnesses and exhibits	3/18/2022
400.00		0.10	40.00	Email from Tung- to request for witnesses and exhibits	3/18/2022
400.00		0.10	40.00	Email to Tung- to request for witnesses and exhibits	3/18/2022
400.00		0.10	40.00	Email to Deaton,Norris-scheduling evidentiary hearing/oral argument	3/18/2022
400.00		0.10	40.00	Email from Deaton-scheduling evidentiary hearing/oral argument	3/18/2022
400.00		0.10	40.00	Email from Norris-possible witnesses	3/18/2022
400.00		0.10	40.00	Email to Norris-possible witnesses	3/18/2022
400.00		0.10	40.00	Email from Norris-possible witnesses	3/18/2022
400.00		0.10	40.00	Email to Norris-possible witnesses	3/18/2022
400.00	0.10		0.00	ECF notification Kiger motion to dismiss	3/21/2022
400.00	0.10		0.00	ECF notification Kiger Mem motion to dismiss	3/21/2022
400.00		0.10	40.00	Email from Deaton-telephone conference regarding motion hearing	3/21/2022
400.00		0.10	40.00	Email to Deaton-telephone conference regarding motion hearing	3/21/2022
400.00		0.10	40.00	Email to Norris-injunction hearing exhibit list	3/21/2022
400.00		0.10	40.00	Email to Norris-injunction hearing exhibit list	3/21/2022
400.00		3.00	1200.00	Review Florida Moms case management, TRO, MTD, Opp to MTD	3/22/2022
400.00		0.05	20.00	Email Tung to Misti conference	3/22/2022
400.00		0.05	20.00	Email Misti to Tung conference	3/22/2022
400.00		0.05	20.00	Email Baker to Misti date works	3/22/2022
400.00		0.05	20.00	Notification tele hearing	3/22/2022
400.00	2.00		0.00	Mem Opposition to Kiger MTD	3/22/2022
400.00		0.05	20.00	Email Baker to Gilmore filings	3/22/2022
400.00		0.10	40.00	Email from Tung-telephone conference regarding motion hearing	3/22/2022
400.00		0.10	40.00	Email from Deaton-telephone conference regarding motion hearing	3/22/2022
400.00		0.10	40.00	Email to Deaton and Tung-telephone conference regarding motion hearing	3/22/2022
400.00		0.10	40.00	Email to Gilmore-recent filings	3/22/2022
400.00	0.10		0.00	Email from Snider-recent filings	3/22/2022
400.00	0.10		0.00	Email to Snider-recent filings	3/22/2022
400.00	0.10		0.00	Email to Snider-recent filings	3/22/2022
400.00		0.10	40.00	Email to Gilmore-recent filings	3/22/2022
400.00	0.10		0.00	Email from Snider-recent filings	3/22/2022
400.00	0.10		0.00	Email to Snider-recent filings	3/22/2022

400.00	0.10		0.00	Email to Snider-Order of Dismissal doc. and ruling	3/23/2022
400.00		0.10	40.00	Email Tung to Baker amending answer	3/24/2022
400.00		0.05	20.00	Email Baker to Tung clarification	3/24/2022
400.00		0.05	20.00	Email Tung clarification	3/24/2022
400.00		0.05	20.00	Email Baker to Tung amendment	3/24/2022
400.00		0.10	40.00	Email from Tung-amending answer on behalf of Beveridge	3/24/2022
400.00		0.10	40.00	Email to Tung-amending answer on behalf of Beveridge	3/24/2022
400.00		0.10	40.00	Email from Tung-amending answer on behalf of Beveridge	3/24/2022
400.00	3.50			research recap cases and briefs re: immunity Beveridge	
400.00		0.10	40.00	Email to Tung-amending answer on behalf of Beveridge	3/24/2022
400.00		0.50	200.00	Review Beveridge motion and mem to amend answer	3/25/2022
400.00		0.50	200.00	Review amended answer	3/25/2022
400.00		0.50	200.00	Opposition to motion to amend	3/26/2022
400.00		0.10	40.00	Review order calendar events	3/28/2022
400.00		0.10	40.00	Email from Snider,Gilmore-Mcmullen /Court date	4/1/2022
400.00		0.10	40.00	Email from Gilmore-Mcmullen /Court date	4/1/2022
400.00		0.10	40.00	Email to Gilmore-Mcmullen /Court date	4/1/2022
400.00		0.50	200.00	Review reply to amend	4/4/2022
400.00		0.10	40.00	Email from Gilmore-Public comment	4/4/2022
400.00		0.10	40.00	Email to Gilmore-Public comment	4/4/2022
400.00		0.10	40.00	Summons return certified mail	4/5/2022
400.00	1.00		0.00	Review reply Kiger MTD	4/5/2022
400.00	0.10		0.00	File Notice of suit McMullen and request for waiver	4/6/2022
400.00		0.10	40.00	Email from Gilmore-public comment card	4/7/2022
400.00		0.10	40.00	Email to Gilmore-public comment card	4/7/2022
400.00		0.10	40.00	Email from Gilmore-public comment card	4/7/2022
400.00		0.10	40.00	Email McMullen waiver attached	4/8/2022
400.00	0.10		0.00	Email from Little-Dr. McMullen's Wavier of Service	4/8/2022
400.00	0.10		0.00	Email to Tung-Dr. McMullen's Wavier of Service	4/8/2022
400.00	0.10		0.00	Email to Snider-new policy questions	4/8/2022
400.00		0.10	40.00	Email to Gilmore-public comment card	4/8/2022
400.00		0.10	40.00	Email to Gilmore-Olathe BOE speaks about amending language in public comment	4/12/2022
400.00		0.10	40.00	Email from Gilmore-Olathe BOE speaks about amending language in public comment	4/12/2022

400.00		0.10	40.00	Email from Gilmore-Olathe BOE speaks about amending language in public comment	4/12/2022
400.00		0.10	40.00	Email to Gilmore-Olathe BOE speaks about amending language in public comment	4/12/2022
400.00		0.10	40.00	Email from Gilmore-Olathe BOE speaks about amending language in public comment	4/12/2022
400.00		0.10	40.00	Email to Gilmore-Olathe BOE speaks about amending language in public comment	4/12/2022
400.00		0.05	20.00	Order granting motion for leave	4/13/2022
400.00		0.10	40.00	Subpoena Connell	4/13/2022
400.00		0.05	20.00	Review Amended Answer	4/13/2022
400.00		0.10	40.00	Email to Gilmore-doc.24	4/13/2022
400.00		3.50	1400.00	Research qualified immunity ejection open meeting rights	4/14/2022
400.00		0.50	200.00	Review Notice of revised policy	4/14/2022
400.00		0.50	200.00	Notes prep for status conference	4/14/2022
400.00		0.10	40.00	Email to Gilmore-new policy	4/14/2022
400.00		0.10	40.00	Email from Gilmore-pre recorded public comments	4/14/2022
400.00		0.10	40.00	Email to Gilmore-pre recorded public comments	4/14/2022
400.00		0.10	40.00	Email to Gilmore-pre recorded public comments	4/14/2022
400.00		1.00	400.00	Review Amuso ruling no qualified immunity	4/15/2022
400.00		1.00	400.00	Notes prep participation in status conference	4/15/2022
	4.10			RECAP Jury verdict and instructions on First Amendment cases Kan Fed and 10th circuit	
400.00		0.10	40.00	Email to Gilmore-teleconference with Judge	4/15/2022
400.00		2.00	800.00	Research Open Mic Unplugged challenges law review	4/16/2022
400.00		2.00	800.00	Search and review Olathe Board Policies ejection removal policy revisions	4/18/2022
400.00		2.00	800.00	Testimony questions for Kiger, McMullen, Beveridge Gilmore and Connell	4/18/2022
400.00		1.00	400.00	Email revisions from Norris re joint motion to vacate	4/18/2022
400.00		0.50	200.00	Revisions and Email back revisions to joint motion to vacate	4/18/2022
400.00		0.10	40.00	Email from Norris revisions to motion	4/18/2022
400.00		0.10	40.00	Email from Norris revisions to motion	4/18/2022
400.00		0.10	40.00	Email from Norris telephone call	4/18/2022
400.00		0.10	40.00	Attempted phone call with Norris	4/18/2022
400.00		0.05	20.00	Email from Norris now available	4/18/2022
400.00	0.10		0.00	Email from Norris re joint motion to vacate	4/18/2022
400.00	0.10		0.00	Email to Norris re joint motion to vacate	4/18/2022
400.00		0.10	40.00	Email to Gilmore-amended complaint	4/18/2022

400.00		0.10	40.00	Email from Gilmore-amended complaint revisions	4/18/2022
400.00		0.10	40.00	Email to Gilmore-amended complaint revisions	4/18/2022
400.00		0.10	40.00	Email to Gilmore-file supplemental declaration	4/18/2022
400.00		0.10	40.00	Email to Norris revisions to motion	4/19/2022
400.00		0.10	40.00	Email from Norris revisions to motion	4/19/2022
400.00		0.05	20.00	Email revisions approved	4/19/2022
400.00		0.05	20.00	Email Norris to file	4/19/2022
400.00		2.00	800.00	Complete motion to amend and edit amended complaint	4/19/2022
400.00		0.50	200.00	Review and sign joint motion to vacate	4/19/2022
400.00		0.05	20.00	Email from Norris to Judge with attached orders	4/19/2022
400.00		0.10	40.00	Review order	4/19/2022
400.00		0.10	40.00	Email to Norris-revised Joint Motion to Vacate	4/19/2022
400.00		0.10	40.00	Email to Norris-revised Joint Motion to Vacate	4/19/2022
400.00		0.10	40.00	Email to Gilmore-doc.30	4/19/2022
400.00		0.10	40.00	Email to Snider-rules of school board	4/19/2022
400.00		0.10	40.00	Review order calendar dates	4/20/2022
400.00		1.00	400.00	Finalize second motion for preliminary injunction	4/21/2022
400.00		0.10	40.00	Email to Gilmore-“Except to ask clarifying questions, board members shall not interact with speakers during the limited public forum”	4/21/2022
400.00		0.10	40.00	Email to Gilmore-doc.33	4/21/2022
400.00		0.10	40.00	Email from Gilmore-"Except to ask clarifying questions, board members shall not interact with speakers during the limited public forum"	4/21/2022
400.00		0.10	40.00	Email to Gilmore-"Except to ask clarifying questions, board members shall not interact with speakers during the limited public forum"	4/21/2022
400.00		0.10	40.00	Email from Gilmore-schedule	4/22/2022
400.00		0.10	40.00	Email to Gilmore-schedule	4/22/2022
400.00		0.50	200.00	Review response to amend complaint	4/26/2022
400.00		1.00	400.00	Finalize reply motion to amend	4/26/2022
400.00		0.10	40.00	Email from Gilmore-canceled hearing	4/26/2022
400.00		0.10	40.00	Email to Gilmore-canceled hearing	4/26/2022
400.00		2.00	800.00	Drafting Injunction questions and exhibit correlation for Kiger, McMullen, Beveridge Gilmore and Connell	4/28/2022
400.00		0.10	40.00	Email from Gilmore-BV BOE VOTES TO REMOVE VP ROLE FROM MEMBER, JIM MCMULLEN	4/28/2022

400.00		0.10	40.00	Email from Snider-BV BOE VOTES TO REMOVE VP ROLE FROM MEMBER, JIM MCMULLEN	4/28/2022
400.00		0.10	40.00	Email to Gilmore,Snider-BV BOE VOTES TO REMOVE VP ROLE FROM MEMBER, JIM MCMULLEN	4/28/2022
400.00		1.00	400.00	Questions for Beveridge revised policy Injunction	4/29/2022
400.00		0.50	200.00	Review order granting amend complaint	4/29/2022
400.00		0.10	40.00	File amended complaint	4/29/2022
400.00	0.10		0.00	Review order denying mtd	4/29/2022
400.00		0.10	40.00	Email to Gilmore-Granted motion to amend	4/29/2022
400.00		0.10	40.00	Email from Gilmore-Board Meeting	4/29/2022
400.00		0.10	40.00	Email to Gilmore-Board Meeting	4/29/2022
400.00		0.10	40.00	Email to Gilmore-Amended filed;doc.38	4/29/2022
400.00		0.10	40.00	Summons to USD 233 and Olathe school board	5/2/2022
400.00		0.10	40.00	Email Summons to clerk USD 233 and Olathe school board	5/2/2022
400.00		0.05	20.00	Email from Tung to Baker extension sick	5/3/2022
400.00		0.10	40.00	Email baker to Tung time?	5/3/2022
400.00		0.10	40.00	Email tung to baker extension	5/3/2022
400.00		0.05	20.00	Email to Tung explaining parties	5/3/2022
400.00		0.10	40.00	Email Misti to parties	5/3/2022
400.00		0.10	40.00	Email from Tung-request for brief extension of time to file response to motion for preliminary injunction	5/3/2022
400.00		0.10	40.00	Email to Tung-request for brief extension of time to file response to motion for preliminary injunction	5/3/2022
400.00		0.10	40.00	Email from Tung-added parties to the amended complaint	5/3/2022
400.00		0.10	40.00	Email to Tung-added parties to the amended complaint	5/3/2022
400.00		0.10	40.00	Print Summons to clerk USD 233 and Olathe school board	5/4/2022
400.00		0.20	80.00	Mail certified summons USD 233 and Olathe school board	5/4/2022
400.00		0.10	40.00	Review order staying briefing	5/4/2022
400.00		0.10	40.00	Email tung to Misti asking questions	5/4/2022
400.00		0.10	40.00	Email Misti to parties	5/4/2022
400.00	0.10		0.00	Review order staying briefing	5/4/2022
400.00		0.10	40.00	Email from Deaton-uniform briefing scheduling	5/4/2022
400.00		0.10	40.00	Email to Gilmore- Summons for school board	5/4/2022
400.00			0.00	Second Motion for Preliminary Injunction	5/4/2022
400.00		0.10	40.00	Email from Steele-SPECIAL MEETING FOR PUBLIC COMMENT	5/7/2022

400.00				Email to Tung-Timeline for reponse to the motion for preliminary injunction and hearing	
		0.10	40.00	setting	5/9/2022
400.00		0.10	40.00	Email from Tung-position on the service	5/9/2022
400.00		0.10	40.00	Email to Tung-position on the service	5/9/2022
400.00		0.10	40.00	Email to Tung-Second Motion for Preliminary Injunction	5/9/2022
400.00		0.10	40.00	Email to Tung-briefing schedule position on conditions of service	5/10/2022
400.00		0.10	40.00	Email to Tung-position on the service	5/10/2022
400.00		0.10	40.00	Email from Tung-proposed schedule	5/11/2022
400.00		0.10	40.00	Email to Tung-Response to proposed schedule	5/11/2022
400.00		0.10	40.00	Email to Norris-briefing schedule conditions of service	5/11/2022
400.00		0.10	40.00	Email to Tung-injunctive motion response and hearing date	5/11/2022
400.00		0.10	40.00	Email to Tung-briefing schedule	5/11/2022
400.00		0.10	40.00	Email to Gilmore-hearing date	5/12/2022
400.00		2.00	800.00	Review Beveridge answer to amended complaint with exhibits	5/13/2022
400.00	0.50		0.00	Review Kiger answer to amended complaint	5/13/2022
400.00	0.50		0.00	Waiver of service McMullen drafted and filed	5/13/2022
400.00		0.05	20.00	Email Tung to Baker dates for hearing	5/13/2022
400.00	0.10		0.00	Email to JG-Answers of defendant Kiger and Beveridge	5/13/2022
400.00		0.10	40.00	Email to 'mgn_nkfirm.com'-response date to Injunction motion	5/13/2022
400.00		0.10	40.00	Email to Misti from Baker dates	5/16/2022
400.00		0.10	40.00	Email to Deaton-response date for the motion for injunctive relief	5/16/2022
400.00		0.10	40.00	Email from Gilmore-Board takes action to censure member at special meeting	5/16/2022
400.00		0.10	40.00	Email to Gilmore-Board takes action to censure member at special meeting	5/16/2022
400.00		0.05	20.00	Email Tung to Misti dates for hearing	5/17/2022
400.00		0.50	200.00	Subpoenas draft to Connell Kuhn	5/17/2022
400.00		0.05	20.00	Email Misti to parties dates for hearing	5/17/2022
400.00		0.10	40.00	Email from Tung-scheduling hearing date	5/17/2022
400.00		0.10	40.00	Email from Deaton-scheduling hearing	5/17/2022
400.00		0.10	40.00	Email from Tung-hearing date	5/17/2022
400.00		0.10	40.00	Email from Gilmore-scheduling hearing	5/17/2022
400.00		0.10	40.00	Email to Gilmore-scheduling hearing	5/17/2022
400.00		0.05	20.00	Email Baker to Misti dates for hearing	5/18/2022
400.00		0.10	40.00	Review order calendar brief dates July 29 Prelim hearing date	5/18/2022
400.00		0.10	40.00	Email from Deaton-scheduling hearing	5/18/2022
400.00		0.10	40.00	Email to Deaton-scheduling hearing	5/18/2022

400.00		0.10	40.00	Email to Tung-forward message regarding scheduling hearing	5/18/2022
400.00		0.10	40.00	Email to Gilmore- Forward of ECF #44	5/18/2022
400.00	0.10		0.00	Second Motion for Preliminary Injunction	5/18/2022
400.00		0.10	40.00	Email to Gilmore-NEF 44	5/18/2022
400.00		0.10	40.00	Email Snider,Gilmore-More lawsuits nationwide	5/23/2022
400.00		0.10	40.00	Email from Gilmore-More lawsuits nationwide	5/24/2022
400.00	0.10		0.00	Email from Snider-More lawsuits nationwide	5/24/2022
400.00		0.10	40.00	Email from Gilmore-More lawsuits nationwide	5/24/2022
400.00		3.00	1200.00	Review joint opposition prelim injunction and exhibits	5/27/2022
400.00		1.00	400.00	Review and compare answers of USD 233 and school board	5/27/2022
400.00		0.10	40.00	Email to Gilmore-Plaintiff contends the PCR provision	5/31/2022
400.00	0.10		0.00	Email from-Behm-KORA request	6/1/2022
400.00	0.10		0.00	Email to Snider,Gilmore-KORA request	6/1/2022
400.00		0.10	40.00	Email from Gilmore-Olathe BOE 6/2	6/3/2022
400.00		0.10	40.00	Email to Gilmore-Olathe BOE 6/2	6/3/2022
400.00	0.50		0.00	Review and compare answer of McMullen to USD 233 and school board	6/6/2022
400.00		0.10	40.00	Review order planning & scheduling 7/13 calendar deadlines	6/7/2022
400.00		0.10	40.00	EMAIL tung to Baker rule 26 planning check calendar	6/8/2022
400.00		0.05	20.00	EMAIL response to tung rule 26 planning check calendar	6/8/2022
400.00		0.10	40.00	EMAIL tung to Baker rule 26 Wednesday check calendar	6/8/2022
400.00		0.05	20.00	Email to tung yes conference wed	6/8/2022
400.00		0.10	40.00	Email from Tung-availibility for Rule 26 planning conference	6/8/2022
400.00		0.10	40.00	Email to Tung-availibility for Rule 26 planning conference	6/8/2022
400.00		0.10	40.00	Email from Tung-availibility for Rule 26 planning conference	6/9/2022
400.00		0.10	40.00	Email to Tung-availibility for Rule 26 planning conference	6/10/2022
400.00		0.05	20.00	EMAIL to tung move time for rule 26	6/15/2022
400.00		0.05	20.00	EMAIL tung OK	6/15/2022
400.00		0.50	200.00	Rule 26 conference	6/15/2022
400.00		0.10	40.00	Email to Tung-availibility for Rule 26 planning conference	6/15/2022
400.00		0.05	20.00	EMAIL tung to Baker draft redlined scheduling order	6/16/2022
400.00		0.50	200.00	Review proposed case scheduling order	6/16/2022
400.00		0.05	20.00	Email baker to tung revise summary	6/16/2022
400.00		0.50	200.00	Edit case management email to tung	6/16/2022
400.00		0.10	40.00	Email to Tung-Case management draft revised	6/16/2022
400.00		0.10	40.00	Email from Tung- red lined scheduling order	6/16/2022

400.00		0.10	40.00	Email to Tung-red lined scheduling order	6/16/2022
400.00		0.10	40.00	Email to Tung-red lined scheduling order revisions	6/16/2022
400.00		0.10	40.00	Email to Tung-red lined scheduling order revisions	6/16/2022
400.00		0.10	40.00	Email to Tung-case management draft revised	6/16/2022
400.00		0.05	20.00	Email tung revision OK	6/17/2022
400.00		0.10	40.00	Email baker to tung need more attorney info	6/20/2022
400.00		2.00	800.00	Research RECAP for briefs motions orders qualified immunity school board city meetings	6/20/2022
400.00		0.10	40.00	Email tung won't give cell Norris info	6/20/2022
400.00		0.05	20.00	Email response to tung order requires	6/20/2022
400.00		0.05	20.00	Email tung response will give if court asks	6/20/2022
400.00		0.10	40.00	Email to Tung-info for conference email	6/20/2022
400.00		0.10	40.00	Email from Tung-info for conference email	6/20/2022
400.00		0.10	40.00	Email to Tung-info for conference email	6/20/2022
400.00		0.50	200.00	Create two case management clean and redlined	6/22/2022
400.00		0.10	40.00	Email to judge schwartz case management	6/22/2022
400.00		0.10	40.00	Email to Tung and Court, proposed scheduling order	6/22/2022
400.00		0.10	40.00	Email to 'ksd_schwartz_chambers@ksd.uscourts.gov'-proposed scheduling order	6/22/2022
400.00		1.00	400.00	Review file for Rule 26 disclosures exhibits and witnesses	6/23/2022
400.00		0.10	40.00	Email tung issue with case management email	6/26/2022
400.00		0.10	40.00	Email from Gilmore-Does this help our case?	6/27/2022
400.00		0.10	40.00	Email to Gilmore-Does this help our case?	6/27/2022
400.00		1.00	400.00	Rule 26 disclosures draft	6/29/2022
400.00		1.00	400.00	Review rule 26 disclosures of defendants	6/30/2022
400.00		0.10	40.00	File Rule 26 disclosures	6/30/2022
400.00		0.10	40.00	Email to Judge Schwartz-case manegment documents and Rule 26 disclosures	6/30/2022
400.00		0.10	40.00	Email from Norris-Rule 26 Disclosures	6/30/2022
400.00		0.10	40.00	Email to Schwartz-proposed scheduling order:case management documents and Rule 26 disclosures	6/30/2022
400.00		0.10	40.00	Research RECAP for briefs motions orders qualified immunity school board city meetings	7/1/2022
400.00		0.10	40.00	Email Norris to Baker Rule 26 descriptions issue	7/5/2022
400.00		0.50	200.00	Review rule 26 disclosures	7/5/2022
400.00		0.10	40.00	Email to Norris-Rule 26 Disclosures	7/5/2022
400.00		0.50	200.00	Research document production rule 26 disclosures	7/6/2022

400.00		0.50	200.00	Assemble and email to Norris documents described in rule 26 disclosures	7/6/2022
400.00		0.10	40.00	Email Baker to Tung insurance policy	7/6/2022
400.00		0.10	40.00	Email from Norris-Rule 26 Disclosures	7/6/2022
400.00		0.10	40.00	Email to Tung-insurance policy declarations	7/6/2022
400.00		0.05	20.00	Email Tung will produce	7/7/2022
400.00		1.00	400.00	Email Rule 26 docs received review	7/11/2022
400.00		0.05	20.00	Email forward to client with documents	7/11/2022
400.00		0.10	40.00	Email client questions about docs	7/11/2022
400.00		0.10	40.00	Email to client explaining docs	7/11/2022
400.00		0.10	40.00	Email to Gilmore-Defendants' Rule 26 Documents & BOE Policy BCBI	7/11/2022
400.00		0.10	40.00	Email to Gilmore-Defendants' Rule 26 Documents & BOE Policy BCBI	7/11/2022
400.00		2.00	800.00	RECAP settlement / stipulation case research	7/12/2022
400.00		0.50	200.00	Notes for scheduling conference	7/13/2022
400.00		1.00	400.00	Tele Scheduling conference	7/13/2022
400.00		1.00	400.00	Calendar Scheduling order dates build event notifications	7/13/2022
400.00		1.00	400.00	Review and build exhibits for Preliminary hearing correlate to testimony	7/13/2022
400.00		0.10	40.00	Email client updates on info court dates	7/13/2022
400.00			400.00		
		1.00		Review Pennsbury School District (Marshall) (settlement $300,000 and 17.91 nominal	7/13/2022
400.00		1.00	400.00	Review Kiger MTD	7/13/2022
400.00		0.50	200.00	Review / compare McMullen MTD	7/13/2022
400.00		1.00	400.00	Review MACQUIGG	7/13/2022
400.00		1.00	400.00	Research caselaw from MacQuigg re due process	7/13/2022
400.00		1.00	400.00	Review Amuso dissolving injunction removed all viewpoint restrictions	7/13/2022
400.00		1.00	400.00	Review Amuso order denying motions to dismiss	7/13/2022
400.00		0.10	40.00	Email client motions filed explanation	7/13/2022
400.00		0.10	40.00	Email tung to misti wants conference	7/13/2022
400.00		0.10	40.00	Email to Snider-motions to dismiss	7/13/2022
400.00		0.10	40.00	Email from Tung-prehearing conference call with Judge Teeter	7/13/2022
400.00		0.10	40.00	Email to Gilmore-Court's scheduling order	7/13/2022
400.00		0.10	40.00	Email to Gilmore-questions for Connell	7/13/2022
400.00		0.10	40.00	Email to Gilmore-Court's scheduling order	7/13/2022
400.00		0.10	40.00	Email from Gilmore-Court's scheduling order	7/13/2022
400.00		0.10	40.00	Email to Gilmore-doc.53	7/13/2022
400.00	3.00		0.00	Draft mem opposition Kiger	7/14/2022

400.00	1.00		0.00	Draft McMullen opposition	7/14/2022
400.00		0.10	40.00	Email to Gilmore-scheduling order doc.	7/14/2022
400.00		0.10	40.00	Email from Gilmore-calendar	7/14/2022
400.00		0.10	40.00	Email to Gilmore-calendar	7/14/2022
400.00		0.10	40.00	Email from Gilmore-motions to dismiss	7/14/2022
400.00		0.10	40.00	Email to Gilmore-motions to dismiss	7/14/2022
400.00		0.10	40.00	Email from Gilmore-motions to dismiss	7/14/2022
400.00		0.10	40.00	Email to Gilmore-motions to dismiss	7/14/2022
400.00		0.10	40.00	Email from Gilmore-new policy adopting 7/14 for public comment	7/14/2022
400.00		0.10	40.00	Email to Gilmore-new policy adopting 7/14 for public comment	7/14/2022
400.00		0.10	40.00	Email to Gilmore-new policy adopting 7/14 for public comment	7/14/2022
400.00		0.10	40.00	Email from Gilmore-Court's scheduling order	7/14/2022
400.00		0.10	40.00	Email to Gilmore-Court's scheduling order	7/14/2022
400.00		0.10	40.00	Email to Gilmore-doc.53	7/14/2022
400.00		0.10	40.00	Email to Gilmore-opposition to motions to dismiss	7/15/2022
400.00		0.10	40.00	Email from Misti conference	7/18/2022
400.00		0.10	40.00	Email from tung to Misti conference date	7/18/2022
400.00		0.05	20.00	Email from Misti conference	7/18/2022
400.00		0.05	20.00	Email from tung to Misti will make date work	7/18/2022
400.00		0.05	20.00	Email to Misti OK date	7/18/2022
400.00		0.10	40.00	Review Order telephone conference set 7/26 calendar	7/18/2022
400.00		0.10	40.00	Email from Deaton-prehearing conference call with Judge Teeter	7/18/2022
400.00		0.10	40.00	Email from Tung-prehearing conference call with Judge Teeter	7/18/2022
400.00		0.10	40.00	Email from Deaton-prehearing conference call with Judge Teeter	7/18/2022
400.00		0.10	40.00	Email from Tung-prehearing conference call with Judge Teeter	7/18/2022
400.00		0.10	40.00	Email to Tung and Deaton-prhearing conference call with Judge Teeter	7/18/2022
400.00	0.10		0.00	Email from Snider-opposition to motions to dismiss	7/18/2022
400.00	0.10		0.00	Email to Snider-opposition to motions to dismiss	7/18/2022
400.00		0.10	40.00	Email to Gilmore-video snaps	7/18/2022
400.00		0.10	40.00	Email to tung mediation with daughtery	7/19/2022
400.00		0.10	40.00	Email from Norris no mediation with daughtery other mediators wants exhibits	7/19/2022
400.00		2.00	800.00	Mediator Research from files other attorneys civil rights	7/19/2022
400.00		0.10	40.00	Email to Norris about exhibits and witnesses	7/19/2022
400.00		0.10	40.00	Email Norris to mediators McClain	7/19/2022
400.00		0.10	40.00	Email Norris questions about memorandum	7/19/2022

400.00		0.50	200.00	Email with Marshall attorneys regarding case and settlement	7/19/2022
400.00		0.10	40.00	Email from Norris-commuications, mediator, and phone conference	7/19/2022
400.00		0.10	40.00	Email to Norris-commuications, mediator, and phone conference	7/19/2022
400.00		0.10	40.00	Email from Norris-old policy BCBI and judge mediator	7/19/2022
400.00		0.10	40.00	Email to Norris-old policy BCBI and judge mediator	7/19/2022
400.00		0.10	40.00	Email from Norris-old policy BCBI and judge mediator	7/19/2022
400.00		0.10	40.00	Email to Norris-old policy BCBI and judge mediator	7/19/2022
400.00		0.10	40.00	Email to Gilmore-Daugherty mediation	7/19/2022
400.00		1.00	400.00	Communications with client re testimony at injunction	7/20/2022
400.00		0.10	40.00	Email Misti list of witnesses	7/22/2022
400.00		0.05	20.00	Email to Misti plaintiff list of witnesses	7/22/2022
400.00		0.05	20.00	Email Norris re Kuhn witness	7/22/2022
400.00		0.05	20.00	Email to Norris list of witnesses	7/22/2022
400.00		0.10	40.00	Email Norris doesn't know questions	7/22/2022
400.00		0.05	20.00	Email to Norris witnesses	7/22/2022
400.00		0.10	40.00	Email from Deaton-preparing for the motion hearing	7/22/2022
400.00		0.10	40.00	Email to Deaton and Norris-preparing for the motion hearing	7/22/2022
400.00		0.10	40.00	Email from Deaton-motion hearing	7/22/2022
400.00		0.10	40.00	Email from Norris-motion hearing	7/22/2022
400.00		0.10	40.00	Email from Gilmore-Beveridge, Steele, Randall	7/22/2022
400.00	0.10		0.00	Email to Snider,Gilmore-Beveridge, Steele, Randall	7/22/2022
400.00		0.10	40.00	Email to client question	7/23/2022
400.00		0.10	40.00	Email to Norris what are your questions?	7/23/2022
400.00		0.05	20.00	Email to Norris witnesses	7/23/2022
400.00		0.10	40.00	Email from Gilmore-motion hearing	7/23/2022
400.00		4.00	1600.00	Questions to Norris; Beveridge Kiger; Rework from first set of questions	7/24/2022
400.00	0.10		0.00	Email misti about conference	7/25/2022
400.00	0.10		0.00	Email my response to misti	7/25/2022
400.00		0.50	200.00	Telephone conference judge	7/26/2022
400.00		0.10	40.00	Email Norris to me mediator McClain not available	7/27/2022
400.00		5.00	2000.00	Prepare injunction hearing exhibits, direct and cross-examination Chris Pittman, Connell, Beveridge, Kuhn, Gilmore arguments on catchall germane to business of board new cases discovered	7/27/2022
400.00		0.10	40.00	Email to Norris mediators	7/27/2022
400.00		0.10	40.00	Email from Gilmore-Fridays Hearing	7/27/2022

400.00		0.10	40.00	Email to Gilmore-Fridays Hearing	7/27/2022
	1.00			Draft requests for admissions McMullen, Kiger	7/28/2022
400.00		2.00	800.00	Draft request for admissions to Beveridge, Olathe Board, USD 233	7/28/2022
400.00		1.00	400.00	Draft request for documents	7/28/2022
400.00	1.00		0.00	Review Kiger and McMullen replies to MTD	7/28/2022
400.00		4.00	1600.00	Travel to courthouse 8:00 a.m. hearing post hearing discussion with client	7/29/2022
400.00		0.10	40.00	Email from Coonts-Witnessed Behavior	7/29/2022
400.00		0.10	40.00	Email from Connell-Witnessed Behavior	7/31/2022
400.00		0.10	40.00	Email client hallway incident	8/1/2022
400.00		0.10	40.00	Email to board about hallway incident	8/1/2022
400.00		0.10	40.00	Email to misti preserving hallway video	8/1/2022
400.00		0.05	20.00	Email to Norris tongier mediator?	8/1/2022
400.00		0.10	40.00	Email to Deaton-Witnessed Behavior	8/1/2022
400.00		0.10	40.00	Email to Gilmore-Witnessed Behavior`	8/1/2022
400.00		0.10	40.00	Email to Gilmore-Witnessed Behavior:hallway incident	8/1/2022
400.00		0.10	40.00	Email from Gilmore-7-29-2022 - Incident Recollection	8/1/2022
400.00		0.10	40.00	Email to Gilmore-7-29-2022 - Incident Recollection	8/1/2022
400.00		0.10	40.00	Email from Gilmore-7-29-2022 - Incident Recollection	8/1/2022
400.00		0.10	40.00	Email to Gilmore-7-29-2022 - Incident Recollection	8/1/2022
400.00		3.00	1200.00	Research RECAP school board rulings new cases downloaded researched; Draft supplemental authorities and file	8/2/2022
400.00		1.00	400.00	Edit request for admissions and request for documents finalize	8/2/2022
400.00		0.10	40.00	Email to Tung-request for admissions Joe Beveridge August 2, 2022	8/2/2022
400.00		0.10	40.00	Email to Tung-Request for Admissions to OLATHE PUBLIC SCHOOLS BOARD OF EDUCATION	8/2/2022
	2.50			RECAP Briefs on enforcement 1st amendment good faith	
400.00		1.00	400.00	Review MTD filed by Beveridge, USD 233; Compare to other MTD	8/3/2022
400.00		3.00	1200.00	Research new arguments MTD research new law regarding state rights due process	8/3/2022
400.00		0.10	40.00	Email to Norris-Request for Documents August 3 2022 to OLATHE PUBLIC SCHOOLS USD 233	8/3/2022
400.00		3.00	1200.00	Draft and finalize opposition to MTD	8/4/2022
400.00		0.10	40.00	Email from Gilmore-board policy changes	8/4/2022
400.00		2.00	800.00	Review denial of PI motion notes	8/5/2022
400.00		0.10	40.00	Email client returning to speaker comment making same statement or statements about Jan removal	8/5/2022

400.00		0.10	40.00	Email to Gilmore,Snider-order denying injunction:doc.70	8/5/2022
400.00		0.10	40.00	Email to Gilmore-board policy changes	8/5/2022
400.00		0.10	40.00	Email from Gilmore-board policy changes	8/5/2022
400.00		0.10	40.00	Email to Gilmore-board policy changes	8/5/2022
400.00		0.10	40.00	Email from Gilmore-board policy changes	8/5/2022
400.00		0.10	40.00	Email to Gilmore-board policy changes	8/5/2022
400.00		0.10	40.00	Email from Norris-Daugherty Mediatior	8/5/2022
400.00		0.10	40.00	Email to Norris-Daugherty Mediatior	8/5/2022
400.00		0.10	40.00	Email from Norris-Daugherty Mediatior	8/5/2022
400.00		0.10	40.00	Email to Norris-Daugherty Mediatior	8/5/2022
400.00	0.10		0.00	Email to Snider-order denying injunction	8/5/2022
400.00	0.10		0.00	Email from Snider-order denying injunction	8/5/2022
400.00	0.10		0.00	Email to Snider-order denying injunction	8/5/2022
400.00	0.10		0.00	Email to Snider-order denying injunction	8/5/2022
400.00		0.10	40.00	Email to Tung-Rule 26 supplement and good faith response to document requests and request for admissions	8/6/2022
400.00	0.10		0.00	Email from Snider-order denying injunction	8/6/2022
400.00		0.10	40.00	Email from Dingle-bill's availibility	8/8/2022
400.00		0.10	40.00	Email to Norris-bill's availibility	8/8/2022
400.00	0.10		0.00	Email to Gilmore-KCUR story	8/8/2022
400.00		0.10	40.00	Email to Norris-mediators	8/8/2022
400.00		0.10	40.00	Email from Norris-Daugherty Mediatior	8/8/2022
400.00		0.10	40.00	Email to Norris-Daugherty Mediatior	8/8/2022
400.00		0.10	40.00	Email from Norris-Daugherty Mediatior	8/8/2022
400.00		0.10	40.00	Email to Norris-Daugherty Mediatior	8/8/2022
400.00		1.00	400.00	Draft settlement proposal elements review attorney billing consent judgment	8/9/2022
400.00		1.00	400.00	Communications with client about settlement proposal different ideas	8/9/2022
400.00		0.10	40.00	Email to Gilmore-settlement proposal	8/9/2022
400.00		0.10	40.00	Email from Gilmore-settlement proposal	8/9/2022
400.00		0.10	40.00	Email from Gilmore-settlement proposal	8/9/2022
400.00		0.10	40.00	Email with client settlement	8/10/2022
400.00		0.10	40.00	Email from Tung-Rule 26 supplement and good faith response to document requests and request for admissions	8/10/2022
400.00		0.10	40.00	Email to Tung-Rule 26 supplement and good faith response to document requests and request for admissions	8/10/2022

400.00				Email to Tung-Rule 26 supplement and good faith response to document requests and	
		0.10	40.00	request for admissions	8/10/2022
400.00		0.10	40.00	Email to Gilmore-settlement proposal	8/10/2022
400.00		0.10	40.00	Email with client settlement	8/11/2022
400.00		0.20	80.00	Email with client settlement	8/11/2022
400.00		2.00	800.00	Draft settlement consent judgment for each defendant	8/11/2022
400.00		0.05	20.00	Email Norris mediator	8/11/2022
400.00		0.05	20.00	Email Norris mediator	8/11/2022
400.00		0.20	80.00	Research other mediators	8/11/2022
400.00		0.10	40.00	Email to Gilmore-consent judgment settlement	8/11/2022
400.00		0.10	40.00	Email to Dingle-bill's availibility	8/11/2022
400.00		0.10	40.00	Email from Gilmore-settlement proposal	8/11/2022
400.00		0.10	40.00	Email to Gilmore-settlement proposal	8/11/2022
400.00		0.10	40.00	Email from Gilmore-settlement proposal	8/11/2022
400.00		0.10	40.00	Email to Gilmore-settlement proposal	8/11/2022
400.00		0.05	20.00	Email JG consent judgment	8/12/2022
400.00		0.50	200.00	Draft joint motion to amend scheduling	8/12/2022
400.00		0.05	20.00	Email Norris discovery	8/12/2022
400.00		0.10	40.00	Email Norris discovery motion to amend	8/12/2022
400.00		0.10	40.00	Email Dingle Russell mediation	8/12/2022
400.00		1.00	400.00	Settlement proposal finalize	8/12/2022
400.00		0.05	20.00	Email Norris consent judgment	8/12/2022
400.00		0.05	20.00	Email C Little admissions	8/12/2022
400.00	0.10		0.00	Email JG next board meeting	8/12/2022
400.00		0.10	40.00	Email JG explaining settlement consent	8/12/2022
400.00		0.05	20.00	Email Norris Dingle mediation	8/12/2022
400.00		0.10	40.00	Email Norris Russell mediation	8/12/2022
400.00	0.10		0.00	Email to Tung-Request for Admissions McMullen Kiger	8/12/2022
400.00	0.10		0.00	Email from Little-Request for Admissions McMullen Kiger	8/12/2022
400.00		0.10	40.00	Email to Gilmore-settlement proposal	8/12/2022
400.00		0.10	40.00	Email from Dingle-bill's availibility	8/12/2022
400.00		0.10	40.00	Email to Norris-bill's availibility	8/12/2022
400.00		0.10	40.00	Email to Norris-proposed joint motion to amend scheduling order	8/12/2022
400.00		0.10	40.00	Email to Gilmore-consent judgment settlement	8/12/2022
400.00		0.10	40.00	Email from Gilmore-consent judgment settlement	8/12/2022

400.00		0.10	40.00	Email to Gilmore-consent judgment settlement	8/12/2022
400.00		0.10	40.00	Email form Gilmore-Ms. Gilmore's settlement proposal	8/12/2022
400.00		0.10	40.00	Email to Gilmore-Ms. Gilmore's settlement proposal	8/12/2022
400.00		0.10	40.00	Online Judge Howard calendar	8/15/2022
400.00		0.10	40.00	Email Norris Howard calendar	8/15/2022
400.00		0.05	20.00	Email Norris Howard mediation	8/15/2022
400.00		0.10	40.00	Email from Norris-mediator	8/15/2022
400.00		0.10	40.00	Email to Norris-mediator	8/15/2022
400.00		0.10	40.00	Email from Norris-slate of mediators	8/15/2022
400.00		0.10	40.00	Email from Norris-Daugherty Mediatior	8/15/2022
400.00		0.10	40.00	Email to Norris-Daugherty Mediatior	8/15/2022
400.00		0.05	20.00	Email Norris Howard mediation	8/16/2022
400.00		0.05	20.00	Email JG mediation dates	8/16/2022
400.00		0.05	20.00	Email Norris Howard mediation	8/16/2022
400.00		0.05	20.00	Email C Little RFP	8/16/2022
400.00		0.05	20.00	Email JG RFP	8/16/2022
400.00		0.05	20.00	Email JG settlement	8/16/2022
400.00		0.10	40.00	Email JG RFP explanation	8/16/2022
400.00		0.05	20.00	Calendar response date RPP	8/16/2022
400.00		0.10	40.00	Email JG RFP explanation	8/16/2022
400.00		0.05	20.00	Email Calendar Norris available	8/16/2022
400.00		0.10	40.00	Email JG Randall email	8/16/2022
400.00		0.05	20.00	Email Calendar Norris 9/19 available	8/16/2022
400.00		0.10	40.00	Email from Norris-mediator	8/16/2022
400.00		0.10	40.00	Email to Norris-mediator	8/16/2022
400.00		0.10	40.00	Email from Norris-mediator	8/16/2022
400.00		0.10	40.00	Email to Norris-mediator	8/16/2022
400.00		0.10	40.00	Email to Gilmore-request for documents	8/16/2022
400.00	0.10		0.00	Notice of Service	8/16/2022
400.00		0.10	40.00	Email to Gilmore-request for documents	8/16/2022
400.00		0.10	40.00	Email to Gilmore-mediation dates	8/16/2022
400.00		0.05	20.00	Email JG Calendar available	8/17/2022
400.00		0.05	20.00	Email JG Calendar available	8/17/2022
400.00		0.05	20.00	Email Norris Calendar available	8/17/2022
400.00		0.05	20.00	Email Book mediation	8/17/2022

400.00	0.10		0.00	Email mediation confirmation	8/17/2022
400.00	0.10		0.00	Calendar mediation date	8/17/2022
400.00		0.05	20.00	Email JG tele	8/17/2022
400.00		0.10	40.00	Email Norris settlement deadline	8/17/2022
400.00		0.10	40.00	Email Norris settlement authority	8/17/2022
400.00		0.10	40.00	Email Norris settlement authority special meeting	8/17/2022
400.00		0.05	20.00	Email JG settlement	8/17/2022
400.00		0.05	20.00	Email JG settlement	8/17/2022
400.00		0.05	20.00	Email JG settlement	8/17/2022
400.00		0.10	40.00	Email mediation zoom	8/17/2022
400.00		0.10	40.00	Email JG mediation	8/17/2022
400.00		0.50	200.00	Review Motion ECF 72	8/17/2022
400.00	0.10		0.00	Email JG 72	8/17/2022
400.00		0.10	40.00	Email from Norris-counter-proposal response deadline	8/17/2022
400.00		0.10	40.00	Email to Norris-settlement authority	8/17/2022
400.00		0.10	40.00	Email from Norris-filling a motion	8/17/2022
400.00		0.10	40.00	Email to Gilmore-counter-proposal response deadline	8/17/2022
400.00		0.10	40.00	Email from Gilmore-settlement authority	8/17/2022
400.00		0.10	40.00	Email from Gilmore-settlement authority	8/17/2022
400.00		0.10	40.00	Email to Gilmore-Special meeting and Defendents' motion for extension of time to submit settlement counter-proposal doc.	8/17/2022
400.00			0.00	Motion for Extension of Time	8/17/2022
400.00		0.10	40.00	Email from Norris-objection to extending the response deadline	8/17/2022
400.00		0.10	40.00	Email to Gilmore-special meeting	8/17/2022
400.00		0.10	40.00	Email to Gilmore-Appt. Request Acknowledgement	8/17/2022
400.00		0.10	40.00	Email from Tebbenkamp-September 19th Mediation with Judge Howard	8/17/2022
400.00		0.10	40.00	Email to Gilmore-September 19th Mediation with Judge Howard	8/17/2022
400.00		0.10	40.00	Email from Harmess-September 19th with Judge Howard	8/17/2022
400.00		0.10	40.00	Email to Gilmore-September 19th with Judge Howard	8/17/2022
400.00		0.10	40.00	Email to Gilmore-doc.72	8/17/2022
400.00		0.50	200.00	Tele JG discovery RFP	8/18/2022
400.00		0.50	200.00	Response Motion ECF 72 74	8/18/2022
400.00		0.50	200.00	Review Board of Education presentation business of the board	8/18/2022
400.00	0.10		0.00	Memorandum in Opposition to Motion	8/18/2022
400.00	0.10		0.00	ORDER Regarding [72] Defendants'Motion for Extension of Time to Submit Settlement C	8/18/2022

400.00	0.10		0.00	Reply to Response to Motion	8/18/2022
400.00		0.10	40.00	Email to Gilmore-doc 74	8/18/2022
400.00		0.10	40.00	Email from Gilmore-state school board talks about our case	8/18/2022
400.00		0.05	20.00	Email JG presentation	8/19/2022
400.00		0.05	20.00	Email JG settlement	8/19/2022
400.00		0.40	160.00	Review order 76 granting	8/19/2022
400.00		0.40	160.00	Review reply 75	8/19/2022
400.00	0.10		0.00	Order on Motion for Extension of Time	8/19/2022
400.00		0.10	40.00	Email to Gilmore-state school board talks about our case	8/19/2022
400.00		0.05	20.00	Email JG board meet special	8/22/2022
400.00	0.10		0.00	Email JG board meet special	8/22/2022
400.00	0.10		0.00	Email JG motion granted	8/24/2022
400.00		0.10	40.00	Email from Gilmore-motion to delay offer	8/24/2022
400.00		0.10	40.00	Email to Gilmore-motion to delay offer	8/24/2022
400.00		0.05	20.00	Email little RFA	8/26/2022
400.00		0.05	20.00	Email JG RFA	8/26/2022
400.00		0.05	20.00	Calendar response RFA	8/26/2022
400.00		0.10	40.00	Email from Little-Defendants' First Request for Admissions to Plaintiff	8/26/2022
400.00		0.10	40.00	Email to Gilmore-Defendants' First Request for Admissions to Plaintiff	8/26/2022
400.00	0.10		0.00	Notice of Service	8/26/2022
400.00		0.10	40.00	Email to Gilmore-Defendants' First Request for Admissions to Plaintiff	8/26/2022
400.00		0.05	20.00	Email little RFA responses	9/1/2022
400.00		0.05	20.00	Email JG RFA responses	9/1/2022
400.00		0.05	20.00	Email JG board meeting	9/1/2022
400.00		0.05	20.00	Email JG board meeting	9/1/2022
400.00		0.10	40.00	Email from Little-Responses to Request for Admissions	9/1/2022
400.00		0.10	40.00	Email to Gilmore-Responses to Request for Admissions	9/1/2022
400.00	0.10		0.00	Email from Snider-request for admissions	9/1/2022
400.00	0.10		0.00	Email to Snider-request for admissions	9/1/2022
400.00	0.10		0.00	Notice of Service	9/1/2022
400.00	0.10		0.00	Email from Snider-Educations responses to plaintiffs request for admissions doc.	9/1/2022
400.00		0.10	40.00	Email from Gilmore-board meeting	9/1/2022
400.00		0.10	40.00	Email to Gilmore-board meeting	9/1/2022
400.00		0.40	160.00	Email JG comments on RFA responses review	9/2/2022
400.00	0.10		0.00	Email JG RFA responses	9/2/2022

400.00		0.50	200.00	Review board meeting 9/1 video	9/2/2022
400.00	0.10		0.00	Email JG props allowed by Boyd	9/2/2022
400.00		0.05	20.00	Email little counter settlement	9/2/2022
400.00		0.30	120.00	Review counter	9/2/2022
400.00		0.10	40.00	Email JG counter settlement response	9/2/2022
400.00		0.10	40.00	Email JG counter settlement	9/2/2022
400.00		0.10	40.00	Email JG counter settlement	9/2/2022
400.00		0.05	20.00	Email little RFP response	9/2/2022
400.00		0.50	200.00	Review RFP notes for good faith	9/2/2022
400.00		0.50	200.00	Review of admissions	9/2/2022
400.00		0.10	40.00	Email JG admissions analysis	9/2/2022
400.00	0.10		0.00	Email JG RFP responses	9/2/2022
400.00		0.10	40.00	Email to JG-document response:Responses to Plaintiff's Request for documents	9/2/2022
400.00		0.10	40.00	Email from Gilmore-Responses to Request for Admissions	9/2/2022
400.00		0.10	40.00	Email to Gilmore-Responses to Request for Admissions	9/2/2022
400.00		0.10	40.00	Email to Gilmore-document response	9/2/2022
400.00		0.10	40.00	Email from Little-Mr. Norris is Defendants' Settlement Counter-Proposal	9/2/2022
400.00		0.10	40.00	Email from Little-Responses to Plaintiff's Request for Production	9/2/2022
400.00		0.10	40.00	Email from Gilmore-Responses to Request for Admissions	9/2/2022
400.00		0.10	40.00	Email to Gilmore-Responses to Request for Admissions	9/2/2022
400.00	0.10		0.00	Email from Edwards-Open Records Request	9/2/2022
400.00	0.10		0.00	Email to Snider-Open Records Request	9/2/2022
400.00	0.10		0.00	Email to Snider,Gilmore-settlement counter	9/2/2022
400.00		0.10	40.00	Email from Gilmore-settlement counter	9/2/2022
400.00		0.10	40.00	Email to Gilmore-settlement counter	9/2/2022
400.00		0.10	40.00	Email from settlement counter	9/2/2022
400.00		0.10	40.00	Email to Gilmore-settlement counter	9/2/2022
400.00		0.10	40.00	Email to Gilmore-settlement counter	9/2/2022
400.00		0.10	40.00	Email from Gilmore-settlement counter	9/2/2022
400.00		0.10	40.00	Email to Gilmore-settlement counter	9/2/2022
400.00		0.10	40.00	Email from settlement counter	9/2/2022
400.00		0.10	40.00	Email to Gilmore-settlement counter	9/2/2022
400.00		0.10	40.00	Email to Gilmore-settlement counter proposal	9/2/2022
400.00		3.00	1200.00	Review admission responses with notes	9/4/2022
400.00		2.50	1000.00	Draft good faith communications as motions to compel	9/5/2022

400.00	0.10		0.00	Motion for Discovery	9/6/2022
400.00	0.10		0.00	Notice of Service	9/6/2022
400.00		2.00	800.00	Docs received in mail scan / file review	9/7/2022
400.00		0.05	20.00	Email Tung joint mediation notice	9/7/2022
400.00		0.05	20.00	Email Norris good faith admissions Beveridge USD 233	9/7/2022
400.00	0.50		0.00	Review Kiger admissions	9/7/2022
400.00	0.10		0.00	Email Norris good faith Kiger admissions	9/7/2022
400.00		0.50	200.00	Review McMullen admissions	9/7/2022
400.00	0.10		0.00	Email Norris good faith McMullen admissions	9/7/2022
400.00		0.40	160.00	Review board admissions; Email Norris good faith board admissions	9/7/2022
400.00		0.05	20.00	Email Tung mediation notice date	9/7/2022
400.00		0.20	80.00	Draft mediation notice	9/7/2022
400.00		0.05	20.00	Email Tung mediation notice draft	9/7/2022
400.00		0.05	20.00	Email Tung mediation notice changes	9/7/2022
400.00		2.00	800.00	Draft admission responses	9/7/2022
400.00		0.05	20.00	Email JG admission responses draft	9/7/2022
400.00	0.10		0.00	Joint Mediation Notice	9/7/2022
400.00	0.10		0.00	Order on Motion for Discovery	9/7/2022
400.00		0.10	40.00	Email to Tung-mediation notice deadline	9/7/2022
400.00		0.10	40.00	Email from Tung-mediation notice deadline	9/7/2022
400.00		0.10	40.00	Email to Tung-notice of mediation draft	9/7/2022
400.00		0.10	40.00	Email from Tung-notice of mediation draft	9/7/2022
400.00		0.10	40.00	Email to Norris-Board of Education admissions good faith:exclusive responses	9/7/2022
400.00		0.10	40.00	Email to Norris-Board of Education admissions good faith:exclusive responses	9/7/2022
400.00	0.10		0.00	Email to Norris-Jim McMullen admissions good faith	9/7/2022
400.00		0.10	40.00	Email to Tung-notice of mediation draft	9/7/2022
400.00		0.10	40.00	Email JG admissions	9/8/2022
400.00		0.20	80.00	Edit admission responses	9/8/2022
400.00		0.10	40.00	Email JG scanned documents of Def	9/8/2022
400.00		0.50	200.00	Email Norris good faith privilege log documents objections	9/8/2022
400.00		0.20	80.00	Email JG no pac money wycliff	9/8/2022
400.00		0.05	20.00	Email JG questions on paper docs	9/8/2022
400.00		0.10	40.00	Email JG scanned documents of Def explain	9/8/2022
400.00		0.10	40.00	Email Tung good faith 2 weeks	9/8/2022
400.00		0.10	40.00	Email Tung good faith response	9/8/2022

400.00		0.05	20.00	Email Tung GF metadata	9/8/2022
400.00		0.20	80.00	Email Tung metadata	9/8/2022
400.00		0.05	20.00	Email Tung GF metadata	9/8/2022
400.00		0.20	80.00	Email Tung metadata more explanation	9/8/2022
400.00		0.60	240.00	Email Tung GF attached 10 emails and metadata	9/8/2022
400.00		0.10	40.00	Email to Norris-native format with the metadata	9/8/2022
400.00		0.10	40.00	Email from Norris-forward native format with the metadata to Tung	9/8/2022
400.00		0.10	40.00	Email from Tung-native format with the metadata	9/8/2022
400.00		0.10	40.00	Email to Tung-native format with the metadata	9/8/2022
400.00		0.10	40.00	Email from Tung-native format with the metadata	9/8/2022
400.00		0.10	40.00	Email to Tung-native format with the metadata	9/8/2022
400.00		0.10	40.00	Email from Tung-native format with the metadata	9/8/2022
400.00		0.10	40.00	Email to Tung-native format with the metadata	9/8/2022
400.00	0.10		0.00	Email to Gilmore-Document production	9/8/2022
400.00	0.10		0.00	Email to Gilmore-good faith document production	9/8/2022
400.00		0.10	40.00	Email to Gilmore-response to admissions	9/8/2022
400.00		0.10	40.00	Email from Gilmore-response to admissions	9/8/2022
400.00		0.10	40.00	Email to Gilmore-response to admissions	9/8/2022
400.00		0.50	200.00	Review attached emails	9/9/2022
400.00		0.50	200.00	Draft and send settlement proposal	9/9/2022
400.00		4.50	1800.00	Organize files review research case law	9/11/2022
400.00		0.05	20.00	Email Howard mediator scheduling	9/12/2022
400.00		0.05	20.00	Email JG Howard mediator scheduling zoom	9/12/2022
400.00		0.05	20.00	Email JG Howard mediator scheduling zoom	9/12/2022
400.00		0.10	40.00	Email from Batcheller-mediation by zoom	9/12/2022
400.00		0.10	40.00	Email to Gilmore-mediation by zoom	9/12/2022
400.00		0.20	80.00	Email JG Document production / mediation	9/15/2022
400.00		0.60	240.00	Review records for document production	9/15/2022
400.00		0.50	200.00	Draft document response	9/15/2022
400.00		0.20	80.00	Email JG Document production	9/15/2022
400.00		0.05	20.00	Email JG Howard mediator zoom	9/15/2022
400.00		1.00	400.00	Email JG review docs attached	9/15/2022
400.00	0.10		0.00	Email JG Howard mediator zoom	9/15/2022
400.00	0.10		0.00	Email JG board meeting	9/15/2022
400.00	0.10		0.00	Email JG board meeting	9/15/2022

400.00		0.10	40.00	Email JG explaining Board wants AF as frivolous	9/15/2022
400.00		0.05	20.00	Email JG mediation	9/15/2022
400.00		1.00	400.00	Edit admission RFP responses	9/15/2022
400.00		0.70	280.00	Edit Arrange final responses with document attachments	9/15/2022
400.00		0.10	40.00	Email to Gilmore-discovery document production responses	9/15/2022
400.00		0.10	40.00	Email from Gilmore-discovery document production responses	9/15/2022
400.00		0.10	40.00	Email to Gilmore-discovery document production responses	9/15/2022
400.00	0.10		0.00	Email from Gilmore-executive session	9/15/2022
400.00	0.10		0.00	Email to Gilmore-executive session	9/15/2022
400.00		0.10	40.00	Email from Sinder-executive session	9/15/2022
400.00		0.05	20.00	Email Norris responses admissions docs responses	9/16/2022
400.00		0.10	40.00	Email to 'PACERMAIL/SAT/AO/USCOURTS'-Joint Mediation Notice and submission of filing	9/16/2022
400.00	0.10		0.00	Certificate of Service	9/16/2022
400.00		0.10	40.00	Email to Norris-responses admissions docs	9/16/2022
400.00	0.10		0.00	Email to Snider-ex. Session	9/16/2022
400.00		0.50	200.00	Email Howard mediation	9/18/2022
400.00		0.05	20.00	Email Howard “	9/18/2022
400.00		0.05	20.00	Email Howard zoom link	9/18/2022
400.00		0.10	40.00	Email to Howard-mediation and Judge Howard	9/18/2022
400.00		0.10	40.00	Email from Howard-mediation and Judge Howard	9/18/2022
400.00		0.10	40.00	Email to Howard-mediation and Judge Howard	9/18/2022
400.00		0.10	40.00	Email from Howard-mediation and Judge Howard	9/18/2022
400.00		4.00	1600.00	Mediation Howard	9/19/2022
400.00		0.05	20.00	Email Tung good faith	9/19/2022
400.00		0.10	40.00	Email to Tung-good faith attempt to resolve	9/19/2022
400.00		0.10	40.00	Email from Batcheller-mediation by zoom	9/19/2022
400.00		0.05	20.00	Email Norris mediation	9/20/2022
400.00		0.05	20.00	Email JG mediation	9/20/2022
400.00		0.05	20.00	Email JG mediation	9/20/2022
400.00		0.05	20.00	Email JG mediation	9/20/2022
400.00	0.10		0.00	Email Howard invoice	9/20/2022
400.00		0.05	20.00	Review invoice	9/20/2022
400.00	0.10		0.00	Email JG Howard invoice	9/20/2022
400.00		0.05	20.00	Email Tung good faith response	9/20/2022

400.00	0.10		0.00	Email JG Howard invoice	9/20/2022
400.00		0.10	40.00	Email from Tung-good faith attempt to resolve	9/20/2022
400.00		0.10	40.00	Email from Norris-mediation by zoom	9/20/2022
400.00		0.10	40.00	Email to Gilmore-mediation by zoom	9/20/2022
400.00		0.10	40.00	Email from Batcheller-mediation and Judge Howard	9/20/2022
400.00		0.10	40.00	Email to Gilmore-mediation and Judge Howard	9/20/2022
400.00		0.05	20.00	Email Norris mediation	9/21/2022
400.00		0.05	20.00	Email Tung good faith	9/21/2022
400.00		0.05	20.00	Email Tung good faith	9/21/2022
400.00		0.05	20.00	Email little good faith	9/21/2022
400.00		0.50	200.00	Review Tung good faith letter	9/21/2022
400.00		0.10	40.00	Email from Tung-good faith attempt to resolve	9/21/2022
400.00		0.10	40.00	Email to Tung-good faith attempt to resolve	9/21/2022
400.00	0.10		0.00	ADR REPORT	9/21/2022
400.00		0.10	40.00	Email from Little-Golden Rule Letter	9/21/2022
400.00		0.10	40.00	Email from Tung-drafted motions good faith attempt to resolve	9/21/2022
400.00		0.10	40.00	Email from Tung-drafted motions good faith attempt to resolve	9/21/2022
400.00		0.10	40.00	Email to Tung-drafted motions good faith attempt to resolve	9/21/2022
400.00		0.10	40.00	Email to Tung, drafted motions good faith admissions	9/22/2022
400.00		0.05	20.00	Email little Tung sick	9/23/2022
400.00		0.10	40.00	Email from Little-Tung under weather	9/23/2022
400.00		0.05	20.00	Email JG Howard invoice	9/26/2022
400.00		0.05	20.00	Email little Tung letter	9/26/2022
400.00		0.25	100.00	Review Tung letter	9/26/2022
400.00		0.10	40.00	Email to Gilmore-Daugherty mediation fee	9/26/2022
400.00		0.35	140.00	Email Tung response to letter discovery presentation to magistrate	9/27/2022
400.00		0.10	40.00	Email to Tung-good faith discovery	9/27/2022
400.00		0.10	40.00	Email to Tung- motions in substance	9/27/2022
400.00		0.05	20.00	Email Tung gf confer discovery	9/28/2022
400.00	0.10		0.00	Email Tung letter	9/28/2022
400.00	0.10		0.00	Email Tung dates	9/28/2022
400.00		0.10	40.00	Email from Tung- motions in substance	9/28/2022
400.00		0.10	40.00	Email to Tung- motions in substance	9/28/2022
400.00		0.10	40.00	Email from Tung-good faith communications	9/28/2022
400.00		0.10	40.00	Email to Tung-good faith communications	9/28/2022

400.00		0.10	40.00	Email from Tung-good faith communications	9/28/2022
400.00		0.35	140.00	Email magistrate discovery dispute	9/29/2022
400.00		0.05	20.00	Email Tung discovery dispute	9/29/2022
400.00		0.05	20.00	Email JG board meeting	9/29/2022
400.00		0.10	40.00	Email to ksdschwartzchambers@ksd.uscourts.gov-discovery conference request	9/29/2022
400.00		0.10	40.00	Email to 'ksdschwartzchambers@ksd.uscourts.gov'-discovery conference request	9/29/2022
400.00		0.10	40.00	Email from Tung-discovery conference request	9/29/2022
400.00	0.10		0.00	Email JG board meeting	9/30/2022
400.00	0.10		0.00	Email JG board meeting topics	9/30/2022
400.00	0.10		0.00	Email JG board meeting	9/30/2022
400.00	0.10		0.00	TRANSCRIPT OF MOTION FOR PRELIMINARY INJUNCTION	10/3/2022
400.00	0.10		0.00	Notice of Service	10/5/2022
400.00		0.10	40.00	Email from Little-Defendants' Supplemental Rule 26 Disclosures	10/5/2022
400.00		1.00	400.00	Email Tung with highlighted snapshots of admissions good faith	10/6/2022
400.00	0.10		0.00	Email Tung out of office	10/6/2022
400.00		0.10	40.00	Email JG forward email conference with magistrate	10/6/2022
400.00	0.10		0.00	Email JG responses	10/6/2022
400.00		0.10	40.00	Email to Tung-Rule 26 supplement and good faith response to document requests and request for admissions	10/6/2022
400.00		0.10	40.00	Email to Gilmore-formal need for motion to compel	10/6/2022
400.00		0.10	40.00	Email from Tung-Rule 26 supplement and good faith response to document requests and request for admissions	10/6/2022
400.00		0.10	40.00	Email to Gilmore-Rule 26 supplement and good faith response to document requests and request for admissions	10/6/2022
400.00		0.10	40.00	Email to Gilmore-Rule 26 supplement and good faith response to document requests and request for admissions	10/6/2022
400.00		0.10	40.00	Email from Gilmore-Rule 26 supplement and good faith response to document requests and request for admissions	10/6/2022
400.00		0.10	40.00	Email to Gilmore-motion to compel	10/6/2022
400.00		0.10	40.00	Email to Tung-Rule 26 supplement and good faith response to document requests and request for admissions	10/6/2022
400.00		0.15	60.00	Email Tung good faith issues	10/10/2022
400.00		0.05	20.00	Email Tung need to give transcript	10/10/2022
400.00		0.05	20.00	Email Tung dates	10/10/2022
400.00		0.10	40.00	Email Tung magistrate discovery conference	10/10/2022

400.00		0.10	40.00	Email from Tung-discovery issues	10/10/2022
400.00		0.10	40.00	Email to Tung-Rule 26 supplement and good faith response to document requests and request for admissions:contacting court	10/10/2022
400.00		0.10	40.00	Email magistrate discovery conference 10 13	10/11/2022
400.00		0.05	20.00	Email magistrate	10/11/2022
400.00		0.10	40.00	Email magistrate Tung attachments	10/11/2022
400.00		0.10	40.00	Email magistrate Tung request	10/11/2022
400.00		0.10	40.00	Email to Kliem-discovery conference request	10/11/2022
400.00		0.10	40.00	Email from Kliem-discovery conference	10/11/2022
400.00		0.10	40.00	Email to Kliem-discovery conference	10/11/2022
400.00	0.10		0.00	NOTICE of Hearing	10/11/2022
400.00	0.10		0.00	Motion for Hearing	10/11/2022
400.00	0.10		0.00	ORDER granting Motion for a Discovery Conference (ECF No. 87)	10/11/2022
400.00		0.10	40.00	Email from Little-Plaintiff's Response to Defendants' First Request for Production of Documents	10/11/2022
400.00		0.10	40.00	Email to Kliem-conference on discovery	10/11/2022
400.00		0.10	40.00	Email from Kliem-conference on discovery	10/11/2022
400.00		0.10	40.00	Email from Kliem-conference on discovery	10/11/2022
400.00	0.10		0.00	Email to Snider,Gilmore-board meeting:viewpoint discrimination and article	10/11/2022
400.00		0.10	40.00	Email magistrate Tung request	10/12/2022
400.00		0.10	40.00	Email to Kliem-chambers copies of Defendants Responses to Plaintiffs Request for Admissions, and Defendant's Response to Plaintiff's Request for Production of Documents	10/12/2022
400.00		0.10	40.00	Email to Kliem-issues and disputes to Defendants Responses to Plaintiffs Request for Admissions and production of documents	10/12/2022
400.00		0.75	300.00	Assemble prior docs, email Kliem with copies for conference	10/13/2022
400.00		1.00	400.00	review 91 magistrate order review and calendar events	10/13/2022
400.00		0.05	20.00	Email Tung dates to meet and confer	10/13/2022
400.00		0.05	20.00	Email Tung dates to meet and confer	10/13/2022
400.00		0.05	20.00	Email Tung dates to meet and confer	10/13/2022
400.00		0.05	20.00	Email Tung dates to meet and confer	10/13/2022
400.00	0.10		0.00	Email JG magistrate order	10/13/2022
400.00		0.10	40.00	Email to Tung-gilmore meet and confer	10/13/2022
400.00		0.10	40.00	Email from Tung-meet and confer	10/13/2022
400.00		0.10	40.00	Email from Tung-meet and confer	10/13/2022

400.00	0.10		0.00	Discovery Hearing	10/13/2022
400.00	0.10		0.00	ORDER regarding Discovery Hearing	10/13/2022
400.00		0.10	40.00	Email from Tung-meet and confer	10/13/2022
400.00		0.10	40.00	Email to Gilmore-order discover doc 91	10/13/2022
400.00		0.45	180.00	Tele JG magistrate order	10/14/2022
400.00	0.10		0.00	Email JG tele	10/14/2022
400.00	0.10		0.00	Email JG paid Howard	10/14/2022
400.00		1.00	400.00	Review discovery in light of magistrate conference	10/15/2022
400.00		0.05	20.00	Email Tung dep dates	10/18/2022
400.00		0.05	20.00	Email norris dep dates	10/18/2022
400.00		0.15	60.00	Check calendars JG and LB	10/18/2022
400.00		0.05	20.00	Email Norris dep dates	10/18/2022
400.00		1.50	600.00	Meet and confer	10/18/2022
400.00		0.45	180.00	Email and attachments JG discovery review	10/18/2022
400.00		0.05	20.00	Email JG update on meeting	10/18/2022
400.00		0.10	40.00	Email from Norris-scheduling client disposition	10/18/2022
400.00		0.10	40.00	Email to Norris-scheduling client disposition	10/18/2022
400.00		0.10	40.00	Email to Tung-Gilmore disposition	10/18/2022
400.00		0.10	40.00	Email to Tung- proposed dates for Ms. Gilmore’s deposition	10/18/2022
400.00		0.10	40.00	Email to Gilmore-deposition	10/18/2022
400.00		0.05	20.00	Email JG dep dates	10/19/2022
400.00		0.05	20.00	Email Norris dep dates	10/19/2022
400.00		0.10	40.00	Email to Norris-scheduling client disposition	10/19/2022
400.00		0.10	40.00	Email to Norris-deposition	10/19/2022
400.00		0.05	20.00	Email Norris dep date 11 8	10/20/2022
400.00		0.10	40.00	Email JG dep explan	10/20/2022
400.00		0.10	40.00	Email from Norris-scheduling client disposition	10/20/2022
400.00		0.10	40.00	Email to Gilmore-Forward email from Norris: scheduling client disposition	10/20/2022
400.00		1.00	400.00	Review discovery in light of prior conference	10/21/2022
400.00		1.00	400.00	Meet and confer	10/24/2022
400.00		0.05	20.00	Email Norris dep location	10/24/2022
400.00		0.05	20.00	Email Norris dep location	10/24/2022
400.00		4.00	1600.00	Research admission responses caselaw KS local rules	10/24/2022
400.00		0.10	40.00	Email from Norris-deposition	10/24/2022
400.00		0.10	40.00	Email to Norris-deposition	10/24/2022

400.00		0.05	20.00	Email JG dep location	10/25/2022
400.00		0.10	40.00	Email to Gilmore-deposition	10/25/2022
400.00		0.10	40.00	Email JG discovery locations search	10/26/2022
400.00		0.10	40.00	Email JG discovery locations search results	10/27/2022
400.00		1.00	400.00	Edit admission doc responses review	10/27/2022
400.00		0.10	40.00	Email JG admission responses	10/27/2022
400.00	0.10		0.00	Notice to Take Deposition	10/27/2022
400.00		0.10	40.00	Email from Gilmore-Misc discovery	10/27/2022
400.00		0.10	40.00	Email to Gilmore-Misc discovery	10/27/2022
400.00		0.05	20.00	Email Tung admission responses confer	10/28/2022
400.00		0.10	40.00	Email Tung confer dates	10/28/2022
400.00		0.05	20.00	Email Tung confer date	10/28/2022
400.00		0.05	20.00	Email Tung confer date	10/28/2022
400.00		1.00	400.00	Assemble docs finalize admit and doc responses	10/28/2022
400.00		0.05	20.00	Email Tung revised admission docs doc responses	10/28/2022
400.00		0.05	20.00	Email Little def revised responses	10/28/2022
400.00		0.05	20.00	Email JG def revised responses	10/28/2022
400.00		0.05	20.00	Notice of deposition	10/28/2022
400.00		0.05	20.00	Email JG notice of dep	10/28/2022
400.00		0.05	20.00	Email JG about def responses	10/28/2022
400.00		0.10	40.00	Email from Little-Amended Responses	10/28/2022
400.00		0.10	40.00	Email to Gilmore- Amended Responses	10/28/2022
400.00		0.10	40.00	Email to Tung-Gilmore revised responses	10/28/2022
400.00		0.10	40.00	Email to Gilmore-notice of deposition	10/28/2022
400.00		0.10	40.00	Email to Gilmore- Amended Responses	10/28/2022
400.00		0.10	40.00	Email from Tung-scheduling to meet for admended responses	10/28/2022
400.00		0.10	40.00	Email to Tung-scheduling to meet for admended responses	10/28/2022
400.00		0.10	40.00	Email from Tung-scheduling to meet for admended responses	10/28/2022
400.00		0.10	40.00	Email to Tung-scheduling to meet for admended responses	10/28/2022
400.00	0.10		0.00	Certificate of Service	10/28/2022
400.00	0.10		0.00	Notice of Service	10/28/2022
400.00		0.10	40.00	Email to Gilmore-notice of deposition	10/28/2022
400.00		0.10	40.00	Email to Tung-revised responses docs	10/28/2022
400.00		0.05	20.00	Email JG def revised responses	10/29/2022
400.00		0.10	40.00	Email from Gilmore-Amended Responses	10/29/2022

400.00		3.00	1200.00	Review privilege log revised admissions from all defendants document production motion to compel possibility	10/31/2022
400.00	0.10		0.00	Email little document responses issue	11/2/2022
400.00		0.05	20.00	Email little document responses issue	11/2/2022
400.00		0.05	20.00	Email JG document responses issue	11/2/2022
400.00		0.10	40.00	Email from Little-correspondence from Emily Tung	11/2/2022
400.00		0.10	40.00	Email to Tung- documents produced	11/2/2022
400.00		0.10	40.00	Email to Gilmore- forward on behalf of Tung: documents produced	11/2/2022
400.00		0.05	20.00	Email JG dep prep	11/4/2022
400.00		0.10	40.00	Email Norris pretrial	11/4/2022
400.00		0.05	20.00	Email tung fee agreement	11/4/2022
400.00		0.05	20.00	Email Norris pretrial	11/4/2022
400.00		0.05	20.00	Email Norris pretrial	11/4/2022
400.00	0.10		0.00	Email JG date to meet	11/4/2022
400.00	0.10		0.00	Email JG date to meet	11/4/2022
400.00	0.10		0.00	Email JG date to meet location and time	11/4/2022
400.00	0.10		0.00	Email Norris still want transcript	11/4/2022
400.00		0.05	20.00	Email JG meet logistics	11/4/2022
400.00		2.00	800.00	Draft statement of facts pretrial	11/4/2022
400.00		0.05	20.00	Email Norris statement of pretrial facts	11/4/2022
400.00		0.10	40.00	Email from Norris-pretrial conference	11/4/2022
400.00		0.10	40.00	Email to Tung-fee agreement doc.	11/4/2022
400.00		0.10	40.00	Email to Norris-pretrial conference	11/4/2022
400.00		0.10	40.00	Email from Norris-pretrial conference	11/4/2022
400.00		0.10	40.00	Email to Gilmore-deposition	11/4/2022
400.00		0.10	40.00	Email to Norris-Prelim draft of statement of facts plaintiff	11/4/2022
400.00		0.10	40.00	Email from Gilmore-Tuesday deposition	11/4/2022
400.00		0.10	40.00	Email to Gilmore-Tuesday deposition	11/4/2022
400.00		0.10	40.00	Email from Gilmore-Tuesday deposition	11/4/2022
400.00		0.10	40.00	Email to Gilmore-Tuesday deposition	11/4/2022
400.00		0.10	40.00	Email to Norris-transcript in Rule 26 disclosures	11/4/2022
400.00		1.00	400.00	Notes for JG meeting prep	11/6/2022
400.00		0.45	180.00	Revise admissions 13 and 14	11/7/2022
400.00		0.05	20.00	Email Norris revised admissions	11/7/2022
400.00		2.00	800.00	Gilmore meeting Deposition	11/7/2022

400.00		0.05	20.00	Email Norris admissions	11/7/2022
400.00		0.10	40.00	Email from Norris-first revised admission	11/7/2022
400.00		0.10	40.00	Email to Norris-first revised admission	11/7/2022
400.00		0.10	40.00	Email to Gilmore-first revised admission	11/7/2022
400.00		0.10	40.00	Email to Norris-first revised admission	11/7/2022
400.00		7.00	2800.00	Gilmore Deposition	11/8/2022
400.00	0.10		0.00	Email Tung dictionary	11/8/2022
400.00		0.10	40.00	Email from Tung-Message from "RNP002673C6B99C"	11/8/2022
400.00		0.10	40.00	Email to Tung-Message from "RNP002673C6B99C"	11/8/2022
400.00		0.10	40.00	Email from Tung-"RNP002673C6B99C":dictionary scan	11/8/2022
400.00		0.05	20.00	Email Tung dictionary need original	11/9/2022
400.00		0.15	60.00	Review attachment dictionary print scan	11/9/2022
400.00		0.05	20.00	Email Tung dictionary says ct r has original	11/9/2022
400.00		0.15	60.00	Tele JG deposition	11/9/2022
400.00		1.00	400.00	Notes to file from deposition questions for trial	11/9/2022
400.00		0.05	20.00	Email Tung pretrial facts	11/9/2022
400.00		0.05	20.00	Email Tung pretrial maybe monday	11/9/2022
400.00		0.10	40.00	Email from Tung-pretrial order draft	11/9/2022
400.00		0.10	40.00	Email to Tung-pretrial order draft	11/9/2022
400.00		0.10	40.00	Email to Tung-Message from "RNP002673C6B99C"	11/9/2022
400.00		0.10	40.00	Email from Tung-Message from "RNP002673C6B99C"	11/9/2022
400.00		0.10	40.00	Email to Tung-Message from "RNP002673C6B99C"	11/9/2022
400.00		0.10	40.00	Email from Tung-pretrial order draft	11/9/2022
400.00		0.05	20.00	Email little beveridge amended RFA	11/10/2022
400.00		0.45	180.00	Review and compare Beveridge amended RFA responses	11/10/2022
400.00		0.05	20.00	Email little defendants amended RFAs privilege log RFP responses	11/10/2022
400.00		0.10	40.00	Email from Little-Defendant Joe Beveridge's Second Amended Responses to Plaintiff's Request for Admissions	11/10/2022
400.00		1.50	600.00	Review defendants amended RFAs privilege log RFP responses	11/11/2022
400.00	0.10		0.00	Olathe news	11/11/2022
400.00	0.10		0.00	Olathe news	11/11/2022
400.00	0.10		0.00	Email JG Olathe news	11/11/2022
400.00	0.10		0.00	Notice of Service	11/11/2022
400.00		1.50	600.00	Edit and draft Pretrial	11/12/2022
400.00		0.35	140.00	Research disqualify when to file premature	11/13/2022

400.00		1.50	600.00	Edit Pretrial review complaint counts statement of facts	11/13/2022
400.00		0.50	200.00	Finalize Pretrial draft	11/14/2022
400.00		0.05	20.00	Email Tung pretrial draft	11/14/2022
400.00		0.05	20.00	Email Tung pretrial response	11/14/2022
400.00		0.10	40.00	Email to Tung-Gilmore fee agreement	11/14/2022
400.00		0.10	40.00	Email to Tung-Gilmore Pretrial Order	11/14/2022
400.00	0.10		0.00	Email from McLaughlin- Olathe Reporter Inquiry	11/14/2022
400.00	0.10		0.00	Email to McLaughlin- Olathe Reporter Inquiry	11/14/2022
400.00	0.10		0.00	Email from McLaughlin- Olathe Reporter Inquiry	11/14/2022
400.00	0.10		0.00	Email to McLaughlin- Olathe Reporter Inquiry	11/14/2022
400.00	0.10		0.00	Email from McLaughlin- Olathe Reporter Inquiry	11/14/2022
400.00	0.10		0.00	Email to McLaughlin- Olathe Reporter Inquiry	11/14/2022
400.00	0.10		0.00	Email from McLaughlin- Olathe Reporter Inquiry	11/14/2022
400.00	0.10		0.00	Email to McLaughlin- Olathe Reporter Inquiry	11/14/2022
400.00	0.10		0.00	Olathe news Board spent over $100,000	11/15/2022
400.00		0.05	20.00	Email Tung agenda minutes	11/15/2022
400.00		0.10	40.00	Review file; Email Tung agenda minutes	11/15/2022
400.00		0.15	60.00	Email JG explain def counter	11/15/2022
400.00		0.10	40.00	Email to Tung-agenda and minutes	11/15/2022
400.00		0.10	40.00	Email from Tung-agenda and minutes	11/15/2022
400.00		0.10	40.00	Email to Tung-agenda and minutes docs.	11/15/2022
400.00	0.10		0.00	Email from McLaughlin- Olathe Reporter Inquiry	11/15/2022
400.00	0.10		0.00	Email to Gilmore-olathe reporter inquiry	11/15/2022
400.00	0.10		0.00	Email from Gilmore-Olathe Reporter Inquiry	11/15/2022
400.00		0.10	40.00	Email to Gilmore-Olathe Reporter Inquiry	11/15/2022
400.00		1.65	660.00	Review JG deposition	11/16/2022
400.00	0.10		0.00	Email JG deposition for review	11/16/2022
400.00		0.10	40.00	Email norris pretrial issue	11/16/2022
400.00		0.10	40.00	Email from Norris-the proposed PTO and proposed stipulations	11/16/2022
400.00		0.10	40.00	Email from Cornerstone Court Reporting Company-Production-Tuesday Deposition	11/16/2022
400.00		0.10	40.00	Email to Gilmore-Tuesday deposition	11/16/2022
400.00		0.10	40.00	Email norris pretrial draft attached	11/17/2022
400.00		0.05	20.00	Email norris pretrial late can’t respond	11/17/2022
400.00		0.05	20.00	Email norris pretrial	11/17/2022
400.00		0.25	100.00	Review statement of facts part pretrial	11/17/2022

400.00		0.05	20.00	Email norris pretrial facts issue	11/17/2022
400.00		0.05	20.00	Email norris pretrial	11/17/2022
400.00		0.05	20.00	Email norris pretrial	11/17/2022
400.00		0.05	20.00	Email norris pretrial	11/17/2022
400.00		0.05	20.00	Email norris pretrial	11/17/2022
400.00		0.10	40.00	Email to Tung, Norris-proposed PTO review	11/17/2022
400.00		0.10	40.00	Email from Norris-proposed PTO review due	11/17/2022
400.00		0.10	40.00	Email to Tung, Norris-proposed PTO review	11/17/2022
400.00		0.10	40.00	Email from Norris-proposed PTO review due	11/17/2022
400.00	0.10		0.00	Order on Motion to Dismiss for Failure to State a Claim	11/18/2022
400.00		0.05	20.00	Email tung pretrial revisions	11/21/2022
400.00		1.00	400.00	Review order dismissal	11/21/2022
400.00		1.00	400.00	Review and compare def pretrial	11/21/2022
400.00		1.00	400.00	Edit plaintiff pretrial in view of order	11/21/2022
400.00		0.10	40.00	Email tung pretrial revisions issues	11/21/2022
400.00		0.10	40.00	Email tung pretrial revisions issues	11/21/2022
400.00	0.10		0.00	Email tung pretrial revisions issues	11/21/2022
400.00		0.05	20.00	Email tung pretrial revisions issues	11/21/2022
400.00		0.15	60.00	Email tung pretrial revisions issues statement of facts	11/21/2022
400.00		0.15	60.00	Email tung pretrial revisions issues statement of facts revised	11/21/2022
400.00		0.20	80.00	Email tung pretrial revisions issues statement of facts revised	11/21/2022
400.00	0.10		0.00	Email tung pretrial	11/21/2022
400.00		0.05	20.00	Email tung pretrial	11/21/2022
400.00		0.05	20.00	Email tung pretrial stipulations	11/21/2022
400.00		0.05	20.00	Email JG order	11/21/2022
400.00		0.75	300.00	Revised stipulation of facts	11/21/2022
400.00		0.05	20.00	Email tung revised stip facts	11/21/2022
400.00		0.05	20.00	Email tung pretrial draft for review	11/21/2022
400.00		0.45	180.00	Review Tung joint pretrial revise track changes	11/21/2022
400.00		0.05	20.00	Email tung pretrial track changes	11/21/2022
400.00		0.05	20.00	Email JG order	11/21/2022
400.00		0.05	20.00	Email JG order	11/21/2022
400.00		0.05	20.00	Email Tung pretrial	11/21/2022
400.00		0.05	20.00	Review joint pretrial	11/21/2022
400.00		0.05	20.00	Email tung pretrial sign name	11/21/2022

400.00		0.10	40.00	Email JG pretrial process	11/21/2022
400.00	0.10		0.00	Email tung magistrate pretrial	11/21/2022
400.00		0.10	40.00	Email to Tung-Def Pretrial 2 revised docs	11/21/2022
400.00		0.10	40.00	Email to Tung-Def Pretrial 2 revised	11/21/2022
400.00		0.10	40.00	Email from Tung-Def Pretrial 2 revised	11/21/2022
400.00		0.10	40.00	Email to Tung-Def Pretrial 2 revised	11/21/2022
400.00		0.10	40.00	Email to Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email from Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email to Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email from Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email to Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email from Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email to Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email from Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email to Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email to Tung-revised plaintiff Pretrial	11/21/2022
400.00		0.10	40.00	Email to Tung-Revised Plaintiff Pretrial doc.	11/21/2022
400.00		0.10	40.00	Email from Little-parties' Pretrial Order	11/21/2022
400.00		0.10	40.00	Email from Tung-Revised Plaintiff Pretrial:impasse	11/21/2022
400.00		0.10	40.00	Email to Gilmore-doc.96	11/21/2022
400.00		0.10	40.00	Email from Gilmore-Kiger and McMullen	11/21/2022
400.00		0.10	40.00	Email to Gilmore-Kiger and McMullen	11/21/2022
400.00	0.10		0.00	Email JG olathe news	11/22/2022
400.00	0.10		0.00	Email JG olathe news	11/22/2022
400.00	0.10		0.00	Email JG olathe news	11/22/2022
400.00		0.10	40.00	Email from Little-Defendants' Rule 26 Documents	11/22/2022
400.00		0.10	40.00	Email to Gilmore-Defendants' Rule 26 Documents	11/22/2022
400.00	0.10		0.00	Email to Gilmore,Snider- olathe reporter article	11/22/2022
400.00	0.10		0.00	Email from Snider- olathe reporter article	11/22/2022
400.00	0.10		0.00	Email to Gilmore,Snider- olathe reporter article	11/22/2022
400.00	0.10		0.00	Email from Gilmore- olathe reporter article	11/22/2022
400.00	0.10		0.00	Email to Gilmore,Snider- olathe reporter article	11/22/2022
400.00	0.10		0.00	Email from Gilmore- olathe reporter article	11/22/2022
400.00	0.10		0.00	Email to Gilmore,Snider- olathe reporter article	11/22/2022
400.00	0.10		0.00	Email from Gilmore- olathe reporter article	11/22/2022

400.00		0.05	20.00	Email JG pretrial questions	11/28/2022
400.00		0.05	20.00	Email JG pretrial questions	11/28/2022
400.00	0.10		0.00	Email from Gilmore-dates in December	11/28/2022
400.00	0.10		0.00	Email to Gilmore-dates in December	11/28/2022
400.00	0.10		0.00	Email from Gilmore-dates in December	11/28/2022
400.00		0.10	40.00	Email Tung discovery search	12/2/2022
400.00		0.10	40.00	Email JG discovery search	12/2/2022
400.00		0.05	20.00	Email Tung discovery search	12/2/2022
400.00		0.45	180.00	Research disqualify 3.7 affirmative defense issue	12/2/2022
400.00		0.10	40.00	Email from Tung-deleted text messages	12/2/2022
400.00		0.10	40.00	Email to Gilmore-Forward email from Tung:deleted text messages	12/2/2022
400.00		0.10	40.00	Email to Tung-text messages	12/2/2022
400.00		0.10	40.00	Email from Gilmore-messages	12/2/2022
400.00		1.50	600.00	Revise pretrial legal theories	12/4/2022
400.00		0.10	40.00	Email Tung revised pretrial	12/6/2022
400.00		0.10	40.00	Email to Tung-Pretrial segment	12/6/2022
400.00		0.50	200.00	Notes prepare pretrial conference participation	12/7/2022
400.00		1.00	400.00	Pretrial conference	12/7/2022
400.00		1.00	400.00	Pretrial conference review notes notes	12/7/2022
400.00		0.30	120.00	Calendar dates	12/7/2022
400.00	0.10		0.00	Email JG trial date Oct 2023	12/7/2022
400.00	0.10		0.00	Email JG trial date Oct 2023	12/7/2022
400.00	0.10		0.00	Email JG trial date Oct 2023	12/7/2022
400.00	0.10		0.00	Email magistrate pretrial	12/7/2022
400.00		1.25	500.00	Review magistrate pretrial form notes	12/7/2022
400.00		1.00	400.00	Finalize motion to disqualify and file	12/7/2022
400.00		0.05	20.00	Email Tung stipulations	12/7/2022
400.00		0.30	120.00	Review and compare stipulations and exhibits	12/7/2022
400.00		0.05	20.00	Email Tung transcript of injunction	12/7/2022
400.00		0.10	40.00	Email from Little-preliminary injunction hearing transcript	12/7/2022
400.00		0.10	40.00	Email to Gilmore and Snider-preliminary injunction hearing transcript	12/7/2022
400.00		0.10	40.00	Email to Gilmore-motion to disqualify	12/7/2022
400.00		0.10	40.00	Email from Tung-proposed stipulations based on Court's Order	12/7/2022
400.00		0.10	40.00	Email to Tung-proposed stipulations based on Court's Order	12/7/2022
400.00		0.10	40.00	Email from Tung-proposed stipulations	12/7/2022

400.00		0.10	40.00	Email to Tung-proposed stipulations	12/7/2022
400.00	0.10		0.00	Email to Gilmore,Thad-set trial date	12/7/2022
400.00		0.10	40.00	Email from Gilmore-set trial date	12/7/2022
400.00		0.10	40.00	Email to Gilmore,Thad-set trial date	12/7/2022
400.00		0.10	40.00	Email from Gilmore-set trial date	12/7/2022
400.00	0.10		0.00	Email to Gilmore,Thad-set trial date	12/7/2022
400.00		0.10	40.00	Email to Tung-proposed stipulations	12/7/2022
400.00		0.10	40.00	Email from Tung-proposed stipulations draft response	12/7/2022
400.00		0.10	40.00	Email to Gilmore-doc.99	12/7/2022
400.00		2.00	800.00	Review billing events	12/8/2022
400.00		1.00	400.00	Review transcript	12/8/2022
400.00		1.00	400.00	Notes and review transcript with testimony from defendant pretrial issues	12/8/2022
400.00		0.30	120.00	Prepare stipulations and exhibits	12/8/2022
400.00		2.00	800.00	Edit / complete magistrate pretrial	12/9/2022
400.00		0.30	120.00	Review order	12/9/2022
400.00		0.05	20.00	Email Tung pretrial	12/9/2022
400.00		0.30	120.00	Continue working / edit pretrial	12/10/2022
400.00		0.20	80.00	Continue working / edit pretrial review notes from conference	12/11/2022
400.00		2.50	1000.00	Review defendant pretrial and continue working / edit pretrial review notes from conference	12/11/2022
400.00		0.05	20.00	Email Tung stipulations	12/12/2022
400.00		4.00	1600.00	pretrial and continue working / edit pretrial statement of facts review exhibits	12/12/2022
400.00		0.30	120.00	Review def stipulations	12/12/2022
400.00		0.10	40.00	Email from Tung-proposed stipulations based on Court's Order	12/12/2022
400.00		0.10	40.00	Email to Tung-proposed stipulations based on Court's Order	12/12/2022
400.00		0.10	40.00	Email from Tung-proposed stipulations based on Court's Order	12/12/2022
400.00		0.10	40.00	Email to Tung-proposed stipulations based on Court's Order	12/12/2022
400.00		4.00	1600.00	pretrial finish review statement of facts elements of action verify other issues to litigate	12/13/2022
400.00	0.20		0.00	Update and review billing costs to current date	12/13/2022
400.00	0.10	0.00	0.00	Email Tung pretrial	12/13/2022
400.00		0.10	40.00	Email Tung pretrial issue extension	12/13/2022
400.00	0.10		0.00	Email Tung to magistrate	12/13/2022
400.00		0.10	40.00	Email magistrate pretrial	12/13/2022
400.00	0.10		0.00	Order extension review	12/13/2022

400.00	0.10		0.00	Order revise pretrial	12/13/2022
	3.50			RECAP briefs objections to pretrial order	12/13/2022
400.00		0.10	40.00	Calendar pretrial revision due	12/13/2022
400.00		2.00	800.00	Research necessity of objections in pretrial	12/13/2022
400.00		0.10	40.00	Email to Tung-Plaintiff REVISED 22-2032-HLT (Gilmore) First Revised PTO	12/13/2022
400.00		0.10	40.00	Email from Tung-updated draft of the PTO	12/13/2022
400.00		0.10	40.00	Email to Tung-updated draft of the PTO	12/13/2022
400.00		0.10	40.00	Email from Tung-updated draft of the PTO	12/13/2022
400.00		0.10	40.00	Email to Tung-updated draft of the PTO	12/13/2022
400.00		0.10	40.00	Email from Tung-request for extension on First Revised PTO	12/13/2022
400.00		0.10	40.00	Email to Tung-request for extension on First Revised PTO	12/13/2022
400.00		0.10	40.00	Email from Tung- updated PTO draft	12/13/2022
400.00		0.10	40.00	Email to Tung- updated PTO draft	12/13/2022
400.00	0.10		0.00	Email to Snider-security at board meetings	12/13/2022
400.00		2.00	800.00	Rework pretrial pursuant to order	12/14/2022
400.00		2.00	800.00	Edit and proof finalize revised pretrial pursuant to order	12/14/2022
400.00		0.20	80.00	Update and review billing costs to current date	12/14/2022
400.00		0.05	20.00	Email Tung pretrial dirty	12/14/2022
400.00		0.05	20.00	Email Tung pretrial dirty	12/14/2022
400.00		0.20	80.00	Draft and file certificate of service pretrial	12/14/2022
400.00		0.10	40.00	Email to Tung-documents: merged changes plaintiff, plaintiff's revised pretrial	12/14/2022
400.00		0.10	40.00	Email to Tung-Plaintiff's Revised Pretrial	12/14/2022
400.00		0.10	40.00	Email to Gilmore-Plaintiff's Revised Pretrial	12/16/2022
400.00		0.10	40.00	Email from Gilmore-Plaintiff's Revised Pretrial 12/14	12/16/2022
400.00		0.10	40.00	Email to Gilmore-Plaintiff's Revised Pretrial 12/14	12/16/2022
400.00		0.10	40.00	Email to Tung, changes to defendant pretrial	12/19/2022
400.00		0.10	40.00	Email to Tung-updated draft of the PTO	12/19/2022
400.00		0.10	40.00	Email from Tung-updated draft of the PTO	12/19/2022
400.00		0.10	40.00	Email to Tung-updated draft of the PTO	12/19/2022
400.00		0.10	40.00	Email from Tung-updated draft of the PTO	12/19/2022
400.00		0.10	40.00	Email to Tung-changes to defendant pretrial	12/19/2022
400.00		0.10	40.00	Email to Gilmore-pretrial additional facts	12/19/2022
400.00		0.10	40.00	Email to Tung-changes to defendant pretrial	12/19/2022
400.00		0.10	40.00	Email to Tung-pretrial	12/21/2022
400.00		0.10	40.00	Email from Little-final red-lined version of the Pre-Trial Order	12/21/2022

400.00		0.10	40.00	Email to Little-final red-lined version of the Pre-Trial Order	12/21/2022
400.00		0.10	40.00	Email to Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email from Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email to Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email from Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email to Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email from Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email to Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email to Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email from Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email to Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email from Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email to Tung-pretrial submission	12/21/2022
400.00		0.10	40.00	Email to Gilmore- Steele special meeting for public comment	12/24/2022
400.00		0.10	40.00	Email to Kliem and Judge Schwartz-plaintiff’s revised Pre-Trial Order	1/4/2023
400.00		0.10	40.00	Email from Kliem-final red-lined version of the Pre-Trial Order	1/4/2023
400.00		0.10	40.00	Email from Kliem and Judge Schwartz-plaintiff’s revised Pre-Trial Order	1/4/2023
400.00		0.10	40.00	Email to Deaton- client availability	1/4/2023
400.00		0.10	40.00	Email to Tung,Kliem-plaintiff’s revised Pre-Trial Order red-lined	1/4/2023
400.00		1.00	400.00	Review magistrate pretrial revisions	1/4/2023
400.00				Extending Deadline for Submission of the Pretrial Order	1/5/2023
400.00		0.10	40.00	Email to Tung-plaintiff's amended pretrial order	1/5/2023
400.00		0.10	40.00	Email from Tung-factual contentions	1/5/2023
400.00		0.10	40.00	Email from Tung-factual contentions	1/5/2023
400.00		0.10	40.00	Email to Kliem and Schwartz-plaintiff's amended pretrial order	1/5/2023
400.00		0.10	40.00	Email from Kliem-Instructions for the Pretrial Order Form	1/5/2023
400.00		0.10	40.00	Email to Kliem and Judge Schwartz-plaintiff’s revised Pre-Trial Order	1/5/2023
400.00		0.10	40.00	Email to Kliem and Judge Schwartz-plaintiff’s revised Pre-Trial Order	1/5/2023
400.00		0.10	40.00	Email to Tung, Kliem-plaintiff's amended pretrial order	1/5/2023
400.00		0.80	320.00	Review Magistrate pretrial revisions	1/5/2023
400.00		0.10	40.00	Review ecf 105	1/5/2023
400.00		0.10	40.00	Email to Norris-pretrial jan 10 2023	1/10/2023
400.00		0.10	40.00	Email from Tung-pretrial jan 10 2023	1/10/2023
400.00				Response by Defendents-motion to disqualify counsel	1/11/2023
400.00		0.10	40.00	Email to Tung, Schwartz, Kliem-plaintiff’s revised Pre-Trial Order	1/11/2023

400.00		0.10	40.00	Email to Tung, Kliem-plaintiff's amended pretrial order	1/11/2023
400.00		0.30	120.00	ECF 106 exhibits to motion to disqualify review	1/11/2023
	1.50			RECAP research	1/11/2023
400.00		1.00	400.00	ECF 106 response to motion to disqualify review	1/11/2023
400.00		1.00	400.00	RECAP 2:19-cv-02005-HLT-TJJ Walker Newman review opp to motion to disqualify 16 pg. premature	1/11/2023
400.00				Motion to disqualify counsel	1/12/2023
400.00		1.50	600.00	Draft Reply with case law to disqualify response	1/12/2023
400.00		2.00	800.00	Research case law def response for reply	1/12/2023
400.00				Order Regarding Pretrial Order	1/17/2023
400.00		0.10	40.00	Email from Kliem-plaintiff's revised Pre-Trial Order	1/17/2023
400.00		0.10	40.00	Review ecf 108 revisions to pretrial	1/17/2023
400.00		0.10	40.00	Email to Judge Schwartz- Court-Revised 22-2032-HLT (Gilmore) PTO documents	1/20/2023
400.00		0.10	40.00	Email to Kliem and Schwartz-revised pretrial order	1/20/2023
400.00		0.10	40.00	Email from Gilmore-Lee Summit school board	1/20/2023
400.00		0.10	40.00	Email from Gilmore-Lee Summit school board	1/20/2023
400.00		0.10	40.00	Email to Gilmore-Lee Summit school board	1/20/2023
400.00		1.50	600.00	Review and compare court revised pretrial	1/20/2023
400.00		0.10	40.00	Email from Kliem-revised pretrail order	1/24/2023
400.00		0.10	40.00	Email to Kliem-revised pretrial order	1/24/2023
400.00		0.10	40.00	Email from Kliem-revised pretrail order	1/24/2023
400.00		1.00	400.00	Review 4th magistrate pretrial revisions	1/24/2023
400.00				Pretrial Order Entered	1/26/2023
400.00	0.10		0.00	Email to Snider-pretrial order	1/26/2023
400.00		0.10	40.00	Email to Gilmore-Pretrial order	1/26/2023
400.00		0.10	40.00	Email from Tung-revised pretrail order	1/26/2023
400.00		0.10	40.00	Email from Tung-Judge Schwartz's final revised version of the pretrial order	1/26/2023
400.00		0.50	200.00	ECF 109 pretrial filed review; calendar events SJ and trial	1/26/2023
400.00		0.10	40.00	Email from Gilmore-Pretrial order	2/2/2023
400.00		0.10	40.00	Email to Gilmore-pretrial order	2/2/2023
400.00		2.00	800.00	Research whether to file SJ and how judge handles as trial issue	2/3/2023
	3.00			RECAP research judgment as matter of law briefs review	2/15/2023
400.00		0.10	40.00	Email to Gilmore-Answer of Joe	2/16/2023
400.00		2.00	800.00	Research motion judgment matter of law vs SJ	2/19/2023

400.00		3.70	1480.00	Review pretrial order; calendar dates for summary judgment and trial; work on outline of sections for summary judgment response; review key documents and deposition testimony for citation in summary judgment briefing.	2/20/2023
400.00		3.00	1200.00	Research presenting trial court issues not decided on SJ motion for judgment notes risk and benefit	3/1/2023
400.00		0.20	80.00	Review Def exhibits email to client	3/31/2023
400.00		2.60	1040.00	Review Def Brief Motion for SJ ecf 111	3/31/2023
400.00		0.10	40.00	Review Def Motion for SJ ecf 111	3/31/2023
400.00		0.20	80.00	New directory SJ Gilmore create and categorize	3/31/2023
400.00		0.10	40.00	Email to Gilmore-gilmore SJ	4/1/2023
400.00		0.10	40.00	Email to Snider-gilmore SJ	4/1/2023
400.00		0.10	40.00	Email from Gilmore-Board meeting videos	4/1/2023
400.00		0.10	40.00	Email to Gilmore-Board meeting videos	4/1/2023
400.00		6.00	2400.00	review summary judgment mem; work on response; legal research	4/1/2023
400.00		6.00	2400.00	Work on response to summary judgment motion; review statement of facts and check record cites; work on additional statement of facts	4/2/2023
400.00		4.50	1800.00	Work on summary judgment response; review motion; check cited materials	4/3/2023
400.00		3.00	1200.00	Work on summary judgment response brief; check record cites	4/4/2023
400.00		5.00	2000.00	Review client's comments on summary judgment motion; work into response; continue working on response and additional statement of facts; review depositions and exhibits.	4/5/2023
400.00		6.00	2400.00	Work on additional statement of facts; review deposition and exhibits	4/6/2023
400.00				Offical Notice of Hearing	4/7/2023
400.00		0.10	40.00	Email from Deaton-scheduling hearing	4/7/2023
400.00		0.10	40.00	Email to Deaton-scheduling hearing	4/7/2023
400.00		0.10	40.00	Email from Deaton- client availability	4/7/2023
400.00		0.10	40.00	Email from Norris-availability	4/7/2023
400.00		0.10	40.00	Email from Deaton-scheduling hearing	4/7/2023
400.00		0.10	40.00	Email from Norris-scheduling hearing	4/7/2023
400.00		0.10	40.00	Email to Gilmore- availability for hearing	4/7/2023
400.00		0.10	40.00	Email to Gilmore-notice of hearing on motion	4/7/2023
400.00		0.10	40.00	Email to Deaton-hearing on the Motion to Disqualify Counsel	4/7/2023
400.00		0.10	40.00	Email from Norris-hearing on the Motion to Disqualify Counsel	4/7/2023
400.00	0.10		0.00	Email from Gilmore-dismiss school Counsel	4/7/2023
400.00	0.10		0.00	Email to Gilmore- dismiss school Counsel	4/7/2023

400.00		0.10	40.00	Email from Gilmore-Notice of Hearing on Motion	4/7/2023
400.00		0.10	40.00	Email to Gilmore-Notice of Hearing on Motion	4/7/2023
400.00		0.10	40.00	Email from Gilmore-Notice of Hearing on Motion	4/7/2023
400.00		4.00	1600.00	Work on summary judgment response; work on responses to statement of facts	4/7/2023
400.00		0.70	280.00	Review Mama Bears consent judgment 2:22 00142 Georgia	4/7/2023
400.00		1.00	400.00	2022 WL 18110246 mama bears ruling review	4/7/2023
400.00		0.80	320.00	Smith v. ALLEGHENY VALLEY SCHOOL DISTRICT review ruling notes for brief	4/7/2023
400.00		0.10	40.00	Email to Gilmore-Notice of Hearing on Motion	4/8/2023
400.00		5.00	2000.00	Work on summary judgment response; review cited testimony and other exhibits	4/8/2023
400.00		6.00	2400.00	Work on summary judgment response; review deposition testimony and exhibits	4/9/2023
400.00		0.10	40.00	Email to Gilmore-Plaintiff's oppostion to summary judgement	4/10/2023
400.00		0.10	40.00	Email to Gilmore-Sworn Statement JG 4/10/2023	4/10/2023
400.00		0.10	40.00	Email from Gilmore-Sworn Statement JG 4/10/2023	4/10/2023
400.00		0.10	40.00	Email to Gilmore-Sworn Statement JG 4/10/2023	4/10/2023
400.00		12.00	4800.00	response to Motion for Summary Judgment; review exhibits for accuracy and redaction;	4/10/2023
400.00				Motion for Summary of Judgement	4/11/2023
400.00		0.10	40.00	Email to Gilmore-Signed Sworn Statement	4/11/2023
400.00		0.10	40.00	Email frim Gilmore-Signed Sworn Statement	4/11/2023
400.00		0.10	40.00	Email to Gilmore-Sworn Statement JG 4/10/2023	4/11/2023
400.00		2.00	800.00	review exhibits for accuracy file response and exhibits	4/11/2023
400.00		0.10	40.00	Email to Gilmore-recorded interview Gilmore's case with the Olathe School District	4/12/2023
400.00		0.10	40.00	Calendar reply deadline; e-mail to client re response	4/12/2023
400.00		0.10	40.00	Email from Norris-availability	4/15/2023
400.00		0.10	40.00	Email to Norris-availability	4/15/2023
400.00		0.10	40.00	Email from Lovett-Bowman-extension to file briefs	4/17/2023
400.00		0.10	40.00	Email from Bowman-request for extension for filing trial briefs	4/17/2023
400.00		0.10	40.00	Email to Bowman-request for extension for filing trial briefs	4/17/2023
400.00		0.10	40.00	Email from Bowman-request for extension for filing trial briefs	4/17/2023
400.00		0.10	40.00	Email from Tung-request for extension for filing trial briefs	4/17/2023
400.00				Motion for Leave to File Excess Pages	4/18/2023
400.00				Order Granted-Motion for Leave to File Excess Pages	4/19/2023
400.00		0.10	40.00	Email from Deaton-hearing on the Motion to Disqualify Counsel (Doc. 99)	4/19/2023
400.00		0.10	40.00	Email to Gilmore-hearing on the Motion to Disqualify Counsel (Doc. 99)	4/19/2023
400.00		0.10	40.00	Email from Gilmore-Olathe reporters article	4/19/2023

400.00		0.10	40.00	Email to Gilmore-Olathe reporters article	4/19/2023
400.00		0.10	40.00	Email from Deaton-hearing on the Motion to Disqualify Counsel (Doc. 99)	4/19/2023
400.00				Motion on hearing- motion to disqualify Counsel	4/24/2023
400.00		0.80	320.00	30 miles travel to court	4/24/2023
400.00		0.80	320.00	30 miles travel from court	4/24/2023
400.00		3.00	1200.00	In person hearing	4/24/2023
400.00				Motion for Summary Judgement	4/25/2023
400.00		0.10	40.00	Email to Gilmore-Reply brief in support of motion for summary judgment doc.	4/25/2023
400.00		0.10	40.00	Email to Gilmore-norris letter	4/25/2023
400.00		0.10	40.00	Email from Gilmore-norris letter	4/25/2023
400.00		0.10	40.00	Email to Gilmore-norris letter	4/25/2023
400.00		0.10	40.00	Email to Gilmore-document 117	4/25/2023
400.00		1.00	400.00	Receive and review reply brief	4/25/2023
400.00		1.30	520.00	Review reply brief	4/26/2023
400.00		1.00	400.00	Review reply brief	4/27/2023
400.00		1.00	400.00	Review reply brief; notes re argument	4/28/2023
400.00		0.20	80.00	Document and file organization - video recordings	4/29/2023
400.00		0.30	120.00	review order Plaintiffs motion to disqualify Counsel	5/4/2023
400.00		0.10	40.00	Email from Tung-injunctive motion response and hearing date	5/12/2023
400.00		0.10	40.00	Email to Tung-injunctive motion response and hearing date	5/12/2023
400.00		0.10	40.00	Email to Tung-injunctive motion hearing date	5/12/2023
400.00		0.10	40.00	Email to Gilmore- document 118: deny motion to disqualify	5/22/2023
400.00		1.00	400.00	Review ecf 118 denying disqualification	5/22/2023
400.00		0.10	40.00	Email from Gilmore-Olathe Board governs itself without policy	6/5/2023
400.00		0.10	40.00	Email to Gilmore-Olathe Board governs itself without policy	6/5/2023
400.00		0.10	40.00	Email to Gilmore-Olathe Board governs itself without policy	6/5/2023
400.00		0.10	40.00	Email from Gilmore-Executive session	6/13/2023
400.00		0.10	40.00	Email to Gilmore-Executive session	6/13/2023
400.00		0.10	40.00	Second Motion to Disqualify Counsel by Plaintiff	6/21/2023
400.00		0.10	40.00	Memordium&Order- Motion for Summary Judgement	6/21/2023
400.00	0.10			Mediation before a magistrate judge	6/21/2023
400.00		0.10	40.00	Email from Norris-availability for scheduling mediation	6/21/2023
400.00		0.10	40.00	Email to Gilmore-Gilmore v. Beveridge et al Order	6/21/2023
400.00		0.10	40.00	Email to Norris-availability for scheduling mediation	6/21/2023
400.00		0.10	40.00	Email from Norris-availability for scheduling mediation	6/21/2023

400.00		0.10	40.00	Email to Gilmore-SJ ruling	6/21/2023
400.00		0.10	40.00	Email from Gilmore-SJ ruling	6/21/2023
400.00		0.10	40.00	Email from Gilmore-Gilmore Case Update	6/21/2023
400.00		0.10	40.00	Email to Gilmore-Gilmore Case Update	6/21/2023
400.00		0.10	40.00	Email to Gilmore-documet 119:summary Judgment ruling	6/21/2023
400.00		2.00	800.00	Draft and finalize second motion to disqualify	6/21/2023
400.00		0.10	40.00	Review ecf 120 order mediation calendar	6/21/2023
400.00		4.00	1600.00	Review ecf 119 sj ruling; forward to client; notes	6/21/2023
400.00		0.10	40.00	Email from Little-scheduling for mediation for Pursuant to Judge Teeter's Order of 6/21/23	6/22/2023
400.00		0.10	40.00	Email from Kliem-schedule mediation in pursuant to Judge Teeter's order	6/22/2023
400.00		0.10	40.00	Email from Tildes-schedule the mediation via phone	6/22/2023
400.00		0.10	40.00	Email from Norris-schedule the mediation via phone	6/22/2023
400.00		0.10	40.00	Email from Tildes-schedule the mediation	6/22/2023
400.00		0.10	40.00	Email to Gilmore-schedule the mediation	6/22/2023
400.00		0.10	40.00	Email to Gilmore-schedule the mediation	6/22/2023
400.00	0.10		0.00	Email to Gilmore https://www.kansascity.com/news/local/education/article276623946.html	6/22/2023
400.00	0.10		0.00	Email to Snider and Gilmore- https://www.kansascity.com/news/local/education/article276623946.html	6/22/2023
400.00	0.10		0.00	Email from Gilmore- https://www.kansascity.com/news/local/education/article276623946.html	6/22/2023
400.00	0.10		0.00	Email to Snider and Gilmore- https://www.kansascity.com/news/local/education/article276623946.html	6/22/2023
400.00		0.10	40.00	Email from Norris-schedule mediation	6/22/2023
400.00		0.10	40.00	Email to Little-mediation	6/22/2023
400.00		0.10	40.00	Email to Gilmore-draft mediation statement to magistrate	6/23/2023
400.00		0.10	40.00	Email to Gilmore-executive session	6/23/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/23/2023
400.00		0.10	40.00	Email from Gilmore-special meeting for executive session	6/23/2023
400.00		0.10	40.00	Email to Gilmore-special meeting for executive session	6/23/2023
400.00		3.00	1200.00	Draft mediation statement with exhibits attached including video	6/23/2023
400.00		0.10	40.00	Email to Gilmore-kansas does not permit punitive damage insurance coverage	6/24/2023
400.00		1.00	400.00	Research voir dire questions free speech 2:21-cv-03989 Stilp	6/25/2023

400.00					
				Golden Rule send a message research 10th circuit Moody v. Ford Motor Co., 506 F. Supp. 2d 823, 836 (N.D. Okla. Mar. 20, 2007)) Blevins v. Cessna Aircraft Co., 728 F.2d	
		2.00	800.00	1576, 1580 (10th Cir. 1984) Shultz v. Rice, 809 F.2d 643, 651-52 (10th Cir. 1986));	6/25/2023
400.00		1.80	720.00	Review Attorney General Trial Brief 20-250-G punitive	6/25/2023
400.00		1.00	400.00	Review Objections to General Trial Brief 20-250-G punitive and nominal damages	6/25/2023
400.00				Order Setting Mediation	6/26/2023
400.00		0.10	40.00	Email to Tildes-schedule the mediation via phone	6/26/2023
400.00		0.10	40.00	Email from Tildes-schedule the mediation via phone	6/26/2023
400.00		0.10	40.00	Email from Norris-schedule the mediation via phone	6/26/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/26/2023
400.00		0.10	40.00	Email to Little,Tildes-mediation	6/26/2023
400.00		0.10	40.00	Email from Tildes-mediation	6/26/2023
400.00		0.10	40.00	Review ecf 122 mediation order	6/26/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/27/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/27/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/27/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/27/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/27/2023
400.00		0.10	40.00	Email to Little,Tildes-mediation	6/27/2023
400.00		2.00	800.00	Mediation statement editing and drafting with exhibits	6/27/2023
400.00				Notice of Hearing- change in date	6/28/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/28/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/28/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/28/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/28/2023
400.00		0.10	40.00	Email to Gilmore-Plaintiff's Confidential Mediation Statement doc.	6/29/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/29/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/29/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/29/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/29/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/29/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/29/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/29/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/29/2023

400.00		0.10	40.00	Email to Gilmore-mediation	6/29/2023
400.00		0.10	40.00	Email to Gilmore-Plaintiff's Confidential Mediation Statement doc.	6/30/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/30/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/30/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/30/2023
400.00		0.10	40.00	Email from Gilmore-mediation	6/30/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/30/2023
400.00		0.10	40.00	Email to Gilmore-mediation	6/30/2023
400.00		0.10	40.00	Email to Gilmore-mediation statement	7/2/2023
400.00	0.10		0.00	Email to Gilmore-Beveridge conflict punitive damage; Beveridge should recuse	7/2/2023
400.00	0.10		0.00	Email to Gilmore-Beveridge conflict punitive damage Beveridge should recuse	7/2/2023
400.00	0.10		0.00	Email from Gilmore-Beveridge conflict punitive damage Beveridge should recuse	7/2/2023
400.00		0.10	40.00	Email from Gilmore-mediation statement	7/2/2023
400.00		2.00	800.00	Mediation statement review and addition of exhibits for magistrate	7/2/2023
400.00		0.10	40.00	Email to Judge Mitchell-Confidential mediation statement of Plaintiff	7/3/2023
400.00		0.10	40.00	Email to Gilmore-Confidential mediation statement of plaintiff	7/3/2023
400.00		0.10	40.00	Email to Gilmore-mediation statement	7/3/2023
400.00		0.10	40.00	Email from Gilmore-mediation statement	7/3/2023
400.00		0.10	40.00	Email to Gilmore-mediation statement	7/3/2023
400.00		1.00	400.00	2:21-cv-03989 research brief motion in limine free speech lay opinion	7/4/2023
400.00		2.00	800.00	Mediation notes for mediation with exhibits	7/5/2023
400.00		3.00	1200.00	Draft Motion in Limine Plaintiffs	7/5/2023
400.00		0.80	320.00	Review REED AUTO OF OVERLAND PARK, LLC motions in limine defendant	7/5/2023
400.00		1.00	400.00	Review REED AUTO OF OVERLAND PARK, LLC motions in limine plaintiff	7/5/2023
400.00		0.50	200.00	Review REED AUTO OF OVERLAND PARK, LLC in limine rulings	7/5/2023
400.00		0.10	40.00	Motions in Limine by Plaintiff	7/6/2023
400.00		0.10	40.00	Denying without Predjudice Motions in Limine	7/6/2023
400.00		0.10	40.00	Email to Gilmore-motion in limine and document 124	7/6/2023
400.00		0.50	200.00	Review edit Motion in Limine Plaintiff	7/6/2023
400.00	0.10			Entry of Appearance	7/7/2023
400.00	0.10			Entry of Appearance	7/7/2023
400.00		0.10	40.00	Voluntary recusal and subtitution of trial Counsel	7/7/2023
400.00	0.10		0.00	Email to Snider-norris withdrew	7/7/2023
400.00		0.10	40.00	Email to Gilmore-new attorneys spencer fane and document 127	7/7/2023
400.00		0.10	40.00	Email to Gilmore-Norris withdrew and document 128	7/7/2023

400.00		0.10	40.00	Email to Tung-Rule 26 Disclosure docs	7/7/2023
400.00		0.10	40.00	Email to Gilmore-Rule 26 Disclosure and Primary set for board of education race documents	7/7/2023
400.00		0.10	40.00	Email to Tung -Rule 26 Disclosure and Primary set for board of education race documents	7/7/2023
400.00	0.10		0.00	Email from Gilmore- forward message from Connell Sheila Battin	7/9/2023
400.00	0.10		0.00	Email to Gilmore- response to forward message from Connell Sheila Battin	7/9/2023
400.00	0.10		0.00	Email from Deaton-Doc.121,Doc.128;dey motion as moot	7/10/2023
400.00		0.10	40.00	Email from Tung-Doc.121,Doc.128;dey motion as moot	7/10/2023
400.00		2.00	800.00	Draft and file Second Motion to Disqualify Counsel	7/11/2023
400.00		0.10	40.00	Email to Gilmore-information on lawsuit	7/12/2023
400.00		0.10	40.00	Email to Gilmore-information on lawsuit	7/12/2023
400.00		0.10	40.00	Email to Gilmore-Board update	7/14/2023
400.00		0.10	40.00	Email from Gilmore-Board update	7/14/2023
400.00		0.10	40.00	Email from Gilmore-Pre-mediation Telephone Conference	7/17/2023
400.00		0.10	40.00	Email to Gilmore-Pre-mediation Telephone Conference	7/17/2023
400.00		0.10	40.00	Email to Bowman-case management order revised	7/17/2023
400.00		0.10	40.00	Email from Bowman-case management order revised	7/17/2023
400.00		0.10	40.00	Email to Bowman-case management order revised	7/17/2023
400.00		0.10	40.00	Email from Bowman-case management order revised	7/17/2023
400.00		0.10	40.00	Email to Goheen-case management order revised	7/17/2023
400.00		0.10	40.00	Email to Bowman-case management order revised	7/17/2023
400.00		0.10	40.00	Email from Bowman-case management order revised	7/17/2023
400.00		0.10	40.00	Email to Bowman-case management order revised	7/17/2023
400.00		0.10	40.00	Email from Bowman-case management order revised	7/17/2023
400.00		0.10	40.00	Email to Bowman-case management order revised	7/17/2023
400.00	0.10			Telephone conference judge	7/19/2023
400.00		0.10	40.00	Email to Mitchell-attendees in mediation Case No. 22-CV-02032-HLT	7/19/2023
400.00		0.10	40.00	Email to Gilmore-attendees in mediation Case No. 22-CV-02032-HLT	7/19/2023
400.00		0.10	40.00	Email to Gilmore-premeditation meeting	7/19/2023
400.00		0.10	40.00	Email to Gilmore-Attendees for mediation	7/19/2023
400.00		0.10	40.00	Email from Gilmore-Attendees for mediation	7/19/2023
400.00		0.10	40.00	Email to Gilmore-Attendees for mediation	7/19/2023
400.00		0.10	40.00	Email from Gilmore-Attendees for mediation	7/19/2023

400.00		0.10	40.00	Email to Gilmore-Attendees for mediation	7/19/2023
400.00		0.10	40.00	Email from Gilmore-Attendees for mediation	7/19/2023
400.00		0.10	40.00	Email to Gilmore-Attendees for mediation	7/19/2023
400.00		1.00	400.00	Telephone conference magistrate mediation	7/19/2023
400.00		0.10	40.00	Email from Bowman-case management order revised	7/21/2023
400.00		0.10	40.00	Email to Gilmore-Case management info	7/24/2023
400.00		0.10	40.00	Email from Gilmore-Case management info	7/24/2023
400.00		0.10	40.00	Email to Gilmore-Attendees for mediation	7/25/2023
400.00		0.10	40.00	Email from Gilmore-Attendees for mediation	7/25/2023
400.00	0.10			review Mediation Minute Order	7/26/2023
400.00		0.10	40.00	Email from Mitchell-Ms. Gilmore's best and final offer	7/26/2023
400.00		0.10	40.00	Email to Mitchell-Ms. Gilmore's best and final offer	7/26/2023
400.00		0.10	40.00	Email from Mitchell-Ms. Gilmore's best and final offer	7/26/2023
400.00		0.10	40.00	Email to Gilmore-Ms. Gilmore's best and final offer	7/26/2023
400.00		3.00	1200.00	mediation in person	7/26/2023
400.00		0.80	320.00	30 miles travel to court	7/26/2023
400.00		0.80	320.00	30 miles travel from court	7/26/2023
400.00		0.10	40.00	Email to Gilmore-offers in mediation statement	7/26/2023
400.00		0.10	40.00	Email to Mitchell-Gilmore settlement 3 mandatory conditions	7/27/2023
400.00		0.10	40.00	Email to Mitchell-Gilmore settlement 3 mandatory conditions	7/27/2023
400.00		0.10	40.00	Email to Gilmore-forward Gilmore settlement 3 mandatory conditions	7/27/2023
400.00		0.10	40.00	Email to Gilmore-mediation	7/27/2023
400.00		0.10	40.00	Email to Gilmore-board meeting	7/28/2023
400.00	0.10		0.00	Email from Gilmore-Districts KORA:funds not allocated for teacher pay	7/29/2023
400.00	0.10		0.00	Email to Gilmore-Districts KORA:funds not allocated for teacher pay	7/29/2023
400.00	0.10		0.00	Email to Gilmore-insurance	7/29/2023
400.00	0.10		0.00	Email from Gilmore-Districts KORA:funds not allocated for teacher pay	7/30/2023
400.00	0.10		0.00	Email from Gilmore-Districts KORA:funds not allocated for teacher pay	7/30/2023
400.00	0.10		0.00	Email to Gilmore-Districts KORA:funds not allocated for teacher pay	7/30/2023
400.00	0.10		0.00	Email from Gilmore-Districts KORA:funds not allocated for teacher pay	7/30/2023
400.00	0.10		0.00	Email to Gilmore-Districts KORA:funds not allocated for teacher pay	7/30/2023
400.00	0.10		0.00	Email to Gilmore-Districts KORA:funds not allocated for teacher pay	7/30/2023
400.00	0.10			review Notice of Hearing	7/31/2023
400.00		0.10	40.00	Email to Deaton-status conference	7/31/2023
400.00		0.10	40.00	Email from Deaton-status conference	7/31/2023

400.00		0.10	40.00	Email to Hatley,Bowman, Deaton,Tung-status conference	7/31/2023
400.00	0.10		0.00	NOTICE FOR THIS HEARING: Status Conference	7/31/2023
400.00		0.10	40.00	Email to Gilmore and Snider-open records request	8/1/2023
400.00		0.10	40.00	Email from Gilmore-legal fees	8/1/2023
400.00		0.10	40.00	Email to Gilmore-legal fees	8/1/2023
400.00		0.10	40.00	Email to Bowman-Rule 26 disclosures	8/1/2023
400.00		0.10	40.00	Email from Bowma-Rule 26 disclosures	8/1/2023
400.00		0.10	40.00	Email from Bowma-Rule 26 disclosures	8/1/2023
400.00		0.10	40.00	Email to Bowman-Rule 26 disclosures	8/1/2023
400.00		0.10	40.00	Email from Bowman-Rule 26 disclosures	8/1/2023
400.00		0.10	40.00	Email from Bowman-Rule 26 disclosures	8/1/2023
400.00		0.10	40.00	Email from Gilmore-Yeager's offer to meet	8/2/2023
400.00		0.10	40.00	Email to Gilmore-Yeager's offer to meet	8/2/2023
400.00		0.10	40.00	Email to Gilmore-admission of fault	8/2/2023
400.00		0.10	40.00	Email from Pittman-response to open records request	8/3/2023
400.00		0.10	40.00	Email from Gilmore-Pittman's response to open records request	8/3/2023
400.00		0.10	40.00	Email from Pittman-KORA Request	8/4/2023
400.00	0.10		0.00	Email to Pittman-open records request	8/4/2023
400.00	0.10		0.00	Email to Gilmore-open records request	8/4/2023
400.00	0.10		0.00	Email to Gilmore-open records request	8/4/2023
400.00	0.10		0.00	Email to Gilmore-open records request	8/4/2023
400.00	0.10		0.00	Email from Gilmore-open records request	8/4/2023
400.00	0.10		0.00	Email to Gilmore-open records request	8/4/2023
400.00	0.10		0.00	Email to Pittman-open records request	8/5/2023
400.00	0.10		0.00	Email from Pittman-KORA Request	8/7/2023
400.00	0.10		0.00	Email to 's.dingle@swrsllp.com'-scheduling mediation with Sanders	8/8/2023
400.00	0.10		0.00	Email to Gilmore and Snider-open records request	8/8/2023
400.00	0.10		0.00	Email to Gilmore- open records request	8/8/2023
400.00	0.10		0.00	Email from Gilmore-open records request	8/8/2023
400.00	0.10		0.00	Email to Gilmore- open records request	8/8/2023
400.00	0.10		0.00	Email to Pittman and Behm-open records request	8/9/2023
400.00	0.10		0.00	Email to Pittman and Behm-open records request	8/9/2023
400.00		0.10	40.00	review Trial Order to follow	8/10/2023
400.00		0.10	40.00	Email from Pittman-open records request	8/10/2023
400.00		0.10	40.00	Email from Gilmore-defense fund and punitive damage	8/10/2023

400.00		0.10	40.00	Email to Gilmore-status conference Teeter	8/10/2023
400.00		0.10	40.00	review Trial Order-Order for additional deadline information	8/11/2023
400.00		0.10	40.00	Email to Gilmore-open records request	8/11/2023
400.00		0.10	40.00	Email to Pittman-open records request	8/11/2023
400.00		4.00	1600.00	Research circuit jury instructions 3rd, 9th 8th and download	8/11/2023
400.00		0.10	40.00	Email from Gilmore-recorded interview Gilmore's case with the Olathe School District	8/12/2023
400.00		0.10	40.00	Email to Gilmore-recorded interview Gilmore's case with the Olathe School District	8/13/2023
400.00		0.10	40.00	Email from Gilmore-recorded interview Gilmore's case with the Olathe School District	8/13/2023
400.00		0.10	40.00	Email to Gilmore-recorded interview Gilmore's case with the Olathe School District	8/13/2023
400.00		0.10	40.00	Email to Gilmore-defense fund and punitive damage	8/14/2023
400.00		0.10	40.00	Email to Gilmore-defense fund and punitive damage	8/14/2023
400.00		0.10	40.00	Email from Gilmore-defense fund and punitive damage	8/14/2023
400.00		3.00	1200.00	Research solid Ground Beveridge Business punitive	8/14/2023
400.00		0.10	40.00	Email to Gilmore-Gilmore Witness list	8/15/2023
400.00		0.10	40.00	Email to Gilmore-Witness list	8/15/2023
400.00		0.10	40.00	Email from Gilmore-Witness list	8/15/2023
400.00		0.10	40.00	Email to Gilmore-Witness list	8/15/2023
400.00	0.10		0.00	Email to Gilmore- open records request	8/15/2023
400.00	0.10		0.00	Email from Gilmore-open records request	8/15/2023
400.00	0.10		0.00	Email to Gilmore- open records request	8/15/2023
400.00	0.10		0.00	Email from Gilmore-open records request	8/15/2023
400.00	0.10		0.00	Email to Gilmore- open records request	8/15/2023
400.00	0.10		0.00	Email to Gilmore- open records request	8/15/2023
400.00	0.10		0.00	Email from Gilmore-open records request	8/15/2023
400.00	0.10		0.00	Email to Gilmore- open records request	8/15/2023
400.00	0.10		0.00	Email from Pittman-open records request	8/16/2023
400.00		0.10	40.00	Email from Deaton-post-judgment briefing	8/16/2023
400.00	0.10		0.00	Email from Pittman-open records request	8/17/2023
400.00	0.10		0.00	Email to Pittman and Behm-open records request	8/17/2023
400.00	0.10		0.00	Email to Gilmore-insurance policy	8/18/2023
400.00	0.10		0.00	Email from Gilmore-insurance policy	8/18/2023
400.00	0.10		0.00	Email to Gilmore-insurance policy	8/18/2023
400.00	0.10		0.00	Email to Gilmore-insurance policy	8/18/2023

400.00	0.10		0.00	Email from Gilmore-insurance policy	8/18/2023
400.00	0.10		0.00	Email to Gilmore-insurance policy	8/18/2023
400.00	0.10		0.00	Email from Gilmore-insurance policy	8/18/2023
400.00	0.10		0.00	Email from Pittman-open records request	8/18/2023
400.00	0.10		0.00	Email to Pittman and Behm-open records request	8/18/2023
400.00		3.00	1200.00	research and review Recap jury instructions 07 cv 01104 Colorado school district 60 pages notes ecf 86-2	8/19/2023
400.00		0.90	360.00	Research Recap jury instructions same decision 07 cv 01104 Colorado school district order	8/19/2023
400.00		0.10	40.00	Email from Hatley-Board meeting videos	8/20/2023
400.00		0.10	40.00	Email to Gilmore-Board meeting videos	8/20/2023
400.00		0.10	40.00	review Motions in Limine Draft Referral	8/21/2023
400.00		0.10	40.00	Email from Gilmore-insurance policy	8/21/2023
400.00		0.10	40.00	Email to Gilmore-insurance policy	8/21/2023
400.00		0.10	40.00	Email to Gilmore and Snider-insurance policy	8/21/2023
400.00		0.10	40.00	Email to Gilmore-insurance policy	8/21/2023
400.00		0.10	40.00	Email to Gilmore-Board meeting videos	8/24/2023
400.00		0.10	40.00	Email to Gilmore-Yeager and McCullen as witnesses	8/26/2023
400.00		0.10	40.00	Email from Gilmore-Yeager and McCullen as witnesses	8/26/2023
400.00		0.10	40.00	Email to Gilmore-Yeager and McCullen as witnesses	8/26/2023
400.00		0.10	40.00	Email from Hatley- Robert Kuhn witness fee and mileage with subpoena	8/27/2023
400.00		0.10	40.00	Email to Hatley- Robert Kuhn witness fee and mileage with subpoena	8/27/2023
400.00		0.10	40.00	Email from Hatley- Robert Kuhn witness fee and mileage with subpoena	8/27/2023
400.00		0.10	40.00	Email to Hatley- Robert Kuhn witness fee and mileage with subpoena	8/27/2023
400.00		0.10	40.00	Email from Hatley- Robert Kuhn witness fee and mileage with subpoena	8/27/2023
400.00		0.10	40.00	Email to Hatley- Robert Kuhn witness fee and mileage with subpoena	8/27/2023
400.00		0.10	40.00	Email to Gilmore-Forward Robert Kuhn witness fee and mileage with subpoena	8/27/2023
400.00		0.10	40.00	Email to Gilmore-Robert Kuhn witness fee and mileage with subpoena	8/27/2023
400.00		0.10	40.00	Email to Gilmore-OPS Insider - Family Newsletter, October 2023	8/27/2023
400.00		0.10	40.00	Email from Gilmore-election info	8/27/2023
400.00		0.10	40.00	Email from Gilmore-OPS Insider - Family Newsletter, October 2023	8/29/2023
400.00		0.10	40.00	Email to Gilmore-OPS Insider - Family Newsletter, October 2023	8/29/2023
400.00		0.10	40.00	Email from Gilmore-Tracie Baker,Vaibhav Trivedi,Jonathan Estes	8/29/2023
400.00		0.10	40.00	Email to Gilmore-wendy anne bublite,thomas hise, amy dobbins	8/29/2023
400.00		0.10	40.00	Email to Gilmore-OPS Insider - Family Newsletter, October 2023	8/29/2023

400.00		0.10	40.00	Email to Bowman-infrequent access to emails	8/31/2023
	4.00			RECAP research viewpoint discrimination briefing and jury instructions	9/6/2023
400.00		3.00	1200.00	Assemble possible electronic exhibits, number, and collate for trial	9/7/2023
400.00		0.10	40.00	Email to Gilmore-Gilmore Witness list	9/8/2023
400.00	0.10		0.00	Email to Gilmore-https://www.kansascity.com/news/local/education/article279099629.html	9/8/2023
400.00		0.10	40.00	Email from Gilmore-exhibit 21	9/8/2023
400.00		0.10	40.00	Email to Gilmore-exhibit 21	9/8/2023
400.00	0.10		0.00	Email from Gilmore-https://www.kansascity.com/news/local/education/article279099629.html	9/8/2023
400.00	0.10		0.00	Email to Gilmore-https://www.kansascity.com/news/local/education/article279099629.html	9/8/2023
400.00	0.10		0.00	Email from Gilmore-https://www.kansascity.com/news/local/education/article279099629.html	9/8/2023
400.00	0.10		0.00	Email to Gilmore-https://www.kansascity.com/news/local/education/article279099629.html	9/8/2023
400.00		0.90	360.00	JERS instructions review	9/8/2023
400.00		1.50	600.00	Continue assembly of trial exhibits	9/8/2023
400.00		2.00	800.00	Plaintiff witness list draft with description	9/8/2023
400.00		0.10	40.00	Email to Deaton-schedule for post-trial briefing	9/10/2023
400.00		0.10	40.00	Email from Deaton-schedule for post-trial briefing	9/10/2023
400.00		0.10	40.00	Email from Deaton-schedule for post-trial briefing	9/10/2023
400.00		0.10	40.00	Email to Gilmore-PLAINTIFF'S WITNESS AND EXHIBIT LIST	9/11/2023
400.00		0.10	40.00	Email from Hatley-conferral on motions in limine	9/11/2023
400.00		0.10	40.00	review filed Final Exhibit List	9/12/2023
400.00		0.10	40.00	review filed Final Witness and Exhibit List	9/12/2023
400.00		0.10	40.00	review filed Final Witness List	9/12/2023
400.00		0.10	40.00	Email to Gilmore-jim randall	9/12/2023
400.00		0.10	40.00	Email from Gilmore-jim randall	9/12/2023
400.00		0.10	40.00	Email to Gilmore-jim randall	9/12/2023
400.00		0.10	40.00	Email from Gilmore-jim randall	9/12/2023
400.00		0.10	40.00	Email to Gilmore-jim randall	9/12/2023
400.00		0.10	40.00	Email from Gilmore-jim randall	9/12/2023
400.00		0.10	40.00	Email to Gilmore-jim randall	9/12/2023
400.00		0.10	40.00	Email to-trial strategy	9/12/2023

400.00		0.10	40.00	Email from Gilmore-trial strategy	9/12/2023
400.00		0.10	40.00	Email to-trial strategy	9/12/2023
400.00		0.10	40.00	Email from Gilmore-trial strategy	9/12/2023
400.00		0.10	40.00	Email to-trial strategy	9/12/2023
400.00		0.10	40.00	Email from Gilmore-trial strategy	9/12/2023
400.00		0.10	40.00	Email to-trial strategy	9/12/2023
400.00		0.10	40.00	Email from Hatley-conferral on motions in limine	9/12/2023
400.00		0.10	40.00	Email to Hatley-conferral on motions in limine	9/12/2023
400.00		0.10	40.00	Email to Hatley-conferral on motions in limine	9/12/2023
400.00		3.00	1200.00	Take snapshots of Jan 18 video meeting and create exhibits 33-47	9/12/2023
400.00		0.50	200.00	Plaintiff witness and exhibit list draft edit and complete	9/12/2023
400.00		1.90	760.00	Objections to def witness list draft	9/13/2023
400.00		3.00	1200.00	Recap research Jeff County board of Education jury instructions 22 pg notes	9/13/2023
400.00		0.50	200.00	Review def ex 29 KASB	9/13/2023
400.00		0.10	40.00	review filed Modify Pretrial Order-Remove Stipulation of Admissibility	9/18/2023
400.00		0.10	40.00	review filed Objection(s) to Witness and Exhibit List	9/18/2023
400.00		0.10	40.00	review filed Objection(s) to Exhibit and Witness List	9/18/2023
400.00		0.80	320.00	Finalize objections to def witness list	9/18/2023
400.00	0.10		0.00	Email from Gilmore-Olathe reporter article today	9/19/2023
400.00	0.10		0.00	Email to Gilmore-Olathe reporter article today	9/19/2023
400.00	0.10		0.00	Email from Snider-Olathe reporter article today	9/19/2023
400.00	0.10		0.00	Email to Snider-Olathe reporter article today	9/19/2023
400.00	0.10		0.00	Email to Gilmore-Olathe reporter article today	9/19/2023
400.00	0.10		0.00	Email from Gilmore-Olathe reporter article today	9/19/2023
400.00	0.10		0.00	Email to Gilmore-Olathe reporter article today	9/19/2023
400.00		0.10	40.00	Review filed Memorandum in Opposition-Modify Pretrial Order	9/20/2023
400.00		0.10	40.00	Email from Gilmore-modify pretrial order	9/20/2023
400.00		0.10	40.00	Email to Gilmore-modify pretrial order	9/20/2023
400.00		0.10	40.00	Email to Gilmore-document 142:opposition to modify pretrial	9/20/2023
400.00		0.10	40.00	Email to Hatley-conferral on motions in limine	9/20/2023
400.00		2.80	1120.00	Opposition to modification of pretrial with research on citation to law and review of ECF filings	9/20/2023
400.00		0.10	40.00	Email to Deaton-punitive damage coverage	9/21/2023
400.00		0.10	40.00	Email from Hatley-motions in limine	9/21/2023
400.00		0.10	40.00	Email to JG- genesis reservation of rights letter	9/21/2023

400.00				Email from Norris-recall message, "[EXTERNAL] RE: 2:22-cv-02032-HLT Gilmore v.	
		0.10	40.00	Beveridge et al".	9/21/2023
400.00		0.10	40.00	Email to Gilmore-insurance	9/21/2023
400.00	0.10			Email to Gilmore-B's understanding is to whether Board intends to pay punitive	
			0.00	damages	9/21/2023
400.00	0.10			Email from Gilmore-B's understanding is to whether Board intends to pay punitive	
			0.00	damages	9/21/2023
400.00	0.10			Email to Gilmore-B's understanding is to whether Board intends to pay punitive	
			0.00	damages	9/21/2023
400.00	0.10			Email from Gilmore-B's understanding is to whether Board intends to pay punitive	
			0.00	damages	9/21/2023
400.00	0.10			Email to Gilmore-B's understanding is to whether Board intends to pay punitive	
			0.00	damages	9/21/2023
400.00	0.10			Email from Gilmore-B's understanding is to whether Board intends to pay punitive	
			0.00	damages	9/21/2023
400.00	0.10			Email to Gilmore-B's understanding is to whether Board intends to pay punitive	
			0.00	damages	9/21/2023
400.00	0.10				
			0.00	Email to Gilmore-understanding is to whether Board intends to pay punitive damages	9/21/2023
400.00		0.10	40.00	Email to Gilmore-Case management info	9/21/2023
400.00	0.10		0.00	Email to Gilmore-insurance	9/21/2023
400.00	0.10		0.00	Email from Gilmore-insurance	9/21/2023
400.00	0.10		0.00	Email to Gilmore-insurance	9/21/2023
400.00	0.10		0.00	Email from Gilmore-insurance	9/21/2023
400.00	0.10		0.00	Email to Gilmore-insurance	9/21/2023
400.00		0.10	40.00	Email to Hatley-conferral on motions in limine	9/21/2023
400.00		0.10	40.00	Email to Deaton-punitive damage coverage	9/21/2023
400.00		0.10	40.00	Email from Deaton-punitive damage coverage	9/21/2023
400.00		0.10	40.00	Email to Deaton-punitive damage coverage	9/21/2023
400.00		0.10	40.00	Email to Bowman-infrequent access to emails	9/21/2023
400.00		0.10	40.00	Email from Norris-recall message	9/21/2023
400.00	0.10			Review filed Motions in Limine	9/22/2023
400.00		0.10	40.00	Email to Gilmore-B's situation	9/22/2023
400.00		0.10	40.00	Email to Gilmore-motion in limine and document 143	9/22/2023
400.00		0.10	40.00	Email to Gilmore-motion in limine	9/22/2023

400.00		0.10	40.00	Email from Gilmore-motion in limine	9/22/2023
400.00		0.10	40.00	Email to Gilmore-motion in limine	9/22/2023
400.00	0.10		0.00	Email to Gilmore and Snider-school board ban	9/22/2023
400.00		0.10	40.00	Email to Gilmore-make an example	9/23/2023
400.00		2.00	800.00	Recap research 5:13-cv-00383 instructions citing Yagman 39 pg	9/23/2023
400.00		0.70	280.00	Yagman punitive damages review	9/23/2023
400.00		0.30	120.00	Yagman nominal damages review	9/23/2023
400.00		2.00	800.00	Yagman general instructions review 18 pg notes and build into draft of instructions	9/23/2023
400.00		3.00	1200.00	Research case law & draft motion for judgment	9/24/2023
400.00	0.10			Review filed Motion for Judgement on the Pleadings	9/25/2023
400.00		0.10	40.00	Email to Gilmore-motion for judgment and document 144	9/25/2023
400.00		0.10	40.00	Email to Gilmore-motion for judgment	9/25/2023
400.00		0.10	40.00	Email from Gilmore-motion for judgment	9/25/2023
400.00		0.10	40.00	Email to Gilmore-motion for judgment	9/25/2023
400.00		2.50	1000.00	Review 9th Circuit Model instructions employment and 1983	9/26/2023
400.00		0.30	120.00	Use 3rd Circuit Model instructions nominal damages section	9/26/2023
400.00		0.70	280.00	Use 3rd Circuit Model instructions color of state law section	9/26/2023
400.00		3.00	1200.00	Review 3rd Circuit Model instructions 1983 notes	9/26/2023
400.00		0.10	40.00	Email to Gilmore-trial exhibits	9/27/2023
400.00		0.30	120.00	1983 purpose instruction on punitive damage jury instruction	9/27/2023
400.00		0.30	120.00	Disclaimer instruction on punitive damage jury instruction	9/27/2023
400.00		1.20	480.00	Research “activity” for jury instructions case law	9/27/2023
400.00		0.30	120.00	RECAP review Shaw Schulte jury verdict	9/27/2023
400.00		1.40	560.00	RECAP review Shaw Schulte jury instructions 19-1343	9/27/2023
400.00		0.10	40.00	Email from Hatley-Motions in Limine	9/28/2023
400.00		0.10	40.00	Email to Hatley-Motions in Limine	9/28/2023
400.00		4.00	1600.00	Create compiled list of jury instructions draft	9/28/2023
400.00		1.40	560.00	Pretext in Employment Discrimination Litigation: Mandatory Instructions for Permissible Inferences? Law review read and notes	9/28/2023
400.00		2.50	1000.00	review and notes re: Motions in Limine Defendant	9/29/2023
400.00		0.10	40.00	Email to Gilmore-insurance indemnification	9/29/2023
400.00		0.10	40.00	Email to Gilmore-insurance indemnification	9/29/2023
400.00		0.10	40.00	Email from Gilmore-insurance indemnification	9/29/2023
400.00		0.10	40.00	Email to Gilmore-insurance indemnification	9/29/2023
400.00		0.90	360.00	Research Tenth circuit review of jury instructions	9/29/2023

400.00		2.00	800.00	Research and Draft Memorandum in Opposition- Exhibit Jury Instructions	10/2/2023
400.00		0.60	240.00	Review Def reply To modify pretrial order	10/2/2023
400.00		0.10	40.00	Email to Gilmore-Beveridge portfolio	10/4/2023
400.00	0.10		0.00	Email to Gilmore-dirty politics	10/4/2023
400.00	0.10		0.00	Email from Gilmore-political	10/4/2023
400.00	0.10		0.00	Email to Gilmore-political	10/4/2023
400.00	0.10		0.00	Email to Gilmore-opponents	10/4/2023
400.00	0.10		0.00	Email from Gilmore-opponents	10/4/2023
400.00	0.10		0.00	Email to Gilmore-opponents	10/4/2023
400.00		1.00	400.00	Download and analyze bill of costs handbook kan district	10/4/2023
400.00		5.00	2000.00	Gilmore trial exam drafting with exhibits	10/4/2023
400.00		0.60	240.00	Conference Gilmore on questions	10/4/2023
400.00		1.00	400.00	Subpoenas draft and mail Beveridge Connell Kuhn Snider Wickliffe	10/4/2023
400.00		3.00	1200.00	Beveridge Trial exam draft with exhibits review	10/5/2023
400.00		2.00	800.00	Review Def Memorandum in Opposition- Motion in Limine	10/6/2023
400.00		0.60	240.00	review def Motion for evidentiary Hearing	10/6/2023
400.00		0.10	40.00	Email to Gilmore-defendants arguments and memorandum in opposition to plaintiff's motions in limine doc. 148	10/6/2023
400.00				Response by Plaintiff- Motion for hearing	10/7/2023
400.00		0.10	40.00	Email to Gilmore-final filing:documet 150	10/7/2023
400.00		1.50	600.00	Plaintiff response to motion for evidentiary hearing with citation of law	10/7/2023
400.00		0.10	40.00	certificate of service Proposed Jury Instructions-Purposes of Conferral	10/9/2023
400.00		0.10	40.00	review certificate of service Purposed Jury Instructions-Defendents initial draft	10/9/2023
400.00		0.30	120.00	review Motion for hearing reply memorandum in support	10/9/2023
400.00		0.10	40.00	Email to Gilmore-proposed draft conferral jury instructions	10/9/2023
400.00		0.10	40.00	Email to Hatley-proposed draft conferral jury instructions	10/9/2023
400.00		0.10	40.00	Email from Bowman-proposed draft conferral jury instructions	10/9/2023
400.00		0.10	40.00	Email from Bowman-proposed draft conferral jury instructions	10/9/2023
400.00		0.30	120.00	Certificate of service of jury instructions	10/9/2023
400.00		2.00	800.00	Finalize draft jury instructions	10/9/2023
400.00	0.10		40.00	review filed Proposed Voir Dire	10/10/2023
400.00		0.10	40.00	Email to Gilmore-Reply memorandum in support of defendents' motion for evidentiary hearing doc. 153	10/10/2023
400.00	0.10		0.00	Email to Gilmore-closed session	10/10/2023
400.00	0.10		0.00	Email from Gilmore-closed session	10/10/2023

400.00	0.10		0.00	Email to Gilmore-closed session	10/10/2023
400.00		0.10	40.00	Email from Bowman-jury instructions	10/10/2023
400.00		0.10	40.00	Email to Bowman-jury instructions	10/10/2023
400.00		0.10	40.00	Email from Bowman-proposed draft conferral jury instructions	10/10/2023
400.00		0.10	40.00	Email to Bowman-proposed draft conferral jury instructions	10/10/2023
400.00		0.10	40.00	Email from Bowman-jury instructions	10/10/2023
400.00		0.10	40.00	Email to Bowman-proposed draft conferral jury instructions	10/10/2023
400.00		0.10	40.00	Email from Deaton-instructions for trial	10/10/2023
400.00		0.10	40.00	Email from Deaton-trial order (Doc. 134)	10/10/2023
400.00		0.10	40.00	Email from Deaton-Judge Teeter prepares for trial	10/10/2023
400.00		0.10	40.00	Email from Deaton-procedure outlined in the trial order (Doc. 134)	10/10/2023
400.00		0.10	40.00	Email to Deaton-procedure outlined in the trial order (Doc. 134)	10/10/2023
400.00		1.00	400.00	Review defendant voir dire 2:04-cv-03694	10/10/2023
400.00		0.90	360.00	Research objections to voir dire 5:20-cv-00250	10/10/2023
400.00		1.00	400.00	Research other voir dire 2:04-cv-03694	10/10/2023
400.00		1.00	400.00	Plaintiff proposed voir dire draft	10/10/2023
400.00	0.10		0.00	Email from Gilmore-closed session	10/11/2023
400.00	0.10		0.00	Email to Gilmore-closed session	10/11/2023
400.00		0.10	40.00	Email to Gilmore-speech recognition from Dragon	10/12/2023
400.00		0.10	40.00	Email from Bowman-proposed jury instructions	10/12/2023
400.00		0.10	40.00	review certificate of service Defendants Trial Exhibits	10/13/2023
400.00		0.80	320.00	review def Amended Exhibit list notes correlate to file	10/13/2023
400.00	0.10		0.00	Email to Snider-witness examination for trial	10/13/2023
400.00		0.10	40.00	Email to Gilmore-witness examination for trial documents	10/13/2023
400.00		0.10	40.00	Email from Deaton-allocation of trial time	10/13/2023
400.00		0.10	40.00	Email from Bowman-Judge Teeter prepares for trial	10/13/2023
400.00		0.10	40.00	Email from Deaton-Judge Teeter prepares for trial	10/13/2023
400.00		0.10	40.00	Email from Bowman-Judge Teeter prepares for trial	10/13/2023
400.00		0.10	40.00	Email from Deaton-Judge Teeter prepares for trial	10/13/2023
400.00		2.00	800.00	Thad Snider witness exam first draft	10/13/2023
400.00	0.10		0.00	Email to-trial strategy	10/14/2023
400.00		0.10	40.00	Email from Gilmore-trial strategy	10/14/2023
400.00		0.10	40.00	Email to-trial strategy	10/14/2023
400.00	0.10		0.00	Email to Gilmore-Robert Kuhn doc.	10/14/2023
400.00		1.50	600.00	Snider Cross exam draft	10/14/2023

400.00		0.80	320.00	Kuhn exam draft	10/14/2023
400.00		0.80	320.00	review def Proposed Voir Dire	10/16/2023
400.00		0.70	280.00	Review defendents-Opp to Motion for Judgment on the pleadings	10/16/2023
400.00		0.10	40.00	Email to Gilmore-meeting for jury instructions	10/16/2023
400.00		0.10	40.00	Email to Gilmore-meeting for jury instructions	10/16/2023
400.00		0.10	40.00	Email to Gilmore-meeting for jury instructions	10/16/2023
400.00		0.10	40.00	Email to Hatley, Bowman-Compiled List of Instructions cited authority	10/16/2023
400.00		0.10	40.00	Email from Hatley-Compiled List of Instructions cited authority	10/16/2023
400.00		0.10	40.00	Email to Hatley-Compiled List of Instructions cited authority	10/16/2023
400.00		0.10	40.00	Email from Hatley-Compiled List of Instructions cited authority	10/16/2023
400.00		0.10	40.00	Email to Hatley-Compiled List of Instructions cited authority	10/16/2023
400.00		0.10	40.00	Email from Hatley-Compiled List of Instructions cited authority	10/16/2023
400.00		0.10	40.00	Email to Hatley-Compiled List of Instructions cited authority	10/16/2023
400.00		0.10	40.00	Email from Hatley-Compiled List of Instructions cited authority	10/16/2023
400.00		1.00	400.00	Recap research Skerce torgeson 2:18-cv-02040-HLT conference example	10/16/2023
400.00		1.00	400.00	NOTICE OF JURY INSTRUCTION CONFERENCE draft	10/16/2023
400.00		2.50	1000.00	Review Def spreadsheet comparison on jury instructions and analyze	10/16/2023
400.00		1.00	400.00	Draft and review final Objection(s) to Proposed Jury Instructions	10/17/2023
400.00	0.10			Proposed Jury Instructions	10/17/2023
400.00		0.60	240.00	work up reply to Motion for Judgement on the Pleadings	10/17/2023
400.00		0.10	40.00	Email to Hatley-Compiled List of Instructions cited authority	10/17/2023
400.00		0.10	40.00	Email to Hatley-Compiled List of Instructions cited authority changes	10/17/2023
400.00		0.10	40.00	Email to Hatley-jury instructions	10/17/2023
400.00		0.10	40.00	Email to Hatley-Notice of Jury Instruction Conference Revised	10/17/2023
400.00		0.10	40.00	Email to Hatley-Compiled List of Instructions cited authority	10/17/2023
400.00		0.10	40.00	Email from Hatley-Compiled List of Instructions cited authority	10/17/2023
400.00		0.10	40.00	Email to Hatley-Compiled List of Instructions cited authority	10/17/2023
400.00		0.10	40.00	Email from Hatley-Compiled List of Instructions cited authority	10/17/2023
400.00		0.10	40.00	Email to Hatley-Compiled List of Instructions cited authority	10/17/2023
400.00		0.10	40.00	Email from Hatley- Notice of Jury Instruction Conference Revised	10/17/2023
400.00		0.10	40.00	Email to Hatley- Notice of Jury Instruction Conference Revised	10/17/2023
400.00		0.10	40.00	Email from Hatley- Notice of Jury Instruction Conference Revised	10/17/2023
400.00		0.10	40.00	Email to Hatley- Notice of Jury Instruction Conference Revised	10/17/2023
400.00		0.10	40.00	Email from Hatley- Notice of Jury Instruction Conference Revised	10/17/2023
400.00		0.10	40.00	Email to Hatley- Notice of Jury Instruction Conference Revised	10/17/2023

400.00		0.10	40.00	Email from Hatley- Notice of Jury Instruction Conference Revised	10/17/2023
400.00		0.10	40.00	Email to Hatley- Notice of Jury Instruction Conference Revised	10/17/2023
400.00		0.10	40.00	Email to Tung,Hatley,Bowman, Deaton-jury instructions	10/17/2023
400.00		0.10	40.00	Email from Hatley-jury instructions	10/17/2023
400.00		0.10	40.00	Email to Tung,Hatley,Bowman, Deaton-jury instructions	10/17/2023
400.00		0.10	40.00	Email to Hatley-proposed instructions	10/17/2023
400.00		0.10	40.00	Email from Hatley,Bowman-Statement of the case	10/17/2023
400.00		0.10	40.00	Email to Hatley-proposed instructions	10/17/2023
400.00		0.10	40.00	Email from Hatley-Plaintiff's Trial Exhibits	10/17/2023
400.00		0.10	40.00	Email from Hatley-proposed instructions	10/17/2023
400.00		0.10	40.00	Email from Deaton-proposed instructions	10/17/2023
400.00		0.10	40.00	Email from Deaton-additional instructions	10/17/2023
400.00		0.10	40.00	Email to Deaton,Bowman,Hatley-additional instructions	10/17/2023
400.00		1.00	400.00	Review and edit notice of jury instructions conference 10/17a compare defendants and plaintiff	10/17/2023
400.00		3.00	1200.00	Draft Jury Instructions with cited authority 28 pgs	10/17/2023
400.00		2.00	800.00	Notes on Pollack Mem for trial brief draft	10/17/2023
400.00		2.40	960.00	Review Pollack SJ Mem public speaking cv-00049 filed 10/6/2023	10/17/2023
400.00		1.50	600.00	8th Circuit manual of model jury instructions download and review on employment first amendment and same decision	10/17/2023
400.00		2.00	800.00	Revising Notice of Jury Instruction Conference	10/17/2023
400.00		2.40	960.00	Review Pollack SJ Mem public speaking cv-00049 filed 10/6/2023	10/17/2023
400.00		0.10	40.00	Email to Deaton-allocation of trial time	10/18/2023
400.00		0.10	40.00	Email from Deaton-allocation of trial time	10/18/2023
400.00		0.10	40.00	Email from Hatley-allocation of trial time	10/18/2023
400.00		0.10	40.00	Email to Hatley-allocation of trial time	10/18/2023
400.00		0.10	40.00	Email to Hatley-Plaintiff's Trial Exhibits	10/18/2023
400.00		3.00	1200.00	Beveridge Trial exam drafting with exhibit correlation	10/18/2023
400.00		3.00	1200.00	Review Motions in Limine and prepare notes	10/19/2023
400.00		1.50	600.00	Review Motion judgment on pleadings and prepare notes	10/19/2023
400.00		0.90	360.00	Review Motion to modify pretrial and response and prepare notes	10/19/2023
400.00		0.80	320.00	Review Motion to hearing and response and prepare notes	10/19/2023
400.00		1.50	600.00	Research Leading questions and create cheat sheet	10/19/2023
400.00		2.00	800.00	Research hearsay and create cheat sheet	10/19/2023
400.00		0.60	240.00	Review and highlight 109 Pretrial for hearing	10/19/2023

400.00	0.10			review order Trial Briefs	10/20/2023
400.00	0.10			Minute Entry for Proceedings	10/20/2023
400.00		0.10	40.00	Email from Gilmore-Board meeting videos	10/20/2023
400.00		0.10	40.00	Email to Gilmore-Board meeting videos	10/20/2023
400.00		0.20	80.00	Review 163 Order	10/20/2023
400.00		0.20	80.00	Review 162 Order	10/20/2023
400.00		4.00	1600.00	Pretrial Hearing	10/20/2023
400.00		0.80	320.00	30 miles travel to court	10/20/2023
400.00		0.80	320.00	30 miles travel from court	10/20/2023
400.00		0.10	40.00	Email to Hatley-proposed redaction	10/21/2023
400.00		0.10	40.00	Email from Hatley-proposed redaction	10/21/2023
400.00		0.10	40.00	Email from Hatley-proposed redaction	10/21/2023
400.00		4.00	1600.00	Connell trial exam with exhibit correlation	10/21/2023
400.00		0.10	40.00	Email to Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email from Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email to Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email from Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email to Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email to Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email from Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email to Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email from Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email to Hatley-proposed redaction	10/22/2023
400.00		0.10	40.00	Email to Hatley-proposed redaction	10/22/2023
400.00		2.50	1000.00	First draft trial brief	10/22/2023
400.00	0.10			Witness List Defendants Amended Witness List	10/23/2023
400.00	0.10			Trial Brief re Qualified Immunity	10/23/2023
400.00	0.10			Trial Brief	10/23/2023
400.00	0.10			Constitutionality of Participation Card Prohibitation on personal attacks	10/23/2023
400.00	0.10			Amended Witness List	10/23/2023
400.00		0.10	40.00	Email from Tung-Maternity Leave	10/23/2023
400.00		0.10	40.00	Email to Gilmore-Natalie Horspool	10/23/2023
400.00		0.10	40.00	Email from Gilmore-Natalie Horspool	10/23/2023
400.00		0.10	40.00	Email to Gilmore-Natalie Horspool	10/23/2023
400.00		0.10	40.00	Email from Deaton-in-person hearing for Thursday, October 26	10/23/2023

400.00		0.10	40.00	Email to Deaton,Tung,Bowman,Hatley-exhibit 20	10/23/2023
400.00		0.70	280.00	Review Def Trial Brief Immunity	10/23/2023
400.00		1.00	400.00	Review Def Trial Brief with exhibits	10/23/2023
400.00		0.50	200.00	Objections to amended witness list	10/23/2023
400.00		0.20	80.00	Review D amended witness list	10/23/2023
400.00		2.00	800.00	Edict and finalize trial brief	10/23/2023
400.00		1.00	400.00	Verify citations to trial brief	10/23/2023
400.00	0.10			Notice of Hearing	10/24/2023
400.00	0.10			Granting Defendents Oral Motion	10/24/2023
400.00		0.10	40.00	Email to Gilmore-jury names	10/24/2023
400.00		0.10	40.00	Email to Gilmore-meeting expcert	10/24/2023
400.00		0.10	40.00	Email to Hatley-Statement of the case	10/24/2023
400.00		0.10	40.00	Email from Hatley,Bowman-Statement of the case	10/24/2023
400.00		0.10	40.00	Email from Hatlry-Defendants' Potential Witnesses and Case Statement	10/24/2023
400.00		0.10	40.00	Email to Bowman,Hatley-Defendants' Potential Witnesses and Case Statement	10/24/2023
400.00		0.10	40.00	Email to Bowman,Hatley-Defendants' Potential Witnesses and Case Statement	10/24/2023
400.00		0.10	40.00	Email to Hatley-Statement of the case	10/24/2023
400.00		0.10	40.00	Email from Deaton-in-person hearing for Thursday, October 26	10/24/2023
400.00	0.10		0.00	Review ECF 170 jury	10/24/2023
400.00		2.00	800.00	Notes for hearing jury should not interpret board policy with citations of law and ECF citations	10/24/2023
400.00		3.00	1200.00	Review client’s excel videos of Beveridge at Aug-Nov meetings and review videos	10/24/2023
400.00		2.50	1000.00	Connell trial exam draft edit	10/24/2023
400.00		0.50	200.00	Witness list addresses and titles draft	10/25/2023
400.00		2.50	1000.00	Prep review orders jury instructions in limine	10/25/2023
400.00		1.70	680.00	Pretext plus mixed motive instructions review 2:17-cv-00412 Middlebrooks 24 pg	10/25/2023
400.00		0.70	280.00	Plaintiff Verdict form Middlebrooks review	10/25/2023
400.00		2.00	800.00	Snider exam edited after Judge rulings	10/25/2023
400.00		0.10	40.00	Trial Date	10/26/2023
400.00		0.10	40.00	Status Conference	10/26/2023
400.00		0.10	40.00	Email to Gilmore-Order to follow and document 171	10/26/2023
400.00		0.10	40.00	Email to Gilmore-trial begins	10/26/2023
400.00		0.10	40.00	Email from Gilmore-trial begins	10/26/2023
400.00		0.10	40.00	Email to Gilmore-trial begins	10/26/2023
400.00	0.10		0.00	Email to Gilmore-Robert Kuhn doc.	10/26/2023

400.00		0.10	40.00	Email to Gilmore-Document 172	10/26/2023
400.00		0.10	40.00	Email to Hatley-witnesses	10/26/2023
400.00		0.10	40.00	Email to Bowman-redacted version of plaintiff's exhibit 20	10/26/2023
400.00		0.10	40.00	Email from Bowman-district witnesses	10/26/2023
400.00		0.10	40.00	Email from Bowman-district witnesses	10/26/2023
400.00		0.10	40.00	Email to Deaton-use of court's screen	10/26/2023
400.00		1.00	400.00	173 review waiver of exhibits and notes on implications as to other exhibits	10/26/2023
400.00		4.50	1800.00	Working on trial prep correlating exams to exhibit books highlighting parts of exhibits	10/26/2023
400.00		0.60	240.00	ECF 172 review	10/26/2023
400.00		1.50	600.00	Research and draft notes to respond to immunity argument	10/26/2023
400.00		3.00	1200.00	After hearing review rework witness exams on jury verdict form	10/26/2023
400.00		2.00	800.00	Hearing in person	10/26/2023
400.00		0.80	320.00	30 miles travel to court	10/26/2023
400.00		0.80	320.00	30 miles travel from court	10/26/2023
400.00		0.10	40.00	Obection(s) as to certain exhibits	10/27/2023
400.00		0.10	40.00	Email to Gilmore-Robert Kuhn witness fee and mileage with subpoena	10/27/2023
400.00		0.10	40.00	Email to Gilmore-jury list	10/27/2023
400.00		0.10	40.00	Email from Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email to Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email from Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email to Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email to Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email from Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email to Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email from Gilmore-jury list	10/27/2023
400.00	0.10		0.00	Email to Gilmore-jury list	10/27/2023
400.00	0.10		0.00	Email to Gilmore-jury list	10/27/2023
400.00		0.10	40.00	Email from Gilmore-jury list	10/27/2023
400.00		0.10	40.00	Email to Gilmore-jury list	10/27/2023
400.00		0.10	40.00	Email to Gilmore-jury list	10/27/2023
400.00		0.10	40.00	Email from Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email to- Gilmore-Robert Kuhn witness fee and mileage with his subpoena	10/27/2023
400.00		0.10	40.00	Email to Deaton, Hatley, Bowman-Mr. Snider's employer	10/27/2023
400.00		0.10	40.00	Email to Haltey-Missing Board meeting videos	10/27/2023

400.00		0.10	40.00	Email from Hatley-Robert Kuhn witness fee and mileage with subpoena	10/27/2023
400.00		0.10	40.00	Email from Hatley-Robert Kuhn witness fee and mileage with subpoena	10/27/2023
400.00		0.10	40.00	Email from Bowman-board meeting videos	10/27/2023
400.00		0.10	40.00	Email from Deaton-Jury List doc.170	10/27/2023
400.00		1.00	400.00	Communication with client questions and trial prep	10/27/2023
400.00		2.00	800.00	Snider exam finalized after review of rulings and focus on essential issues	10/27/2023
400.00		2.00	800.00	Kuhn exam draft with correlation of exhibits to use	10/27/2023
400.00		3.00	1200.00	Gilmore draft exam	10/27/2023
400.00		0.70	280.00	Jury list review notes	10/27/2023
400.00		0.10	40.00	Email to Gilmore-trial testimony	10/28/2023
400.00		1.50	600.00	Edit Gilmore trial exam	10/28/2023
400.00		0.70	280.00	Finalize Beveridge exam	10/28/2023
400.00		2.00	800.00	Conference with Gilmore re trial testimony and jury selection	10/28/2023
400.00		4.00	1600.00	Review meeting videos – record events for each to be used as playbacks for jury	10/28/2023
400.00		2.00	800.00	Wickliffe Exam outline with questions draft	10/28/2023
400.00		0.10	40.00	Email to Gilmore-Tracie Baker,Christy Mestel,Vaibhav Trivedi,Jonathan Estes	10/29/2023
400.00		0.10	40.00	Email from Gilmore-Tracie Baker,Christy Mestel,Vaibhav Trivedi,Jonathan Estes	10/29/2023
400.00		0.10	40.00	Email to Gilmore-Tracie Baker,Christy Mestel,Vaibhav Trivedi,Jonathan Estes	10/29/2023
400.00		0.10	40.00	Email to Gilmore-Tracie Baker,Christy Mestel,Vaibhav Trivedi,Jonathan Estes	10/29/2023
400.00		1.00	400.00	Reorganize witness exams	10/29/2023
400.00		3.00	1200.00	Opening statement practice and rehearse x4	10/29/2023
400.00		0.90	360.00	Written bullets for opening	10/29/2023
400.00		3.00	1200.00	Edit Kuhn exam going first	10/29/2023
400.00		1.50	600.00	Download all exhibits and videos to both laptops	10/29/2023
400.00		0.70	280.00	Verify videos and exhibits on both laptops	10/29/2023
400.00	0.10			Jury Trial	10/30/2023
400.00		0.10	40.00	Email from Deaton-confirm the time of each party	10/30/2023
400.00		1.00	400.00	Reorganize witness exams	10/30/2023
400.00		8.00	3200.00	Monday jury trial	10/30/2023
400.00		0.80	320.00	30 miles travel to court	10/30/2023
400.00		0.80	320.00	30 miles travel from court	10/30/2023
400.00	0.10		40.00	Plaintiff Presents Evidence	10/31/2023
400.00		0.10	40.00	Email from Deaton-privilege issue	10/31/2023
400.00		1.00	400.00	Reorganize witness exams	10/31/2023
400.00		8.00	3200.00	Tuesday jury trial	10/31/2023

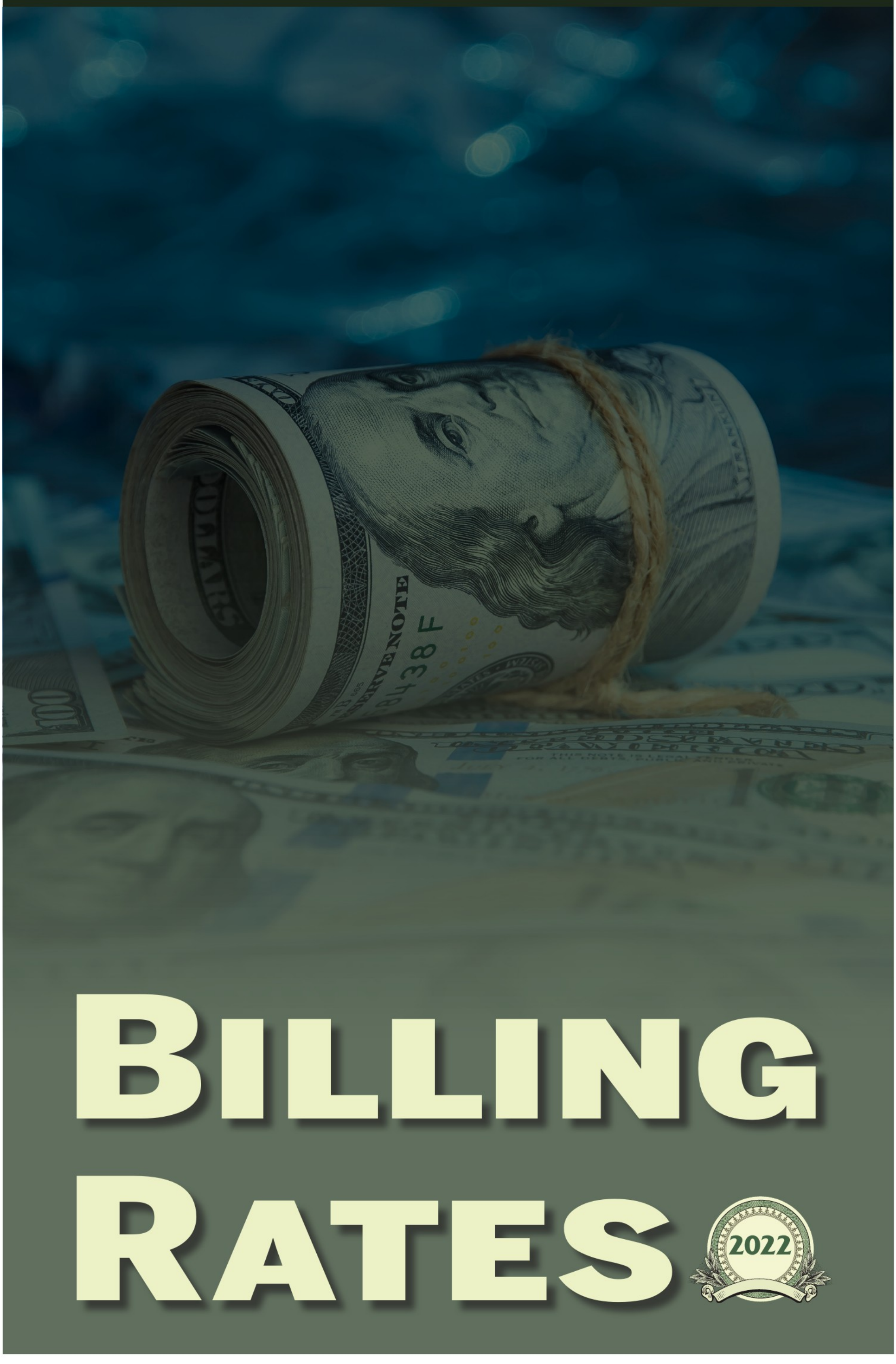
400.00		0.80	320.00	30 miles travel to court	10/31/2023
400.00		0.80	320.00	30 miles travel from court	10/31/2023
400.00	0.10		40.00	Motion for Judgement- *As a Matter of Law*	11/1/2023
400.00	0.10		40.00	Minute Entry for Proceedings	11/1/2023
400.00		0.10	40.00	Email to Gilmore-Julie and soliciting legal advice	11/1/2023
400.00		0.10	40.00	Email to Gilmore-make an example	11/1/2023
400.00		0.10	40.00	Email from Gilmore-make an example	11/1/2023
400.00		0.10	40.00	Email from Inzerillo-exhibit list	11/1/2023
400.00		0.10	40.00	Email to Inzerillo-exhibit list	11/1/2023
400.00		1.00	400.00	Revise closing arguments	11/1/2023
400.00		8.00	3200.00	Wednesday jury trial	11/1/2023
400.00		0.80	320.00	30 miles travel to court	11/1/2023
400.00		0.80	320.00	30 miles travel from court	11/1/2023
400.00		0.10	40.00	Final Jury Instructions	11/2/2023
400.00		0.10	40.00	Jury Trial Completed	11/2/2023
400.00		0.10	40.00	Jury Verdict	11/2/2023
400.00		0.10	40.00	Proposed Jury Instructions	11/2/2023
400.00		0.10	40.00	Email from Inzerillo-exhibit list	11/2/2023
400.00		0.10	40.00	Email to Bowman-Trial email response	11/2/2023
400.00		0.10	40.00	Email from Deaton-final jury instructions and verdict form	11/2/2023
400.00		8.00	3200.00	Thursday jury trial	11/2/2023
400.00		0.80	320.00	30 miles travel to court	11/2/2023
400.00		0.80	320.00	30 miles travel from court	11/2/2023
400.00	0.10		0.00	Email to Snider-KC Star story	11/3/2023
400.00	0.10		0.00	Email to Ritter- Statement of Attorney Linus L. Baker regarding the Kansas federal jury verdict rendered in Gilmore v. Beveridge on November 2, 2023	11/3/2023
400.00	0.10		0.00	Email from Ritter- Statement of Attorney Linus L. Baker regarding the Kansas federal jury verdict rendered in Gilmore v. Beveridge on November 2, 2023	11/3/2023
400.00	0.10		0.00	Email to Snider-Statement of Attorney Linus L. Baker regarding the Kansas federal jury verdict rendered in Gilmore v. Beveridge on November 2, 2023	11/3/2023
400.00	0.10		0.00	Email to Gilmore-Gilmore press statement doc. and Statement of Attorney Linus L. Baker regarding the Kansas federal jury verdict rendered in Gilmore v. Beveridge on November 2, 2023	11/3/2023
400.00	0.10		0.00	Email from Snider-https://www.kansascity.com/news/politics-government/election/article281380353.html	11/3/2023

400.00	0.10		0.00	Email to Snider-https://www.kansascity.com/news/politics-government/election/article281380353.html	11/3/2023
400.00	0.10		0.00	Email to news, Gilmore, Snider-Statement of Attorney Linus L. Baker regarding the Kansas federal jury verdict rendered in Gilmore v. Beveridge on November 2, 2023:press statement and questions	11/3/2023
400.00		0.10	40.00	Motion to Expedite Expedited Motion	11/6/2023
400.00		0.10	40.00	Expedite Expedited Motion to Communicate	11/6/2023
400.00		0.10	40.00	Email to Gilmore-Defendents' expedited motion to communicate with Jurors document	11/6/2023
400.00	0.10		0.00	Email to Gilmore- my ballot pdf	11/6/2023
400.00	0.10		0.00	Email to Gilmore- open records request	11/6/2023
400.00	0.10		0.00	Email from Gilmore-open records request	11/6/2023
400.00	0.10		0.00	Email to Gilmore- open records request	11/6/2023
400.00	0.10		0.00	Email to Gilmore- open records request	11/6/2023
400.00	0.10		0.00	Email from Gilmore-open records request	11/6/2023
400.00	0.10		0.00	Email to Gilmore- open records request	11/6/2023
400.00	0.10		0.00	Email to Gilmore- open records request	11/6/2023
400.00	0.10		0.00	Email from Gilmore-open records request	11/6/2023
400.00	0.10		0.00	Email to Gilmore- open records request	11/6/2023
400.00	0.10		0.00	Email from Gilmore-open records request	11/6/2023
400.00	0.10		0.00	Email to Gilmore- open records request	11/6/2023
400.00		0.20	80.00	Draft opposition to 182 motion for jury contact	11/6/2023
400.00		0.10	40.00	Upload and file opposition to jury motion	11/6/2023
400.00		0.10	40.00	Review Def 182 motion for jury contact	11/6/2023
400.00		0.20	80.00	review Order denying Motion to communicate with Jurors	11/7/2023
400.00		0.10	40.00	Email to Gilmore-Order on Motion to Expedite	11/7/2023
400.00		0.10	40.00	Email to Gilmore-Order on Motion to Expedite	11/7/2023
400.00		0.10	40.00	Email from Gilmore-Order on Motion to Expedite	11/7/2023
400.00		0.10	40.00	Email from Deaton-schedule for post-trial briefing	11/9/2023
400.00		0.10	40.00	Email to Deaton, Bowman, Hatley-schedule for post-trial briefing	11/9/2023
400.00		0.10	40.00	Email to Deaton, Bowman, Hatley-schedule for post-trial briefing	11/9/2023
400.00		0.10	40.00	Email from Deaton-schedule for post-trial briefing	11/10/2023
400.00		0.10	40.00	Email to Deaton,Bowman,Hatley-schedule for post-trial briefing	11/10/2023
400.00		0.50	200.00	Memorialize thoughts on jury instructions –no error	11/10/2023
400.00		1.50	600.00	Organize paper – paper exhibits binders	11/10/2023

400.00		0.10	40.00	Review 182 order on jury contact	11/13/2023
400.00		0.10	40.00	To client re: order	11/13/2023
400.00		0.10	40.00	ORDER setting briefing schedule and teleconference	11/13/2023
400.00		0.10	40.00	Calendar fee events	11/13/2023
400.00		0.10	40.00	client re: order question	11/13/2023
400.00		0.10	40.00	To client re: order explanation	11/13/2023
400.00		0.10	40.00	To Magistrate re: order mediation	11/13/2023
400.00		0.10	40.00	Email to Gilmore-opposition to Juror contract	11/16/2023
400.00		0.10	40.00	Email from Gilmore-opposition to Juror contract	11/16/2023
400.00	2.00		0.00	Review billing events	11/18/2023
400.00		1.80	720.00	Work on motion for attorney fees and bill of costs	11/18/2023
400.00		0.50	200.00	Complete bill of costs and email to counsel for approval	11/21/2023
400.00	2.00		0.00	Review billing in spreadsheet for error	11/21/2023
400.00		9.90	3960.00	Draft motion for fees and costs (8.7),Draft Decl. in support of fees and costs (1.2)	11/24/2023
	0.10			Docket entry mediation	11/27/2023
400.00	0.20			Mediation telephone conference Judge Mitchell	11/27/2023
	1.00			Finalize motion for fees and declaration	12/1/2023
400.00	52.00		0.00	Staff administrative tasks; conversion of word billing to excel with formula verification; review billing events	11/10 - 11/30
	143.15	792.85			
			317300.00		

EXHIBIT 3

MISSOURI LAWYERS MEDIA



BILLING RATES 2022

Welcome to Billing Rates 2022

By Scott Lauck
slauck@molawyersmedia.com

Courts have been busy this year clearing the backlog of cases that built up during the pandemic. That has meant a glut of trials and settlements — and with them a fresh batch of hourly rates for Missouri practitioners.

Missouri Lawyers Media's 2022 Billing Rates section examined fee applications filed with local state and federal courts to give a glimpse, however limited, into the amounts that lawyers in this state charge per hour for their services.

Most often, these are cases that are subject to a fee-shifting statute, such as in employment and civil-rights cases. A number of hourly rates come from class-action settlements in which attorneys' customary fees are used to calculate a "lodestar" reference point for the fees for the class counsel. Other examples include fees that are owed as part of a contract dispute, and in some instances in cases in which one side has been forced to pay the other side's fees as a court-ordered sanction.

Bankruptcy filings are also a source of hourly rates, though not nearly as rich a vein as they once were. According to the Administrative Office of the U.S. Courts, personal and business bankruptcy filings have steadily declined in the last few years, falling 11.7 percent nationwide for the 12-month period ending Sept. 30.

The bankruptcy courts St. Louis and Kansas City, which provide much of the data for this project, fell 15.3 percent and 12.7 percent, respectively. The 2021 Billing Rates survey — which covered a two-year period — featured 220 attorney and staff rates, 87 of which came from bankruptcy cases. This year's listing features a comparable 216 total rates, but only 37 figures came from bankruptcy sources.

New this year, the Billing Rates survey examined filings not only in federal courts in Missouri but also those in Kansas City, Kansas, and in the Southern District of Illinois, both of which border Missouri's metropolitan areas and frequently draw Missouri-licensed practitioners.

The median hourly rate for Missouri lawyers as a whole was $400, up from last year's figure of $330 an hour. The statewide median was $450 per hour for partners and $325 for associates and other attorneys, such as counsel or lawyers whose titles weren't apparent from firm websites or court filings.

In St. Louis, the median rate was $385 an hour, up from $330 in our last survey. The median partner charged $420 per hour, while the median nonpartner charged $350. The St. Louis figures were calculated from a pool of 89 lawyers.

In Kansas City, the median rate was $425 an hour, up from $347 in 2021. The median partner charged $488 an hour, and the median nonpartner rate was $325. The Kansas City rates were calculated from a pool of 73 attorneys.

This year's survey pulled in just 13 rates from outside of the state's two metropolitan areas, yielding a median of $295 per hour.

Law firm staff, such as legal administrative assistants, paralegals and law clerks, had a median rate of $150 per hour. The pool of 41 staff members was drawn from around the state, though most were concentrated in the metropolitan areas.

METHODOLOGY

Where possible, we use the attorney's standard or customary rates, rather than the rate the court applied or discounted rates offered to a particular client. Rates can vary according to the case or client, so a listed rate for an attorney might not apply in other cases.

The rates are a sampling only. Though drawn from recent court filings, some fee requests were for work performed in previous years, so rates might have changed in the meantime. Wherever possible, we have used the most recent available rates.

Attorneys are listed with the firm or organization where they worked at the time the fee request was made. They might have changed firms or been promoted since then, or the firm might have changed names or ceased to exist.

Information on titles, practice specialties and office locations is drawn primarily from fee applications, supplemented with information from firm websites. Practice listings typically describe the type of case for which the fee was incurred, which might not be the attorney's main area of practice.

Attorneys and staff in offices near the metropolitan St. Louis area in Illinois and the metropolitan Kansas City area in Kansas were counted as in-state rates.

Reporter Scott Lauck and freelance researcher Jennie Goodman researched the listings.

Void for vagueness: Courts trim fee requests that lack detail

By Scott Lauck
slauck@molawyersmedia.com

Lawyers may not like keeping track of their time in six-minute increments. But when it comes to getting fees approved by the court, it appears there's no such thing as too much detail.

In a case in the Western District of Missouri, one lawyer found himself on the end of a judge's pointed criticism, though in the end it turned out not to matter.

The $250,000 request in *Albelo v. Epic Landscape Productions LC* stemmed from a settlement under the Fair Labor Standards Act to recover unpaid wages and overtime for a class of workers. After the defense objected that the plaintiffs' request didn't show the substance of the work they claimed to have done, Judge Greg Kays ordered the attorneys to submit more detailed records.

Their response, Kays wrote in a March order, was "uneven." Attorneys with the Kansas City firm of Bertram & Graf and the Dodge City, Kansas firm Rebein Brothers submitted adequate records.

"And then there is what attorney Michael Hodgson has submitted," Kays wrote. According to the order, Hodgson, a Lee's Summit practitioner, sought more than 333 hours' worth of work at $550 an hour. But Kays said the supporting record was just a copy of his work calendar, with a number of entries that appeared to be unrelated to the litigation and few entries showing any kind of sustained work on briefs or depositions.

"In short, while the Court is certain Mr. Hodgson and his staff worked on this case, it has no idea exactly how much time they spent working on this case," Kays wrote. "Frankly, the Court doubts Mr. Hodgson has a very good idea either."

However, Kays still awarded the full $250,000, as he noted that the request by the other two firms totaled $242,093. The court, Kays wrote, "can still award the entire amount sought because it is certain Mr. Hodgson and his staff performed at least $8,000 worth of work on this case."

Hodgson couldn't be reached for comment.

Reductions for redactions

Turning over one's detailed time records as part of a fee request risks disclosing privileged information to the other side and possibly to the public. As a result, it's common for attorneys to redact their records to obscure sensitive entries. But that has its own risks, as a group of Lewis Rice attorneys found when requesting fees at the end of a successful contract dispute.

The case, *Ascentium Capital LLC v. Littell*, resulted in a judgment of about $329,000 against a limousine company that defaulted on its loans during the pandemic. The plaintiff lender won its attorneys' fees and costs. Attorneys from Lewis Rice's St. Louis office, who represented the lender, sought $139,000 in attorney's fees.

However, Judge Nanette K. Laughrey's April order deducted about $10,500 from the total, finding that a number of entries by partner Joseph Trad were "impermissibly vague" and didn't describe what the attorney had been doing. Examples, Laughrey said, included blocks of time described as "work on lawsuit issues," "review e-mail correspondence exchanges" or "work on open issues."

Trad argued in a court filing that the "details gleaned from surrounding time entries" provided enough context for the court to gauge the reasonableness of the hours. In some instances, the judge agreed and denied challenges raised by the defendants. Elsewhere, she wrote, the surrounding entries "do little to elucidate" what Trad was working on.

About $850 worth of the rejected fees came from items in which the lawyers had redacted critical information from the entries — even though the billing statements were filed under seal. Laughrey wrote that the redactions prevented her from determining if the entries are reasonable. For example, the fee for researching "case law pertaining to evidence required to [redacted]" was disallowed because "the Court cannot determine the subject matter of the research."

Block billing

Part of the defendant's argument in the case was that the Lewis Rice attorneys had engaged in "block billing" — entries that list several tasks without specifying how much time was spent on each one.

Laughrey, however, was more concerned with the imprecision of the entries than the number of items on a single line. She threw out time spent on telephone conferences with unknown subjects and work on non-specific pleadings. But she OK'd a 3.2-hour entry for "work on deposition preparation including mediation statement" because she said the overall amount of time spent on the tasks seemed reasonable.

A similar issue arose in a case in the Eastern District of Missouri that recently resulted in a large jury verdict. The case, *Major Brands Inc. v. Mast-Jagermeister Inc. US*, garnered an $11.75 million award for the plaintiff on claims under the Missouri Franchise Act. It was the third largest jury verdict of 2021 as tracked by Missouri Lawyers Media.

Lewis Rice, which represented Major Brands, was chided by the defense for engaging in block billing in that case as well. But Judge Henry Autrey had no problem with it.

"While the entries do not indicate how many minutes were spent on each particular task, they are sufficiently specific to communicate the work that was done and its connection to the case," he wrote in his September order. "Furthermore, there is no evidence that attorneys were spending an excessive amount of time on their tasks or duplicating the work done by others."

Other than a $13,000 reduction for time spent on unrelated legal theories, Autrey approved nearly the entire $3.39 million fee request.

Court says judge could, but didn't have to, award fees for father's successful appeal

By Scott Lauck
slauck@molawyersmedia.com

A split panel of the Missouri Court of Appeals Eastern District ruled Nov. 15 that a judge had the legal authority to award attorneys' fees to a father who successfully fought off his mother's attempt to gain court-ordered visitation rights.

However, the panel's majority added, the judge didn't abuse his discretion when he declined to grant those fees. But Judge Gary M. Gaertner Jr. partly dissented, saying that, now that the legal issues had been clarified, the parties should get a new hearing on whether the fees were justified.

"A failure of the trial court to exercise its discretion due to a mistaken view of its authority is grounds for remand, rather than deference," Gaertner wrote.

The ruling leaves the father's attorney, Larry Gillespie of Gillespie, Hetlage & Coughlin in Clayton, without an award to cover the cost of a case that has now gone to the Court of Appeals twice. However, Gillespie said in an interview that it at least sends a clear signal that judges have the authority to grant such awards.

"Needless to say, I agreed wholeheartedly with the dissent," he said.

The case stems from a dispute involving a child, referred to as X.P.E.L. in the case, who was born to unmarried parents. The father filed a petition for a declaration of paternity and custody of the child. His mother initially sought third-party custody but later abandoned that effort and supported her son's bid for custody.

She later filed an amended petition seeking visitation under a Missouri statute that allows grandparents to make such a request under certain conditions.

In June 2021, the Eastern District affirmed an earlier finding that the grandmother failed to satisfy the requirements for visitation under state law. The court said the statute only applies to dissolution proceedings and declined to read it broadly to apply to paternity and custody actions as well.

Although the father had won on appeal, Washington County Associate Circuit Judge Troy K. Hyde declined to order the grandmother to pay his $70,000 in attorneys' fees, citing the arguments the grandmother had made. It wasn't clear, however, whether he was swayed by her legal argument that the relevant statutes of Missouri's domestic relations didn't apply, or by her arguments that the fee was excessive and that she couldn't afford to pay.

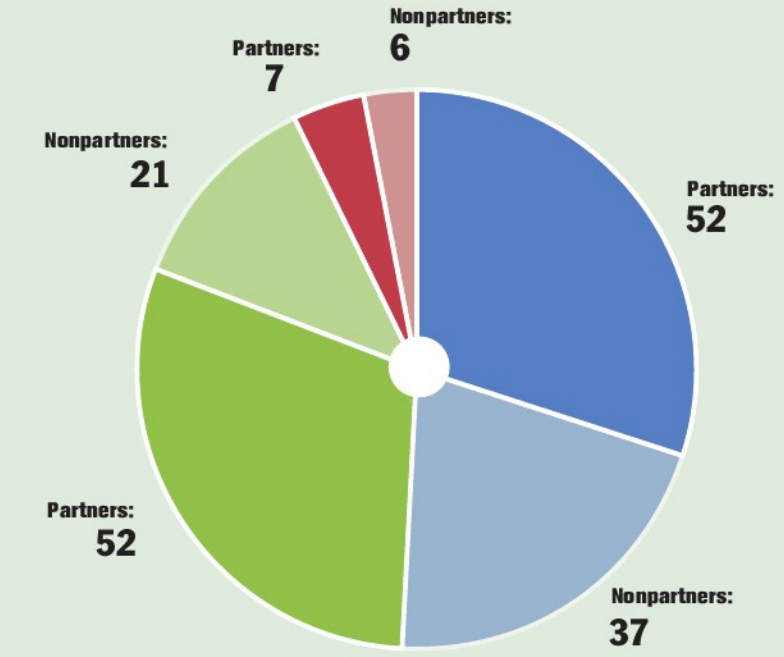
Judge Cristian M. Stevens, writing for the appellate court, said plain language of the statute allowed the judge to award the fees against the grandmother, who had willingly intervened in the case. However, he and Judge John P. Torbitzky affirmed the judge's decision to deny them, as he might also have considered her more discretionary arguments.

Jefferson City attorney Jay Anielak, who represented the grandmother, was pleased that even though the Eastern District disagreed with his legal arguments, it allowed the trial judge's discretionary ruling to stand.

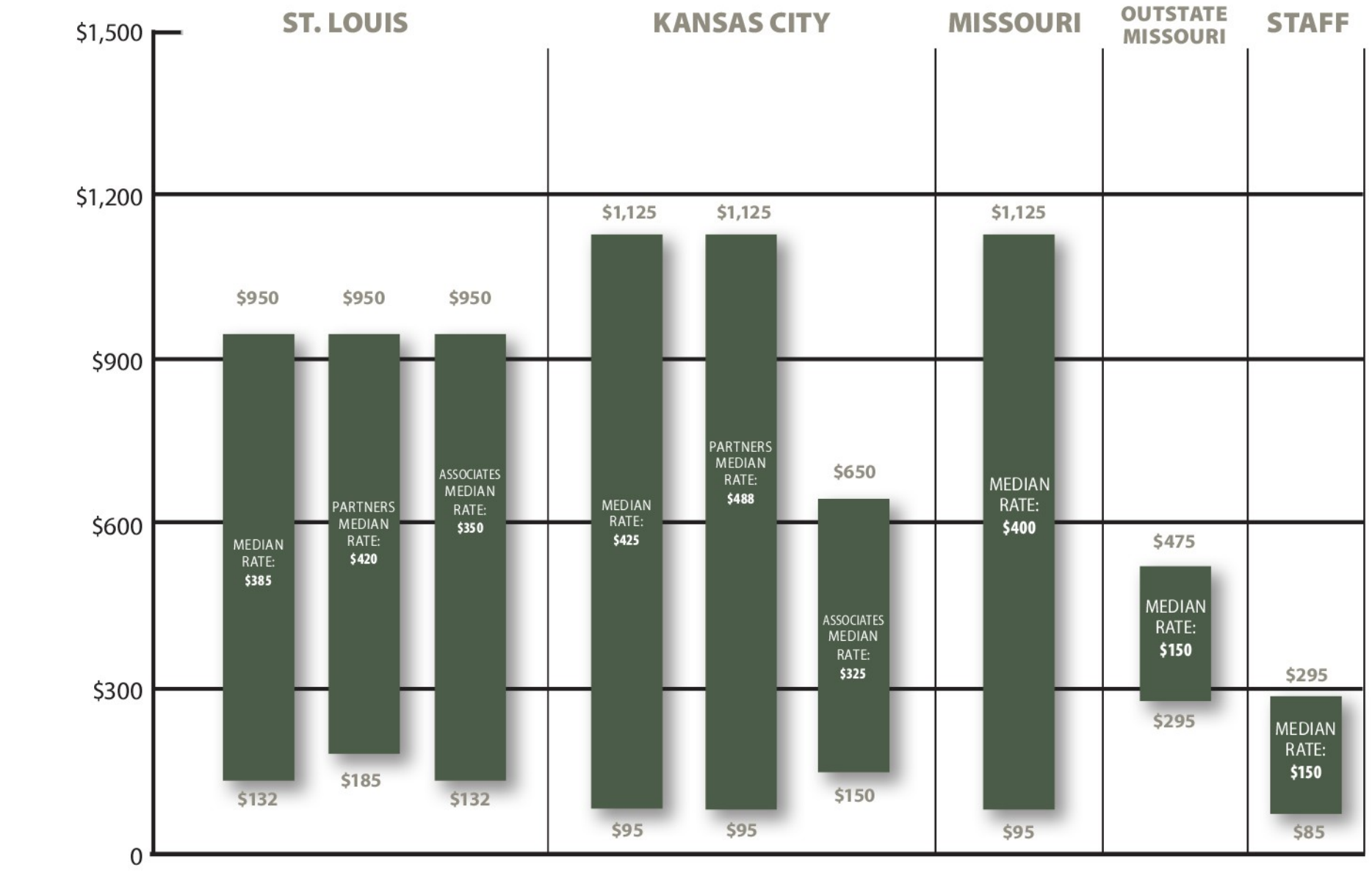
"The court has the ability to award zero, even if they have the ability to assign fees," he said.

The case is *C.T. v. J.L.L.*, ED110039..

ATTORNEY RATE LOCATIONS



ATTORNEY RATE RANGES



HIGHEST MISSOURI RATES

RANK	HOURLY RATE	ATTORNEY	FIRM	TITLE	CITY	YEAR	PRATICE AREA
1	$1,125	Norman E. Siegel	Stueve Siegel Hanson	Senior Partner	Kansas City	2022	Class Action
2	$950	Gary Burger	Burger Law Firm	Partner	St. Louis	2022	Employment
2	$950	Michael Flannery	Cuneo Gilbert & LaDuca	Attorney	St. Louis	2022	Employment
4	$825	J. Austin Moore	Stueve Siegel Hanson	Partner	Kansas City	2022	Class Action
4	$825	Lindsay Todd Perkins	Stueve Siegel Hanson	Partner	Kansas City	2022	Class Action
6	$725	David Lunceford	Lunceford Law Firm	Partner	Lee's Summit	2022	Employment
6	$725	Eric Playter	Playter & Playter	Partner	Kansas City	2022	Employment
6	$725	Richard B. Walsh Jr.	Lewis Rice	Member	St. Louis	2021	Missouri Franchise Act
9	$650	Christina Neilsen	Lunceford Law Firm	Partner	Lee's Summit	2022	Employment
9	$650	Dennis Egan	Popham Law Firm	Partner	Kansas City	2022	Employment
9	$650	Lynne Bratcher	Bratcher Gockel Law	Partner	Kansas City	2022	Employment
9	$650	Martin M. Meyers	Meyers Law Firm	Partner	Kansas City	2022	Employment
9	$650	Matt Bartle	Bartle + Marcus	Partner	Kansas City	2022	Commercial litigation
9	$650	Yasmin Zainulbhai	Stueve Siegel Hanson	Senior Counsel	Kansas City	2022	Class Action
9	$650	Mark J. Pedroli	Pedroli Law	Partner	Clayton	2022	Civil Rights
9	$650	Evan Z. Reid	Lewis Rice	Member	St. Louis	2021	Missouri Franchise Act
17	$625	Kevin Baldwin	Baldwin & Vernon	Partner	Kansas City	2022	Employment
18	$616	Larry E. Parres	Lewis Rice	Member	St. Louis	2022	Corporate law

IN-STATE

NAME	TITLE	CITY	YEAR	RATE / HOUR	PRACTICE AREA
ARMSTRONG TEASDALE					
Thomas J. Fritzlen	Partner	Kansas City	2021	$350	Contract
Beverly M. Weber	Partner	Kansas City	2021	$350	Contract
Greg Todd	Partner	Kansas City	2021	$350	Contract
Sherri Ratliff	Paralegal	Kansas City	2021	$110	Contract
BALDWIN & VERNON					
Kevin Baldwin	Partner	Kansas City	2022	$625	Employment
BARTLE + MARCUS					
Matt Bartle	Partner	Kansas City	2022	$650	Commercial litigation
BARTON & BURROWS					
Stacey A. Burrows	Member	Overland Park, KS	2022	$325	Trust litigation
George A. Burton	Member	Overland Park, KS	2022	$325	Trust litigation
N/A	Associate	Overland Park, KS	2022	$200	Trust litigation
N/A	Law Clerk	Overland Park, KS	2022	$150	Trust litigation
BECK & SANT					
J. Talbot Sant Jr.	Partner	O'Fallon	2022	$360	Contract
Steven Beck	Partner	O'Fallon	2022	$280	Contract
BERTRAM & GRAF					
Tim West	Attorney	Kansas City	2022	$395	Fair Labor Standards Act
Bianca Fennix	Paralegal	Kansas City	2022	$125	Fair Labor Standards Act
BIRK LAW FIRM					
Kelvin Birk	Attorney, CPA	Cape Girardeau	2021	$315	Bankruptcy
BRATCHER GOCKEL LAW					
Lynne Bratcher	Partner	Kansas City	2022	$650	Employment
Marie Gockel	Partner	Kansas City	2022	$600	Employment
Erin Vernon	Attorney	Kansas City	2022	$450	Employment
Mike Bell	Paralegal	Kansas City	2022	$150	Employment
Robert Jaben	Trial Assistant	Kansas City	2022	$150	Employment
BRINKER & DOYEN					
Jeffrey J. Brinker	Partner	St. Louis	2022	$185	Civil rights
Bridgette N. Fu	Partner	St. Louis	2022	$185	Civil rights
Gary P. Paul	Partner	St. Louis	2022	$185	Civil rights
D. Michael Bell	Associate	St. Louis	2022	$150	Civil rights
Emily E. Lavine	Associate	St. Louis	2022	$150	Civil rights
Claire C. Kates	Associate	St. Louis	2022	$150	Civil rights
Anne Elise Brodsky	Associate	St. Louis	2021	$150	Civil rights
Angela M. Torrence	Paralegal	St. Louis	2022	$110	Civil rights

IN-STATE

NAME	TITLE	CITY	YEAR	RATE / HOUR	PRACTICE AREA
BROWN & CURRY					
Dan Curry	Partner	Kansas City	2021	$550	Civil rights
Sarah Brown	Partner	Kansas City	2021	$550	Civil rights
N/A	Paralegal	Kansas City	2021	$150	Civil rights
BURGER LAW FIRM					
Gary Burger	Partner	St. Louis	2022	$950	Employment
Nicole Gorovsky	Associate	St. Louis	2022	$600	Employment
Genavieve Fikes	Associate	St. Louis	2022	$500	Employment
Jim Bax	Associate	St. Louis	2022	$500	Employment
Michael Sheldon	Associate	St. Louis	2022	$400	Employment
Brian Winebright	Associate	St. Louis	2022	$350	Employment
Joel Beckwith	Associate	St. Louis	2022	$350	Employment
John Burns	Associate	St. Louis	2022	$350	Employment
Joe Ott	Associate	St. Louis	2022	$250	Employment
Mike Singer	Associate	St. Louis	2022	$250	Employment
Casey Flugel	Paralegal	St. Louis	2022	$200	Employment
Taylor Morthland	Paralegal	St. Louis	2022	$200	Employment
Britni Fendler	Paralegal	St. Louis	2022	$150	Employment
Gretchen Tutt	Paralegal	St. Louis	2022	$150	Employment
Laura McGuinness	Paralegal	St. Louis	2022	$150	Employment
Rodney McBride	Paralegal	St. Louis	2022	$150	Employment
CARMODY MACDONALD					
Robert Eggmann	Principal	St. Louis	2022	$525	Bankruptcy
CHAPEL LAW GROUP					
Nimrod Chapel Jr.	Partner	Jefferson City	2022	$475	Employment
Sofia Sanchez	Paralegal	Jefferson City	2022	$150	Employment
CHECKETT, PAULY, BAY AND MORGAN					
J. Kevin Checkett	Partner	Carthage	2022	$295	Bankruptcy
Jessica Adams	Associate	Carthage	2022	$180	Bankruptcy
Janet Waggoner	Paralegal	Carthage	2022	$120	
CONROY BARAN					
Robert Baran	Member	Kansas City	2022	$295	Bankruptcy
Ryan Shaw	Attorney	Kansas City	2022	$250	Bankruptcy
CORNERSTONE LAW FIRM					
M. Katherine Paulus	Partner	Kansas City	2022	$600	Fair Debt Collection Act
Brittany Mehl	Partner	Kansas City	2022	$600	Fair Debt Collection Act
Joshua Wunderlich	Associate	Kansas City	2022	$450	Fair Debt Collection Act
Jessica M. McDowell	Counsel	Kansas City	2022	$350	Fair Debt Collection Act
CRUSE, CHANEY-FAUGHN					
Fredrich J. Cruse	Attorney	Hannibal	2022	$225	Bankruptcy
Julia A. Chaney-Faughn	Attorney	Hannibal	2022	$200	Bankruptcy

IN-STATE

NAME	TITLE	CITY	YEAR	RATE / HOUR	PRACTICE AREA
CUNEO GILBERT & LADUCA					
Michael Flannery	Attorney	St. Louis	2022	$950	Employment
DANNA MCKITRICK					
A. Thomas DeWoskin	Principal	St. Louis	2022	$405	Bankruptcy
DASHTAKI LAW FIRM					
Cyrus Dashtaki	Partner	Jefferson City	2022	$475	Employment
L.E. Beck	Attorney	Jefferson City	2022	$250	Employment
Sandra Sintakas	Paralegal	Jefferson City	2022	$125	Employment
DAVID M. DUREE & ASSOCIATES					
David Duree	Partner	O'Fallon, IL	2021	$400	Appellate
DCG LAW FIRM					
Dione C. Greene	Partner	Kansas City	2021	$515	Employment
Michelle Simons	Paralegal	Kansas City	2021	$175	Employment
DEBORAH S. GREIDER LLC					
Deborah Greider	Attorney	St. Louis	2022	$600	Employment
DESAI LAW FIRM					
Spencer Desai	Attorney	St. Louis	2022	$250	Bankruptcy
DOBSON, BERNS & RICH					
Gregory A. Rich	Partner	St. Louis	2021	$500	Employment
Amanda Anthony	Associate	St. Louis	2021	$425	Employment
Meredith Berwick	Associate	St. Louis	2021	$350	Employment
Nicole Matlock	Associate	St. Louis	2021	$350	Employment
DONALD SAMSON, ATTORNEY AT LAW					
Donald Samson	Attorney	Belleville, IL	2021	$275	Bankruptcy
EDELMAN, LIESEN & MEYERS					
Katherine E. Myers	Partner	Kansas City	2022	$475	Employment
Sarah Liesen	Partner	Kansas City	2022	$475	Employment
Alexander Edelman	Partner	Kansas City	2022	$425	Civil rights
Alexander Edelman	Partner	Kansas City	2022	$425	Civil rights
ENGELMEYER & PEZZANI					
Anthony Pezzani	Partner	Town and Country	2022	$400	Fair Labor Standards Act
FINKES LEGAL					
Jason Finkes	Partner	St. Louis	2022	$350	Employment
GALLAGHER DAVIS					
Adam James Olszeski	Partner	Brentwood	2022	$300	ERISA
GREEN LEAF LEGAL KC					
Benjamin Stelter-Embry	Attorney	Kansas City	2021	$425	Civil rights
HAAR & WOODS					
Peter C. Woods	Partner	St. Louis	2021	$350	Breach of Contract
Dawn M. Renwick	Paralegal	St. Louis	2021	$150	Breach of Contract
HARRIS DOWELL FISHER & YOUNG					
Portia C. Kayser	Attorney	Chesterfield	2022	$290	Civil rights
HARTNETT REYES-JONES					
Matthew J. Gierse	Partner	St. Louis	2021	$250	ERISA
HERREN, DARE AND STREETT					
David Dare	Partner	St. Louis	2022	$350	Bankruptcy
HODGSON LAW FIRM					
Michael Hodgson	Partner	Lee's Summit	2022	$550	Fair Labor Standards Act
Jennifer Pate	Paralegal	Lee's Summit	2022	$125	Fair Labor Standards Act
HOWARD & JOHNSON					
Veronica Johnson	Partner	St. Louis	2022	$435	Employment
HUSCH BLACKWELL					
Kyle P. Seelbach	Partner	St. Louis	2021	$550	Contract
C. Herrmann	Paralegal	St. Louis	2021	$295	Contract
JONATHAN STERNBERG, ATTORNEY					
Jonathan Sternberg	Partner	Kansas City	2022	$425	Appellate
KENNEDY HUNT					
Sarah Jane Hunt	Partner	St. Louis	2022	$350	Employment
Amber Kempf	Attorney	St. Louis	2022	$350	Employment
MaryAnne Quill	Attorney	St. Louis	2022	$250	Employment
KHAZAELI WYRSCH					
James R. Wyrsch	Partner	St. Louis	2022	$350	Contract

IN-STATE

NAME	TITLE	CITY	YEAR	RATE / HOUR	PRACTICE AREA
KOLDE LAW					
Daniel J. Kolde	Partner	St. Louis	2022	$350	Civil rights
LATHROP GPM					
Robert J. Haupt	Partner	Kansas City	2022	$495	Trust litigation
Rhett M. Buchmiller	Associate	Kansas City	2022	$240	Trust litigation
LAW OFFICE OF HENRY TANNER					
Henry W. Tanner Jr.	Partner	Kansas City	2021	$400	Employment
N/A	Paralegal	Kansas City	2021	$175	Employment
LAW OFFICES OF JOAN M. SWARTZ					
Joan Swartz	Partner	St. Louis	2022	$600	Employment
Jenifer C. Snow	Attorney	St. Louis	2022	$400	Employment
Jodi M. Carpenter	Paralegal	St. Louis	2022	$200	Employment
LEWIS RICE					
Richard B. Walsh Jr.	Member	St. Louis	2021	$725	Missouri Franchise Act
Evan Z. Reid	Member	St. Louis	2021	$650	Missouri Franchise Act
Larry E. Parres	Member	St. Louis	2022	$616	Corporate law
Oliver H. Thomas	Member	St. Louis	2021	$600	Missouri Franchise Act
Derick C. Albers	Member	St. Louis	2021	$600	Missouri Franchise Act
John J. Hall	Member	St. Louis	2022	$591	Corporate law
Michael J. Hickey	Member	St. Louis	2022	$591	Intellectual property
Edward T. Pivin	Member	St. Louis	2021	$520	Missouri Franchise Act
Benjamin J. Siders	Member	St. Louis	2022	$510	Intellectual property
Sarah A. Milunski	Member	St. Louis	2021	$510	Missouri Franchise Act
Joseph Trad	Member	St. Louis	2021	$450	Contract
Taylor J. Essner	Associate	St. Louis	2021	$385	Missouri Franchise Act
Thomas Hunter Brown	Associate	St. Louis	2021	$350	Contract
Katherine G. McWherter	Associate	St. Louis	2021	$325	Missouri Franchise Act
Jeannine Moentmann	Paralegal	St. Louis	2021	$280	Missouri Franchise Act
Lindsey M. Bruno	Associate	St. Louis	2021	$275	Missouri Franchise Act
Christie Paddock	Paralegal	St. Louis	2022	$221	Intellectual property
Tyler E. Fear	Paralegal	St. Louis	2021	$200	Missouri Franchise Act
Justine Lanciault	Paralegal	St. Louis	2021	$160	Contract
LEX VALOREM					
Patricia Williams	Partner	St. Louis	2021	$400	Contract
Vincent T. Volpe	Partner	St. Louis	2021	$400	Contract
LOWTHER JOHNSON					
Lee Viorel	Member	Springfield	2022	$150	Bankruptcy
LUNCEFORD LAW FIRM					
David Lunceford	Partner	Lee's Summit	2022	$725	Employment
Christina Neilsen	Partner	Lee's Summit	2022	$650	Employment
D'Vante Lewis	Associate	Lee's Summit	2022	$250	Employment
Peter Gardner	Associate	Lee's Summit	2022	$250	Employment
Victoria Arends	Associate	Lee's Summit	2022	$250	Employment
Anna Donladson	Paralegal	Lee's Summit	2022	$125	Employment
Caludia Everhart	Paralegal	Lee's Summit	2022	$125	Employment
Lexi Graham	Paralegal	Lee's Summit	2022	$125	Employment
MCCAUSLAND BARRETT & BARTALOS					
Thomas J. Golson	Associate	Kansas City	2022	$224	Post-judgment discovery
MCMICHAEL, LOGAN, SCHAEFFER & GILPIN					
Daniel J. McMichael	Partner	St. Louis	2022	$450	Class action
MERRICK BAKER STRAUSS					
Victor Weber	Member	Kansas City	2021	$300	Bankruptcy
Bruce E. Strauss	Member	Kansas City	2022	$250	Bankruptcy
Josephine Ellerman	Member	Kansas City	2021	$95	Bankruptcy
MEYERS LAW FIRM					
Martin M. Meyers	Partner	Kansas City	2022	$650	Employment

IN-STATE

NAME	TITLE	CITY	YEAR	RATE / HOUR	PRACTICE AREA
MOLNER LAW GROUP					
Mark D. Molner	Partner	Kansas City	2021	$400	Contract
Michael A. Bene	Associate	Kansas City	2021	$300	Contract
MOON & MOON ATTORNEYS					
Charles Moon	Attorney	Springfield	2022	$250	Bankruptcy
MOORE RAMIREZ LAW FIRM					
Mario Moore Ramirez	Partner	Kansas City	2022	$250	Employment
MORROW WILLNAUER CHURCH					
Peggy A. Wilson	Member	Kansas City	2022	$185	Trust litigation
James C. Morrow	Member	Kansas City	2022	$185	Trust litigation
N/A	Associate	Kansas City	2022	$150	Trust litigation
N/A	Law Clerk	Kansas City	2022	$85	Trust litigation
NORRIS KEPLINGER					
David Welder	Partner	Leawood, KS	2022	$500	Civil rights
Courtney McCray	Associate	Leawood, KS	2022	$350	Civil rights
Paul Breer	Associate	Leawood, KS	2022	$350	Civil rights
Emily Tung	Associate	Leawood, KS	2022	$350	Civil rights
Holli Dobler	Associate	Leawood, KS	2022	$350	Civil rights
Cheryl Little	Paralegal	St. Louis	2022	$250	Civil rights
Aly Ridgley	Paralegal	St. Louis	2022	$250	Civil rights
PEDROLI LAW					
Mark J. Pedroli	Partner	Clayton	2022	$650	Civil rights
PLAYTER & PLAYTER					
Eric Playter	Partner	Kansas City	2022	$725	Employment
Chris Playter	Partner	Kansas City	2022	$500	Employment
POPHAM LAW FIRM					
Dennis Egan	Partner	Kansas City	2022	$650	Employment
Bert Braud	Partner	Kansas City	2022	$575	Employment
Cooper Mach	Partner	Kansas City	2022	$425	Employment
Brandy Cook	Legal Assistant	Kansas City	2022	$150	Employment
Nicole Eaton	Legal Assistant	Lee's Summit	2022	$150	Employment
PRUGH LAW OFFICE					
Mark Prugh	Partner	Waynesville	2021	$350	Appellate
REEVES LAW					
John Reeves	Partner	St. Louis	2022	$450	Appellate
RHODE LAW FIRM					
Shari R. Rhode	Partner	Carbondale, IL	2022	$500	Employment
ROGER G. BROWN & ASSOCIATES					
Roger Brown	Partner	Jefferson City	2022	$405	Employment
Leslie Noblett	Paralegal	Jefferson City	2022	$95	Employment
ROSENBLUM GOLDENHERSH					
Jeffrey B. Hunt	Of-counsel	St. Louis	2021	$385	Commercial litigation
Brian Beck	Shareholder	St. Louis	2021	$370	Commercial litigation
SAINT LOUIS UNIVERSITY					
John Ammann	Attorney	St. Louis	2022	$600	Employment
SANDBERG PHOENIX					
Clayton G. Kuhn	Shareholder	St. Louis	2021	$402	RICO
Andrew R. Kasnetz	Shareholder	St. Louis	2021	$380	RICO
David P. Weiss	Counsel	St. Louis	2021	$315	RICO
Benjamin R. Wesselschmidt	Shareholder	St. Louis	2021	$275	RICO
SCHMIDT BASCH					
Michael A. Becker	Attorney	St. Louis	2022	$350	Bankruptcy
Andrew R. Magdy	Attorney	St. Louis	2022	$265	Bankruptcy
Jennifer M. Scott	Attorney	St. Louis	2022	$225	Bankruptcy
SCHOTTEL & ASSOCIATES					
James W. Schottel Jr.	Partner	St. Louis	2022	$450	Civil rights

IN-STATE

NAME	TITLE	CITY	YEAR	RATE / HOUR	PRACTICE AREA
SHAUGHNESSY LAW FIRM					
Ryan S. Shaughnessy	Partner	O'Fallon, IL	2022	$500	Employment
SIMON LAW FIRM					
Kevin Carnie	Partner	St. Louis	2022	$595	Civil rights
Patrick McPhail	Associate	St. Louis	2022	$450	Civil rights
Amy Sciuto	Paralegal	St. Louis	2022	$275	Civil rights
SIRO SMITH DICKSON					
Eric Smith	Partner	Kansas City	2022	$600	Employment
SPENCER FANE					
Eric L. Johnson	Partner	Kansas City	2021	$560	Bankruptcy
Erik O. Solverud	Partner	Kansas City	2022	$525	Copyright infringement
Stacy N. Harper	Partner	Overland Park, KS	2021	$480	Data privacy
Lisa A. Epps	Partner	Kansas City	2021	$430	Bankruptcy
Andrea M. Chase	Partner	Kansas City	2021	$400	Bankruptcy
Zachary R.G. Fairlie	Associate	Kansas City	2021	$295	Bankruptcy
Lisa F. Wright	Office Administrator	Kansas City	2021	$250	
Shannon M. Spangler	Paralegal	Kansas City	2021	$250	
Sarah E. Estlund	Paralegal	Kansas City	2021	$220	
Daphne V. Rambo	Legal Administrative Assistant	Kansas City	2021	$190	
STOCKMAN LAW					
Reginald Stockman	Partner	North Kansas City	2022	$475	Employment
Reginald Stockman	Partner	North Kansas City	2021	$425	Employment
N/A	Paralegal	North Kansas City	2021	$150	Employment
STUEVE SIEGEL HANSON					
Norman E. Siegel	Senior Partner	Kansas City	2022	$1,125	Class action
J. Austin Moore	Partner	Kansas City	2022	$825	Class action
Lindsay Todd Perkins	Partner	Kansas City	2022	$825	Class action
Yasmin Zainulbhai	Senior Counsel	Kansas City	2022	$650	Class action
SUMMERS COMPTON WELLS					
David Sosne	Member	St. Louis	2022	$395	Bankruptcy
THE MARKS LAW FIRM					
Jonathan D. Marks	Partner	St. Louis	2021	$350	International Child Abduction Remedies Act
THE MCDONOUGH LAW FIRM					
W. Christopher McDonough	Partner	Chesterfield	2022	$500	Employment
THOMAS, BIRDSONG, MILLS, MCBRIDE & OSBORNE					
David A. Osborne	Partner	Rolla	2022	$325	ERISA
THOMPSON COBURN					
Mike Bartolacci	Partner	St. Louis	2021	$440	Interpleader Action
TUETH KEENEY COOPER MOHAN JACKSTADT					
Ian Cooper	Partner	St. Louis	2021	$225	Employment defense
Adam Henningsen	Associate	Edwardsville, IL	2021	$132	Employment defense
UNITED STATES ARBITRATION & MEDIATION					
Robert Litz	Attorney	St. Louis	2022	$425	Mediator
WADDELL LAW FIRM					
A. Scott Waddell	Partner	Prairie Village, KS	2022	$425	Consumer protection
Hannah Huffman	Counsel	Prairie Village, KS	2022	$325	Consumer protection
WILLIAMS LAW					
Michael Williams	Partner	Kansas City	2022	$550	Employment
YECKEL LAW FIRM					
Joseph F. Yeckel	Partner	St. Louis	2022	$350	Appellate



EXHIBIT 3

USAO ATTORNEY'S FEES MATRIX — 2015-2021

Revised Methodology starting with 2015-2016 Year

Years (Hourly Rate for June 1 – May 31, based on change in PPI-OL since January 2011)

Experience	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
31+ years	568	581	602	613	637	665
21-30 years	530	543	563	572	595	621
16-20 years	504	516	536	544	566	591
11-15 years	455	465	483	491	510	532
8-10 years	386	395	410	417	433	452
6-7 years	332	339	352	358	372	388
4-5 years	325	332	346	351	365	380
2-3 years	315	322	334	340	353	369
Less than 2 years	284	291	302	307	319	333
Paralegals & Law Clerks	154	157	164	166	173	180

Explanatory Notes

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared by the Civil Division of the United States Attorney's Office for the District of Columbia (USAO) to evaluate requests for attorney's fees in civil cases in District of Columbia courts. The matrix is intended for use in cases in which a fee-shifting statute permits the prevailing party to recover "reasonable" attorney's fees. *See, e.g.,* 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b) (Equal Access to Justice Act). The matrix has not been adopted by the Department of Justice generally for use outside the District of Columbia, or by other Department of Justice components, or in other kinds of cases. The matrix does **not** apply to cases in which the hourly rate is limited by statute. *See* 28 U.S.C. § 2412(d).

2. A "reasonable fee" is a fee that is sufficient to attract an adequate supply of capable counsel for meritorious cases. *See, e.g., Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010). Consistent with that definition, the hourly rates in the above matrix were calculated from average hourly rates reported in 2011 survey data for the D.C. metropolitan area, which rates were adjusted for inflation with the Producer Price Index-Office of Lawyers (PPI-OL) index. The survey data comes from ALM Legal Intelligence's 2010 & 2011 Survey of Law Firm Economics. The PPI-OL index is available at http://www.bls.gov/ppi. On that page, under "PPI Databases," and "Industry Data (Producer Price Index - PPI)," select either "one screen" or "multi-screen" and in the resulting window use "industry code" 541110 for "Offices of Lawyers" and "product code" 541110541110 for "Offices of Lawyers." The average hourly rates from the 2011 survey data are multiplied by the PPI-OL index for May in the year of the update, divided by 176.6, which is the PPI-OL index for January 2011, the month of the survey data, and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).

3. The PPI-OL index has been adopted as the inflator for hourly rates because it better reflects the mix of legal services that law firms collectively offer, as opposed to the legal services that typical consumers use, which is what the CPI-

Legal Services index measures. Although it is a national index, and not a local one, *cf. Eley v. District of Columbia*, 793 F.3d 97, 102 (D.C. Cir. 2015) (noting criticism of national inflation index), the PPI-OL index has historically been generous relative to other possibly applicable inflation indexes, and so its use should minimize disputes about whether the inflator is sufficient.

4. The methodology used to compute the rates in this matrix replaces that used prior to 2015, which started with the matrix of hourly rates developed in *Laffey v. Northwest Airlines, Inc*. 572 F. Supp. 354 (D.D.C. 1983), *aff'd in part, rev'd in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985), and then adjusted those rates based on the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington-Baltimore (DC-MD-VA-WV) area. The USAO rates for years prior to and including 2014-15 remains the same as previously published on the USAO's public website.

5. The various "brackets" in the column headed "Experience" refer to the attorney's years of experience practicing law. Normally, an attorney's experience will be calculated starting from the attorney's graduation from law school. Thus, the "Less than 2 years" bracket is generally applicable to attorneys in their first and second years after graduation from law school, and the "2-3 years" bracket generally becomes applicable on the second anniversary of the attorney's graduation (*i.e.*, at the beginning of the third year following law school). *See Laffey*, 572 F. Supp. at 371. An adjustment may be necessary, however, if the attorney's admission to the bar was significantly delayed or the attorney did not otherwise follow a typical career progression. *See, e.g., EPIC v. Dep't of Homeland Sec.*, 999 F. Supp. 2d 61, 70-71 (D.D.C. 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate); *EPIC v. Dep't of Homeland Sec.*, 982 F. Supp. 2d 56, 60-61 (D.D.C. 2013) (same). The various experience levels were selected by relying on the levels in the ALM Legal Intelligence 2011 survey data. Although finer gradations in experience level might yield different estimates of market rates, it is important to have statistically sufficient sample sizes for each experience level. The experience categories in the current USAO Matrix are based on statistically significant sample sizes for each experience level.

6. ALM Legal Intelligence's 2011 survey data does not include rates for paralegals and law clerks. Unless and until reliable survey data about actual paralegal/law clerk rates in the D.C. metropolitan area become available, the USAO will compute the hourly rate for Paralegals & Law Clerks using the most recent historical rate from the USAO's former *Laffey* Matrix (*i.e.*, $150 for 2014-15) updated with the PPI-OL index. The formula is $150 multiplied by the PPI-OL index for May in the year of the update, divided by 194.3 (the PPI-OL index for May 2014), and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).

7. The attorney's fees matrices issued by the United States Attorney's Office are intended to facilitate the settlement of attorney's fees claims in actions in which the United States may be liable to pay attorney's fees to the prevailing party and the United States Attorney's Office is handling the matter. The United States Attorney's Office is presently working to develop a revised rate schedule, based upon current, realized rates paid to attorneys handling complex federal litigation in the District of Columbia federal courts. This effort is motivated in part by the D.C. Circuit's urging the development of "a reliable assessment of fees charged for complex federal litigation in the District." *D.L. v. District of Columbia*, 924 F.3d 585, 595 (D.C. Cir. 2019). This new matrix should address the issues identified by the majority in *D.L.*, but it is expected that it will be some time before a new matrix can be prepared. In the interim, for matters in which a prevailing party agrees to payment pursuant to the matrices issued by the United States Attorney's Office, the United States Attorney's Office will not demand that a prevailing party offer the additional evidence that the law otherwise requires. *See Eley*, 793 F.3d at 104 (quoting *Covington v. District of Columbia*, 57 F.3d 1101, 1109 (D.C. Cir. 1995)) (requiring "evidence that [the] 'requested rates are in line with those prevailing in the community for *similar services*'").