

**AFFIDAVIT OF CHRISTIE JESS – KS #78983**

STATE OF MISSOURI     )  
  )  
COUNTY OF PLATTE     )

1. I, Christie Jess, make the following declaration based on my personal knowledge.
2. The hours I spent representing Colleen Stuart and Jana Harden are set forth in the attached spreadsheet. As outlined in the spreadsheet, I spent 522.4 hours on this matter. The hours I worked on this case were reasonably necessary to prosecute this case successfully.
3. I graduated from the Oklahoma City Law School in 1993. I began my legal career in the United States Virgin Islands in 1993 and moved to the state of Missouri in 1995 when I was admitted to the Missouri Bar. I am a member of the the United States Western District Court of Missouri and the United States District Court of Kansas.
4. Since 2009, I have been an active member of the National Employment Lawyers Association (NELA) Kansas City Chapter. Being an active member of NELA has helped increase my knowledge, experience and expertise in prosecuting employment discrimination cases.
5. Since 2001, I have been an active Kansas City Metropolitan Bar Association (KCMBA) member, serving on the Labor and Employment Committee in various years.
6. Since 2009 I have been a partner in the Employee Rights Law Firm, in which the practice is, and primarily always has been, devoted to representing plaintiffs in employment discrimination, retaliation, and whistleblowing cases.
7. Since becoming a licensed attorney, I have been involved in numerous jury and bench trials, many of which were resolved before a verdict was rendered.

8. In 2014 on two separate occasions, I was selected by the Platte County, Missouri Judicial Committee as a finalist for the judicial appointment of an associate circuit judge by the Missouri governor.

9. Both Mark Jess and I are contacted regularly by the press to provide legal opinions on employment law cases, legislation and other notable events affecting employees and employment law matters.

10. I have been involved in several appeals to the Missouri Court of Appeals, Western District. Two were employment discrimination cases and one was a domestic family law case.

a. *Howard v. City of Kansas City*, 332 S.W.3d 772, 776 (Mo. 2011)

b. *Whitworth v. McBride & Son Homes, Inc.*, 344 S.W.3d 730 (Mo.App. W.D. 2011)

c. *Loraine Jenkins v. Paul Austin*, WD68302

11. I have tried twenty two criminal jury trials and six civil employment law jury trials. I have tried numerous bench trials including criminal, adult abuse, collections, domestic relations, juvenile, and civil matters, including a child sex abuse case, *Presely v. Presley*, Case No. 1516-CV09692, in which the judge awarded a verdict for \$3,000,000 against a Defendant. This was a pro bono case in which we did not seek attorneys fees. I have also tried two employment discrimination cases through arbitration.

12. I have argued before the Missouri Western District Court of Appeals and have practiced in 29 counties in the state of Missouri, three counties in the state of Kansas, in the U.S. Western District Court of Missouri and the U.S. District Court of Kansas. In my 29 years of practice before so many judges, in so many venues, against numerous great attorneys including the attorneys in this case, which developed my expertise, and skill, I believe a rate of \$600.00 is reasonable for the services I rendered in this case. This rate is within the range of those customarily

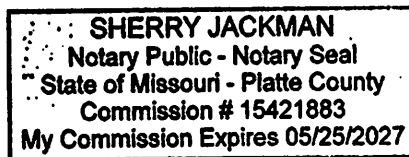
charged by lawyers of my experience and skill and in line with the prevailing market rates in the area for attorneys like me.

13. As told to the Court, I completely lost hearing in my right ear and can no longer be an attorney taking witnesses during a jury trial. With this physical impairment, during trial my role switches to that of a support role and my hourly rate is \$150.00. This is reflected in my fee spreadsheet.

14. Accordingly, my fee calculation for this case, submitted herein as Exhibit 1, is based on an hourly rate of \$600.00 and \$150.00 during trial.

  
Christie Jess

Subscribed and sworn to before me this 7<sup>th</sup> day of NOV, 2024



  
NOTARY PUBLIC

My Commission Expires:

5/25/2027

**Billable Hours Tracker**

CHRISTIE JESS

<b>Total Billable Hours</b>
<b>523.10</b>
<b>\$ 285,720.00</b>

**Instructions**

1. Enter DATE, CLIENT, DESCRIPTION OF WORK/PROJECT and HOURLY RATE in their respective columns.

2\*. When ready to begin, select the cell in TIME STARTED, then press the ENTER CURRENT TIME button.

3\*. When you're ready to stop, select the cell in TIME ENDED, then press the ENTER CURRENT TIME button.

TOTAL TIME, NUMBER OF HOURS, and BILLABLE HOURS will autopopulate once start time and end time have been entered. The BILLABLE HOURS column converts the time spent into billable hours.

\*The ENTER CURRENT TIME button will enter the current time in any cell you select. Macros must be enabled to use this function. Regional settings may vary.

- OC= opposing counsel**
- C= court**
- CC = co-counsel**
- D = draft**
- R = review**
- RT = respond to**
- A = attend**
- RS = research**
- Depo = Deposition**
- Med = Mediation**
- LR = Larry Rute - mediator**
- Corresp = Email, letter, text**
- PL = pleading**

Date	Client	Total Time	Billable Hours	Description of Work/Project	Hourly Rate	Billable \$
1/13/22	Stuart v. Topeka	0.20	0.20	review email from potential client/draft email to potential client	\$600.00	\$ 120.00
1/20/22		0.30	0.30	R clients timeline	\$600.00	\$ 180.00
1/22/22		0.40	0.40	D clients' fee agreements, R signed agreement, set up file in Dropbox	\$600.00	\$ 240.00
1/22/22		0.30	0.30	R & RT to co-counsel Corresp regarding type of claims to assert	\$600.00	\$ 180.00
2/1/22		1.00	1.00	RS types of claims to assert	\$600.00	\$ 600.00
2/4/22		1.20	1.20	T/C Mtg clients and MJ	\$600.00	\$ 720.00
2/16/22		0.20	0.20	R representation and spoliation letter to Defendant	\$600.00	\$ 120.00
2/17/22		0.15	0.15	R Corresp from clients (JH, CS)	\$600.00	\$ 90.00
2/17/22		0.10	0.10	R Corresp from CC	\$600.00	\$ 60.00
2/7/22		0.75	0.75	T/C Mtg w/ J.C.	\$600.00	\$ 450.00
2/14/22		0.10	0.10	R Corresp from CC Re: 1983	\$600.00	\$ 60.00
2/18/22		0.20	0.20	R Corresp from JH (3 emails)	\$600.00	\$ 120.00
2/19/22		0.10	0.10	RT Corresp fr/ JH	\$600.00	\$ 60.00
2/21/22		1.00	1.00	R 13 emails fr/ CC and Clients re: demand letter to City of Topeka	\$600.00	\$ 600.00
2/23/22		0.50	0.50	R 5 emails from Clients and CC	\$600.00	\$ 300.00
3/23/22		1.00	1.00	FaceTime meeting with clients in Topeka	\$600.00	\$ 600.00
3/7/22		0.20	0.20	R correspondence from JH and CC	\$600.00	\$ 120.00
3/14/22		0.30	0.30	R 3 emails from MJ, CS regarding update	\$600.00	\$ 180.00
3/22/22		0.40	0.40	Email 4 correspondence w JH and CS	\$600.00	\$ 240.00
4/17/22		0.60	0.60	R 6 Email w/ COD draft and questions CS/JH	\$600.00	\$ 360.00
4/20/22		0.20	0.20	R 2 emails from JC re: COD	\$600.00	\$ 120.00
5/2/22		0.30	0.30	R 3 emails from JH, CS and JC re: CODs	\$600.00	\$ 180.00
5/9/22		0.10	0.10	R JC email re: COD	\$600.00	\$ 60.00
5/17/22		0.20	0.20	R MJ CS emails re COD	\$600.00	\$ 120.00
5/19/22		0.20	0.20	R MJ and JH emails re COD	\$600.00	\$ 120.00

DE = docket entry

Mtg = meeting

5/23/22		1.40	1.40	R 3 Emails from KS EEOC Intake , save info to Dropbox, notify clients	\$600.00	\$ 840.00
5/24/22		0.40	0.40	R 4 emails from MJ re: EEOC	\$600.00	\$ 240.00
5/24/22		0.50	0.50	R email from EEOC, provide information requested	\$600.00	\$ 300.00
6/6/22		0.30	0.30	R Email from JH and MJ re: concerns at work	\$600.00	\$ 180.00
6/10/22		0.20	0.20	R Email from EEOC re: CS	\$600.00	\$ 120.00
6/15/22		0.20	0.20	R email from JC re: EEOC filing	\$600.00	\$ 120.00
7/25/22		0.10	0.10	R Email from MJ r: Info requested by EEOC Harden	\$600.00	\$ 60.00
8/15/22		0.20	0.20	R email from JC re: HR findings	\$600.00	\$ 120.00
8/23/22		0.20	0.20	R email fr EEOC re: CS	\$600.00	\$ 120.00
9/26/22		1.00	1.00	R email and attachment from JH re: Def position statement with EEOC	\$600.00	\$ 600.00
9/27/22		0.10	0.10	R email fr CS re: Def Position stmt w EEOC	\$600.00	\$ 60.00
10/11/22		0.50	0.50	R 3 emails from EEOC re: FOIA request	\$600.00	\$ 300.00
10/26/22		0.50	0.50	R 3 emails from EEOC re: CS, JH and JC RTS ltrs	\$600.00	\$ 300.00
10/28/22		0.10	0.10	R Email from JC re: RTS	\$600.00	\$ 60.00
11/21/22		0.40	0.40	R Email from CS r:Wheeles / attachment	\$600.00	\$ 240.00
11/30/22		0.50	0.50	R MJ email and attach re: Dkan Local Rules	\$600.00	\$ 300.00
12/27/22		1.10	1.10	R MJ Email and convert Dkan Complaint to Word	\$600.00	\$ 660.00
12/29/22		0.20	0.20	R MJ Email re: Complaint first draft	\$600.00	\$ 120.00
12/29/22		2.30	2.30	R Complaint draft for corrections and formatting	\$600.00	\$ 1,380.00
1/8/23		0.30	0.30	R 3 emails from JC ltr received from HR	\$600.00	\$ 180.00
1/11/23		0.50	0.50	R MJ email re: complaint changes	\$600.00	\$ 300.00
1/15/23		0.20	0.20	R emails from MJ and EP re: co counsel	\$600.00	\$ 120.00
1/19/23		0.30	0.30	R KSD CMECF entry for case filing	\$600.00	\$ 180.00
1/19/23		0.90	0.90	File case complaint	\$600.00	\$ 540.00
1/19/23		2.00	2.00	Email to Court re: summons and preparation of summons	\$600.00	\$ 1,200.00
1/19/23		0.20	0.20	email from WIBW-TV re: information about lawsuit/ R MJ	\$600.00	\$ 120.00
1/19/23		0.10	0.10	email from Tim Hrenchir at Topeka Capital-Journal re: lawsuit	\$600.00	\$ 60.00
1/19/23		0.50	0.50	R 5 emails from clients and MJ re: concerns about publicity	\$600.00	\$ 300.00
1/20/23		0.40	0.40	R 4 emails from clients and MJ re: concerns that story was published	\$600.00	\$ 240.00
1/20/23		1.30	1.30	R 9 emails from City and MJ re: service of process	\$600.00	\$ 780.00

1/26/23		0.10	0.10	R Email fr CS	\$600.00	\$ 60.00
1/27/23		0.10	0.10	R Email response from MJ to CS	\$600.00	\$ 60.00
2/7/23		0.20	0.20	r KSD CMECF entry for Wheeles ext of time to respond	\$600.00	\$ 120.00
2/7/23		0.20	0.20	r KSD CMECF entry setting initial scheduling dates	\$600.00	\$ 120.00
2/7/23		0.80	0.80	calendar dates and notify clients	\$600.00	\$ 480.00
2/7/23		1.20	1.20	R email from P Gragson re:scheduling order, Emails from	\$600.00	\$ 720.00
2/20/23		0.20	0.20	R email from JH re: 4th major position	\$600.00	\$ 120.00
2/20/23		2.30	2.30	t/c discussions regarding JH's offer t/c with P. Gragson and subsequent	\$600.00	\$ 1,380.00
2/22/23		1.30	1.30	call with clients re: promotion	\$600.00	\$ 780.00
2/22/23		1.30	1.30	R 9 emails with Playters, clients andMJ re: promotions	\$600.00	\$ 780.00
2/23/23		0.40	0.40	R 4 emails from court, clients and MJ regarding Def Answers filed today	\$600.00	\$ 240.00
2/23/23		0.60	0.60	Review Defendant's Answer	\$600.00	\$ 360.00
2/24/23		2.00	2.00	R 11 emails between attorneys and clients regarding strategy of	\$600.00	\$ 1,200.00
2/24/23		1.30	1.30	R Court's order regarding planning scheduling, calendar and notify	\$600.00	\$ 780.00
2/27/23		0.80	0.80	Review court's order, look at calendar for available dates, Email to	\$600.00	\$ 480.00
2/27/23		1.30	1.30	R and email (9 total) w/ clients, OC, co-counsel re: J. Wheeles and	\$600.00	\$ 780.00
2/28/23		0.10	0.10	R Email from CS r: settinga meeting to discuss status	\$600.00	\$ 60.00
3/1/23		0.40	0.40	R 4 emails w/ OC, Co-counsel and MJ re: J. Wheeles	\$600.00	\$ 240.00
3/2/23		2.10	2.10	r: 13 emails re: J. Wheeles w/ OC, Co-counsel, MJ and JH and JC	\$600.00	\$ 1,260.00
3/6/23		0.40	0.40	email to OC and R email from OC re: scheduling meeting	\$600.00	\$ 240.00
3/10/23	meeting	2.30	2.30	Prepare scheduling order and hve scheduling confence w/ OC	\$600.00	\$ 1,380.00
3/23/23		0.20	0.20	Email exchange w/ OC re: scheduling Order of Rule 26 disclosures	\$600.00	\$ 120.00
3/23/23		0.20	0.20	R: emails JC re: rules of conduct	\$600.00	\$ 120.00
3/23/23		0.70	0.70	R redlined scheduling order fr/ oc, exchange emails.	\$600.00	\$ 420.00
3/23/23		0.70	0.70	review rule 26 disclosures	\$600.00	\$ 420.00
3/24/23		0.20	0.20	R emails from CP andJC re: rule 26 disclosures	\$600.00	\$ 120.00
3/24/23		0.40	0.40	email and rec email w/ oc's office re: information needed to file sch	\$600.00	\$ 240.00
3/25/23		0.30	0.30	emails re: scheduling order (3)	\$600.00	\$ 180.00
3/27/23		0.20	0.20	R email from Schwartz re: OC info	\$600.00	\$ 120.00
3/27/23		0.90	0.90	R Defendant's initial Rule 26 disclosures, file w/ dropbox, provide	\$600.00	\$ 540.00
4/5/23		1.50	1.50	prepare and attend scheduling conference held	\$600.00	\$ 900.00
4/5/23		0.10	0.10	Review docket entry (2 entries)	\$600.00	\$ 60.00

4/5/23		1.20	1.20	calendar dates and notify clients, discuss status	\$600.00	\$ 720.00
4/6/23		2.10	2.10	Prepare Motion and Protective Order for OC's consideration, email to OC	\$600.00	\$ 1,260.00
4/6/23		0.40	0.40	R Email from MJ and OC re:Protective order(4)	\$600.00	\$ 240.00
4/6/23		0.40	0.40	file motin for joint protective order with the court and send a courtesy	\$600.00	\$ 240.00
4/11/23		0.50	0.50	R CS retirement and damage calculations	\$600.00	\$ 300.00
4/12/23		0.50	0.50	R JC Retirment and damage calculaions	\$600.00	\$ 300.00
4/12/23		0.40	0.40	R emotional distress matrix meeting w/ co-counsel regarding	\$600.00	\$ 240.00
4/12/23		1.50	12.00	demand	\$600.00	\$ 7,200.00
4/12/23		0.90	0.90	t/c with plaintiffs regarding initial demand	\$600.00	\$ 540.00
4/12/23		0.10	0.10	R. MJ initial demand to OC	\$600.00	\$ 60.00
4/13/23		0.20	0.20	R email from Schwartz chambers re: protective order	\$600.00	\$ 120.00
4/13/24		0.30	0.30	R KSD CMECF entry for case filing (2 filings)	\$600.00	\$ 180.00
4/13/23		0.50	0.50	R email from CP re: medical record release concerns/discussions w/ MJ	\$600.00	\$ 300.00
4/13/23		0.50	0.50	R Email from CS with attachments re: promotional process	\$600.00	\$ 300.00
4/18/23		0.30	0.30	R 3 email from OC r: rue 26 docs	\$600.00	\$ 180.00
4/19-4/30		4.00	4.00	Review documents produced with initial disclosures	\$600.00	\$ 2,400.00
4/18/23		3.40	3.40	JH production of documents, review and prepare for production	\$600.00	\$ 2,040.00
4/20/23		3.00	3.00	Rec and Review Def first discovery requests to plaintiffs including	\$600.00	\$ 1,800.00
4/20/23		0.10	0.10	R KSD CMECF entry for Def discov email disc to plaintiffs, email	\$600.00	\$ 60.00
4/20/23		0.60	0.60	exchanges regarding completion and discussion with MJ re: changes to	\$600.00	\$ 360.00
4/20/23		1.00	1.00	protective order and whether to	\$600.00	\$ 600.00
4/21/23		0.10	0.10	r MJ email to schwartz chambers re: protective order change	\$600.00	\$ 60.00
4/21/23		0.50	0.50	r 4 emails from oc/mj/court re: protective order changes requested	\$600.00	\$ 300.00
4/22/23		0.10	0.10	R email from JC re meeting	\$600.00	\$ 60.00
4/25/23		0.80	0.80	r email from court with attachment re: protective order issue, calendar	\$600.00	\$ 480.00
4/25/23		2.10	2.10	R defendants' counter offer, discuss with co-counsel and clients	\$600.00	\$ 1,260.00
4/25/23		0.40	0.40	r email from oc and MJ regarding setting up call to discuss protective	\$600.00	\$ 240.00
4/26/23		1.50	1.50	T/C meetingw/ OC MJ to discuss protective order issue / prepare for	\$600.00	\$ 900.00
4/26/23		0.50	0.50	r emails between MJ and OC re: meeting and records w attachments	\$600.00	\$ 300.00
4/20-5/1/23		7.30	7.30	Prepare first draft discovery to defendant	\$600.00	\$ 4,380.00
5/1/23		1.40	1.40	email to CP and re email response re: discovery requests to Def w	\$600.00	\$ 840.00
5/1/23		0.10	0.10	R email from MJ re: drafting of protective order issues	\$600.00	\$ 60.00

5/1/23		0.10	0.10	R MJ email to OC re: medical records	\$600.00	\$ 60.00
5/5/23		1.10	1.10	R Email w/ discovery drafted responses from JC - review	\$600.00	\$ 660.00
5/7/23		1.50	1.50	R email w/ attachments from JH re: discovery responses	\$600.00	\$ 900.00
5/8/23		0.50	0.50	R emails from and to MJ/OC re: medical records	\$600.00	\$ 300.00
5/9/23		1.70	1.70	R Email from Schwartz re: court needing the mediation statement	\$600.00	\$ 1,020.00
5/9/23		0.30	0.30	Send Email and R emails between MJ and OC re: meeting and records	\$600.00	\$ 180.00
5/9/23		0.10	0.10	R KSD CMECF entry for Plt discov	\$600.00	\$ 60.00
5/9/23		0.90	0.90	Meeting w/ MJ and R MJ's settlement report to Schwartz and	\$600.00	\$ 540.00
5/9/23		0.30	0.30	R CS discovery responses	\$600.00	\$ 180.00
5/10/23		0.70	0.70	R JC discovery response updated information added to dropbox	\$600.00	\$ 420.00
5/10/23		0.20	0.20	R emails between OC and MJ re: medical records	\$600.00	\$ 120.00
5/12/23		1.00	1.00	R email from JC r: updated docs and information to her discovery	\$600.00	\$ 600.00
5/15/23		0.10	0.10	R email from JC re: status	\$600.00	\$ 60.00
5/16/23		2.00	2.00	review CP objections and answers to discovery responses that he prepared	\$600.00	\$ 1,200.00
5/18/23		0.50	0.50	Rec and review Schwartz minute entry to choose a mediator.	\$600.00	\$ 300.00
5/19/23		0.20	0.20	R email from OC regarding a mediator. MJ email to OC regarding	\$600.00	\$ 120.00
5/22/23		0.40	0.40	R JH interrogatory draft responses	\$600.00	\$ 240.00
5/22/23		0.40	0.40	R JH executed authorization, download and file in dropbox	\$600.00	\$ 240.00
5/19/23-5/24		0.50	0.50	several emails between CJ, MJ and OC re: mediator	\$600.00	\$ 300.00
5/25/23		0.40	0.40	emails between Larry Rute/Mediator office regarding setting up mediation	\$600.00	\$ 240.00
5/26/23		0.10	0.10	Email from JC w/ her executed verification page	\$600.00	\$ 60.00
5/30/23		0.40	0.40	emails w/ CP and clients and MJ re: scheduling mediation July 7th.	\$600.00	\$ 240.00
5/30-6/1/23		0.40	0.40	emails w/ OC and CJ regarding mediation and Def intent on a GRL	\$600.00	\$ 240.00
6/2/23		0.20	0.20	emails with Larry Rutes office	\$600.00	\$ 120.00
6/2/23		0.20	0.20	schedling and confirming mediation	\$600.00	\$ 120.00
6/2/23		0.20	0.20	Email w/ JC re: mediaiton	\$600.00	\$ 120.00
6/2/23		0.90	0.90	Receive and review Def GRL, discuss with Co Counsel	\$600.00	\$ 540.00
6/4/23		3.20	3.20	Research and prepare to respond to OC's GRL,discuss with clients and MJ	\$600.00	\$ 1,920.00
6/6/23		0.40	0.40	R OC email re: ext of time to answer discovery and ask for t/c on Def GRL,	\$600.00	\$ 240.00
6/7/23		2.10	2.10	t/c meeting w/ OC and MJ to discuss Def GRL, prepare for same	\$600.00	\$ 1,260.00
6/7/23		0.30	0.30	R email from OC w/ proposed order attachment and corre to schwartz	\$600.00	\$ 180.00
6/8/23		0.30	0.30	R JC medical/prescription records	\$600.00	\$ 180.00
6/8/23		0.10	0.10	R Email from Schwartz re: Def Order	\$600.00	\$ 60.00

6/9/23		0.10	0.10	R KSD CMECF entry for Def motion	\$600.00	\$ 60.00
6/9/23		0.20	0.20	Review Def Motion to Ext Disc	\$600.00	\$ 120.00
6/12/23		0.40	0.40	Email to OC and Rec response re: medical reoccrds	\$600.00	\$ 240.00
6/12/23		0.10	0.10	Receive email from Court Clerk	\$600.00	\$ 60.00
6/12/23		0.20	0.20	R KSD CMECF entry of Schwartz docket entry	\$600.00	\$ 120.00
6/12/23		2.00	2.00	Rec and Review Def discovery written responses both city and	\$600.00	\$ 1,200.00
6/13/23		0.10	0.10	R KSD CMECF entry for Def discovery responses	\$600.00	\$ 60.00
6/14/23		0.20	0.20	R Email from OC re: JC communications	\$600.00	\$ 120.00
6/15/23		0.20	0.20	draft email to OC re: medical records	\$600.00	\$ 120.00
6/15/23		0.30	0.30	send and receive emails w/ OC re: Def document production	\$600.00	\$ 180.00
6/15/23		2.40	2.40	download email documents and do an initial review of format, send def responses to clients, receive	\$600.00	\$ 1,440.00
6/15/23		1.50	1.50	input from JC re: Defendant's Document production of some of the	\$600.00	\$ 900.00
6/16/23		2.50	2.50	documents defendant is producing,	\$600.00	\$ 1,500.00
6/16/23		0.20	0.20	Email from OC re: JH personal email	\$600.00	\$ 120.00
6/24/23		0.30	0.30	Email to assistant re: document spreadsheet	\$600.00	\$ 180.00
6/26/23		0.30	0.30	R Email tr/ OC Re Stuart stipulation to discovery w/ attachment	\$600.00	\$ 180.00
Jun-23		0.20	0.20	R Email from MJ to Mediator w attachment	\$600.00	\$ 120.00
7/5/23		0.40	0.40	R email tr/ OC re: mediation (2 emails and 2 drafts)	\$600.00	\$ 240.00
7/7/23		2.70	2.70	Attend Zoom Mediaiton, t/c with clients	\$600.00	\$ 1,620.00
7/6/23		0.40	0.40	Rec documents from Defendant's attorney/download documents	\$600.00	\$ 240.00
1/14/22		1.50	1.50	Initial meeting w/ CS, JH, MJ,CJ	\$600.00	\$ 900.00
2/8/22		0.70	0.70	initial meeting w/ JC, MJ, CJ	\$600.00	\$ 420.00
2/7/22		0.90	0.90	Case file set up CS, JH, JC	\$600.00	\$ 540.00
4/17-5/3/22		7.50	7.50	Prepare COD, Exhibit A, Entry of Appearance, Cover Letter for CS, JH, Prepare initial formatted styling of	\$600.00	\$ 4,500.00
12/7/22		0.60	0.60	complaint for MJ	\$600.00	\$ 360.00
1/18/23		1.60	1.60	Prepare Conf Filing Sheet, Summons for complaints filing with D Kan	\$600.00	\$ 960.00
5/26/23		5.60	5.60	Prepare Rule 26 Disclosures for CS, JH and CS, gather and review docs, Prepare intial discovery requests,	\$600.00	\$ 3,360.00
5/8/23		9.30	9.30	interrogs, RFPDs to City of Topeka	\$600.00	\$ 5,580.00
9/12/23		3.10	3.10	Prepare 2nd RFPD and interr to City of Topeka, verificaiton page and COD	\$600.00	\$ 1,860.00
3/1/24		16.70	16.70	Prepare Plaintiffs' additional facts to SJ response	\$600.00	\$ 10,020.00
8/30/23		8.40	8.40	Defend deposition of Jana Harden	\$600.00	\$ 5,040.00
8/31/23		8.10	8.10	Defend depoiiton of Colleen Stuart	\$600.00	\$ 4,860.00

9/1/23		7.90	7.90	Defend deposition of Jennifer Cross	\$600.00	\$ 4,740.00
9/5-10/16/23		28.00	28.00	Attend depositions of Bryan Wheeles, Monasmith, Hanika,	\$600.00	\$ 16,800.00
10/16/23		6.70	6.70	Prepare and Take the deposition of Jeralyn Wheeles' first deposition	\$600.00	\$ 4,020.00
9/5-11/8/23		14.00	14.00	Travel for depositions (7 trips) to Topeka.	\$600.00	\$ 8,400.00
7/7 and 10/9/23		2.00	2.00	Prepare Damage Calculations for 1st and 2nd mediations	\$600.00	\$ 1,200.00
9/3-11/8/23		15.00	15.00	Review and pull documents and put together exhibits for depositions of	\$600.00	\$ 9,000.00
9/3/-11/8/23		1.80	1.80	Prepare Notice of Depositions for B. Wheeles, J. Wheeles (2), J.	\$600.00	\$ 1,080.00
9/1-9/15/24		46.00	46.00	Prepare Deposition outlines for B. Wheeles, 2 J. Wheeles, S. Wade,	\$600.00	\$ 27,600.00
8/28/23		8.00	8.00	Prepare Plaintiffs' for deposition including travel to Topeka	\$600.00	\$ 4,800.00
9/16-9/19/24		31.00	31.00	Attend Court for jury trial	\$150.00	\$ 4,650.00
9/10/24		4.50	4.50	Add updated necessary documents to Exhibit List and prepare Witness	\$600.00	\$ 2,700.00
9/11/24		6.30	6.30	download exhibit list to jumpdrive, bring to court clerk, work with third	\$600.00	\$ 3,780.00
9/9/24		0.50	0.50	Download and prepare trial subpeona for J. Cross	\$600.00	\$ 300.00
9/9-9/15/24		27.40	27.40	Preparing team for trial, getting together supplies, getting copies of	\$150.00	\$ 4,110.00
9/16-9/19/24		2.90	2.90	Review daily docket entries for trial and court's final entry. Review Local		\$ -
10/8/24		0.30	0.30	Confer with OC re: attorneys fees and costs	\$600.00	\$ 180.00
7/5/23		1.70	1.70	Review Def Disc Responses and Prepare GRL - mail to OC	\$600.00	\$ 1,020.00
7/7/23		0.10	0.10	R email from OC re: GRL	\$600.00	\$ 60.00
7/20/23		0.80	0.80	Re, Rev, and draft emails to/from MJ, OC and me re: scheduling of	\$600.00	\$ 480.00
7/25/23		0.30	0.30	R and Rev email from Schwartz re: mediation report due, calendar,	\$600.00	\$ 180.00
7/25/23		0.40	0.40	4 emails to/from clients re: depositions	\$600.00	\$ 240.00
7/28/23		0.40	0.40	R and Rev email from OC re: depositions and follow up with JH	\$600.00	\$ 240.00
8/1/23		0.30	0.30	Rec, Rev and Draft emails with clients re: deposition schedules of	\$600.00	\$ 180.00
8/2/23		0.30	0.30	Rec, Rev and Draft emails with clients re: deposition schedules of	\$600.00	\$ 180.00
8/2/23		0.70	0.70	Rec, Rev and Draft email w/OC re: deposition schedule, calendar depos	\$600.00	\$ 420.00
8/3/23		0.30	0.30	R and Rev Court entry of plaintiffs depositions	\$600.00	\$ 180.00
8/4/23		0.50	0.50	emails to/from JC CS JH re: deposition schedule and prep	\$600.00	\$ 300.00
8/4/23		0.80	0.80	Rec and Rev Court's docket entry of depositions filed and to be taken by	\$600.00	\$ 480.00
8/4/23	Re	0.30	0.30	R, Rev and draft emails with JC CS and JH, MJ re: deposition prep	\$600.00	\$ 180.00
8/7/23		0.40	0.40	R and Rev and Draft emails with Chris Playter and Eric Playter re: who	\$600.00	\$ 240.00
8/10/23		0.50	0.50	Initial Review spreadsheet of Defendant's produced documents	\$600.00	\$ 300.00
8/18/23		0.20	0.20	Draft and receive email w/ Chris Playter re: spreadsheet of docs	\$600.00	\$ 120.00

8/28/23		0.40	0.40	R & R emails fr/ Sean McCauley, OC and MJ re: his attendance at Eubanks	\$600.00	\$	240.00
8/28/23		0.20	0.20	R & R emails with OC Re: Zoom set up of deposition and use of	\$600.00	\$	120.00
8/29/23		0.30	0.30	R & Rev emails w/OC, CP, MJ re: Zoom link for depositions and	\$600.00	\$	180.00
9/1/23		0.60	0.60	Court Reporter confirmation of depositions to be taken by plaintiffs	\$600.00	\$	360.00
9/4/23		0.40	0.40	email w/ attach from CS re: B. Wheeles deposition	\$600.00	\$	240.00
9/4/23		0.10	0.10	R & Rev invoice for JH deposition.	\$600.00	\$	60.00
9/4/23		0.30	0.30	Emails from JC r: B. Wheeles docs for Deposition	\$600.00	\$	180.00
9/4/23		0.30	0.30	Emails w/ OC re: missing exhibits from Court reporter	\$600.00	\$	180.00
9/5/23		0.20	0.20	Email with court reporter re: confirmation of Monasmith and	\$600.00	\$	120.00
9/5/23		0.20	0.20	Email from OC re: City policy Attachment	\$600.00	\$	120.00
9/5/23		0.30	0.30	Emails w Court Reporter re: anticipated length of depo and	\$600.00	\$	180.00
9/6/23		0.30	0.30	Emails w/ court reporter re: eubanks, maisberger and russell dep confirm	\$600.00	\$	180.00
9/6/23		0.30	0.30	Emails from clients re: Russell, Maisberger and Eubanks depo,	\$600.00	\$	180.00
9/7/23		0.30	0.30	Emails w/ court reporter re: wade, hanika deposition confirmation	\$600.00	\$	180.00
9/7/23		0.20	0.20	Emails w/ Court Reporter, change from Wade to Maisburger on	\$600.00	\$	120.00
9/10/23		0.60	0.60	6 emails w/ clients and MJ re: second discovery requests to Def.	\$600.00	\$	360.00
9/12/23		1.00	1.00	File COS w/ court - 2nd Disc to DEF, 6 emails w/ clients and MJ re:	\$600.00	\$	600.00
9/13/23		0.20	0.20	emails w/ OC re: October 9 mediation w/ Larry Rute	\$600.00	\$	120.00
9/13/23		0.20	0.20	emails w/ Larry Rute confirming mediation 10/9/23	\$600.00	\$	120.00
9/14/23		0.20	0.20	Emails w/ court reporter re: invoice	\$600.00	\$	120.00
9/20/23		0.90	0.90	R and Rev First RFA to Plaintiffs, send to clients, calendar date due	\$600.00	\$	540.00
9/21/23		0.20	0.20	R B. Wheeles Transcript, download to dropbox, forward to clients	\$600.00	\$	120.00
9/21/23		0.10	0.10	Re and Re invoice for B. Wheeles Depo from Court Reporter	\$600.00	\$	60.00
9/21/23		1.60	1.60	R & Rev depo transcripts of JC, JH and CS. Missing exhibits, forward to	\$600.00	\$	960.00
9/22/23		2.20	2.20	r & rev suppl rule 26 disc w/ documents, download to dropbox,	\$600.00	\$	1,320.00
9/22/23		0.20	0.20	Emails w/ OC re: mediaiton date Rec and Rev Docket entry of Def	\$600.00	\$	120.00
9/22/23		0.10	0.10	Suppl Initial Disclosures COS	\$600.00	\$	60.00
9/26/23		0.40	0.40	Emails w/ OC re: depo schedule of Haltom and J. Wheeles, Calendar,	\$600.00	\$	240.00
9/26/23		0.10	0.10	email w/ Chris Playter re: J. Wheeles deposition	\$600.00	\$	60.00
9/27/23		0.50	0.50	R & Rev Monasmith and Cochran transcript and exhibits. Download to	\$600.00	\$	300.00
9/28/23		0.20	0.20	R & Rev invoice from Ct Reporter, Monasmith and Cochran	\$600.00	\$	120.00
10/3/23		0.20	0.20	Emails w/ OC re: Purny and Wade Deposition schedule	\$600.00	\$	120.00

10/3/23		0.20	0.20	Emails w/ JC re: questions for Purney deposition	\$600.00	\$	120.00
10/5/23		0.20	0.20	Email from CS w/ Attachment, News article	\$600.00	\$	120.00
10/5/23		0.50	0.50	Email w/ Larry Rute & MJ, t/c with Larry and MJ re: mediation	\$600.00	\$	300.00
10/9/23		0.20	0.20	R, Rev and draft emails w/ OC and MJ re: purney deposition	\$600.00	\$	120.00
10/10/23		0.30	0.30	Rev Docket entries of depositions	\$600.00	\$	180.00
10/10/23		0.50	0.50	Purney, Wade, J. Wheelles schedule Purney, J. Wheelles, Haltom	\$600.00	\$	300.00
10/10/23		0.20	0.20	Wade for depositions w Court R and Rev invoice for mediaiton, share with clients and file in dropbox	\$600.00	\$	120.00
10/10/23		0.20	0.20	Exchange emails w/OC re: location of depositions	\$600.00	\$	120.00
10/11/23		0.60	0.60	Look for missing exhibits, email w/ Court Reporter, OC, MJ and CP	\$600.00	\$	360.00
10/12/23		0.20	0.20	Rec and Rev Court Reporter depo postponed J. Wheelles	\$600.00	\$	120.00
10/12/23		0.60	0.60	R & Rev email, w/ 2nd Disc Def Responses w/ attachments, forward Confirmation from Court Reporter -	\$600.00	\$	360.00
10/13/23		0.20	0.20	S. Wade depo	\$600.00	\$	120.00
10/13/23		2.90	2.90	Re and Rev link w/ documents produced by Def (PSU Files)	\$600.00	\$	1,740.00
10/13/23		0.20	0.20	Confirmation w/ Court Reporter re: Wade and J. Wheelles depositions	\$600.00	\$	120.00
10/15/23		0.90	0.90	R & Rev email from JC w/ questions for Wade and J. Wheelles' deposition,	\$600.00	\$	540.00
10/15/23		0.30	0.30	R & Rev Transcript of Maisberger from Eric Playter, download to	\$600.00	\$	180.00
10/17/23		0.80	0.80	Emails between OC, MJ and me re: document production by Def.	\$600.00	\$	480.00
10/18/23		0.90	0.90	S email exchange between OC and MJ/me re: Def documents to be	\$600.00	\$	540.00
10/18/23		0.50	0.50	multiple emails in exchange w/ JC and MJ re: Hanika investigative file	\$600.00	\$	300.00
10/19/23		1.00	1.00	Meeting w/ MJ re: documents held in a "Vault" and strategy moving	\$600.00	\$	600.00
10/19/23		0.50	0.50	Email exchange w/ OC and MJ re: vaulted documents and trying to	\$600.00	\$	300.00
10/18/23		1.70	1.70	Prepare Plaintiff's Answers to RFA, COS	\$600.00	\$	1,020.00
10/20/23		0.10	0.10	Email/Serve Def w/ Plaintiffs Answers to RFA and COS	\$600.00	\$	60.00
10/20/23		0.10	0.10	Review Docket Entry of COS	\$600.00	\$	60.00
10/20/23		0.30	0.30	Re suppl documents from OC, Download to Dropbox	\$600.00	\$	180.00
10/20/23		0.20	0.20	R & Rev Email exchg MJ/OC re: documents, jump drive	\$600.00	\$	120.00
10/24/23		0.40	0.40	R & Rev emails from OC and MJ re: email to send to Schwartz re:	\$600.00	\$	240.00
10/24/23		1.70	1.70	R & Rev Mudrick's invest file from OC, discuss with MJ	\$600.00	\$	1,020.00
10/24/23		0.10	0.10	Rec email from OC w/ Cover letter for jump drive	\$600.00	\$	60.00
10/24/23		0.20	0.20	R & Rev email from Schwartz' clerk re: pretrial orde date, discuss with	\$600.00	\$	120.00
10/25/23		0.30	0.30	email exchange w/ oc re: mudrick's deposition	\$600.00	\$	180.00
10/25/23		0.40	0.40	R & Rev Email tr/ OC w/ Joint Motion to Amend Sch Order	\$600.00	\$	240.00

10/26/23		0.10	0.10	Review docket entry re: Joint Motion	\$600.00	\$	60.00
10/26/23		0.80	0.80	Rev Schwartz order, calendar dates, discuss w/ MJ	\$600.00	\$	480.00
12/6/23		0.40	0.40	Pretrial Order Conference w/ Schwartz by Telephone	\$600.00	\$	240.00
12/27/23		0.20	0.20	Email exchange w/ OC re: jump drive	\$600.00	\$	120.00
10/27/23		0.40	0.40	Receive depo transcripts and exhibits of Haltom and Purney from Court	\$600.00	\$	240.00
10/27/23		0.10	0.10	R & Rev invoice for Purney and Haltom depositions	\$600.00	\$	60.00
10/30/23		0.10	0.10	Email from OC re: Mudrick depo schedule	\$600.00	\$	60.00
10/30/23		0.40	0.40	Schedule Mudrick Depo w/ Court Reporter, provide Zoom link to MJ	\$600.00	\$	240.00
10/31/23		0.40	0.40	Rec J. Wheelles depo transcript and exhibits, download, file in dropbox,	\$600.00	\$	240.00
10/31/23		0.40	0.40	Rec S. Wade depo transcript and exhibits, download, file in dropbox,	\$600.00	\$	240.00
10/31/23		0.10	0.10	Rec invoice tr/ Court Reporter for J. Wheelles and S. Wade depositions	\$600.00	\$	60.00
11/6/23		0.30	0.30	Email exchange w/ OC re: J. Wheelles' 2nd depo, finding a date	\$600.00	\$	180.00
11/7/23		0.40	0.40	R & Rev Zoom depo confirmation from Court Reporter for Murdock	\$600.00	\$	240.00
11/7/23	for nov 10, 2023	0.30	0.30	schedule J. Wheelles 2nd deposition w/ court reporter	\$600.00	\$	180.00
11/9/23		0.20	0.20	Email tr/ Court reporter confirming J. Wheelles depo, request time length.	\$600.00	\$	120.00
11/13/23		0.10	0.10	Rec invoice tr/ Court Reporter for Cochran and Monasmith depo	\$600.00	\$	60.00
11/13/23		0.10	0.10	Rec invoice tr/ Court Reporter for B. Wheelles depo	\$600.00	\$	60.00
11/17/23		0.20	0.20	Review News Article about S. Wade's lawsuit against the City of	\$600.00	\$	120.00
11/20/23		0.30	0.30	Rec Mudrick depo transcript w/ exhibits, download and forward to	\$600.00	\$	180.00
11/21/23		0.30	0.30	Rec J. Wheelles 2nd depo transcript and exhibits, download to dropbox,	\$600.00	\$	180.00
11/21/23		0.10	0.10	R & Rev email tr/OC re: first draft of Pretrial Order to be sent to us soon	\$600.00	\$	60.00
11/21/23		0.40	0.40	tr/C w/ MJ and OC re: Pretrial Order Drafting	\$600.00	\$	240.00
11/22/23		0.10	0.10	Rec invoice tr/ Court Reporter for Mudrick depo	\$600.00	\$	60.00
11/27/23		2.50	2.50	Email exchange w/ OC, MJ, me re: pretrial order drafting. 5 emails and	\$600.00	\$	1,500.00
11/27/23		0.30	0.30	Rev MJ email to Clients re: Facts in pretrial order	\$600.00	\$	180.00
11/27/23	MJ	0.10	0.10	Review MJ research on 1983 action	\$600.00	\$	60.00
11/27/23		2.30	2.30	Prepare Damage section of Pretrial Order, email w/ MJ and CoCounsel	\$600.00	\$	1,380.00
11/27/23		0.10	0.10	Email damage section of Pretrial Order to OC	\$600.00	\$	60.00
11/27/23	MJ legal contention in pretrial order	0.20	0.20	Review MJ draft of legal contention of Pretrial Order	\$600.00	\$	120.00
11/27/23	MJ edits to pretrial order	1.60	1.60	exchange emails w/ OC and MJ, Review OC and MJ changes Pretrial	\$600.00	\$	960.00
11/27/23		0.10	0.10	Review OC's filing of Pretrial Order with Schwartz	\$600.00	\$	60.00
11/27/23		0.10	0.10	Review MJ email to Clients re: pretrial order w/ Attachment	\$600.00	\$	60.00

12/4/23		0.60	0.60	Make changes to damage calculations and exchange w/ OC	\$600.00	\$	360.00
12/4/23		0.10	0.10	Review OC's filing of Pretrial Order with Schwartz	\$600.00	\$	60.00
12/6/23		0.20	0.20	Review Court's docket/minute entry 17C w/ MJ and clients re: pretrial	\$600.00	\$	120.00
12/6/23		0.70	0.70	order and status	\$600.00	\$	420.00
12/7/23		0.20	0.20	Re MJ and OC emails re: status of Judge's pretrial order	\$600.00	\$	120.00
12/7/23		2.30	2.30	Rec revised Pretrial Order from Schwartz with requested changes	\$600.00	\$	1,380.00
12/12/23		0.50	0.50	Email exchange w/ Lexitas re: Wade, Purney and Haltom's transcript	\$600.00	\$	300.00
12/12/23		0.20	0.20	Email exchange w/ OC re: stipulated exhibits for pretrial order	\$600.00	\$	120.00
12/12/23		1.70	1.70	review and determination of exhibits to stipulate to for pretrial order and Review MJ exchange w/ OC w/	\$600.00	\$	1,020.00
12/12/23	MJ revisions to Pretrial Order	0.10	0.10	revised pretrial order attachment	\$600.00	\$	60.00
12/12/23		0.50	0.50	exchange w/ Lexitas re: missing exhibits of B. Wheeles deposition to	\$600.00	\$	300.00
12/13/23		0.90	0.90	Email Exchange w/ MJ and OC re: recent revisions to order, setting	\$600.00	\$	540.00
12/13/23		0.30	0.30	Received finalized revised order from OC Email Exch w/ OC and MJ	\$600.00	\$	180.00
12/13/23		0.10	0.10	Review email from OC to Schwartz w/ revised Pretrial Order	\$600.00	\$	60.00
12/14/23		0.80	0.80	R and Rev court email/minute entry re: more changes needed, calendar	\$600.00	\$	480.00
12/19/23		0.20	0.20	Email Exchange w/ OC re: OC questions about Schwartz' requested	\$600.00	\$	120.00
12/20/23		0.40	0.40	17C meeting w/ OC and MJ to discuss Schwartz' requested	\$600.00	\$	240.00
12/20/23		0.40	0.40	R and Rev OC's redlined revised Pretrial Order	\$600.00	\$	240.00
12/20/23		0.40	0.40	R and Rev MJ's redline/clean revised pretrial order to file, Rev MJ's filing	\$600.00	\$	240.00
12/20/23		0.60	14.40	Rev court's entry of Pretrial Order, scheduled pretrial conf and jury trial	\$600.00	\$	8,640.00
12/26/23		0.30	0.30	Email exchange w/ OC re: Def request to exceed page limit on their	\$600.00	\$	180.00
12/27/23		0.50	0.50	Rev docket entry of Def Motion to Exceed Page Limit on MSJ, download	\$600.00	\$	300.00
1/5/24		0.10	0.10	R & Rev email from Larry Rute re: potential settlement negotiations	\$600.00	\$	60.00
1/9/24		0.20	0.20	Email Exchange w/ OC re: def request for additional time to file MSJ	\$600.00	\$	120.00
1/9/24		0.20	0.20	Docket entry and Order granting Motion for ext of time to file MSJ	\$600.00	\$	120.00
1/11/24		0.30	0.30	Review Def Motion for trial location and suggestions in support	\$600.00	\$	180.00
1/12/24		0.20	0.20	Review and download article re: Steve Wade	\$600.00	\$	120.00
1/12/24		0.20	0.20	Download news article about this case	\$600.00	\$	120.00
1/12/24	MJ draft Motion to determine trial locatio	0.20	0.20	Review Plaintiffs motion for trial location	\$600.00	\$	120.00
1/12/24		0.30	0.30	File Plaintiffs Motion for Trial location	\$600.00	\$	180.00
1/19/24		1.10	1.10	Review Defendant's Motion for Summary Judgment and	\$600.00	\$	660.00
1/29/24		0.30	0.30	Email exchange w/ OC re: Pit additional time to file response to	\$600.00	\$	180.00

1/29/24		0.90	0.90	Prepare Motion for extension of time to file responsive pleading to MSJ	\$600.00	\$ 540.00
1/29/24		0.20	0.20	Review court's order, calendar new deadline to file responsive pleading	\$600.00	\$ 120.00
2/1/24		0.10	0.10	Email to Chris Playter re: division of tasks in preparing responsive	\$600.00	\$ 60.00
2/2/24		0.30	0.30	Email exchange with Chris Playter re: response to MSJ	\$600.00	\$ 180.00
2/9/24		0.30	0.30	Receive statement of facts from CS	\$600.00	\$ 180.00
2/14/24		1.50	1.50	R email from Chris Playter w/ draft response to Def SOF	\$600.00	\$ 900.00
2/14/24		0.40	0.40	Prepare motion for 2nd extension to respond	\$600.00	\$ 240.00
2/14/24		0.20	0.20	File Motion	\$600.00	\$ 120.00
2/15/24		0.20	0.20	Review court's order granting motion and calendaring due date	\$600.00	\$ 120.00
2/20/24		0.50	0.50	Review Chris Playter's portion of plaintiff's statement of facts from	\$600.00	\$ 300.00
2/22/24		0.40	0.40	Review Chris Playter's exhibits to add to our response	\$600.00	\$ 240.00
2/25/24		0.20	0.20	Email w/ attachment to clients a rough draft of our response to MSJ	\$600.00	\$ 120.00
2/26/24	MJ prepare Amended Complaint	0.20	0.20	File Motion to Amend Complaint	\$600.00	\$ 120.00
2/26/24		0.40	0.40	Review CS facts for response to MJS	\$600.00	\$ 240.00
2/26/24		1.40	1.40	Draft declarations for CS JH and JC for response to MSJ	\$600.00	\$ 840.00
2/26/24		1.80	1.80	Final review of response to MSJ prepare exhibits for filing, file with	\$600.00	\$ 1,080.00
3/4/24		0.20	0.20	Email exchange re: Def request for add'l to file a reply	\$600.00	\$ 120.00
3/5/24		0.20	0.20	Email exchange w/ OC re: motion to additional pages	\$600.00	\$ 120.00
3/5/24		0.40	0.40	Review docket entries, defense motions filed and court's orders	\$600.00	\$ 240.00
3/11/24		0.40	0.40	Review Def Response to Pits Motion to Amend Complaint	\$600.00	\$ 240.00
3/25/24		1.60	1.60	review court's docket entry re: def reply. Download reply and exhibits,	\$600.00	\$ 960.00
Mar-39	MJ prepare Motion to File SurReply, SurRe	0.40	0.40	Reviewed pleadings prior to filing	\$600.00	\$ 240.00
4/8/24		0.30	0.30	Review Def Response to Pits Motion to File SurReply, download, send to	\$600.00	\$ 180.00
4/15/24	MJ prepare reply to Def Respo	0.30	0.30	Review pleadings for filing, file	\$600.00	\$ 180.00
7/12/24		0.10	0.10	Email from Larry Rute re: status	\$600.00	\$ 60.00
7/26/24		0.20	0.20	Review Court's trial scheduling order, calendar	\$600.00	\$ 120.00
7/27/24		0.20	0.20	Review Court Rules on Trial scheduling	\$600.00	\$ 120.00
8/7/24		0.20	0.20	Review Chris Playter initial exhibit list draft	\$600.00	\$ 120.00
8/9/24		2.30	2.30	Review Court's Order re: MSJ, meeting with MJ and CP. Telephone	\$600.00	\$ 1,380.00
8/9/24		0.20	0.20	Download court's order, send to clients	\$600.00	\$ 120.00
8/12/24		0.40	0.40	Review Court's order re: judge reassignment, discuss with MJ	\$600.00	\$ 240.00
8/12/24		0.40	0.40	discussion w/ co counsel re: judge reassignment	\$600.00	\$ 240.00

8/12/24		0.40	0.40	Email from OC re: Meeting with Judge Crouse, T/C with Judge Crouse	\$600.00	\$	240.00
8/13/24		0.50	0.50	Review court's supplemental trial scheduling order, calendar, send to T/C meeting w/ MJ/CP/Clients re:	\$600.00	\$	300.00
8/14/24		0.60	0.60	settlement demand, receive email R and Rev Chris Playter's updates to	\$600.00	\$	360.00
8/15/24		0.30	0.30	exhibit list	\$600.00	\$	180.00
8/17/24		0.90	0.90	Final preparation of witness and exhibit list with additional exhibits.	\$600.00	\$	540.00
8/19/24	MJ attend MIL hearing	0.20	0.20	Review court's docket entry re: change in MIL hearing, calendar	\$600.00	\$	120.00
8/19/24		0.30	0.30	Rev docket entry Def Motion to file depo designation, download and	\$600.00	\$	180.00
8/19/24		0.30	0.30	rev Def final witness and exhibit lists, download, send to clients	\$600.00	\$	180.00
8/20/24		0.30	0.30	T/C w/ Judge Crouse re: Def Motion to Designate Depo	\$600.00	\$	180.00
8/20/24		0.10	0.10	Rev court's minute entry - deny Def Motion	\$600.00	\$	60.00
8/24/24	MJ draft MIL	0.40	0.40	Format MIL for MJ	\$600.00	\$	240.00
8/26/24		0.80	0.80	Docket entry Def MIL, download, copy to client, discuss with MJ	\$600.00	\$	480.00
8/26/24		0.20	0.20	File MIL	\$600.00	\$	120.00
9/3/24		0.20	0.20	R and Review and discuss Chris Player resp to Me Too evidence	\$600.00	\$	120.00
9/3/24		0.20	0.20	R Review Def Resp to Plt MIL email exch w/ oc and MJ re MIL	\$600.00	\$	120.00
9/6/24	mj	0.10	0.10	hearing, Jury Instructions,	\$600.00	\$	60.00
9/8/24		0.50	0.50	r rev def jury instructions prepare initial draft of jury	\$600.00	\$	300.00
9/6/24		3.10	3.10	instructions to circulate to CP MJ EP	\$600.00	\$	1,860.00
9/9/24		0.10	0.10	CP final jury instructions sent to OC	\$600.00	\$	60.00
9/9/24		0.30	0.30	r and rev red lined jury instruc from OC, review MJ and KE emails	\$600.00	\$	180.00
9/9/24		0.90	0.90	Prepare changes and additons to exhibits, email OC, notify court on	\$600.00	\$	540.00
9/10/24		1.00	1.00	email exchange w/OC MJ and CP re: jury instructions	\$600.00	\$	600.00
9/10/24		0.10	0.10	rev docket entry def jury instructions	\$600.00	\$	60.00
9/10/24		0.10	0.10	rev court's minute entry re MIL hearing	\$600.00	\$	60.00
3/10/23		3.50	3.50	Meeting with JC, CS, JH, CP, EP, MJ and me at Annie's Place, case	\$600.00	\$	2,100.00
10/8/24		0.20	0.20	T/C w/ OC re: attorney fees			
10/10/24		2.80	2.80	Research D. Kan Local Court Rule 54.1 and 2, caselaw on issue of fees,	\$600.00	\$	1,680.00
10/3/24		0.90	0.90	Prepare Motion for Attorneys Fees	\$600.00	\$	540.00
11/4/24		0.70	0.70	Prepare Affidavit for Fees	\$600.00	\$	420.00
11/4/24		1.50	1.50	Prepare Memorandum for Fees	\$600.00	\$	900.00
11/7/24		0.30	0.30	Review Ocs Outline for Discussion re: fees	\$600.00	\$	180.00
11/7/24		0.20	0.20	T/C with OC re: fees	\$600.00	\$	120.00

11/7/24		0.50	0.50	Prepare Statement of Consultation and File with the court	\$600.00	\$	300.00
11/7/24		1.30	1.30	Obtain attorney affidavits for memorandum	\$600.00	\$	780.00