

1 Olu K. Orange, Esq. [S.B. #213653]
ORANGE LAW OFFICES
2 3435 Wilshire Blvd., Suite 2900
Los Angeles, California 90010
3 Telephone: (213) 736-9900
4 Facsimile: (213) 417-8800
Email: oluorange@att.net

5 Dan Stormer, Esq. [S.B. #101967]
Cindy Pánuco, Esq. [S.B. #266921]
6 Mohammad Tajsar, Esq. [S.B. #280152]
7 HADSELL, STORMER & RENICK LLP
128 North Fair Oaks Avenue
8 Pasadena, California 91103-3645
Telephone: (626) 585-9600
9 Facsimile: (626) 577-7079
Email: dstormer@hadsellstormer.com
10 cpanuco@hadsellstormer.com
mtajsar@hadsellstormer.com

11 Attorneys for Plaintiffs

12 [Additional counsel listed on next page]

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 CHRISTIAN RODRIGUEZ,
17 ALBERTO CAZAREZ, individually
and as class representatives

18 *Plaintiffs,*

19 vs.

20 CITY OF LOS ANGELES, CARMEN
21 TRUTANICH, CHARLES BECK,
ALLAN NADIR, ANGEL GOMEZ
22 AND DOES 1 THROUGH 10.

23 *Defendants.*

) Case No.: CV11-01135 DMG (JEMx)

) [Assigned to the Honorable Dolly M.
Gee – Courtroom 7]

) **COMPENDIUM OF EVIDENCE IN**
) **SUPPORT OF PLAINTIFFS’**
) **MOTION FOR ATTORNEY FEES**

) **[VOLUME 2 OF 5]**

) DATE: December 2, 2016
) TIME: 2:00 p.m.
) CRTRM: 7

) *[Filed concurrently herewith: 1) Pltfs’*
) *Mtn for Attorney’s Fees; 2) Ntc of*
) *Lodging; and, 3) [Proposed] Order]*

) Complaint Filed: February 7, 2011

1 [Additional counsel cont. from first page]
2 Anne K. Richardson, Esq. [S.B. #151541]
3 Alisa Hartz, Esq. [S.B. #285141]
4 PUBLIC COUNSEL
5 610 S. Ardmore Ave.
6 Los Angeles, California 90005
7 Telephone: (213) 385-2977
8 Facsimile: (213) 385-9089
9 Email: arichardson@publiccounsel.org
10 ahartz@publiccounsel.org
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46621	8/6/2015	35460
Job Date	Case No.	
6/4/2015	CV11-01135-DMG	
Case Name		
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Original and 1 Certified Copy of Transcript of: Antonio Rodriguez	1,304.00
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Barbara E. Hadsell
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47653	10/31/2015	37159
Job Date	Case No.	
10/21/2015	CV11-01135-DMG	
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Code	Earning	Hours	Rate	Amount	Code	Tax	Status	Taxable	Amount	Code	Deduction	Amount	Type	Regular		
Reg	Regular Earnings	20.00	11.0000	220.00				220.00						04/30/2015		
									13.64					1888.77		
									31.23		Total Deductions	0.00	Chk/Vcr #	16112		
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March 10, 2015

Olu K. Orange, Esq.
 ORANGE LAW OFFICES
 3435 Wilshire Boulevard, Suite 2900
 Los Angeles, California 90010

Anne K. Richardson, Esq.
 Alisa L. Hartz, Esq.
 Viridiana Chabolla
 PUBLIC COUNSEL
 610 South Ardmore Avenue
 Los Angeles, California 90005

Dan Stormer, Esq.
 Cindy Panuco, Esq.
 Mohammad Tajsar, Esq.
 HADSELL STORMER & RENICK
 128 North Fair Oaks Avenue, Suite 204
 Pasadena, California 91103

Rena M. Shahandeh, Esq.
 Michael Amerian, Esq.
 Cory Brente, Esq.
 LOS ANGELES CITY ATTORNEY'S OFFICE
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 ADRS Case No. 15-1501-LMM

Hon. Louis M. Meisinger	Date	Time Allocated (Days)
Review of Briefs, Preparation		
Mediation Hearing	March 30, 2015	1.0
TOTAL TIME		1.0
Non-Refundable Administrative Fee (\$195/party)		\$390.00
Total Amount Billed (1.0 day x \$10,000/ full day) + \$390.00		\$10,390.00

* Please note that in exchange for the payment set forth on this statement Hon. Louis Meisinger will allocate eight (8) hours for the hearing and two (2) hours of preparation. All additional time spent by Judge Meisinger will be billed to the parties at the rate of \$1,000 per hour.

ORANGE LAW OFFICES
 HADSELL STORMER & RENICK
 PUBLIC COUNSEL

(Counsel for Plaintiffs, Christian Rodriguez and Allan Cazarez on behalf of Alberto Cazarez Estate)

Amount Due (50% of \$10,390.00) \$5,195.00

LOS ANGELES CITY ATTORNEY'S OFFICE

(Counsel for Defendants, City of Los Angeles. Carmen Trutanich, Charles Beck, Allan Nadir, and Angel Gomez)

Amount Due (50% of \$10,390.00) \$5,195.00

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- All counsel are jointly and severally liable for the payment of fees associated with the neutral's services.
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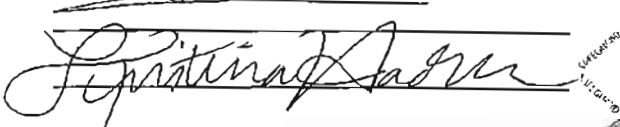
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March 10, 2015

Jlu K. Orange, Esq.
 ORANGE LAW OFFICES
 3435 Wilshire Boulevard, Suite 2900
 Los Angeles, California 90010

Anne K. Richardson, Esq.
 Alisa L. Hartz, Esq.
 Viridiana Chabolla
 PUBLIC COUNSEL
 610 South Ardmore Avenue
 Los Angeles, California 90005

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 Cindy Panuco, Esq.
 Mohammad Tajsar, Esq.
 HADSELL STORMER & RENICK
 128 North Fair Oaks Avenue, Suite 204
 Pasadena, California 91103

Rena M. Shahandeh, Esq.
 Michael Amerian, Esq.
 Cory Brente, Esq.
 LOS ANGELES CITY ATTORNEY'S OFFICE
 City Hall East
 200 North Main Street 6th Floor
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 ADRS Case No. 15-1501-LMM

Hon. Louis M. Meisinger	Date	Time Allocated (Days)
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Mediation Hearing	March 30, 2015	1.0
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Total Amount Billed (1.0 day x \$10,000/ full day) + \$390.00		\$10,390.00

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ORANGE LAW OFFICES
 HADSELL STORMER & RENICK
 PUBLIC COUNSEL

(Counsel for Plaintiffs, Christian Rodriguez and Allan Cazarez on behalf of Alberto Cazarez Estate)

Amount Due (50% of \$10,390.00) **\$5,195.00**

LOS ANGELES CITY ATTORNEY'S OFFICE

(Counsel for Defendants, City of Los Angeles. Camen Trutanich, Charles Beck, Allan Nadir, and Angel Gomez)

Amount Due (50% of \$10,390.00) **\$5,195.00**

Please include the case name and invoice number when making your check payable to:
 ADR Services, Inc. (Tax ID# 20-0098025)

PLEASE REMIT PAYMENT BY MARCH 20, 2015.

Thank you for your courtesy and cooperation.

- Please note that counsel, not the represented party, has contracted for the neutral's services.
- All counsel are jointly and severally liable for the payment of fees associated with the neutral's services.
- Fees for unused time will not be refunded.

M:\Open Files\15-1501-Rodriguez v. City of Los Angeles inv.doc

Mileage

HAUSELL
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RENICK

LLP

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(626) 585-9600

PACIFIC PREMIER BANK
5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706

90-8578/3222

66232

8/30/2016

PAY TO THE
ORDER OF

CINDY PANUCO

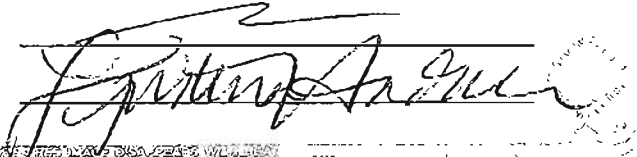
\$ **186.61

One Hundred Eighty-Six and 61/100

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042

GENERAL ACCOUNT



MEMO

LOSORELLI/RODRIGUEZ/OFFICE

⑈066232⑈

HAUSELL STORMER & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

8/30/2016

66232

RODRIGUEZ CP MILEAGE & PARKING AT PRELIM

21.07

Pacific Prem. - Gen C LOSORELLI/RODRIGUEZ/OFFICE

186.61

HADSELL
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90-8578/3222

66134

8/4/2016

PAY TO THE
ORDER OF

David Hannah-

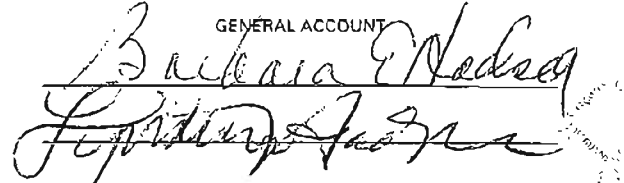
\$ **304.50

Three Hundred Four and 50/100*****

DOLLARS

Daivid Hannah

GENERAL ACCOUNT



MEMO

[REDACTED]

RODRIGUE

⑈066134⑈

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
David Hannah-

8/4/2016

66134

[REDACTED]

RODRIGUEZ DAVID HANNAH PARKING/MILEAGE

17.53

[REDACTED]

Pacific Prem. - Gen C

[REDACTED]

RODRI

304.50

6/29 - 8/2/16 MILEAGE / CASH REIMBURSEMENT

CLIENT	TOTAL MILES	X \$.54	TOTAL CASH REIMBURSEMENT	TOTAL
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

0906 Rodriguez 23.2 = \$12.53 + \$5.00 = \$17.53




6/29 - 8/2/16 TOTAL MILES = [REDACTED]
TOTAL CASH REIMBURSEMENT = [REDACTED]

6/29 - 8/2/16 GRAND TOTAL: \$304.50

- David Hannah

MILEAGE FORM

DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	RATE
					

7/5	0906 Rodriguez	Norma	23.2	USDC	\$5.00
-----	----------------	-------	------	------	--------



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5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91705
90-4401/1222

65979

6/30/2016

PAY TO THE
ORDER OF

CINDY PANUCO

**16.00

\$

Sixteen and 00/100

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042

GENERAL ACCOUNT

Barbara E. Hadsell
[Signature]

MEMO

RODRIGUEZ PARKING AT MEETING WITH CITY

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⑈065979⑈

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

6/30/2016

65979

RODRIGUEZ PARKING AT MEETING WITH CITY A

16.00

Pacific Prem. - Gen C RODRIGUEZ PARKING AT MEETING WITH CI

16.00

HADSELL
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SECURITY BANK OF CALIFORNIA
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IRVINDALE, CA 91706
90-4401/1222

65866

5/31/2016

PAY TO THE ORDER OF CINDY PANUCO

**345.74

Three Hundred Forty-Five and 74/100

\$

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042

GENERAL ACCOUNT

MEMO [REDACTED] RODRIGUEZ PARKIN

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⑈065866⑈ ⑆122244016⑆ ⑆40514753⑈

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

5/31/2016

65866

[REDACTED]
CINDY PANUCO
RODRIGUEZ CINDY PANUCO PARKING AT 3/11/1 14.00
[REDACTED]

Pacific Prem. - Gen C [REDACTED] RODRIGUEZ PAR

345.74

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IRVINDALE, CA 91705
90-4401/1222

65590

3/15/2016

PAY TO THE
ORDER OF

CINDY PANUCO

\$ **42.79

Forty-Two and 79/100

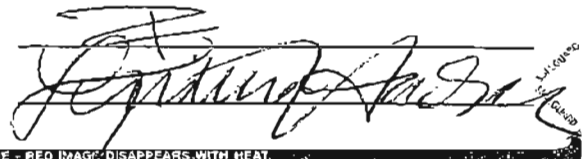
DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042

GENERAL ACCOUNT

MEMO

[REDACTED] RODRIGUEZ MILEAGE/PARKING



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⑈065590⑈ ⑆122244016⑆ 140514753⑈

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

3/15/2016

65590

[REDACTED]
RODRIGUEZ MILEAGE/PARKING CINDY PANUCO 25.77

Security Bank - Gen C [REDACTED] RODRIGUEZ MILEAGE/PARKIN

42.79

HADSELL
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RENICK | LLP

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SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

11/3/2015

PAY TO THE
ORDER OF

Bank Of America

**1,887.64

\$

One Thousand Eight Hundred Eighty-Seven and 64/100

DOLLARS

Bank Of America
P.O. Box 15721
Wilmington, DE 19886-5721

GENERAL ACCOUNT

MEMO

ACCOUNT # [REDACTED] ROD

⑈065111⑈

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
Bank Of America

11/3/2015

6511:

RODRIGUEZ DAN STORMER PARKING

16.00



Security Bank - Gen C ACCOUNT # [REDACTED]

1,887.64

BankAmericard Rewards

Bank of America

World MasterCard

DAN L STORMER
 Account Number: 5524 3311 3784 8094
 September 17 - October 16, 2015

Account Information:
 www.bankofamerica.com

Mail billing inquiries to:
 Bank of America
 P.O. Box 982235
 El Paso TX 79998-2235

Mail payments to:
 Bank of America
 P.O. Box 15019
 Wilmington DE 19886-5019

Customer Service:
 1-800-421-2110

(1-800-346-3178 TTY)

Payment Information		
New Balance Total		\$1,887.64
Current Payment Due		\$25.00
Total Minimum Payment Due..... \$25.00		
Payment Due Date..... 11/13/15		
<p>Late Payment Warning: If we do not receive your Total Minimum Payment by the date listed above, you may have to pay a late fee of up to \$38.00 and your APRs may be increased up to the Penalty APR of 29.99%.</p> <p>Total Minimum Payment Warning: If you make only the Total Minimum Payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:</p>		
If you make no additional charges using this card and each month you pay	You will payoff the balance shown on this statement in about	And you will end up paying an estimated total of
Only the Total Minimum Payment	9 years	\$2,898.00
\$62.00	36 months	\$2,232.00 (Savings = \$666.00)
<p>If you would like information about credit counseling services, call 1-866-300-5238.</p>		

Account Summary
[REDACTED]

Transactions

Transaction Date	Posting Date	Description	Reference Number	Account Number	Amount	Total
[REDACTED]						

16 0018876400002500001398460005524331137848094

BANK OF AMERICA
 P.O. BOX 15019
 WILMINGTON DE 19886-5019

Account Number: 5524 3311 3784 8094

New Balance Total.....\$1,887.64
 Total Minimum Payment Due25.00
 Payment Due Date 11/13/15

SS 1020 N 561 000 12 04154 #001 SP 0.416
 DAN L STORMER
 HADSELL
 128 N FAIR OAKS AVE
 PASADENA CA 91103-3650

Enter payment amount \$ 1,887.64

Check here for a change of mailing address or phone numbers
 Please provide all corrections on the reverse side.
 Mail this coupon along with your check payable to: Bank of America



⑆524022250⑆ 20111137848094⑈

REDACTED

Stormer Decl. - Ex. C
 Page 301

BankAmericard Rewards®



World MasterCard®

5524 3311 3784 8094
 September 17 - October 16, 2015
 Page 3 of 6

Transactions continued

Transaction Date	Posting Date	Description	Reference Number	Account Number	Amount	Total
Purchases and Adjustments						
09/22	09/23	CIVIC CENTER PARKING LOS ANGELES CA	3120	8094	16.00	<i>Rodriguez</i>



2015 Totals Year-to-Date	
Total fees charged in 2015	\$0.00
Total interest charged in 2015	

Interest Charge Calculation

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

	Annual Percentage Rate	Promotional Transaction Type	Promotional Offer ID	Promotional Rate End Date	Balance Subject to Interest Rate	Interest Charges by Transaction Type
Purchases	10.99%				\$0.00	\$0.00
Balance Transfers	10.99%				\$0.00	\$0.00
Direct Deposit and Check Cash Advances	17.99%				\$0.00	\$0.00
Bank Cash Advances	20.99%				\$0.00	\$0.00

APR Type Definitions: Daily Interest Rate Type - Vs Variable Rate (rate may vary)

Rewards

1,886 BASE EARNED THIS MONTH
 124,010 TOTAL AVAILABLE



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IRVINDALE, CA 91706
90-4401/1222

10/22/2015

PAY TO THE
ORDER OF

David Hannah-

**345.84

\$

Three Hundred Forty-Five and 84/100

DOLLARS

Daivd Hannah

GENERAL ACCOUNT

MEMO

MILEAGE/PARKING

⑈065067⑈

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
David Hannah-

10/22/2015

6506

RODRIGUEZ DAVID HANNAH MILEAGE/PARKING

15.84

Security Bank - Gen C MILEAGE/PARKING

345.84

9/10 - 10/21/15 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$0.575	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	-----------	--------------------------	-------



0906 Rodriguez	23.2	= \$13.34	+ \$ 2.50	= \$ 15.84
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9/10 - 10/21/15 TOTAL MILES :



TOTAL CASH REIMBURSEMENT :



9/10 - 10/21/15 GRAND TOTAL : \$ 345.84

- David Hannah

MILEAGE FORM

2015 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PARK
--------------	--------	-----	----------------	-----------	------



10/7	0906 Rodriguez	Norma	23.2	USDC	\$2.56
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IRWINDALE, CA 91708
90-4401/1222

9/15/2015

PAY TO THE
ORDER OF

CINDY PANUCO

**26.08

\$

Twenty-Six and 08/100

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042

GENERAL ACCOUNT

Barbara E. Nelson
[Signature]

MEMO

RODRIGUEZ REIMBURSE PARKING/TRAVEL SET

⑈064928⑈

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

9/15/2015

64928

RODRIGUEZ CINDY PANUCO TRAVEL/PARKING

26.08

Security Bank - Gen C RODRIGUEZ REIMBURSE PARKING/TRAVEL

26.08

REDACTED

Stormer Decl. - Ex. C
Page 306

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5200 IRVINDALE AVE., STE 168
IRVINDALE, CA 91706
90-4401/1222

9/10/2015

PAY TO THE
ORDER OF

David Hannah-

\$ **300.47

Three Hundred and 47/100

DOLLARS

David Hannah

GENERAL ACCOUNT

Barbara E. Nelson
[Signature]



MEMO

[REDACTED]

⑈064923⑈ 12 [REDACTED]

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
David Hannah-

9/10/2015

64923

[REDACTED]

RODRIGUEZ DAVID HANNAH MILEAGE/PARKING

15.84

[REDACTED]

Security Bank - Gen C [REDACTED]

300.47

7/31 - 9/8/15 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.575	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	-----------	--------------------------	-------



0906 Rod-Torres	23.2	= \$13.34	+ \$2.50	= \$15.84
-----------------	------	-----------	----------	-----------



7/31 - 9/8/15 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT = \$ [REDACTED]

7/31 - 9/8/15 GRAND TOTAL = \$300.47

-David Hannah

MILEAGE FORM

2015 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PRICE
--------------	--------	-----	----------------	-----------	-------



8/27	0906 Rodriguez Norma		23.2	USDC	\$2.50
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64780

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IRVINDALE, CA 91706
90-4401/1222

8/6/2015

PAY TO THE ORDER OF David Hannah-

**413.40

\$

Four Hundred Thirteen and 40/100

DOLLARS

Daivid Hannah

GENERAL ACCOUNT

MEMO

[Redacted memo text]

⑈064780⑈

[Redacted MICR line]

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
David Hannah-

8/6/2015

64780

RODRIGUEZ DAVID HANNAH MILEAGE/PARKING

15.84

[Redacted transaction details]

Security Bank - Gen C

[Redacted account number]

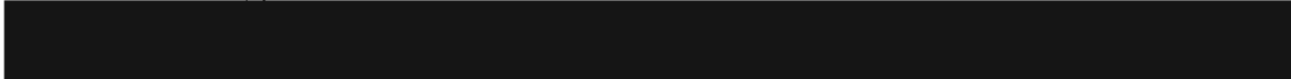
413.40

7/7 - 7/30/15 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	X.575	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	-------	--------------------------	-------



0906 Rodriguez	23.2	= \$13.34	+ \$2.50	= \$15.84
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7/7 - 7/30/15 TOTAL MILES =



TOTAL CASH REIMBURSEMENT =

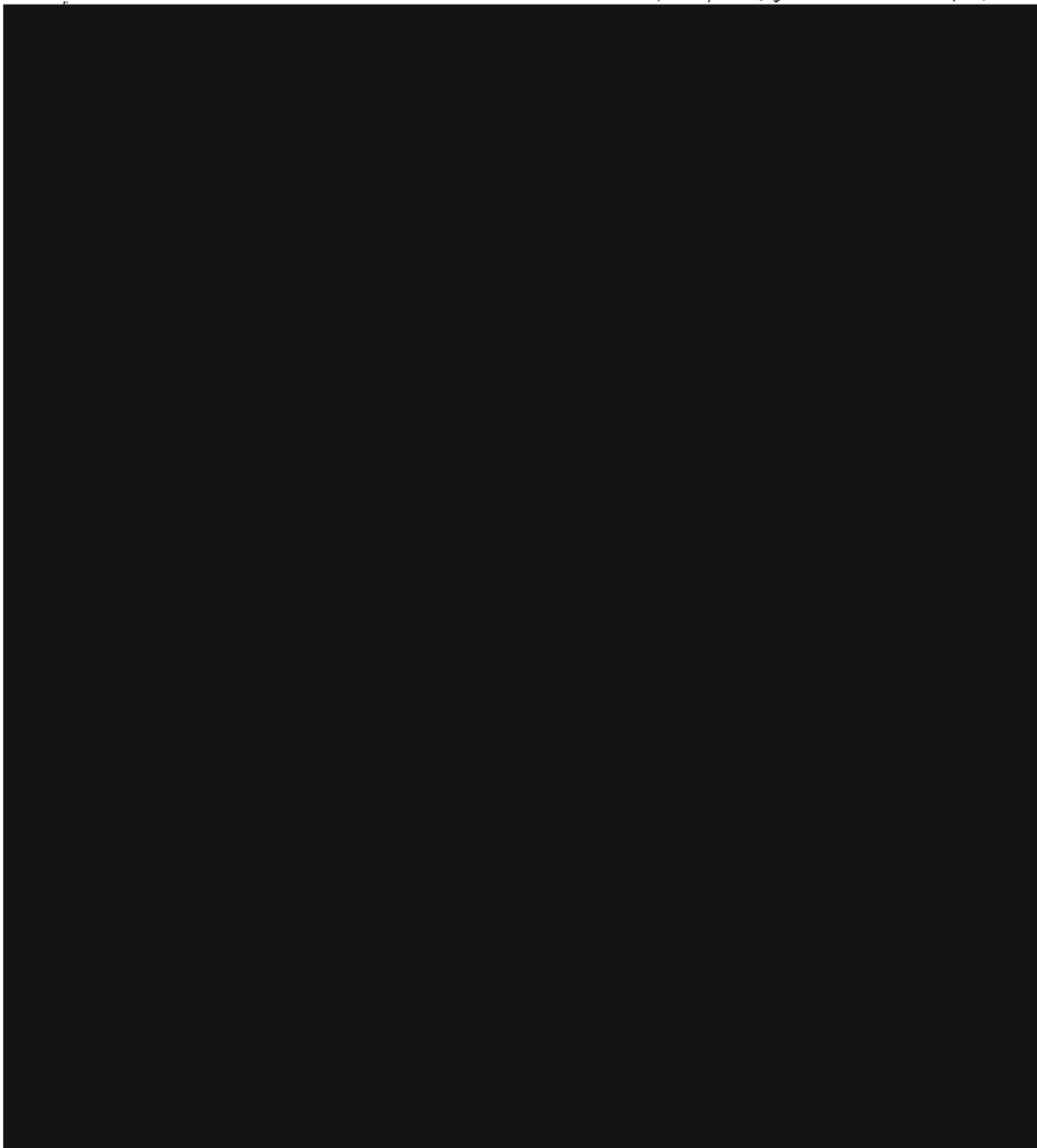


7/7 - 7/30/15 GRAND TOTAL = \$413.40

- David Hannah

MILEAGE FORM

2015
DATE CLIENT - FOR TOTAL
MILES TRAVEL TO PARK



7/30 0906 Rodriguez Norma 23.2 USDC \$2.50



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IRWINDALE, CA 91706
90-4401/1222

7/7/2015

PAY TO THE
ORDER OF

David Hannah-

\$ **242.34

Two Hundred Forty-Two and 34/100

DOLLARS

Daivd Hannah

Barbara E. Hodson
GENERAL ACCOUNT
[Signature]

MEMO

RODRIGUEZ

⑈064660⑈

HADSELL STORMER & RENICK LLP GENERAL ACCOUNT
David Hannah-

7/7/2015

6466

RODRIGUEZ DAVID HANNAH MILEAGE/PARKING

27.51

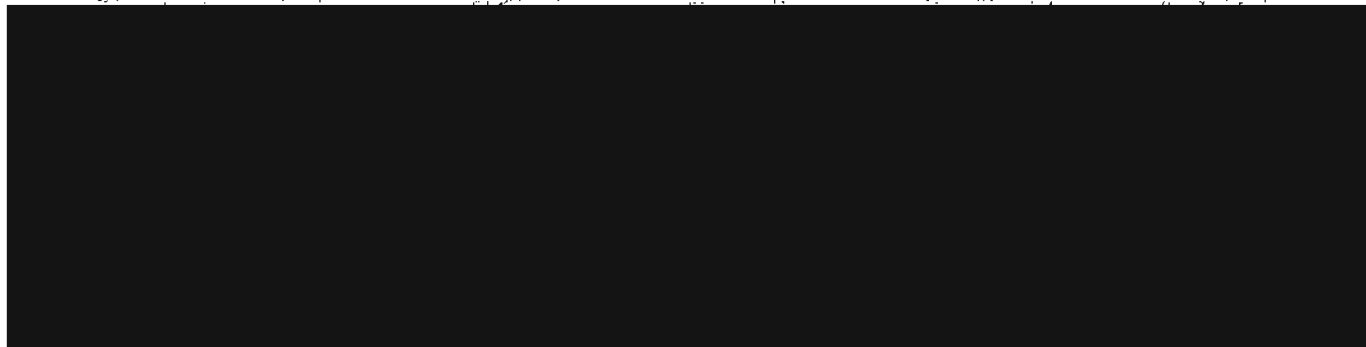
Security Bank - Gen C

RODRIGUEZ

242.34



0100 Redacted 7-19 = 4 20.01 + # 7.11, 18 2015



6/2 - 6/20/15 [unclear] [redacted]
[unclear] [redacted]

6/2 - 6/20/15 [unclear] [redacted]
[unclear]
[signature]

MILEAGE FORM

2015 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PARK
6/4	0906 Rodriguez	Jessica	11.6	USDC	\$2.50
		Jam	23.2	USDC	\$2.50
					\$5.00

[REDACTED]

6/12	0906 Rodriguez	Jessica	23.2	USDC	\$5.00
------	----------------	---------	------	------	--------

[REDACTED]

04003

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IRWINDALE, CA 91706
90-4401/1222

6/9/2015

PAY TO THE
ORDER OF

David Hannah-

\$ **290.56

Two Hundred Ninety and 56/100

DOLLARS

Daivid Hannah

GENERAL ACCOUNT

MEMO

[REDACTED] RODRIGUEZ [REDACTED]

⑈064553⑈

[REDACTED]

HADSELL STORMER & RENICK LLP - GENERAL ACCOUNT
David Hannah-

6/9/2015

64553

[REDACTED]
RODRIGUEZ DAVID HANNAH MILEAGE/PARKING 52.52

[REDACTED]

Security Bank - Gen C

[REDACTED] RODRIGUEZ [REDACTED]

290.56

5/12 - 6/3/15 MILEAGE / CASH REIMBURSEMENT





CLIENT	TOTAL MILES	x \$.575	TOTAL CASH REIMBURSEMENT	TOTAL
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
0906 Rodriguez	69.6	= \$40.02	+ \$12.50	= \$52.52
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

5/12 - 6/3/15 TOTAL MILES = [REDACTED]
TOTAL CASH REIMBURSEMENT = [REDACTED]

5/12 - 6/3/15 GRAND TOTAL = \$290.56

-David Hannah

MILEAGE FORM

2015 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PARK
					
5/27	0906 Rodriguez	Jessica	23.2	USDC Roma Shahandeh	\$5.00
					
6/2	0906 Rodriguez	Norma	23.2	USDC	\$5.00
					
6/3	0906 Rodriguez	Jessica	23.2	USDC	\$2.50
					

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IRVINDALE, CA 91706
90-4401/1222

64535

6/4/2015

PAY TO THE ORDER OF CINDY PANUCO

\$ **106.63

One Hundred Six and 63/100

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042

GENERAL ACCOUNT

Barbara E. HadSELL
[Signature]

MEMO

RODRIGUEZ/ [REDACTED]

⑈064535⑈ [REDACTED]

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

6/4/2015

64535

RODRIGUEZ PARKING AT DEPO 5/19/15

16.00

Security Bank - Gen C RODRIGUEZ/OFFICE PARKING& ASSOCIATE

106.63

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5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

64453

5/12/2015

PAY TO THE ORDER OF David Hannah-

\$ **293.57

Two Hundred Ninety-Three and 57/100 *****
DOLLARS

David Hannah

GENERAL ACCOUNT
[Signature]

MEMO

[REDACTED] RODRIGUEZ [REDACTED]

⑈064453⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
David Hannah-

5/12/2015

64453

[REDACTED]
RODRIGUEZ DAVID HANNAH MILEAGE/PARKING 15.84

[REDACTED]

Security Bank - Gen C [REDACTED] RODRIGUEZ [REDACTED]

293.57

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(626) 585-9600


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IRWINDALE, CA 91706
90-4401/1222

64352

4/9/2015

PAY TO THE
ORDER OF

Mohammad Tajsar-

\$ **26.50

Twenty-Six and 50/100*

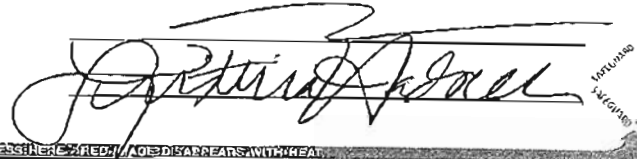
DOLLARS

Mohammad Tajsar

GENERAL ACCOUNT

MEMO

RODRIGUEZ 3/30/15 MEDIATION PARKING AND



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⑈064352⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
Mohammad Tajsar-

4/9/2015

64352

RODRIGUEZ M. TAJ SAR PARKING & MILEAGE

26.50

Security Bank - Gen C RODRIGUEZ 3/30/15 MEDIATION PARKING A

26.50

HADSELL
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Pasadena, California 91103
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SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

64348

4/9/2015

PAY TO THE ORDER OF CINDY PANUCO

\$ 25.94

Twenty-Five and 94/100

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042

GENERAL ACCOUNT

MEMO RODRIGUEZ REIMBURSEMENT 3/30/15 MEDIATIO

⑈064348⑈



HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

4/9/2015

64348

RODRIGUEZ CINDY PANUCO MILEAGE/PARKING

25.94

Security Bank - Gen C RODRIGUEZ REIMBURSEMENT 3/30/15 MEDIA

25.94

HADSELL
STORMER
RENICK

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 595-9600

LLP


SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

64349

4/9/2015

PAY TO THE
ORDER OF

David Hannah-

\$ **162.66

One Hundred Sixty-Two and 66/100

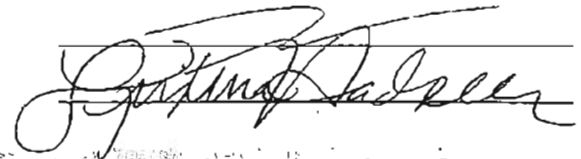
DOLLARS

Daivd Hannah

GENERAL ACCOUNT

MEMO

██████████ RODRIGUEZ/██████████



⑈064349⑈ ⑆122244013⑆ 140914753⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
David Hannah-

4/9/2015

64349

████████████████████
RODRIGUEZ DAVID HANNAH MILEAGE/PARKING
████████████████████

57.94
51.94
2.59
50.19

Security Bank - Gen C

██████████ RODRIGUEZ/██████████

162.66

2/25 - 4/3/15 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.575	TOTAL CASH REIMBURSEMENT	TOTAL
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
0906 Rodriguez	71.2	\$40.94	+ \$11.00	= \$51.94

2/25 - 4/3/15 TOTAL MILES = [REDACTED]
TOTAL CASH REIMBURSEMENT = \$ [REDACTED]

2/25 - 4/3/15 GRAND TOTAL = \$162.66

-David Hannah

MILEAGE FORM(S)

2015 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	RATE
2/26	0906 Rodriguez	Norma	23.2	USDC	\$7.50
3/9	0906 Rodriguez	Norma	23.2	USDC	\$5.00
3/24	0906 Rodriguez	Tami	24.8	Hon. Louis Meisinger	\$3.50

12/8/14 - 1/9/15 MILEAGE/CASH REIMBURSEMENT

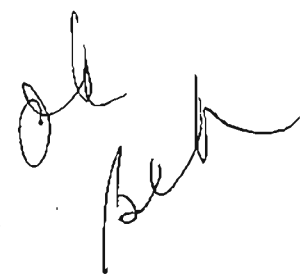
CLIENT	TOTAL MILES	x \$0.56	TOTAL CASH REIMBURSEMENT	TOTAL
[REDACTED]				
0906: Rodriguez	46.4	\$25.98	+ \$7.50	= \$33.48

~~64065 4000000~~

12/8/14 - 1/9/15 TOTAL MILES = [REDACTED]
TOTAL CASH REIMBURSEMENT = [REDACTED]

12/8/14 - 1/9/15 GRAND TOTAL = \$157.30

- David Hannah



MILEAGE FORM

2014 DATE CLIENT FOR TOTAL MILES TRAVEL TO PARK



12/22 0906 Rodriguez Norma 23.2 USDC \$2.50



1/5 0906 Rodriguez Norma 23.2 USDC \$5.00





63948

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5200 IRWINDALE AVE., STE. 108
IRWINDALE, CA 91706
90-4401/1222

1/8/2015

PAY TO THE ORDER OF

CINDY PANUCO

\$ **129.48

One Hundred Twenty-Nine and 48/100

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042

GENERAL ACCOUNT

Barbara E. Hodsey
Rodriguez

MEMO

RODRIGUEZ PARKING FOR SUMMARY JUDGEM

⑈063948⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

1/8/2015

63948

RODRIGUEZ - CINDY PANUCO PARKING AT SUM

16.00

Security Bank - Gen C RODRIGUEZ PARKING FOR SUMMARY JUDG

129.48

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SECURITY BANK OF CALIFORNIA
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IRVINDALE, CA 91706
90-4401/1222

63805

11/25/2014

PAY TO THE ORDER OF CINDY PANUCO

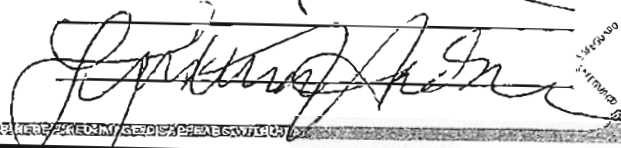
**12.50

Twelve and 50/100*****

\$

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LOS ANGELES, CA 90042


GENERAL COUNSEL

MEMO RODRIGUEZ PARKING FOR MOTION TO DECER

⑈063805⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

11/25/2014

63805

CINDY PANUCO PARKING AT MTN TO DECERTIF

12.50

Security Bank - Gen C RODRIGUEZ PARKING FOR MOTION TO DEC

12.50

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IRVINDALE, CA 91706
90-4401/1222

63786

11/18/2014

PAY TO THE ORDER OF

David Hannah-

\$ **290.56

Two Hundred Ninety and 56/100*****

DOLLARS

David Hannah

GENERAL ACCOUNT

Barbara E. Hadsell
[Signature]

MEMO

RODRIGUEZ/ [REDACTED]

⑈063786⑈ ⑆122244016⑆ 140514753⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
David Hannah-

11/18/2014

63786

RODRIGUEZ D. HANNAH MILEAGE/PARKING

82.46

[REDACTED]

Security Bank - Gen C RODRIGUEZ/ [REDACTED]

290.56

10/28 - 11/17/14 MILEAGE/CASH REIMBURSEMENT.

CLIENT	TOTAL MILES	X \$0.56	TOTAL CASH REIMBURSEMENT	TOTAL
[REDACTED]				
0906 Rodriguez	116.0	= \$64.96	+ \$17.50	= \$82.46
[REDACTED]				

10/28 - 11/17/14 TOTAL MILES - [REDACTED]
 TOTAL CASH REIMBURSEMENT [REDACTED]

10/28 - 11/17/14 GRAND TOTAL: \$290.56

-David Hannah

MILEAGE FORM

2014 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PARK
10/31	0906 Rodriguez	Tami	23.2	USDC/Rene Shehadeh	\$5.00
11/3	0906 Rodriguez	Tami	23.2	USDC	\$5.00
11/7	0906 Rodriguez	Jessica	23.2	USDC	\$2.50
11/10	0906 Rodriguez	Jessica	23.2	USDC	\$2.50
11/17	0906 Rodriguez	Norma	23.2	USDC	\$2.50

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& RENICK LLP (626) 585-9600

S
SECURITY BANK OF CALIFORNIA
5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

63750

11/4/2014

PAY TO THE ORDER OF

CLAUDIA DIAZ

\$ **111.57

One Hundred Eleven and 57/100*****

DOLLARS

CLAUDIA DIAZ
519 SOUTH STREET
GLENDALE, CA 91202

GENERAL ACCOUNT
Barbara E. Nason
[Signature]

MEMO

MILEAGE/PARKING - [REDACTED] RODRIGU

⑈063750⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
CLAUDIA DIAZ

11/4/2014

63750

CLAUDIA DIAZ - MILEAGE - DELIVER DOCS TO OP

77.44

[REDACTED]

Security Bank - Gen C MILEAGE/PARKING [REDACTED] RODRI

111.57

10/01/14	Rodriguez Filing/Courtesy Copy - LASC	Round Trip Miles 22	12.32
10/24	Deliver Rodriguez Docs to Opp Counsel in Northridge	58.14	32.56
10/31	Deliver Rodriguez Docs to Opp Counsel in Northridge	58.14	32.56
		Total: [REDACTED] @	156 -

111.57

Date: November 3, 2014

Claudia Diaz Claudia Diaz
 BEH Beh

Rodriguez - 77.44

[REDACTED]

111.57

HADSELL The Marine Building
STORMER 128 North Fair Oaks Avenue, Suite 204
& RENICK LLP Pasadena, California 91103
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5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

63719

10/30/2014

PAY TO THE ORDER OF Mario Orozco Vazquez

\$ **17.44

Seventeen and 44/100

DOLLARS

Mario Orozco Vazquez

GENERAL ACCOUNT

Barbara E. Hadsell
Cristina [Signature]

MEMO RODRIGUEZ PARKING & MILEAGE FOR TRAVEL

10/29/14
"063719" [Redacted]

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
Mario Orozco Vazquez

10/30/2014

63719

RODRIGUEZ MARIO VAZQUEZ- PARKING/MILEA

17.44

Security Bank - Gen C RODRIGUEZ PARKING & MILEAGE FOR TRA

17.44

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& RENICK LLP (626) 585-9600


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IRWINDALE, CA 91706
90-4401/1222

63699

10/28/2014

PAY TO THE ORDER OF David Hannah-

\$ **283.09

Two Hundred Eighty-Three and 09/100*****

DOLLARS

Daivid Hannah

GENERAL ACCOUNT

Barbara E. Hadsell
[Signature]

MEMO

RODRIGUEZ/ [REDACTED]

⑈063699⑈ [REDACTED]

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
David Hannah-

10/28/2014

63699

RODRIGUEZ DAVID HANNAH MILEAGE/PARKING

102.40

[REDACTED]

Security Bank - Gen C RODRIGUEZ/ [REDACTED]

283.09

10/7-10/27/14 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.56	TOTAL CASH REIMBURSEMENT	TOTAL
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
0906 Rodriguez	165.0	= \$92.40	+ \$10.00	= \$102.40



10/7-10/27/14 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT = [REDACTED]

10/7-10/27/14 GRAND TOTAL = \$283.09

- David J. Hannah

Ok to pay

MILEAGE FORM

2014 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PAY
10/8	0906 Rodriguez	Norma	23.2	USDC	\$2.50
10/16	0906 Rodriguez	Norma	23.2	Rene Shahandeh	\$2.50
10/17	0906 Rodriguez	Norma	70.8	Janie Jefferey - Northridge	0
10/22	0906 Rodriguez	Jessica	24.6	LACC District Office of General Counsel	\$2.50
10/27	0906 Rodriguez	Jessica	23.2	USDC	\$2.50

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& RENICK LLP Pasadena, California 91108
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IRVINDALE, CA 91706
90-4401/1222

63635

10/9/2014

PAY TO THE ORDER OF CINDY PANUCO

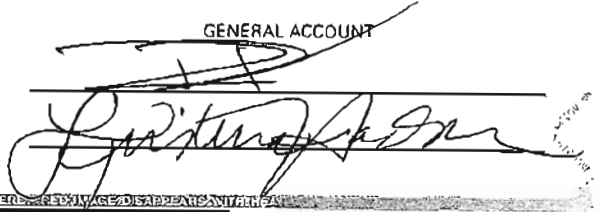
\$ **16.00

Sixteen and 00/100

DOLLARS

CINDY PANUCO
805 TEMPLE TERRACE #207
LSO ANGELES, CA 90042

GENERAL ACCOUNT



MEMO RODRIGUEZ PARKING FOR DEPO OF CHRIS RO.

⑈063635⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
CINDY PANUCO

10/9/2014

63635

CINDY PANUCO PARKING AT DEPO CHRIS ROD

16.00

Security Bank - Gen C RODRIGUEZ PARKING FOR DEPO OF CHRIS

16.00

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& RENICK LLP (626) 585-9600


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IRWINDALE, CA 91706
90-4401/1222

63620

10/7/2014

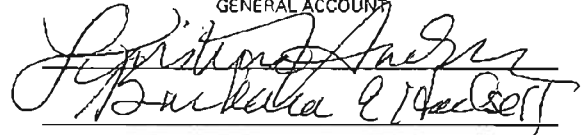
PAY TO THE ORDER OF David Hannah-

\$ **180.22

One Hundred Eighty and 22/100*****
DOLLARS

Daivd Hannah

GENERAL ACCOUNT



MEMO

[REDACTED] RODRIG

⑈063620⑈ ⑆122244016⑆ 140514753⑈

HADSELL, STORMER, & RENICK LLP - GENERAL ACCOUNT
David Hannah-

10/7/2014

63620

[REDACTED]

DAVID HANNAH MILEAGE/PARKING 15.49
Rodriguez

Security Bank - Gen C [REDACTED]

180.22

9/9-10/6/14 MILEAGE/CASH REIMBURSEMENT

CLIENT TOTAL MILES x \$.56 TOTAL CASH REIMBURSEMENT TOTAL



0906 Rodriguez 23.2 = \$ 12.99 + \$ 2.50 = \$ 15.49

9/9 - 10/6/14 TOTAL MILES: [REDACTED]
TOTAL CASH REIMBURSEMENT: [REDACTED]

9/9 - 10/6/14 GRAND TOTAL = \$180.22

-David Hannah

ok [signature]

MILEAGE FORM

2014
DATE

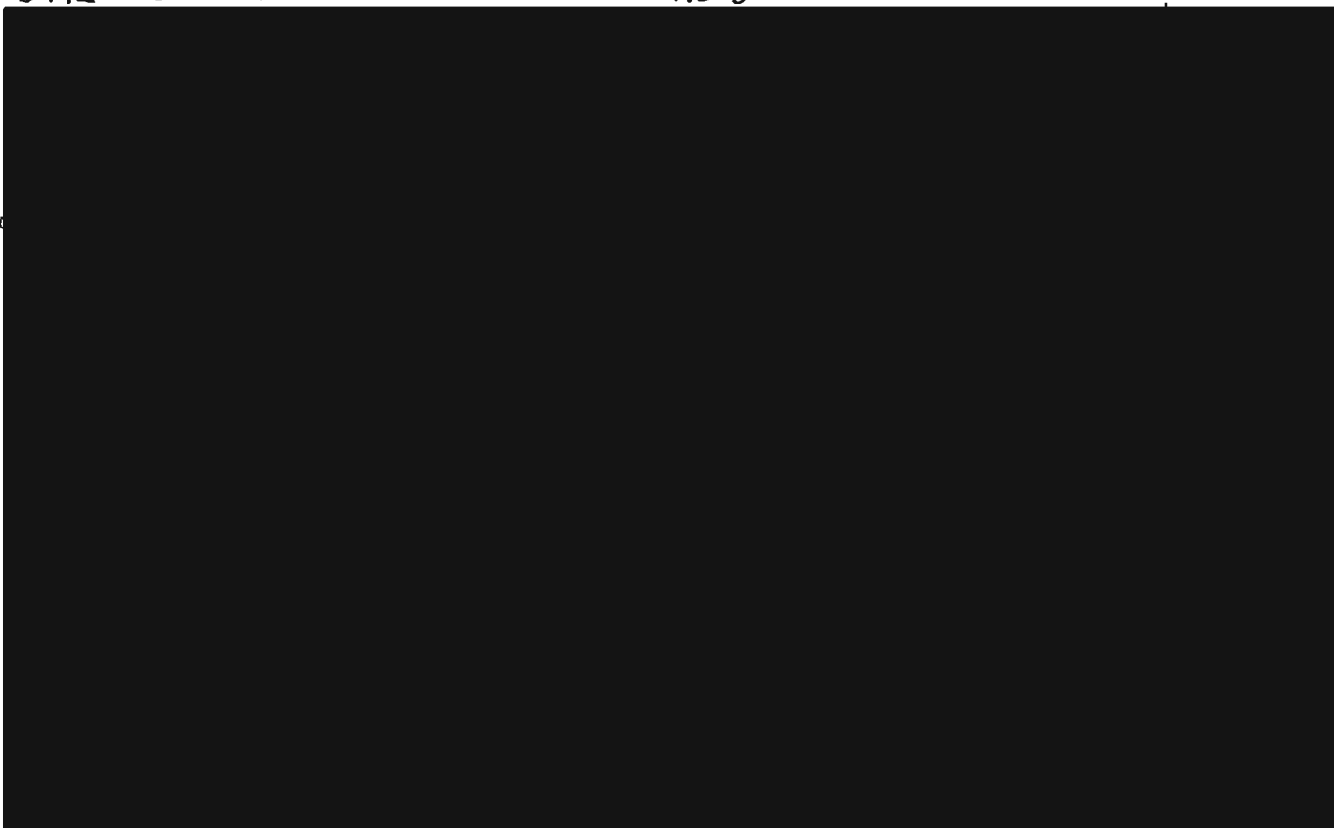
CLIENT

FOR

TOTAL
MILES

TRAVEL TO

PARK



10/6 0906 Rodriguez Cindy 23.2 USDC \$ 2.50



Rodriguez
Cowles Copy
Parking



LOS ANGELES MALL
225 N. Los Angeles
LA, CA 90012

Pay Station Number: 8
Entered: 10/01/2014 10:35
Exited: 10/01/2014 10:56
Ticket Number: 9837
Transaction Number: 9343
Rate: A
Parking Fee: \$5.00
Total Tax: \$0.00

Total Fee: \$5.00
Fee Paid: \$20.00
Change: \$15.00

Thank you for your visit
Please come again!

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

63130

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 07/29/14
Check Number: 63130
Amount: 271.20

Memo:

[REDACTED] /RODRIGUEZ, D.
[REDACTED]

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

63130

NUMBER
63130

DATE \$ AMOUNT
07/29/14 271.20

^^Two Hundred Seventy-one And 20/100 Dollars^^

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

[Handwritten Signature]

⑈063130⑈

6/23 - 7/11/14 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$:56	TOTAL CASH REIMBURSEMENT	TOTAL
0928 Betj	118.7	= \$66.47	+ \$25.75	= \$92.22

0906 Rodriguez	23.4	= \$13.10	+ \$2.50	= \$15.60
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6/23 - 7/11/14 TOTAL MILES =

TOTAL CASH REIMBURSEMENT =

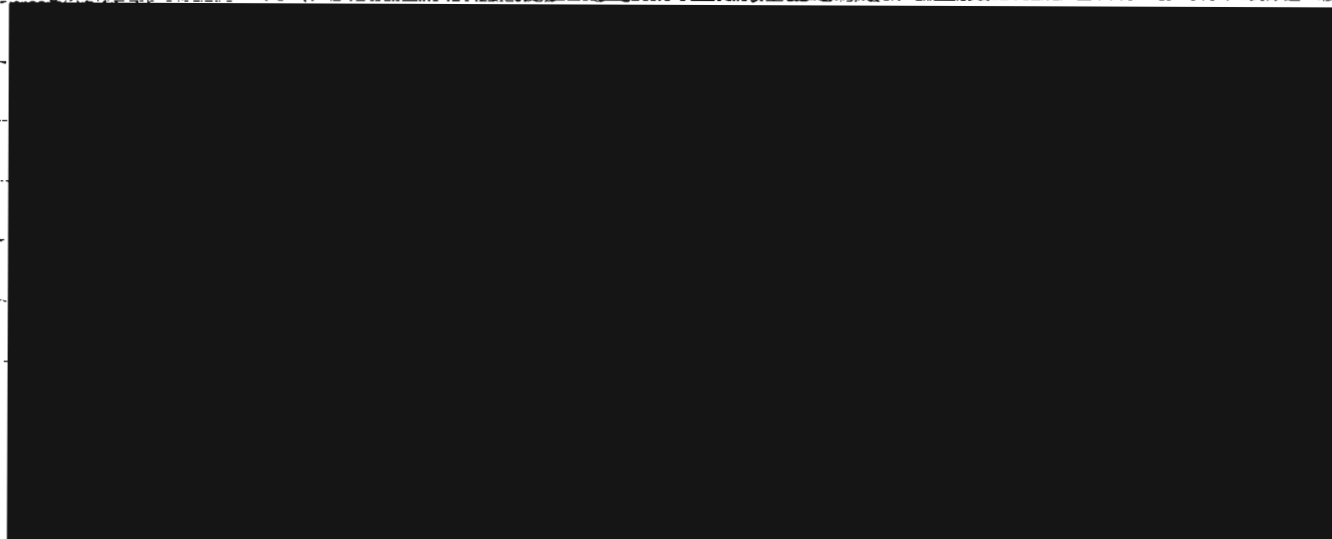
6/23 - 7/11/14 GRAND TOTAL = \$271.20

- David Hannah

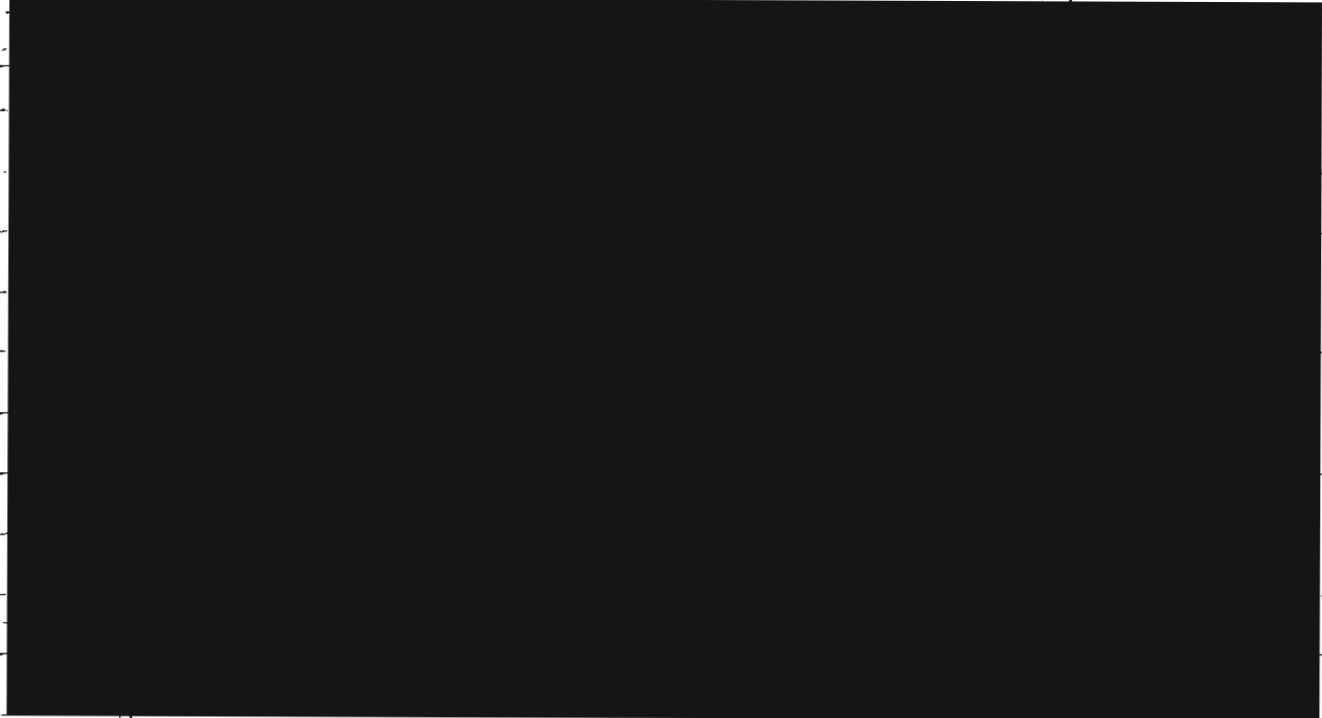
Betj

MILEAGE FORM

2014 DATE CLIENT FOR TOTAL MILES TRAVEL TO PERK



6/30 0906 Rodri^v ~~xxxx~~ Jessira 23.4 Rene Shahmoudah \$2.50



HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

U 2 U 1 0

From:
HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 03/06/14
Check Number: 62610
Amount: 396.00

Memo:
D

[REDACTED] RODRO

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600


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6200 IRVINDALE AVE., STE. 188
IRVINDALE, CA 91706
90-4401/1222

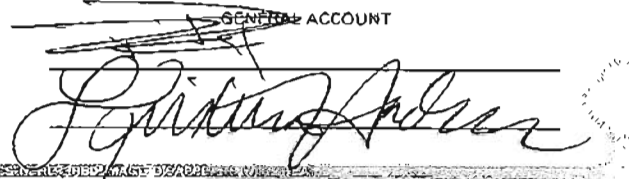
62610
NUMBER
62610

DATE \$ AMOUNT
03/06/14 396.00

Three Hundred Ninety-six And 00/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT


⑈062610⑈ [REDACTED]

1/27 - 2/18/14 MILEAGE/CASH REIMBURSEMENT

DATE CLIENT	TOTAL MILES	x \$.565	TOTAL CASH REIMBURSEMENT	TOTAL
----------------	----------------	-----------	-----------------------------	-------



0906 Rodriguez	9.9	= \$ 5.59	+ \$ 3.75	= \$ 9.34
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1/27 - 2/18/14 TOTAL MILES =



TOTAL CASH REIMBURSEMENT =



1/27 - 2/18/14 GRAND TOTAL = \$396.00

-David Hannah

jk Bet

MILEAGE FORM

2014 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PART

2/7	0906 Rodriguez	Norma /	9.9	USDC	\$750 - \$30
-----	----------------	---------	-----	------	--------------

--	--	--	--	--	--

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

02241

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 12/05/13
Check Number: 62247
Amount: 92.11

Memo:

ACCOUNT# 5474 9750 0872 3404
RODRIGUEZ [REDACTED]

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



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5200 IRWINDALE AVE., STE. 158
IRWINDALE, CA 91706
90-4401/1222

62247

NUMBER
62247

DATE
12/05/13

\$

AMOUNT
92.11

Ninety-two And 11/100 Dollars

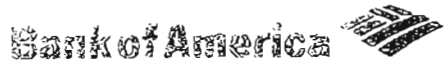
PAY
TO THE
ORDER
OF

BUSINESS CARD
P.O. BOX 15710
WILMINGTON, DE 19886-5710

GENERAL ACCOUNT

Barbara S. Hadsell
[Signature]

⑈062247⑈ [REDACTED]



ANNE RICHARDSON

WorldPoints

October 21, 2013 - November 20, 2013

Cardholder Statement

Account Information:
www.bankofamerica.com

Mail Billing Inquiries to:
BANK OF AMERICA
PO BOX 982238
EL PASO, TX 79998-2238

Mail Payments to:
BUSINESS CARD
PO BOX 15796
WILMINGTON, DE 19886-5796

Customer Service:
1.800.673.1044, 24 Hours

TTY Hearing Impaired:
1.888.500.6267, 24 Hours

Outside the U.S.:
1 509.353.6656, 24 Hours

For Lost or Stolen Card:
1.800.673.1044, 24 Hours

Business Offers:
www.bankofamerica.com/mybusinesscenter

Payment Information

New Balance Total \$92.11
Minimum Payment Due \$10.00
Payment Due Date 12/17/13

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a fee based on the outstanding balance:
\$19.00 for balance less than \$100.01
\$29.00 for balance less than \$1,000.01
\$39.00 for balance less than \$5,000.01
\$49.00 for balance greater than \$5,000.01

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance.

Account Summary



Transactions

Posting Date	Transaction Date	Description	Reference Number	Amount
11/13	11/12	CIVIC CENTER PARKING LOS ANGELES CA - Rodriguez	55436873316263167691741	15.00

0002000 0001000 0009211

BUSINESS CARD
PO BOX 15796
WILMINGTON, DE 19886-5796

ANNE RICHARDSON
HADSELL AND STORMER INC
HADSELL AND STORMER INC
128 N FAIR OAKS AVE
PASADENA, CA 91103-364528

**N0011899

Account Number [REDACTED]
October 21, 2013 - November 20, 2013

New Balance Total \$92.11
Minimum Payment Due \$10.00
Payment Due Date 12/17/13

Enter payment amount

\$

92.11

Check here for a change of mailing address or phone numbers.
Please provide all corrections on the reverse side

Mail this coupon along with your check payable to:
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or make your payment online at
www.bankofamerica.com

⑆5499900111⑆15795008723404⑈

REDACTED

Stormer Decl. - Ex. C
Page 352

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

U 2 2 0

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 12/03/13
Check Number: 62231
Amount: 380.87

Memo

[REDACTED] RODRIGUEZ [REDACTED]

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

6223

NUMBER
62231

DATE 12/03/13 \$ AMOUNT 380.87

Three Hundred Eighty And 87/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

David Hannah
[Signature]

⑈062231⑈

[REDACTED]

MILEAGE FORM

2013 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PURPOSE
--------------	--------	-----	----------------	-----------	---------

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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11/13	0906 Rodriguez	Jessica	24.2	LA Community College District	\$3.1
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
------------	------------	------------	------------	------------	------------

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

02101

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 11/14/13
Check Number: 62181
Amount: 41.50

Memo:

RODRIGUEZ/ [REDACTED] MILEAGE REIMBURSEMENT

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(828) 585-9600


SECURITY BANK OF CALIFORNIA
6200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

62181

NUMBER
62181

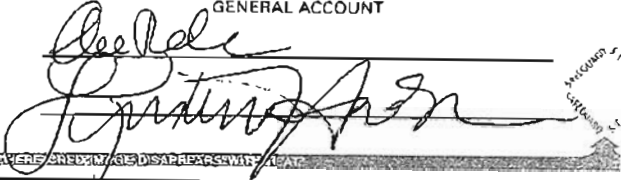
DATE \$ AMOUNT
11/14/13 41.50

Forty-one And 50/100 Dollars

PAY
TO THE
ORDER
OF

CLAUDIA DIAZ

GENERAL ACCOUNT



062181

REDACTED

Claudia Diaz - Milaig Round Trip

11/1/13 Pick UP Docs Downtown LA for "Rodriguez" 27.6



Total



Miles

OK -
Bel

186:906 Rodriguez - 15.60



HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

02100

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 11/05/13
Check Number: 62135
Amount: 224.19

Memo:

[REDACTED] RODRIGUEZ [REDACTED]

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

62135

NUMBER
62135

DATE \$ AMOUNT
11/05/13 224.19

Two Hundred Twenty-four And 19/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

Lee R. [Signature]
[Signature]

⑈062135⑈ [REDACTED]

10/7 - 11/1/13 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.65	CASH REIMBURSEMENT	TOTAL
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
0906 Rodriguez	49.6	= \$28.02	+ \$7.50	= \$35.52



10/7 - 11/1/13 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT = [REDACTED]

10/7 - 11/1/13 GRAND TOTAL = \$224.19

- David Hannah

Bea

MILEAGE FORM

2013 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PARK
--------------	--------	-----	----------------	-----------	------

10/16	0906 Rodriguez	Norma	23.2	USDC	\$5.00
-------	----------------	-------	------	------	--------

10/30	0906 Rodriguez	Jessica	26.4	LA Community College Dist	\$2.50
-------	----------------	---------	------	---------------------------	--------

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

01210

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 07/30/13
Check Number: 61218
Amount: 49.31

Memo:

RODRIGUEZ MILEAGE/PARKING
REIMBURSEMENTS

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

61218

NUMBER
61218

DATE \$ AMOUNT
07/30/13 49.31

Forty-nine And 31/100 Dollars

PAY
TO THE
ORDER
OF

CINDY PANUCO

GENERAL ACCOUNT

Barbara E. Hadsee
Cristina Aron

⑈061218⑈

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

61806

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 04/09/13
Check Number: 61806
Amount: 269.45

Memo:

RODRIGUEZ/ [REDACTED]

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marne Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4491/1222

61806

NUMBER
61806

DATE \$ AMOUNT
04/09/13 269.45

Two Hundred Sixty-nine And 45/100 Dollars

PAY TO THE ORDER OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

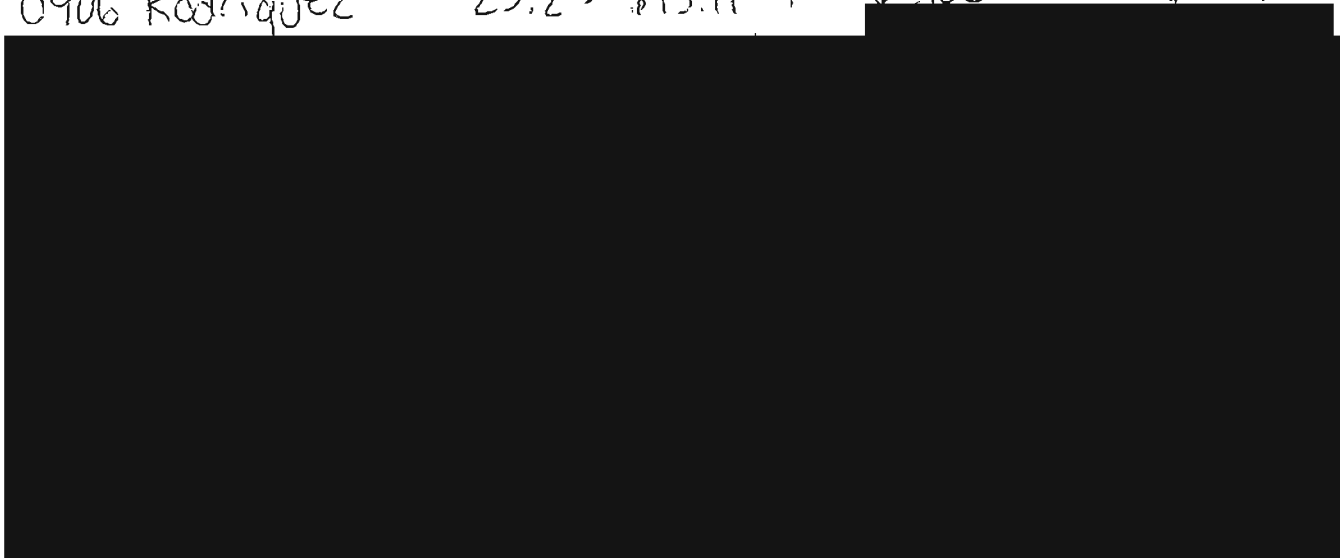
GENERAL ACCOUNT

David Hannah
[Signature]

⑈06 1806⑈ [REDACTED]

3/7-4/5/13 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.565	TOTAL CASH REIMBURSEMENT	TOTAL
0906 Rodriguez	23.2	= \$13.11	+ \$5.00	= \$18.11



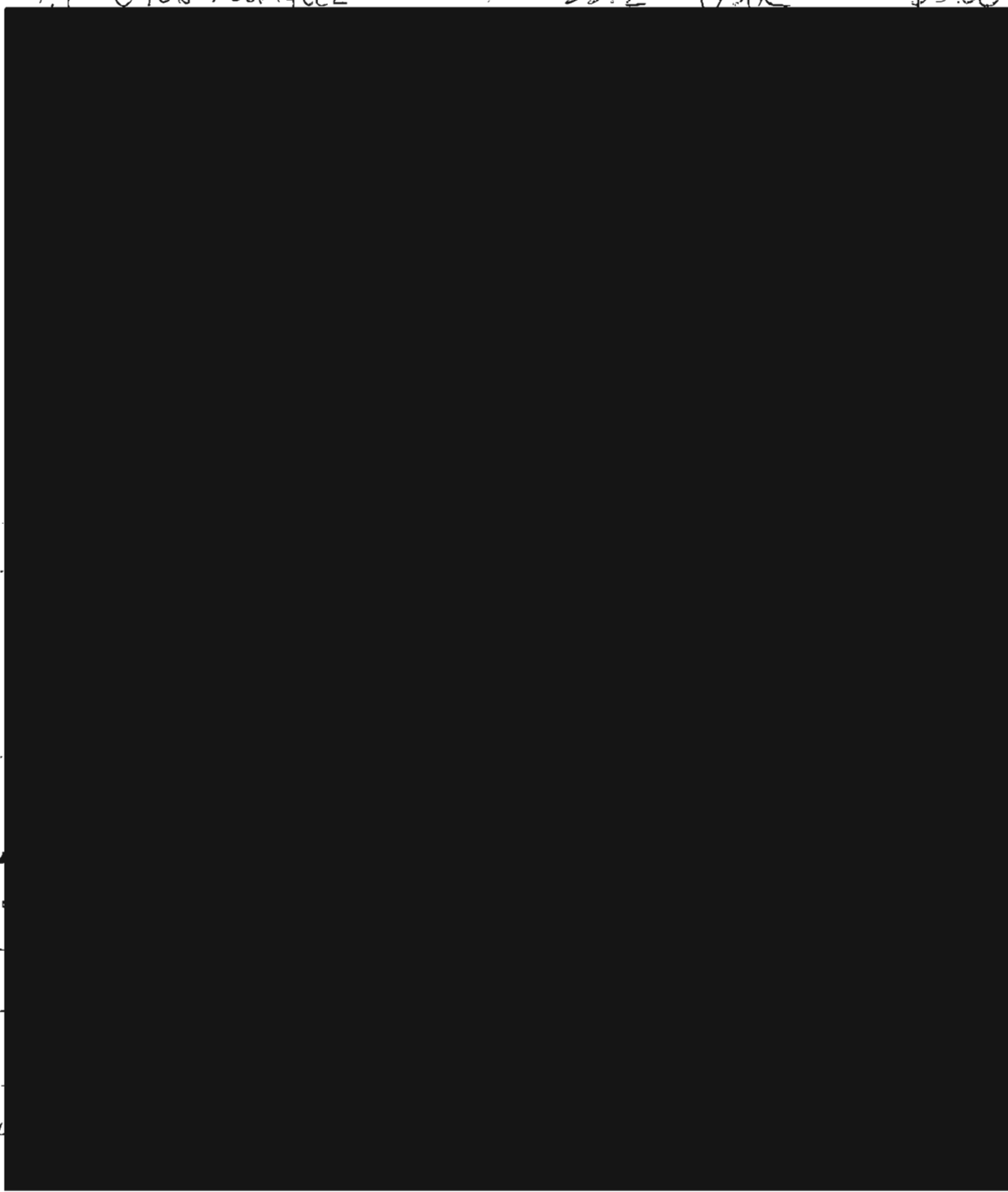
3/7-4/5/13 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT [REDACTED]

3/7-4/5/13 GRAND TOTAL = \$269.45

-David Hannah

MILEAGE FORM

2013 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PARK
3/7	0906 Rodriguez	Tami	23.2	USDC	\$5.00



HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60810

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103


Date: 11/29/12
Check Number: 60810
Amount: 27.08

Memo:

RODRIGUEZ MILEAGE REIMBURSEMENT

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

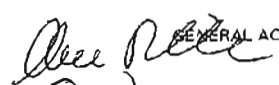
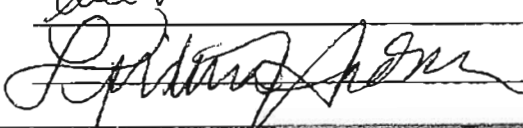
<u>HADSELL</u>		60810	
<u>STORMER</u>	The Marine Building 128 North Fair Oaks Avenue, Suite 204 Pasadena, California 91103 (626) 585-9600		
<u>RICHARDSON</u>			
<u>& RENICK LLP</u>			



SECURITY BANK OF CALIFORNIA
5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

	DATE	S	AMOUNT
	11/29/12		27.08

Twenty-seven And 08/100 Dollars

PAY TO THE ORDER OF	CINDY PANUCO	GENERAL ACCOUNT  
------------------------------	--------------	---

"060810" [REDACTED]

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60742

From:

HADSELL, STORMER, RICHARDSON & RENICK, L.
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 11/08/12
Check Number: 60742
Amount: 27.31

Memo:

RODRIGUEZ TRAVEL EXPENSES MILEAGE
11/1/12

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 595-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

60742

NUMBER
60742

DATE 11/08/12 \$ AMOUNT 27.31

Twenty-seven And 31/100 Dollars

PAY
TO THE
ORDER
OF

CINDY PANUJO

GENERAL ACCOUNT

⑈060742⑈

HADSELL STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60743

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 11/08/12
Check Number: 60743
Amount: 27.31

Memo:

RODRIGUEZ TRAVEL EXPENSES MILEAGE
10/27/12

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
6200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

60743

NUMBER
60743

DATE \$ AMOUNT
11/08/12 \$ 27.31

Twenty-seven And 31/100 Dollars

PAY
TO THE
ORDER
OF

CINDY PANUCCO

GENERAL ACCOUNT

[Handwritten Signature]

⑈060743⑈

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60630

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 10/04/12
Check Number: 60630
Amount: 14.00

Memo:

ACCT# [REDACTED] RODRIGUEZ

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
6200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91705
90-4401/1222

60630

NUMBER
60630

DATE 10/04/12 \$ AMOUNT 14.00

Fourteen And 00/100 Dollars

PAY
TO THE
ORDER
OF

BUSINESS CARD
P.O. BOX 15710
WILMINGTON, DE 19886-5710

GENERAL ACCOUNT
Barbara Hadsell
[Signature]
EXPIRES 11/04
2010

⑈060630⑈



ANNE RICHARDSON

WorldPoints

August 21, 2012 - September 20, 2012

Cardholder Statement

Account Information:
www.bankofamerica.com

Mail Billing Inquiries to:
BANK OF AMERICA
PO BOX 982238
EL PASO, TX 79998-2238

Mail Payments to:
BUSINESS CARD
PO BOX 15796
WILMINGTON, DE 19886-5796

Customer Service:
1.800.673.1044, 24 Hours

TTY Hearing Impaired:
1.888.500.6267, 24 Hours

Outside the U.S.:
1.509.353.6656, 24 Hours

For Lost or Stolen Card:
1.800.673.1044, 24 Hours

Business Offers:
www.bankofamerica.com/mybusinesscenter

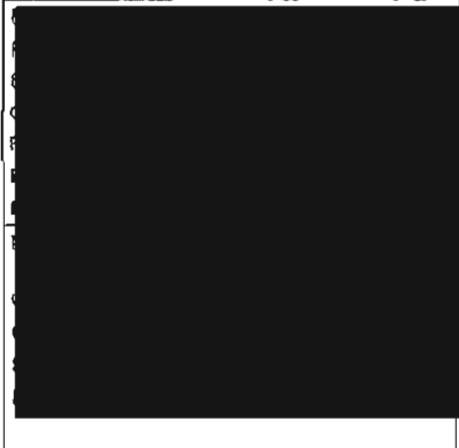
Payment Information

New Balance Total \$14.00
Minimum Payment Due \$10.00
Payment Due Date 10/17/12

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a fee based on the outstanding balance:
\$19.00 for balance less than \$100.01
\$29.00 for balance less than \$1,000.01
\$39.00 for balance less than \$5,000.01
\$49.00 for balance greater than \$5,000.01

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance.

Account Summary



Transactions

Posting Date	Transaction Date	Description	Reference Number	Amount
08/27	08/24	Purchases and Other Charges EL PUEBLO PARKING LOT LOS ANGELES CA	55436872237262377018537	14.00
		TOTAL PURCHASES AND OTHER CHARGES FOR THIS PERIOD		\$14.00

0005902 0001000 0001400



BUSINESS CARD
PO BOX 15796
WILMINGTON, DE 19886-5796



ANNE RICHARDSON
HADSELL AND STORMER INC
HADSELL AND STORMER INC
128 N FAIR OAKS AVE
PASADENA, CA 91103-364528

***P0013036

Account Number: [REDACTED]
August 21, 2012 - September 20, 2012

New Balance Total \$14.00
Minimum Payment Due \$10.00
Payment Due Date 10/17/12

Enter payment amount



14.00

Check here for a change of mailing address or phone numbers.
Please provide all corrections on the reverse side.

Mall this coupon along with your check payable to:
BUSINESS CARD,
or make your payment online at
www.bankofamerica.com

⑆54999001⑆15795010740206⑈

REDACTED

Stormer Decl. - Ex. C
Page 368

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60539

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 09/11/12
Check Number: 60539
Amount: 229.12

Memo:

[REDACTED]
[REDACTED] RODRIGUEZ/ [REDACTED]

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
6200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

60539

NUMBER
60539

DATE 09/11/12 AMOUNT \$ 229.12

Two Hundred Twenty-nine And 12/100 Dollars

PAY TO THE ORDER OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

[Handwritten Signature]
[Handwritten Signature]

⑈060539⑈

8/27 - 9/10/12 MILEAGE / CASH REIMBURSEMENT

CLIENT	TOTAL MILES	\$.555	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	---------	--------------------------	-------



0906 Rodriguez	11.6	= \$6.44	+ \$2.50	= \$8.94
----------------	------	----------	----------	----------

8/27 - 9/10/12 TOTAL MILES [REDACTED]
 TOTAL CASH REIMBURSEMENT = [REDACTED]

8/27 - 9/10/12 GRAND TOTAL = \$229.12

- David Hannah

10/11/11

2012
DATE

CLIENT

FOR

TOTAL
MILES

TRAVEL TO

PARK



11/0 0906 Rodriguez Bizarra (11.6) 0.50 \$2.50

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60479

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 08/28/12
Check Number: 60479
Amount: 205.14

Memo:

[REDACTED] RODRIGUEZ [REDACTED]

HADSELL The Marine Building
STORMER 128 North Fair Oaks Avenue, Suite 204
KEENY Pasadena, California 91103
RICHARDSON (626) 585-9600
& RENICK LLP



SECURITY BANK OF CALIFORNIA
5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

60479

NUMBER
60479

DATE \$ AMOUNT
08/28/12 205.14

Two Hundred Five And 14/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

Blue Note
[Signature]

⑈060479⑈ [REDACTED]

8/7 - 8/24/12 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	X \$.555	TOTAL CASH REIMBURSEMENT	TOTAL
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
0906 Rodriguez	69.6	= \$38.63	+ \$15.00	= \$53.63
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

8/7 - 8/24/12 TOTAL MILES = [REDACTED]
TOTAL CASH REIMBURSEMENT = [REDACTED]

8/7 - 8/24/12 GRAND TOTAL = \$205.14

- David Hannah

pls pay

MILEAGE FORM

2012
DATE CLIENT FOR TOTAL MILES TRAVEL TO PARK



8/16 0906 Rodriguez Norms 23.2 USDC \$5.00



8/17 0906 Rodriguez Bizncz 23.2 Rene Shehandeh \$5.00

8/20 0906 Rodriguez Bizncz 23.2 USDC \$5.00



HADSELL, STORMER, KEENEY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60399

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 08/07/12
Check Number: 60399
Amount: 111.10

Memo:

[REDACTED] RODRIGUEZ

HADSELL
STORMER
KEENEY
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

60399

NUMBER
60399

DATE 08/07/12 AMOUNT \$ 111.10

One Hundred Eleven And 10/100 Dollars

PAY
TO THE
ORDER
OF

CINDY PANUCO

GENERAL ACCOUNT

[Handwritten Signature]

⑈060399⑈ [REDACTED]

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60288

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 07/10/12
Check Number: 60288
Amount: 161.49

Memo:

[REDACTED] /RODRIGUEZ/ [REDACTED]

HADSELL
STORMER
KEENY
RICHARDSON
& RENICK LLP
The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600


SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

60288

NUMBER
60288

DATE \$ AMOUNT
07/10/12 161.49

One Hundred Sixty-one And 49/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

Baileya E. Hodges
[Signature]

⑈060288⑈

6/25 - 7/9/12 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.555	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	-----------	--------------------------	-------



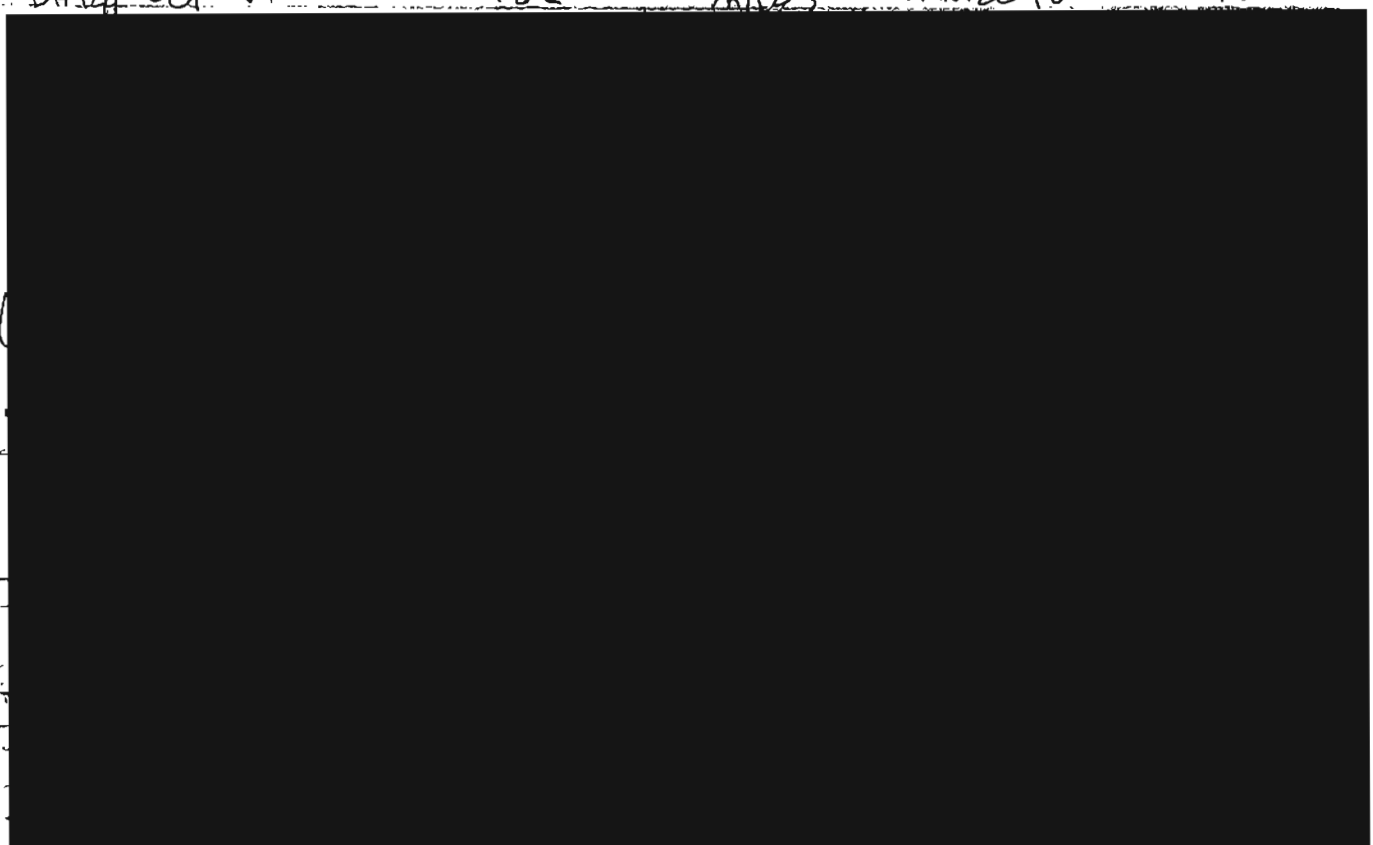
0906 Rodriguez	23.2	\$12.88	+ \$150.90	= \$163.78
----------------	------	---------	------------	------------

6/25 - 7/9/12 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT = [REDACTED]
 6/25 - 7/9/12 GRAND TOTAL = \$161.49

- David Hannah

MILEAGE FORM

2012 DATE CLIENT FOR TOTAL MILES TRAVEL TO PERK



7/9 0906 Rodriguez Blanca 23,2 USDC \$2.50

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 07/05/12
Check Number: 60275
Amount: 162.43

Memo:

ACCT# [REDACTED] RODRIGUEZ [REDACTED]
RICHARDSON CARD

HADSELL The Marine Building
STORMER 128 North Fair Oaks Avenue, Suite 204
KEENY Pasadena, California 91103
RICHARDSON (626) 585-9600
& RENICK LLP


SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

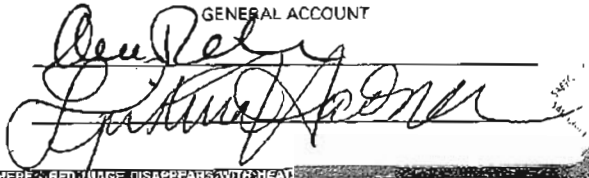
60275
NUMBER
60275

DATE \$ AMOUNT
07/05/12 162.43

One Hundred Sixty-two And 43/100 Dollars

PAY
TO THE
ORDER
OF

BUSINESS CARD
P.O. BOX 15710
WILMINGTON, DE 19886-5710

GENERAL ACCOUNT


⑈060275⑈ [REDACTED]

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60235

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 06/26/12
Check Number: 60235
Amount: 207.80

Memo:

[REDACTED] RODRIGU
[REDACTED]

HADSELL
STORMER
KEENY
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91708
90-4401/1222

60235

NUMBER
60235

DATE \$ AMOUNT
06/26/12 207.80

Two Hundred Seven And 80/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

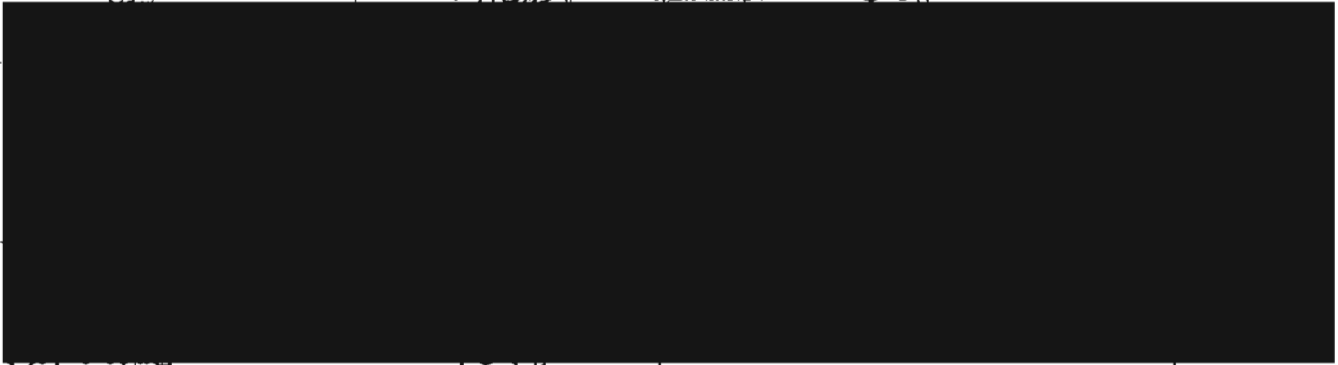
GENERAL ACCOUNT

David Hannah
[Signature]

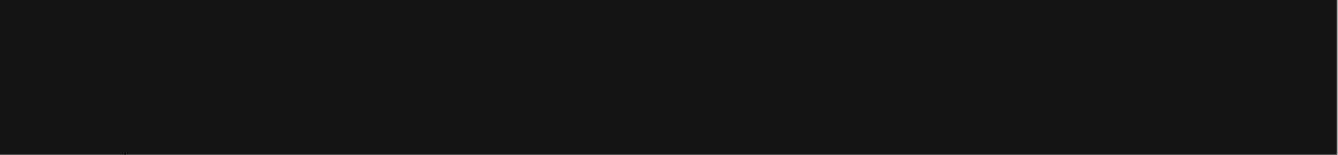
⑈060235⑈

6/4 - 6/25/12 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$0.555	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	-----------	--------------------------	-------



0906 Rodriguez	23.2	= \$12.88	+ \$5.00	= \$17.88
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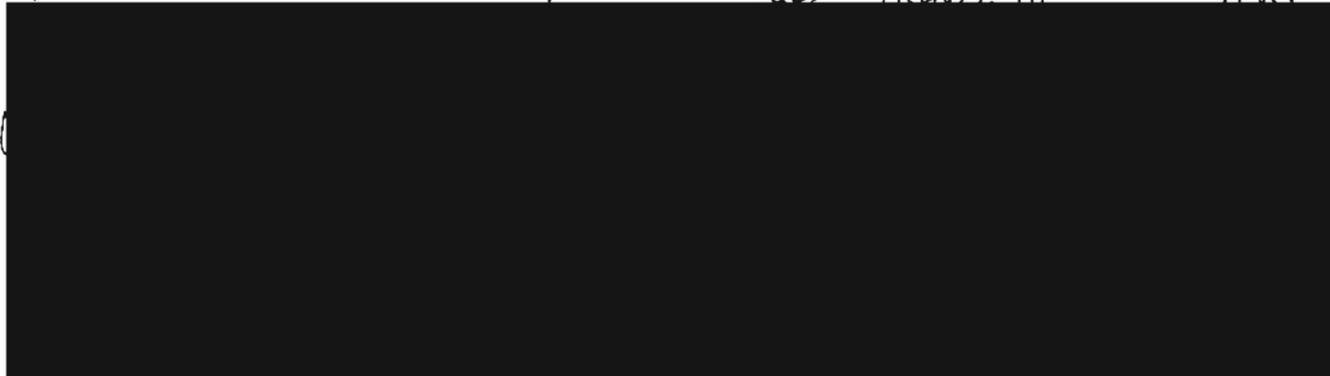
6/4 - 6/25/12 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT = [REDACTED]

6/4 - 6/25/12 GRAND TOTAL = \$207.80
 - David Hannah

OK

MILEAGE FORM

2012
DATE CLIENT FOR TOTAL MILES TRAVEL TO PARTY



10/11 OYO, Rodriguez B. enca 23.2 USDC \$5.00



HADSELL, STORMER, KEENEY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60195

From:

HADSELL, STORMER, KEENEY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 06/19/12
Check Number: 60195
Amount: 27.54

Memo:

RODRIGUEZ MILEAGE AND PARKING AT
SETTLEMENT CONFERENCE

HADSELL
STORMER
KEENEY
RICHARDSON
& RENICK LLP

The Marne Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91708
90-4401/1222

60195

NUMBER
60195

DATE \$ AMOUNT
06/19/12 \$ 27.54

Twenty-seven And 54/100 Dollars

PAY
TO THE
ORDER
OF

CINDY PANUCO

GENERAL ACCOUNT

⑈060195⑈

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60175

From:
HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 06/12/12
Check Number: 60175
Amount: 30.00

Memo:
RODRIGUEZ [REDACTED]

HADSELL
STORMER
KEENY
RICHARDSON
& RENICK LLP
The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

60175
NUMBER
60175

DATE \$ AMOUNT
06/12/12 \$ 30.00

Thirty And 00/100 Dollars

PAY TO THE ORDER OF ANNE RICHARDSON

GENERAL ACCOUNT
[Handwritten Signature]

⑈060175⑈ [REDACTED]

office

Anne

188. 000 Rodriguez - 12.00

EL PUEBLO PARKING LO
125 PASEO DE LA PLAZA
4TH FLOOR
LOS ANGELES, CA, 90012
213-485-8248

Merchant ID: 8028940853
Term ID: 0031540008028940853000

Sale Rodriguez

XXXXXXXXXXXXXXXXXXXX286
MASTERCARD

Entry Method: Swiped

Amount:		
Tax:	\$	12.00
	\$	0.00
Total:	\$	12.00

06/01/12
Inv #: 000006
Approved: Online

18:32:59
Appr Code: 890052

Customer Copy
THANK YOU!

HADSELL, STORMER, KEENEY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

60096

From:

HADSELL, STORMER, KEENEY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 05/22/12
Check Number: 60096
Amount: 369.74

Memo:

[REDACTED] RODRIGUEZ/

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

HADSELL
STORMER
KEENEY
RICHARDSON
& RENICK LLP
The Marne Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600


SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 188
IRVINDALE, CA 91706
90-4401/1222

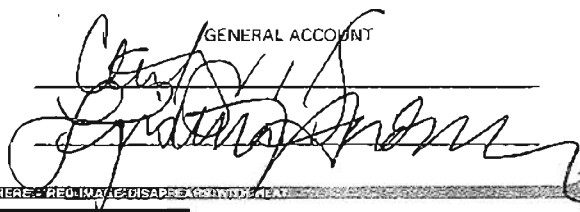
60096
NUMBER
60096

DATE 05/22/12 \$ AMOUNT 369.74

Three Hundred Sixty-nine And 74/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT


⑈060096⑈

5/8 - 5/21/12 MILEAGE/CASH REIMBURSEMENT
CLIENT TOTAL MILES x \$.555 TOTAL CASH REIMBURSEMENT TOTAL



0906 Rodriguez 23.2 = \$12.88 + \$5.00 = \$17.88

5/8 - 5/21/12 TOTAL MILES = [REDACTED]
TOTAL CASH REIMBURSEMENT = [REDACTED]

5/8 - 5/21/12 GRAND TOTAL = \$369.74

- David Hannah

[Handwritten signature]

MILEAGE FORM

2012
DATE

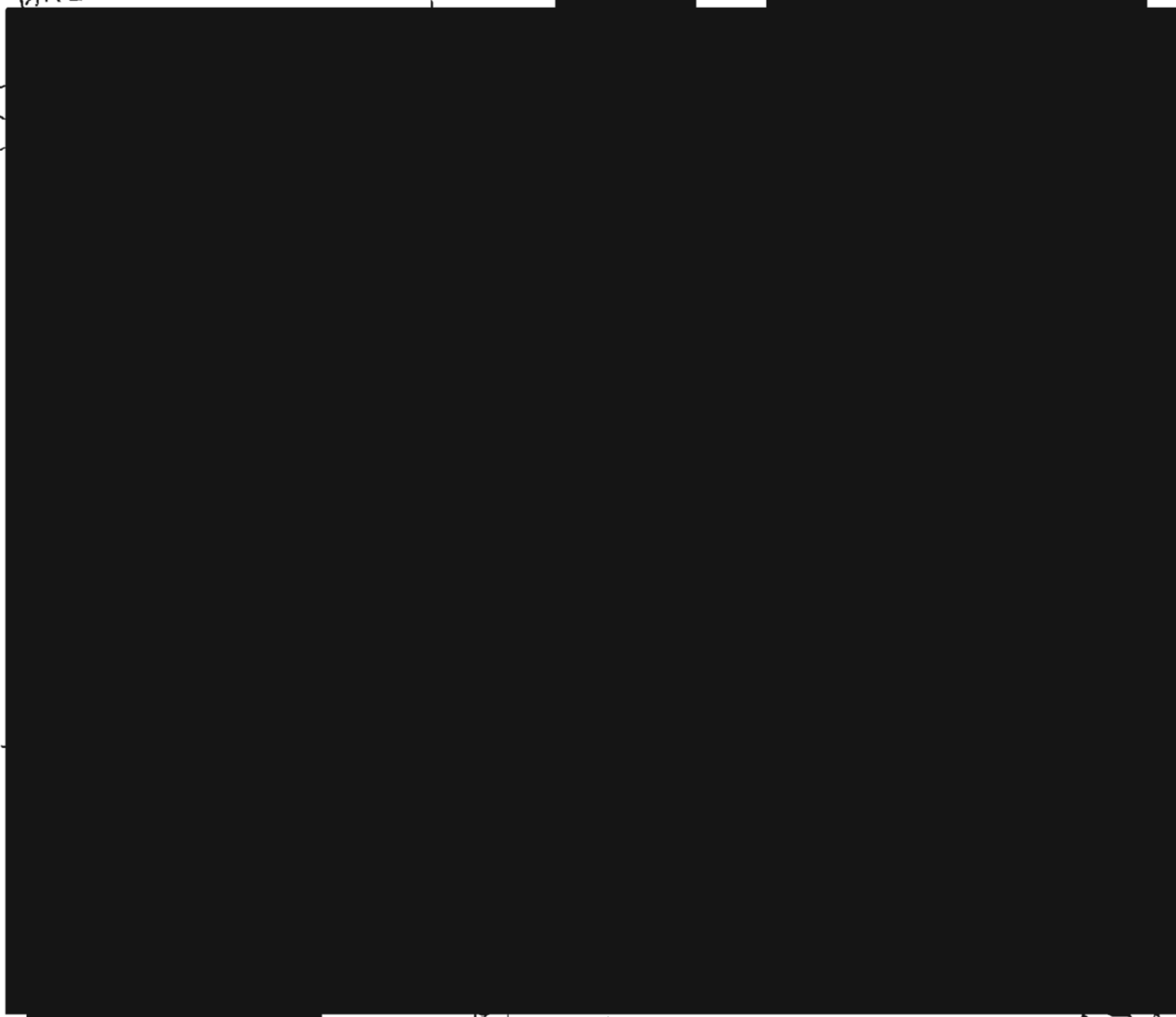
CLIENT

FOR

TOTAL
MILES

TRAVEL TO

DARK



5/21 0906 Rodriguez Biencas 23.2 USDC \$5.00

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

56708

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 04/05/12
Check Number: 56708
Amount: 24.10

Memo:

RODRIGUEZ PARKING/MILES MEETING AT OLU'S OFFICE

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

56708

HADSELL The Marine Building
STORMER 128 North Fair Oaks Avenue, Suite 204
KEENY Pasadena, California 91103
RICHARDSON (626) 585-9600
& RENICK LLP

FIRST CALIFORNIA BANK
15622 ARROW HIGHWAY
IRVINDALE, CALIFORNIA 91706

NUMBER 56708

90-3730/1222

DATE \$ AMOUNT
04/05/12 24.10

Twenty-four And 10/100 Dollars

PAY TO THE ORDER OF CINDY PANUCO

Barbara E. Hadsell
GENERAL ACCOUNT
[Signature]

056708

Rodriguez

Los Angeles Mall
City of Los Angeles

TRANSACTION NO. 468928
TICKET NO. 319713

OPERATOR-LANEY VILLANUEVA-23

IN: 03:30PM MAR30/12
OUT: 04:16PM MAR30/12

1 LA MALL \$7.50

BALANCE DUE \$7.50
CASH \$10.00
CHANGE DUE \$2.50

7.50
parking



HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

56699

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 04/03/12
Check Number: 56699
Amount: 177.17

Memo:

[REDACTED] RODR
IGUEZ/ [REDACTED]

56699

<p>HADSELL STORMER KEENY RICHARDSON & RENICK LLP</p>	<p>The Marine Building 128 North Fair Oaks Avenue, Suite 204 Pasadena, California 91103 (626) 585-9600</p>	<p>FIRST CALIFORNIA BANK 15622 ARROW HIGHWAY IRVINDALE, CALIFORNIA 91706</p> <p>90-3730/1222</p>	<p>NUMBER 56699</p>
---	--	--	-------------------------

DATE	\$	AMOUNT
04/03/12		177.17

One Hundred Seventy-seven And 17/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

[Handwritten Signature]

⑈056699⑈ 1: [REDACTED]

3/12 - 4/2/12 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.555	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	----------	--------------------------	-------



0906 Rodriguez 23.2 = \$12.88 + \$ 5.00 = \$17.88

3/12 - 4/2/12 TOTAL MILES

TOTAL CASH REIMBURSEMENT =

3/12 - 4/2/12 GRAND TOTAL = \$177.17

- David Hannah

2012
DATE

MILEAGE FORM

CLIENT FOR TOTAL MILES TRAVEL TO PARK



4/2 0906 Rodriguez Biznca 23.2 USDC \$5.00

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

56625

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 03/20/12
Check Number: 56625
Amount: 27.50

Memo:

[REDACTED] RODRIGUEZ PARKING

HADSELL
STORMER
KEENY
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600

FIRST CALIFORNIA BANK
15622 ARROW HIGHWAY
IRVINDALE, CALIFORNIA 91706

90-3730/1222

NUMBER 56625

56625

DATE 03/20/12 \$ AMOUNT 27.50

Twenty-seven And 50/100 Dollars

PAY
TO THE
ORDER
OF

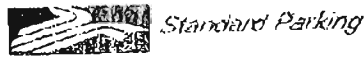
ANNE RICHARDSON

GENERAL ACCOUNT
Barbara Hedrick
[Signature]

⑈056625⑈

MODE	2-8400
RECEIPT OF	ING TICKET
DATE: 3-9-12	INITIALS: CAD
	AMOUNT
528-7	13.50
We appreciate y	\$13.50

office



Equitable Plaza
 3450 HOLSHIRE BLVD
 Los Angeles, CA 90017

Rodriguez

Fee Computer Number:	1
Cashier:	STANDARD ID #100
Transaction Number:	742131
Entered:	03/15/2012 08:54
Exited:	03/15/2012 11:27
Ticket #60661	Dispenser #1
Rate:	Regular Rate
Total Fee:	\$14.00
Cash:	\$20.00
Change:	\$6.00

Thank you for choosing
 Standard Parking
 Have a nice day

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

56471

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 02/09/12
Check Number: 56471
Amount: 312.82

Memo:

RODRIGUEZ/

HADSELL
STORMER
KEENY
RICHARDSON
& RENICK LLP
The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600

FIRST CALIFORNIA BANK
15822 ARROW HIGHWAY
IRWINDALE, CALIFORNIA 91706

90-3730/1222

56471

NUMBER 56471

DATE 02/09/12 \$ AMOUNT 312.82

Three Hundred Twelve And 82/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

David Hannah
[Signature]

⑈05647⑈

1/23 - 2/6/12 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.555	TOTAL CASH REIMBURSEMENT	TOTAL
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
0906 Rodriguez	46.4	= \$25.75 +	\$7.50	= \$33.25



1/23 - 2/6/12 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT = [REDACTED]

1/23 - 2/6/12 GRAND TOTAL = \$312.82

- David Hannah

ok bet

MILEAGE FORM

2012
DATE

CLIENT

FOR

TOTAL
MILES

TRAVEL TO

RATE

1/23

0906 Rodriguez

Bianca

23.2

USDC

\$2.50

1/30

0906 Rodriguez

Norma

23.2

USDC

\$5.00

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

56412

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 01/24/12
Check Number: 56412
Amount: 141.93

Memo:

[REDACTED]
[REDACTED] RODRIGUEZ

HADSELL
STORMER
KEENY
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600

FIRST CALIFORNIA BANK
15622 ARROW HIGHWAY
IRWINDALE, CALIFORNIA 91706

90-3730/1222

56412

NUMBER
56412

DATE \$ AMOUNT
01/24/12 141.93

One Hundred Forty-one And 93/100 Dollars***

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

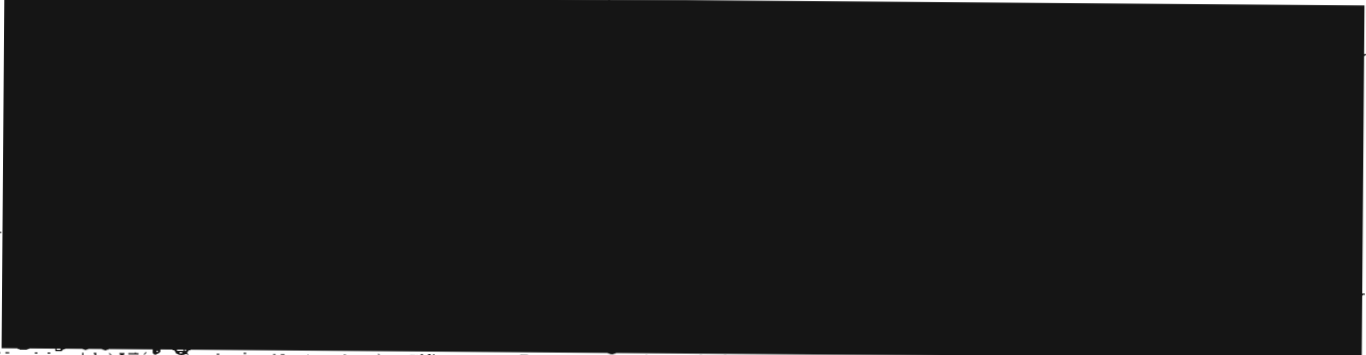
GENERAL ACCOUNT

David Hannah
Christina Anderson

⑈056412⑈ [REDACTED]

1/9 - 1/23/12 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.555	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	-----------	--------------------------	-------



0906 Rodriguez	23.2	= \$12.88	+ \$5.00	= \$17.88
----------------	------	-----------	----------	-----------

1/9 - 1/23/12 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT = [REDACTED]

1/9 - 1/23/12 GRAND TOTAL = \$141.93

- David Hannah

MILEAGE FORM

2012 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	Rate
--------------	--------	-----	----------------	-----------	------



1/23	0906 Rodriguez	Tami	23.2	USDC	\$5.00
------	----------------	------	------	------	--------

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

56269

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 12/13/11
Check Number: 56269
Amount: 202.93

Memo:

[REDACTED] RODRIGUEZ/LEDUC/[REDACTED]

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

HADSELL The Marine Building
STORMER 128 North Fair Oaks Avenue, Suite 204
KEENY Pasadena, California 91103
RICHARDSON (626) 585-9600
& RENICK LLP

FIRST CALIFORNIA BANK
15622 ARROW HIGHWAY
IRVINDALE, CALIFORNIA 91706
90-3730/1222

56269

NUMBER
56269

DATE \$ AMOUNT
12/13/11 202.93

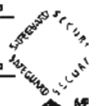
Two Hundred Two And 93/100 Dollars***

PAY TO THE ORDER OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

Barbara E. Hadsell MP
[Signature] MP



⑈056269⑈ [REDACTED]

MILEAGE FORM

2011
DATE CLIENT FOR TOTAL MILES TRAVEL TO PARK

[REDACTED]

12/8 0906 Rodriguez TAM / 11.6 USDC \$10 - \$5.00 cop

[REDACTED]

MILEAGE FORM

2011
DATE CLIENT FOR TOTAL TRAVEL TO PARK
MILES

[REDACTED]

12/8 0906 Rodriguez TAM / 11.6 USDC \$10-\$5.00

[REDACTED]

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

56203

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 11/29/11
Check Number: 56203
Amount: 56.20

Memo:

[REDACTED] RODRIGUEZ/[REDACTED]

HADSELL
STORMER
KEENY
RICHARDSON
& RENICK LLP
The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600

FIRST CALIFORNIA BANK
15622 ARROW HIGHWAY
IRVINDALE, CALIFORNIA 91708
90-3730/1222

56203
NUMBER
56203

DATE 11/29/11 AMOUNT \$ 56.20

**Fifty-six And 20/100 Dollars

PAY TO THE ORDER OF

ANNE RICHARDSON

GENERAL ACCOUNT
Barbara E. Haddley MP
[Signature] MP

⑈056203⑈

interoffice
MEMORANDUM

To: Kris
From: Anne Richardson
Subject: Reimbursements
Date: November 23, 2011

Here are my most recent receipts:



Thanks.



186.09⁰⁴ Rodriguez 12.20
56.20

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

56207

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 11/29/11
Check Number: 56207
Amount: 448.27

Memo:

[REDACTED] RODRIGUEZ [REDACTED]

HADSELL
STORMER
KEENY
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600

FIRST CALIFORNIA BANK
16822 ARROW HIGHWAY
IRVINDALE, CALIFORNIA 91706

90-3730/1222

56207

NUMBER
56207

DATE \$ AMOUNT
11/29/11 448.27

Four Hundred Forty-eight And 27/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT
Balkas E Nelson
[Signature]

⑈056207⑈ [REDACTED]

MILEAGE FORM

2011 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PURK
[REDACTED]					
11/10	0906 Rodriguez	Biznes	77.2	USDC	\$2,50
[REDACTED]					
[REDACTED]					
[REDACTED]					

HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

55857

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 08/23/11
Check Number: 55857
Amount: 153.73

Memo:

RODRIGUEZ/ [REDACTED]

HADSELL The Marine Building
STORMER 128 North Fair Oaks Avenue, Suite 204
KEENY Pasadena, California 91103
RICHARDSON (626) 585-9600
& RENICK LLP

FIRST CALIFORNIA BANK
16622 ARROW HIGHWAY
IRVINDALE, CALIFORNIA 91706

90-3730/1222

55857

NUMBER
55857

DATE \$ AMOUNT
08/23/11 153.73

One Hundred Fifty-three And 73/100 Dollars***

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT

David Hannah
[Signature]

⑈055857⑈

8/9 - 8/19/11 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$0.555	CASH REIMBURSEMENT	TOTAL
0906 Rodriguez	23.2	= \$12.88	+ \$2.50	= \$15.38



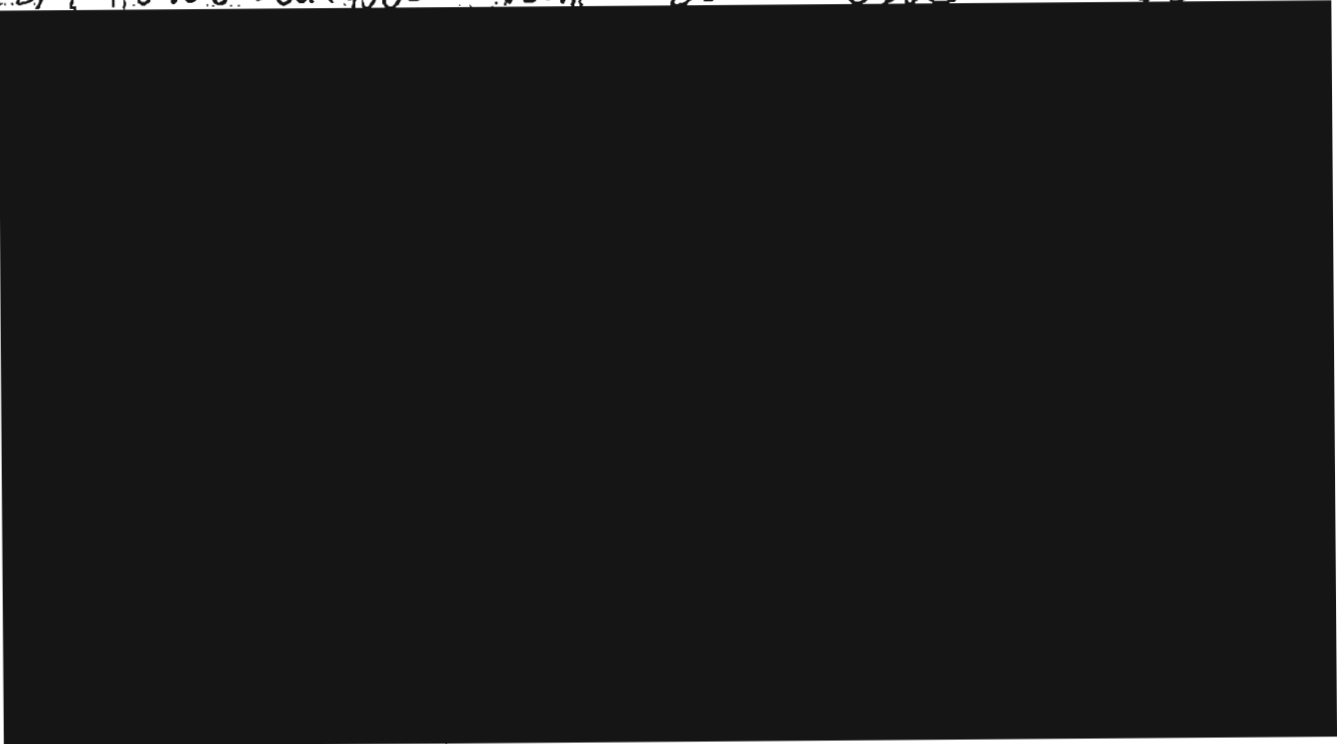
8/9 - 8/19/11 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT [REDACTED]

8/9 - 8/19/11 GRAND TOTAL = \$153.73

- David Hannah

MILEAGE FORM

2011 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PARK
8/9	0906 Rodriguez	Jami	23.2	USDC	\$2.50



HADSELL, STORMER, KEENY, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

55710

From:

HADSELL, STORMER, KEENY, RICHARDSON & RE
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 07/07/11
Check Number: 55710
Amount: 206.65

Memo:

[REDACTED] RODRIGUEZ [REDACTED]

HADSELL The Marine Building
STORMER 128 North Fair Oaks Avenue, Suite 204
KEENY Pasadena, California 91103
RICHARDSON (626) 585-9600
& RENICK LLP

FIRST CALIFORNIA BANK
15822 ARROW HIGHWAY
IRWINDALE, CALIFORNIA 91706

90-3730/1222

55710

NUMBER
55710

DATE \$ AMOUNT
07/07/11 206.65

Two Hundred Six And 65/100 Dollars

PAY
TO THE
ORDER
OF

DAVID HANNAH
613 MUSEUM DRIVE
LOS ANGELES, CA 90065

GENERAL ACCOUNT
[Signature]
MP

⑈055710⑈ [REDACTED]

6/27-7/6/11 MILEAGE/CASH REIMBURSEMENT

CLIENT	TOTAL MILES	x \$.51	TOTAL CASH REIMBURSEMENT	TOTAL
--------	-------------	---------	--------------------------	-------

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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0906 Rodriguez	23.2	= \$11.83	+ \$2.50	= \$14.33
----------------	------	-----------	----------	-----------

[REDACTED]

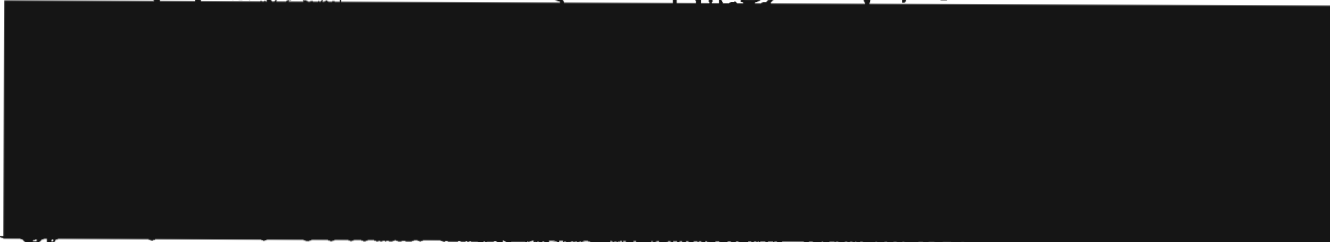
6/27-7/6/11 TOTAL MILES = [REDACTED]
 TOTAL CASH REIMBURSEMENT = [REDACTED]

6/27-7/6/11 GRAND TOTAL = \$206.65

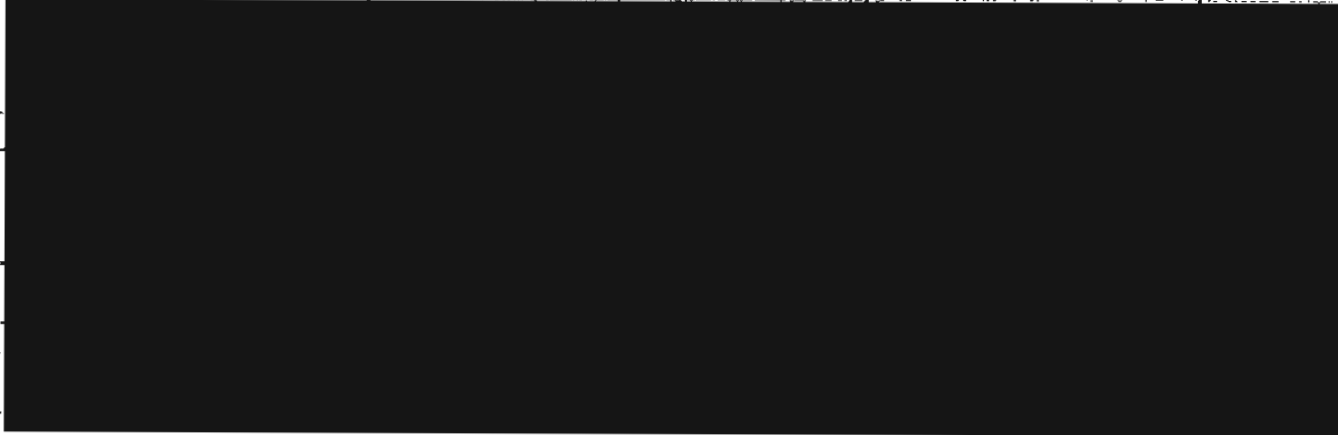
David Hannah
 OK

MILEAGE FORM

2011 DATE	CLIENT	FOR	TOTAL MILES	TRAVEL TO	PAID
--------------	--------	-----	----------------	-----------	------



6/29	0906 Rodriguez	Trm.	23.2	1/SDC	\$250
------	----------------	------	------	-------	-------



Prepaid Phone

HADSELL, STORMER, RICHARDSON & RENICK LLP GENERAL ACCOUNT

61940

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 05/21/13
Check Number: 61940
Amount: 3,036.11

Memo:

ACCT# 3-93009

[REDACTED] RODRIGUEZ [REDACTED]

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRWINDALE AVE., STE. 188
IRWINDALE, CA 91706
90-4401/1222

61940

NUMBER
61940

DATE \$ AMOUNT
05/21/13 3,036.11

Three Thousand Thirty-six And 11/100 Dollars

PAY
TO THE
ORDER
OF

AMERICAN EXPRESS
BOX 0001
LOS ANGELES, CA 90096-0001

GENERAL ACCOUNT

[Handwritten Signature]
[Handwritten Signature]

⑈061940⑈

[REDACTED]



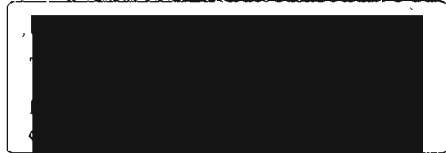
Business Gold Rewards
HADSELL STORMER
ANNE K RICHARDSON
Closing Date 05/09/13

OPEN_{sv}

p. 1/5

Account Ending 3-93009

New Balance	\$3,036.11
Please Pay By	05/24/13



01103 911
01K0
001 003 02035 ROUTE0E

See page 2 for important information about your account.

New Balance	\$3,036.11
Days in Billing Period: 31	

Customer Care

Pay by Computer
open.com/pbc

Customer Care **Pay by Phone**
1-800-492-3344 1-800-472-9297

See page 2 for additional information.

Please fold on the perforation below, detach and return with your payment



Payment Coupon
Do not staple or use paper clips



Pay by Computer
open.com/pbc



Pay by Phone
1-800-472-9297

Account Ending 3-93009

Enter account number on all documents
Make check payable to American Express.



ANNE K RICHARDSON
HADSELL STORMER
128 N FAIR OAKS AVE
STE 204
PASADENA CA 91103-3650

Please Pay By	05/24/13
Amount Due	\$3,036.11

07419 ROUTE0E 02035 0010Z. (2)

Check here if your address or phone number has changed. Note changes on reverse side.

AMERICAN EXPRESS
BOX 0001
LOS ANGELES CA 90096-8000

0000349991718995145 000303611000303611 05 H

REDACTED

Stormer Decl. - Ex. C
Page 419

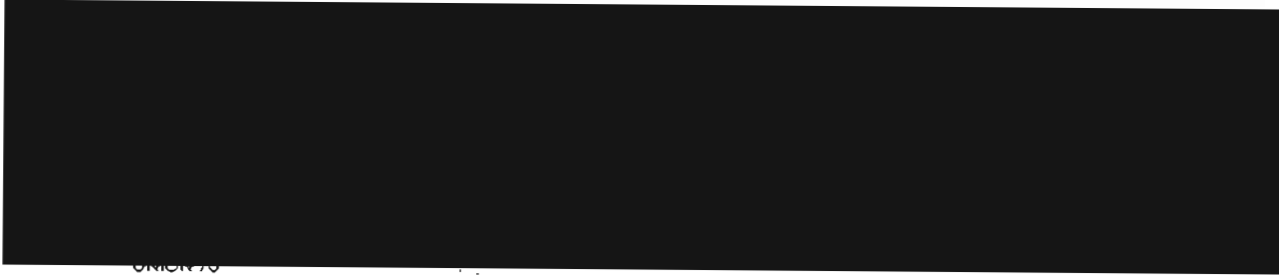
AMNE K RICHARDSON

Account Ending 3-93009

p 4/5

Detail Continued

Amount



04/30/13	VIRGIN MOBILE PREPAIDTOPUP	800-665-9715	OR	<i>Rodriguez</i>	\$40.00
04/30/13	VIRGIN MOBILE PREPAIDTOPUP	800-665-9715	OR	<i>Rodriguez</i>	\$40.00



001 UNL REG

Fees

Amount

Total Fees for this Period \$0.00

2013 Fees and Interest Totals Year-to-Date

	Amount
Total Fees in 2013	\$184.52
Total Interest in 2013	\$0.00



REDACTED

Records Request

HADSELL
 STORMER
 RICHARDSON
 & PENICK LLP
 The Marine Building
 128 North Fair Oaks Avenue, Suite 204
 Pasadena, California 91103
 (626) 585-9600

EXPLANATION	AMOUNT

90-4401/1222

4166

PAY AMOUNT OF Fifteen and 2/100 DOLLARS

DATE	TO THE ORDER OF	CHECK NUMBER	REFERENCE	DESCRIPTION
11/30/15	West Los Angeles College	4166	Redignaz	Records for A. Cazarez

CHECK AMOUNT \$ 15.00

GENERAL ACCOUNT
[Signature]

 SECURITY BANK OF CALIFORNIA
 5200 IRWINDALE AVE, STE 168
 IRWINDALE, CA 91706

⑈004166⑈



MARSELL
 STORMER
 RICHARDSON
 S. BERNICK LLC

The Marine Building
 128 North Fair Oaks Avenue, Suite 204
 Pasadena, California 91103
 (626) 585-9600

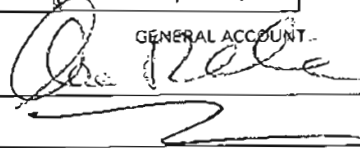
EXPLANATION	AMOUNT

90-4401/1222
 4165

PAY AMOUNT OF Fifteen and 00/100 DOLLARS

DATE	TO THE ORDER OF	CHECK NUMBER	REFERENCE	DESCRIPTION
1/26/15	West Los Angeles College	4165	Rodriguez	Records for Christian R

CHECK AMOUNT
 \$ 15.00

GENERAL ACCOUNT


 SECURITY BANK OF CALIFORNIA
 5200 IRVINDALE AVE., STE. 168
 IRVINDALE, CA 91706

⑈004165⑈



HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

02110

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 10/31/13
Check Number: 62118
Amount: 25.00

Memo:

RODRIGUEZ RECORD REQUEST

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4461/1222

62118

NUMBER
62118

DATE 10/31/13 \$ AMOUNT 25.00
Twenty-five And 00/100 Dollars

PAY
TO THE
ORDER
OF

ANTIOCH UNIVERSITY
400 CORPORATE POINTE
CULVER CITY, CA 90230

GENERAL ACCOUNT

Barbara Edwards
Spencer Adams

⑈062118⑈

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

02125

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date 10/31/13
Check Number: 62125
Amount: 25.00

Memo

CAZAREZ RECORD REQUEST

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600


SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91708
90-4401/1222

62125

NUMBER
62125

DATE \$ AMOUNT
10/31/13 25.00

**Twenty-five And 00/100 Dollars

PAY
TO THE
ORDER
OF

ANTIOCH UNIVERSITY
400 CORPORATE POINTE
CULVER CITY, CA 90230

GENERAL ACCOUNT

Carlean E Hadsett
[Signature]

⑈062125⑈

63080

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 07/10/14
Check Number: 63080
Amount: 15.00

Memo:

RODRIGUEZ - RECORDS FOR CHRISTIAN
RODRIGUEZ

HADSELL
STORMER
RICHARDSON
& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 166
IRVINDALE, CA 91706
90-4401/1222

63080

NUMBER
63080

DATE \$ AMOUNT
07/10/14 15.00

Fifteen And 00/100 Dollars

PAY
TO THE
ORDER
OF

L.A. COMMUNITY COLLEGE DISTRICT
770 WILSHIRE BLVD., 7TH FLR.
LOS ANGELES, CA 90017

GENERAL ACCOUNT

⑈063080⑈

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

63081

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 07/10/14
Check Number: 63081
Amount: 15.00

Memo:

RODRIGUEZ - RECORDS FOR ALBERTO
CAZAREZ

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
5200 IRWINDALE AVE., STE. 168
IRWINDALE, CA 91706
90-4401/1222

63081

NUMBER
63081

DATE \$ AMOUNT
07/10/14 15.00

Fifteen And 00/100 Dollars

PAY
TO THE
ORDER
OF

L.A. COMMUNITY COLLEGE DISTRI
770 WILSHIRE BLVD., 7TH FLR.
LOS ANGELES, CA 90017

GENERAL ACCOUNT

⑈06308⑈

HADSELL, STORMER, RICHARDSON & RENICK LLP - GENERAL ACCOUNT

63095

From:

HADSELL, STORMER, RICHARDSON & RENICK, L
128 N. FAIR OAKS AVE., SUITE #204
PASADENA, CA 91103

Date: 07/15/14
Check Number: 63095
Amount: 15.00

Memo:

RODRIGUEZ LA TRADE TECH RECORDS
REQUEST FOR ALBERTO CAZAREZ

HADSELL

STORMER

RICHARDSON

& RENICK LLP

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600



SECURITY BANK OF CALIFORNIA
6200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91706
90-4401/1222

63095

NUMBER
63095

DATE \$ AMOUNT
07/15/14 15.00

Fifteen And 00/100 Dollars

PAY
TO THE
ORDER
OF

L.A. COMMUNITY COLLEGE DISTRI
770 WILSHIRE BLVD., 7TH FLR.
LOS ANGELES, CA 90017

GENERAL ACCOUNT

Alce Palle
[Signature]

⑈063095⑈

Witness Fees

90-4401/1222
12035

EXPLANATION	AMOUNT

The Marine Building
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
(626) 585-9600

HADSELL
STORMER
RICHARDSON
X RENICK LLP

PAY AMOUNT OF Sixty-nine + 64/100 DOLLARS

DATE	TO THE ORDER OF	CHECK NUMBER	REFERENCE	DESCRIPTION	CHECK AMOUNT
01/14/14	Allen Nadir	12035	1914-0901	Rodriguez - Witness Fee GENERAL ACCOUNT #2	69.64

[Handwritten Signature]

SECURITY BANK OF CALIFORNIA
5200 IRVINDALE AVE., STE. 168
IRVINDALE, CA 91705



⑈012035⑈



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DECLARATION OF ANNE RICHARDSON

I, Anne Richardson, declare as follows:

1. I am an attorney licensed to practice law in the state of California. I make this declaration in support of Plaintiffs’ Motion for Attorney’s Fees. It is based on my own personal knowledge, and if called as a witness, I could and would testify to the following matters.

2. I am Directing Attorney of the Consumer Law Project at Public Counsel, counsel for Plaintiffs in this action. Before joining Public Counsel, from 1998 to 2014, I was a partner at Hadsell Stormer Richardson & Renick and its predecessors, where I specialized in complex employment and civil rights cases. From 1990 to 1998, I was an associate at Hadsell & Stormer, and a fellow at Litt & Stormer. From 1989 to 1990, I clerked for the Honorable Mariana R. Pfaelzer, U.S. District Judge for the Central District of California.

3. I graduated with Distinction from Stanford Law School in 1989, and received my B.A. from Swarthmore College in 1984. In 2006, I was named a California Lawyer Attorney of the Year along with Dan Stormer and Paul Hoffman for my work on the *Doe v. Unocal* case involving violations of international human rights law and I received the ACLU of Southern California Pro Bono award. I have been named to the “SuperLawyers” list for Southern California by Los Angeles Magazine every year since 2004, and am regularly named to the Top 50 Women Lawyers in Southern California list. I am rated AV Preeminent by Martindale Hubbell. A true and correct copy of my curriculum vitae is attached hereto as Exhibit A.

4. I have taught Section 1983 Litigation as an Adjunct Professor at Loyola and Whittier Law Schools and am regularly asked to give lectures regarding public interest and class action litigation to lawyers, law students, and public interest organizations. Most recently I was one of four trainers selected to provide training in the Impact Fund’s Class Action Institute for 2016. I have also spoken to such organizations and institutions as: UCLA Law School, Loyola Law School, University

1 of California, Irvine School of Law, USC Law School, Occidental College, California
2 Employment Lawyers Association, Los Angeles County Bar Association; State Bar of
3 California Labor and Employment Section; Litigation Counsel of America, University
4 of Colorado Law School, Rutgers Law School, National Academy of Arbitrators, and
5 others.

6 5. In addition to this case, I have been co-lead counsel on numerous class
7 actions in both state and federal court, including *United Steel, et al. v. ConocoPhillips*,
8 CV 08-02068-PSG (FFMx), 593 F.3d 802 (9th Cir. 2010) (lead appellate counsel in
9 wage and hour class action regarding “on duty” meal periods); *Trujillo v. City of*
10 *Ontario*, EDCV 04-1015-VAP (SGLx), 2009 U.S. Dist. LEXIS 79309 (C.D. Cal.
11 2009) (class action involving violations of right to privacy where police officers were
12 videotaped in their locker room); *Avery v. Orange County Transportation Authority*,
13 Case No. 07CC00004 (class action certified regarding excessive penalties in fines on
14 toll roads and violation of due process); *Fitzgerald v. City of Los Angeles*, CV 03-
15 01876-DDP (RZx), 2009 U.S. Dist. LEXIS (C.D. Cal. 2009) (class action challenging
16 search and seizure policy of LAPD in Skid Row), and *Paige v. State of California*,
17 2007 U.S. App. LEXIS 12050 (9th Circuit 2007) (appeal from a two-month trial
18 alleging disparate impact in a failure to promote case). I have also worked on other
19 class action cases in which my former firm was lead counsel, including *Wang v.*
20 *Chinese Daily News*, CV 04-1498-CBM (AJWx) (class action alleging multiple wage
21 and hour violations); *Soto v. Starwood Hotels & Resorts Worldwide, Inc.*, BC 352849
22 (class action alleging meal and rest break violations), and *Flores v. Albertsons*, 2003
23 U.S. Dist. LEXIS 26857 (C.D. Cal. 2003) (P. Anderson, J.) (overtime violations
24 against janitorial staff). I have also been co-lead counsel on numerous other complex
25 non-class cases.

26 6. Public Counsel is the largest pro bono law firm in the United States.
27 Founded in 1970, as of the date of this declaration, it has 112 total staff, with 68
28 attorneys. Lawyers at the firm handle direct services as well as impact litigation,

1 including class actions and complex civil rights matters. Public Counsel is a nonprofit
2 legal services firm that generally does not charge its clients for legal representation,
3 and thus depends on donations, private and government grants, and attorney fee
4 awards to sustain its services. Public Counsel bills my time at the rate of \$825 an hour,
5 and that is also the rate Hadsell Stormer & Renick is seeking for the time I spent while
6 at that firm.

7 7. Since 2011 when Hadsell Stormer Richardson & Renick entered an
8 appearance in this case, I have been deeply involved in this case and was named Co-
9 Lead Class Counsel in 2013 by this Court. Among other things, I was involved in
10 amending the complaint; drafting and responding to discovery; meetings and telephone
11 calls with the clients and class members; the hearing on the motion to compel further
12 responses to discovery; reviewing discovery produced by the defendants; preparing for
13 and taking certain depositions and overseeing the preparation by others of certain
14 depositions; drafting the motion for class certification, with exhibits, and the reply
15 brief; drafting the motion for preliminary injunction, with exhibits, and the reply brief;
16 and I presented portions of the oral arguments at both hearings.

17 8. I was lead appellate counsel for the plaintiffs in the Ninth Circuit after the
18 City appealed this Court's Order granting a preliminary injunction. I took primary
19 responsibility for the drafting of the respondents' brief and the supplemental briefing
20 requested by the Court, and I handled the oral argument. That appeal involved complex
21 issues of abstention and federal court jurisdiction. It is notable that the City defendants
22 hired the appellate specialists Greines Martin Stein & Richland, LLP to handle briefing
23 and oral argument for that appeal.

24 9. I coordinated and was partial author of the plaintiffs' motion for summary
25 adjudication and all the oppositions to Defendants' three motions for summary
26 judgment, and I argued some of those motions, as well as opposing the motion for
27 class decertification, and I argued that motion. The cross motions for summary
28 judgment involved numerous complex issues, including presumed damages, immunity

1 under Section 1983, issue preclusion, constitutional issues, and abstention.

2 10. I interviewed and provided information for plaintiffs' expert Edwina
3 Barvosa, who ultimately produced an expert report regarding damages for the class. I
4 attended her deposition and drafted an opposition to her testimony at trial. This
5 involved complex issues of presumed damages for a class action, for which the case
6 law is underdeveloped, at best. The court's ruling on this motion in limine, as well as
7 the prior motions for summary judgment regarding damages, resulted in a ruling in
8 which plaintiffs would be permitted to seek damages for the entire class at trial
9 (although not statutory damages).

10 11. I was involved in pretrial preparations, including drafting the
11 Memorandum of Contentions of Law and Fact and guiding the drafting of the Pretrial
12 Conference Order, Exhibit List, Witness List, some of the motions in limine and other
13 pretrial documents. I guided the review of plaintiffs' database of class members from
14 records received from the City and oversaw outreach as we got closer to trial to class
15 members who had called for information during the case.

16 12. I was involved in every stage of the settlement discussions. I was present
17 at each of the 17 settlement discussions with Judge Patrick Walsh, some in person and
18 some over the telephone, and I drafted or partially drafted and reviewed the mediation
19 briefs and the settlement proposal drafts that went back and forth. I argued for
20 plaintiffs' positions at mediation and negotiated along with my cocounsel extensively
21 for over 6 months. I researched and guided the research by others of numerous issues
22 raised by the settlement discussions. I spoke with community members, class
23 members, and other attorneys who were interested in this case in order to obtain input
24 and discuss possible resolution of the case. I also provided input on and edited the
25 motion for preliminary approval and the exhibits, and I guided the drafting of and
26 edited the motion for attorney's fees and spent time drafting and collecting
27 declarations in support thereof, as well as compiling the hours and the costs. I have
28 spent 725.3 hours on this matter while at Public Counsel and 592.4 hours while at

1 Hadsell Stormer.

2 13. In addition to my own time, Public Counsel is seeking compensation for
 3 the work of two other attorneys, two paralegals, and one law student. The rates we are
 4 seeking (before a 5% reduction, and without including time spent going forward) are:

Name	Title/Year Graduation	Rate	Hours	Lodestar
Anne Richardson	Attorney, 1989	\$825	725.3	\$598,372.50
Alisa Hartz	Attorney, 2012	\$375	630.8	\$236,550
Dexter Rappleye	Attorney, 2014	\$300	112	\$33,600
Anya Engel	Law Student, 2016	\$225	35.3	\$7,942.50
Barbara Garcia Le	Senior Paralegal	\$225	98.8	\$22,230
Sally Chung	Paralegal	\$195	18.5	\$3,607.50
TOTAL			1620.7	\$902,302.50

14 14. Alisa Hartz is a staff attorney at Public Counsel. Ms. Hartz was a member
 15 of the inaugural class of the University of California, Irvine School of Law from which
 16 she graduated in 2012 and is a member in good standing of the California bar. Prior to
 17 joining Public Counsel, she served as law clerk to the Hon. Dean D. Pregerson of the
 18 United States District Court for the Central District of California, and for the Hon.
 19 Stephen Reinhardt of the United States Court of Appeals for the Ninth Circuit. During
 20 law school, she worked as a law clerk at Public Counsel and at the ACLU of Southern
 21 California. She is a 1994 graduate of Swarthmore College and she received a Ph.D. in
 22 Comparative Literature from Brown University in 2005. She has experience litigating
 23 class action cases and other complex cases involving civil rights, including *Peter P. v.*
 24 *Compton Unified School District*, 2:15-CV-03726-MWF-PLA (class action regarding
 25 access to education for students impacted by trauma), *Cruz v. State*, Case No.
 26 RG14727139 (class action successfully settled concerning students' right to
 27 meaningful learning time), *Allen v. Pomona*, 2:16-CV-01859-R-E (multi-plaintiff case
 28 regarding the unlawful seizure of homeless individuals' property), *Housing Works v.*

1 *County of Los Angeles*, 2:15-CV-08982-GW-RAO (case concerning the ability of
2 mentally disabled individuals to access General Relief), *United States v. County*, 2: 15-
3 CV-05903-DDP-JEM (intervention on behalf of mentally disabled former prisoners
4 asserting that the provisions of the settlement agreement between the parties
5 concerning jail discharge procedures violated intervenors' rights under the Americans
6 with Disabilities Act and the Constitution).

7 15. Ms. Hartz worked on many aspects of the *Rodriguez* case from the time
8 she and I started at Public Counsel in September, 2014 until the present. She
9 researched and drafted many sections of the oppositions to motions for summary
10 judgment; the plaintiffs' affirmative motion for summary adjudication; the opposition
11 to the motion to decertify the class, the reply to the motion for summary adjudication,
12 and the supplemental briefing requested by the court. She assisted in the preparation of
13 several depositions, including officers Switzer and Rodriguez, and she took one of
14 those depositions. She assisted in trial preparations, including correspondence with
15 certain experts, and preparation of numerous pretrial documents. She researched and
16 wrote certain motions in limine and oppositions to the defendants' motions in limine.
17 She drafted portions of several mediation briefs, researched various settlement issues,
18 attended many settlement discussions both in person and telephonically, and was
19 instrumental in documenting and revising numerous settlement proposals and drafting
20 the final settlement agreement and its exhibits. She answered numerous calls from
21 class members and provided information to them at various times, and she attended
22 meetings with community groups interested in assisting class members. She drafted the
23 motion for preliminary approval of the settlement. Finally, she researched and drafted
24 much of the Motion for Attorney's Fees. Public Counsel seeks to recover her work on
25 this case at the rate of \$375 an hour.

26 16. From 2014 to 2016, Dexter Rappleye was a Fellow from the University of
27 Irvine Fellowship Program. He graduated from UC Irvine School of Law in 2014 and
28 worked at Public Counsel from approximately November, 2014 to July, 2016. His

1 work on this case included compilation of data from service records into a spreadsheet
2 to ascertain the number and names of class members, calling class members who
3 contacted us at various times in order to answer questions, seek and provide
4 information, and work on certain motions in limine. Public Counsel bills its attorneys
5 at Mr. Rappleye's level at the rate of \$300 an hour.

6 17. Anya Engel worked for Public Counsel as a law student during the
7 summer of 2015, when she worked on the *Rodriguez* case. She was a second year law
8 student who was the Class of 2016. Her work on this case consisted of calling class
9 members to provide updates on the case and obtain information regarding the impact
10 of the curfews on them. One other law student also spent time on this project, but she
11 spent fewer hours on the project, and we are not seeking any compensation for her
12 time. Public Counsel bills its law students at Ms. Engel's level at the rate of \$225 an
13 hour.

14 18. We are also seeking recovery of the time spent by two paralegals, Barbara
15 Garcia Le and Sally Chung, at the rates of \$225 and \$195, respectively. Public Counsel
16 bills its paralegals at the rate of \$175 to \$225, depending on their education and
17 experience. Ms. Le had over 14 years' experience as a paralegal and is billed as a
18 senior paralegal; Ms. Chung was a 2012 graduate of Amherst College, where she was a
19 Bill and Melinda Gates Millennium Scholar, subsequently worked at the ACLU and
20 Public Counsel, and is billed as an intermediate paralegal.

21 19. In addition to the above noted class action matters, Public Counsel has
22 also been counsel of record to the following class actions, among others: *Franco v.*
23 *Holder*, CV 10-2211-DMG (C.D. Cal.); *Reed v. State of California*, Case No.
24 BC432420; *F.L.B (formerly J.E.F.M.) et al v. Lynch et al*, 14-CV091926-TSZ (W.D.
25 Wash.) ; *G.F. v. Contra Costa County*, 13-cv-03667-MEJ (N.D. Cal.); *Casey A. v.*
26 *Gundry*, CV-10-00192 (C.D. Cal.); *D.J. v. California*, Case No. BS142775; *Benito R.*
27 *v. East Los Angeles Regional Center*, Case No. BC429819; *Bautista v. State of*
28 *California*, Case No. BC418871; *Community Action League v. Lancaster, et al.*, CV

1 11-4817 ODW (VBKx) (C.D. Cal.); and *Nozzi v. Housing Authority of the City of Los*
2 *Angeles*, CV-07-380 PA (FFMx).

3 20. In pursuing this case for five years, including successful motions for class
4 certification and a preliminary injunction, responding to an appeal to the Ninth Circuit
5 Court of Appeals, cross-motions for summary judgment, opposing a motion to
6 decertify the class, extensive discovery, including one motion to compel and
7 depositions of numerous lay and expert witnesses, as well as preparations for trial and
8 bringing and opposing numerous motions in limine, and undertaking over a year of
9 settlement discussions, I believe that I and the other Class Counsel have demonstrated
10 a high degree of skill in the litigation of the issues and that we have achieved an
11 outstanding result for the Class.

12 21. The Jobs and Education Program was carefully crafted over the course of
13 about ten months of negotiating to provide value to class members. The parties
14 engaged in approximately 17 settlement conferences with Magistrate Judge Walsh,
15 either in person or telephonically over this time period. Those class members who
16 already have a job or career they are happy with can either seek educational benefits
17 that may help them advance in their careers, transfer the benefit to a close relative, or
18 obtain supportive services to assist them in job retention. In addition to being offered
19 GED courses, college education, job training, paid apprenticeships, and job placement
20 assistance, class members who are identified as requiring the full training program
21 receive a \$1,000 stipend as an incentive for completing the program, in two
22 installments. Those individuals identified as being job-ready can still obtain
23 supportive services of up to \$1,000 to assist with job and education-related needs such
24 as transportation, books, or job-related equipment or work-related specialized apparel.

25 22. To ensure that class members are receiving a valuable benefit, the Jobs
26 and Education Program will be monitored by a third-party evaluator from California
27 State University, Northridge on an annual basis. The monitor will evaluate the
28 progress of the program and identify any management issues related to

1 implementation. The monitor will produce an annual report, which will be provided to
2 the Parties, that has the authority to propose changes to the Program.

3 23. Although the Jobs and Education Program uses some existing City
4 program infrastructure, it is funded entirely by new non-supplanting outlay of funds by
5 the City and is provided only to class members and their transferees. A maximum of
6 10% of the funds will go to the City for administrative costs in handling the Program.

7 24. United States Magistrate Judge Patrick J. Walsh has commented about the
8 quality of the settlement, the skill demonstrated by all involved counsel, and the
9 societal value of resolving this case in the manner agreed upon by the parties. See
10 Order on Joint Stipulation to Make Use of Statements from Hon. Patrick J. Walsh
11 Regarding Settlement, filed on July 1, 2016. Dkt. 379.

12 a. "In all the cases I've participated in this is the best settlement I've
13 ever seen."

14 b. "Having spent some time with the parties and with their counsel
15 over the last month, I am confident that the lawyers know what
16 they're doing. And they're doing the best they can be on behalf of
17 their clients."

18 c. "I can't tell you enough. It's some of the best lawyering I've seen
19 in 15 years on this job. You guys have done a hell of a job on both
20 sides."

21 d. [This settlement] "could be a big sea change in the world starting
22 with Los Angeles where rather than lock these folks up and have
23 injunctions against them, you invest \$30 million."

24 25. Attached as Exhibit B is a summary of the time spent by all Public
25 Counsel personnel on this case, and Exhibit C is a true and correct copy of the itemized
26 time records which have been kept contemporaneously during the pendency of this
27 case. It is our policy and practice to keep such contemporaneous time records of all
28 matters that are pending in litigation for which fees may be sought. I have exercised

1 the following billing judgment in the matter by deducting certain time that was either
2 duplicative or nominal; specifically, I deducted the 7.5 hours spent by one staff
3 attorney, Adelaide Anderson, whose work on the case was *de minimis*, and I deducted
4 a total of 23.6 hours spent by Dexter Rappleye and 2.6 hours spent by Sally Chung
5 where the primary purpose was to observe a hearing or deposition. The total time
6 deducted in the exercise of such billing judgment is 33.7 and the total fees so deducted
7 are \$11,149.50 and are highlighted in gray on our time records. Thereafter, I deducted
8 an overall 5% of the remaining time in order to eliminate any time that could be
9 redundant, duplicative, or was not necessary for the results obtained in this case, which
10 deduction constitutes \$45,115.13. I then reviewed the records to look for time spent
11 working on the Bane Act claim, on which we did not prevail, and on liability on the
12 one defendant, Allan Nadir, who was dismissed from the case. The vast majority of the
13 time we spent working on those matters was inextricably connected to the claims on
14 which and defendants against whom we did prevail. Nevertheless, I have indicated on
15 Exhibits B and C in gray italics all the time records, conservatively speaking, in which
16 we spent time working on those issues, including time that was recorded as only
17 partially working on those issues. That time comes out to a total of 70.4 hours spent by
18 Alisa Hartz and myself, for a total of \$31,890.00, and such time is significantly less
19 than the 5% overall reduction of our time (\$45,115.13). Thus, I am comfortable stating
20 that any time that was not connected to the claims and defendants that were proceeding
21 to trial, is more than made up for by the 5% reduction that we have taken overall.

22 26. In preparation of this Motion for Attorney's Fees, I spent 31.4 hours and
23 Ms. Hartz spent 46.7 hours, as of October 11, 2016. Billed at the rates of \$825/hour
24 and \$375/hour, respectively, our fees for this Motion amount to \$43,417.50.

25 Additional time will be spent by counsel for the Plaintiffs in this matter up through the
26 motion for final approval on December 2, 2016. I estimate the additional amount of
27 hours that will be spent by Public Counsel in that period of time to be 40 hours for
28 me, 40 hours for Ms. Hartz, and 10 hours for a paralegal or junior attorney at the rate

1 of \$225. This time will encompass responding to class members' calls and questions
2 from community members, working on probate matters for the Estate of Alberto
3 Cazarez, reviewing and responding to any objections, engaging in a mediation
4 regarding attorneys' fees, preparing a reply to the City's Opposition, and preparation
5 for and appearance at the Final Approval Hearing. Therefore, I estimate
6 conservatively that there will be an additional \$50,250 total expended through the
7 Final Approval Hearing (which is not included in the chart above but is included in
8 Exhibit B attached hereto).

9 27. Based on these contemporaneous records, the combined fees sought by
10 Public Counsel at this time are: \$913,452.00 less \$11,149.50 in fees that have been
11 waived in the exercise of billing judgment, less a 5% overall cut in the amount of
12 \$45,115.13, plus \$50,250 in fees which I estimate will be spent between now and the
13 Final Approval Hearing, for a Grand Total of \$907,437.38.

14 28. In addition, there will be many hours that will have to be spent by counsel
15 for Plaintiffs to implement this settlement over the next four years. Defendants have
16 taken the position that counsel should estimate their hours over the next four years
17 and seek the total attorneys' fee award now. For many reasons, however, we do not
18 believe that is possible, and we request instead that Plaintiffs' counsel be permitted to
19 seek fees during the course of the implementation of the settlement. For one thing,
20 while we have agreed to provide *pro bono* counsel or law students to represent class
21 members who wish to be taken off the gang injunction, it will likely take substantial
22 time to set up this *pro bono* panel and to create the necessary templates so as to permit
23 such counsel to perform their representations. It is impossible to know at this time just
24 how many people will seek to be removed from the gang injunctions, and equally
25 impossible to know how many the City will stipulate to remove without a hearing.
26 Thus, it is impossible to know the scope of the work that will be required by
27 plaintiffs' counsel just to implement the Gang Removal Process. It is also impossible
28 to know how many issues may arise with respect to the Jobs and Education Program,

1 and whether complaints must be handled and the system altered to handle any issues
2 that arise. It is impossible at this juncture to know whether the monitoring that will be
3 handled by Cal State Northridge will elucidate any problems that must be dealt with
4 by counsel. It is also impossible to know whether recipients of excess funds under
5 Settlement Agreement ¶ 35(d) will need to be selected, given that this depends on
6 whether the minimum expenditure is reached. For all these reasons, plaintiffs’
7 counsel request that the Court retain jurisdiction over this case for a period not to
8 exceed five years and permit plaintiffs’ counsel to seek periodic attorneys’ fees from
9 this Court, should the parties not be able to reach informal agreement in the future as
10 fees are incurred.

11 29. Public Counsel is seeking a total of \$5,381.84 in expenses it incurred
12 while litigating this case. A summary and a detailed itemization of these expenses is
13 attached as Exhibit D, and may be summarized as follows:

Expense Description	Amount
Photocopies	3,070.50
Transcripts	206.02
Mediation	1,731.67
Mileage/Parking	290.35
Phone	11.56
Supplies	71.74
TOTAL	5,381.84

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1 30. Attached hereto as Exhibit E is a true and correct copy of the transcript
2 from the July 29, 2016, hearing before this Court on the Unopposed Motion for
3 Preliminary Approval of Settlement.

4
5 I declare under penalty of perjury under the laws of the United States that the
6 foregoing is true and correct.

7 Executed at Los Angeles, California on October 12, 2016.

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Anne Richardson

ANNE K. RICHARDSON
Public Counsel
610 S. Ardmore Ave.
Los Angeles, CA 90005
(213) 385-2977 x 146
arichardson@publiccounsel.org

HONORS Named in Top 100 Lawyers in Southern California in 2014-15 by Los Angeles Magazine
Named in Top 50 Women Lawyers in Southern California, 2004-2005, 2007- 2009, 2012-2016 by Los Angeles Magazine
Honored by National Lawyers Guild, Los Angeles, 2012
Named California Lawyer Attorney of the Year, 2006
ACLU Pro Bono Award, 2006
AV Preeminent Rating, Martindale Hubbell
Named in Best Lawyers in America, 2003 - present
Named to SuperLawyers List by Los Angeles Magazine, 2003 - present

LEGAL EXPERIENCE

9/14 to date PUBLIC COUNSEL
Director, Consumer Law Project; Associate Director, Opportunity Under Law. Direct and develop complex litigation in variety of areas affecting low income persons and income inequality.

1/08 - 9/14 HADSELL STORMER RICHARDSON & RENICK, LLP
Partner. Handled all aspects of litigation and appeals on behalf of plaintiffs in the areas of civil rights, employment discrimination, class actions, and international human rights.

1/93 - 12/07 HADSELL & STORMER, INC.
Partner 1/98 - 12/07. Associate 1/93 - 12/97.

10/90 - 10/92 LITT & STORMER/LITT, MARQUEZ & FAJARDO
Public Interest Fellowship Attorney. Worked on all aspects of a wide range of public interest litigation.

8/89 - 8/90 THE HONORABLE MARIANA R. PFAELZER
Law Clerk, United States District Court for the Central District of California. Drafted research memoranda and opinions.

6/88 - 8/88 CENTER FOR CONSTITUTIONAL RIGHTS Summer Intern, New York. Worked on cases involving international human rights law, poverty and environmental problems, attorneys' fees in public interest litigation.

6/87 - 8/87 ACLU OF SOUTHERN CALIFORNIA, Los Angeles Summer Intern. Worked on cases involving the Freedom of Information Act, homelessness, and the Palestinian deportation case.

EDUCATION

STANFORD LAW SCHOOL, Stanford, CA
J.D. with Distinction, 1989
Associate Editor, Stanford Law Review
Board Member, Stanford Public Interest Law Foundation

SWARTHMORE COLLEGE, Swarthmore, PA
B.A. in Philosophy, 1984

TEACHING EXPERIENCE

Fall 2004 LOYOLA LAW SCHOOL, Los Angeles
Spring 96-99 Adjunct Professor, Civil Rights Litigation under Section 1983,
Fall 1994 Introduction to Appellate Advocacy

Spring, 1995 WHITTIER COLLEGE OF LAW, Los Angeles
Adjunct Professor, Civil Rights

BAR AND PROFESSIONAL MEMBERSHIPS

Admitted to all California courts, 1990
Admitted to U.S. District Court, Central District of California, 1990
Admitted to U.S. District Court, Northern District of California, 1999
Admitted to U.S. District Court, Southern District of California, 2010
Admitted to U.S. District Court for the District of Columbia, 2009
Admitted to U.S. Court of Appeals for the Ninth Circuit, 1992
Admitted to U.S. Court of Appeals for the District of Columbia Circuit, 2009
Admitted to United States Supreme Court, 2008
Board Member, ACLU of Southern California, 2000 to present
Member, California Employment Lawyers' Association
Member, Consumer Attorneys Association of Los Angeles

Member, Los Angeles County Bar Association, Labor & Employment
Charter Member, Litigation Counsel of America
Fellow, American Bar Foundation

**CASES RESULTING
IN PUBLISHED
OPINIONS**

United States of America v. County of Los Angeles, 2015 U.S. Dist. LEXIS 167716 (C.D. Cal. 2015)
Obaydullah v. Obama, 688 F.3d 784 (D.C. Cir. 2012)
Richards v. County of Los Angeles, 775 F. Supp. 2d 1176 (C.D. Cal. 2011)
Carter v. County of Los Angeles, 770 F. Supp. 2d 1042 (C.D. Cal. 2011)
Obaydullah v. Obama, 609 F.3d 444 (D.C. Cir. 2010)
Obaydullah v. Obama, 744 F. Supp. 2d 344 (D.D.C. 2010)
United Steel v. ConocoPhillips Co., 593 F.3d 802 (9th Cir. 2010)
Trujillo v. City of Ontario, 2009 U.S. Dist. LEXIS 79309 (C.D. Cal. 2009)
Rosenstock v. LAUSD, 2009 U.S. Dist. LEXIS 108187 (C.D. Cal. 2009)
Doe v. Wal-Mart Stores, 572 F.3d 677 (9th Cir. 2009)
Metoyer v. Chassman, 504 F.3d 909 (9th Cir. 2008)
Fitzgerald v. City of Los Angeles, 485 F. Supp. 2d 1137 (C.D. Cal. 2007)
Blair v. City of Los Angeles, 223 F.3d 1074 (9th Cir. 2000)
Doe v. Unocal Corp., 110 F. Supp. 2d 1294 (C.D. Cal. 2000)
Doe v. Unocal Corp., 27 F. Supp. 2d 1174 (C.D. Cal. 1998)
Beyda v. City of Los Angeles, 65 Cal. App. 4th 511 (1998)
Doe v. Unocal Corp., 963 F. Supp. 880 (C.D. Cal. 1997)
Rosenthal v. Great Western Financial Sec. Corp., 14 Cal. 4th 394 (1996)
Macias v. State of California, 10 Cal. 4th 844 (1995)
Martin v. Fisher, 11 Cal. App. 4th 118 (1992)
Angelheart v. City of Burbank, 232 Cal. App. 3d 460 (1991)

PUBLICATIONS

Contributor, Los Angeles Review of Books, *Advocate* Magazine

Multiple blog posts as contributor on www.celavoice.org

Chapter 28 on Evidence in Age Discrimination in Employment edited by Lindemann, Grossman and Kadue

"Opposing Employment Discrimination," Chapter 15 of the NLG Employee and Union Member Guide to Labor Law (Clark Boardman Callaghan) (original chapter and yearly supplements)

Co-author with Nancy Borra, Chapter 21 of Sexual Harassment in Employment Law (1997 Supplement), edited by Lindemann & Kadue

"Absolutely Exhausted," an article on exhaustion of administrative remedies for employment discrimination claims; Los Angeles Lawyer, 9/95

Stormer and Richardson, "The Graying of America: Age Discrimination in the Nineties," 26 West Los Angeles Law Review 189 (1995)

SELECTIVE LIST OF PRESENTATIONS

Impact Fund Class Action Institute, 2016
UC Berkeley Law School, 2016
Loyola Law School, 2014
First Tuesday Speaker, Occidental College, March 2012
University of Colorado Law School, March 2012
Litigation Counsel of America, Santa Fe, NM, May 2009
UCLA Pro Bono Conference, 2009
Stanford Law School, 2008
Los Angeles County Bar Association, 2001, 2002, 2006
Los Angeles County Bar Association Annual Labor & Employment Law Symposium, March 1996, 2002
California Employment Lawyers Association, 2001, 2006, 2014
Institute for Corporate Counsel, December 2006
Los Angeles County Bar Association, Labor & Employment Retreat, 2000, 2006
Western Trial Lawyers' Association, March 2001
National Lawyers Guild Convention, Detroit, 1998
National Academy of Arbitrators, 1998 Annual Meeting, San Diego

MISCELLANEOUS

Representing an Afghan detainee in Guantánamo Bay, 2009 to present
Board Member, Slingshot Fund, Myanmar, 2013-2015
Misión Observadora de Elecciones Ciudadanos Estadounidenses, El Salvador, March 1994
Conversational Spanish

Private Pilot's License, 1981
Profiled by Los Angeles Daily Journal, July 13, 1998

		TOTAL					
STAFF	HRS	BANE ACT/ NADIR	RATE	FEES	DEDUCTIONS	BANE ACT/ NADIR	TOTAL
ANNE RICHARDSON	1989	725.3	825	\$598,372.50		\$10,065.00	\$598,372.50
ALISA HARTZ	2012	630.8	375	\$236,550.00		\$21,825.00	\$236,550.00
DEXTER RAPPELEYE	2014	135.6	300	\$40,680.00	\$7,080.00		\$33,600.00
ADELAIDE ANDERSON	2010	7.5	475	\$3,562.50	\$3,562.50		\$0.00
ANYA ENGEL		35.3	225	\$7,942.50			\$7,942.50
BARBARA GARCIA LE		98.8	225	\$22,230.00			\$22,230.00
SALLY CHUNG		21.1	195	\$4,114.50	\$607.00		\$3,607.50
TOTAL		1654.4		\$913,452.00	\$11,149.50	\$31,890.00	\$902,302.50
LESS 5% OVERALL							\$45,115.13
GRAND TOTAL SOUGHT THROUGH OCT. 11, 2016							\$857,187.38
PLUS TIME TO BE SPENT THROUGH FINAL APPROVAL							50,250
GRAND TOTAL SOUGHT THROUGH FINAL APPROVAL							\$907,437.38

Date	Staff	Case	Time Description
Shaded time entries have been deleted based on billing judgment			
<i>Time entries in grey italics pertain to the Bane Act and/or Nadir's Motion for Summary Judgment</i>			
9/5/2014	AKR	Rodriguez	0.2 Con with Jessica at HSR regarding MSJ, deadlines
9/8/2014	AKR	Rodriguez	0.5 Instruct and assist preparing notice of change of address to Public Counsel
9/8/2014	BGL	Rodriguez	1.2 Prepare notice of change of address for AR, get log in number for ECF
9/8/2014	AKR	Rodriguez	0.5 Con with cocounsel regarding discovery
9/9/2014	AKR	Rodriguez	1.5 Tel call with opp counsel re scheduling of summary judgment and cut-offs and con with co-counsel re same
9/11/2014	AKR	Rodriguez	0.5 Con with cocounsel re opt-outs and status of depositions
9/11/2014	BGL	Rodriguez	4.6 Create files for pleadings, correspondence, business file, evidence file, and attorneys notes; organize docs
9/12/2014	AKR	Rodriguez	2.4 Review exhibits from Tremblay Depo to prepare for depositions and organize files
9/12/2014	BGL	Rodriguez	3.3 Prepare exhibit binders for exhibits used during depositions
9/12/2014	BGL	Rodriguez	1.1 Prepare index for exhibit binders
9/12/2014	BGL	Rodriguez	3.4 Create files for discovery
9/12/2014	BGL	Rodriguez	1.5 Setting up workspace for Rodriguez
9/15/2014	AKR	Rodriguez	1.5 Review deposition of Anne Tremblay and con with cocounsel re exhibits
9/15/2014	AKR	Rodriguez	2.1 Prep for depo of Gomez
9/15/2014	BGL	Rodriguez	4. Uploading documents on NetDocs for case files, etc.
9/15/2014	BGL	Rodriguez	3.6 Prep depo exhibits and put onto workspace
9/16/2014	AKR	Rodriguez	3.4 Review discovery requests to Christian and con with cocounsel re same
9/16/2014	AKR	Rodriguez	1.9 Review deposition exhibits to Nadir's deposition
9/16/2014	BGL	Rodriguez	3.2 Con with Anne R and upload discovery requests for plaintiffs; prep format for responding to same
9/16/2014	BGL	Rodriguez	2.4 Upload documents to NetDocs
9/16/2014	BGL	Rodriguez	2.5 Add exhibits to the Depo Exhibit notebook and update index
9/16/2014	AKR	Rodriguez	0.3 Con with Jessica re research files
9/17/2014	AKR	Rodriguez	4.4 Review Gomez exhibits and prep questions for Gomez deposition; con with Olu re Nadir deposition and questions
9/17/2014	BGL	Rodriguez	3.5 Con with Anne R and gets exhibits for Angel Gomez deposition; make copies of each in preparation for depo
9/18/2014	AKR	Rodriguez	4.2 Prep for deposition, prep questions, review and select exhibits
9/18/2014	BGL	Rodriguez	2.1 File depositions and discovery and upload to computer
9/19/2014	AKR	Rodriguez	7.5 Deposition of Angel Gomez and prep for same, con with co-counsel
9/19/2014	AKR	Rodriguez	1.2 Travel to/from deposition of Gomez
9/19/2014	BGL	Rodriguez	0.4 Upload Tremblay Depo
9/23/2014	AKR	Rodriguez	5.9 Prep for deposition of Hart and review exhibits
9/24/2014	AKR	Rodriguez	5.5 Deposition of William Hart, prep for same, con with co-counsel, opp counsel
9/24/2014	AKR	Rodriguez	1. Travel to/from deposition of Hart
9/25/2014	BGL	Rodriguez	1.5 Compress evidence of recording in order to be able to send to cocounsel; confirm receipt
9/26/2014	BGL	Rodriguez	2.1 Prepare files and upload documents to workspace
9/30/2014	AKR	Rodriguez	0.7 Con with cocounsel regarding ex parte on Rodriguez dep, stip and MSJ deadline
10/2/2014	AKR	Rodriguez	1. Conf call with cocounsel regarding discovery and who will do what; email re same
10/6/2014	AKR	Rodriguez	1.2 Review depo excerpts and add additional pages from Tremblay declaration for opposition to MSJ
10/6/2014	AKR	Rodriguez	2.5 Conf with CP, OO, MT re discovery
10/7/2014	AH	Rodriguez	3.5 <i>Researching Bane Act section of MSJ motion</i>
10/7/2014	AKR	Rodriguez	3.9 Prep for deposition of Paysinger and review articles re: same, prep potential exhibits for depo
10/7/2014	BGL	Rodriguez	3.5 Create files for discovery, depositions, pleadings, research
10/7/2014	BGL	Rodriguez	2.8 Add exhibits to the Depo Exhibit notebook and update index
10/8/2014	AKR	Rodriguez	2.4 Deposition of Paysinger and con with opp-counsel re same
10/8/2014	AKR	Rodriguez	0.8 Travel to/from deposition of Paysinger
10/8/2014	AKR	Rodriguez	4.1 Prep for deposition of Paysinger and select exhibits
10/8/2014	AKR	Rodriguez	0.2 Call with MT regarding discovery
10/10/2014	AH	Rodriguez	6.8 <i>Researching Bane Act section of MSJ motion</i>
10/13/2014	AKR	Rodriguez	5. Prep discovery responses and con with cocounsel re same
10/14/2014	AH	Rodriguez	10.5 <i>Drafting and revising Bane Act section of MSJ motion</i>
10/14/2014	AKR	Rodriguez	4.3 Con with client re: discovery responses and prepare same; con with cocounsel re same
10/14/2014	AKR	Rodriguez	3.5 Prep motion for summary judgment, argument, review same, con with cocounsel
10/14/2014	BGL	Rodriguez	2. Prep files for discovery, pleadings, evidence and put files in order
10/14/2014	BGL	Rodriguez	1.7 Filing, uploading documents to NetDocs
10/15/2014	AH	Rodriguez	4. Drafting First Amendment section of MSJ motion
10/15/2014	AKR	Rodriguez	3.9 Review discovery and con with cocounsel, client re same
10/15/2014	AKR	Rodriguez	1.1 Con with cocounsel re legal argument on MSJ and clarify same
10/16/2014	AH	Rodriguez	7.2 Drafting MSJ, researching injunction as inherently coercive
10/16/2014	BGL	Rodriguez	2.2 Uploading depositions of Nadir, Paysinger, Dickerson PMK, Hart, and Gomez
10/17/2014	AH	Rodriguez	7.1 <i>Revising MSJ (Bane Act and First Amendment)</i>
10/17/2014	AKR	Rodriguez	0.5 Call with cocounsel regarding depositions
10/18/2014	AH	Rodriguez	5. Researching and drafting First Amendment section of MSJ
10/18/2014	AKR	Rodriguez	1. Conf call regarding Rodriguez MSJ
10/19/2014	AH	Rodriguez	6. <i>Revising Bane Act and First Amendment sections of MSJ based on Anne's comments</i>
10/19/2014	AH	Rodriguez	2. Research on Monell violations in similar factual circumstances
10/19/2014	AH	Rodriguez	0.5 Team call on MSJ status and filing
10/19/2014	AKR	Rodriguez	7.5 Legal research, separate statement, writing motion for partial summary adjudication and con with team re same

10/20/2014 AH	Rodriguez	2 Reviewing separate statement
10/20/2014 AH	Rodriguez	3 revision of MSJ
10/20/2014 AKR	Rodriguez	8.9 Prep Motion for Partial Summary Adjudication, separate statement, review/revise legal sections: research, con with cocounsel re
10/21/2014 AH	Rodriguez	5 revision of MSJ - due process and monell sections, removal of first amendment section
10/21/2014 AH	Rodriguez	1 Revision of separate statement to make it correspond to brief
10/21/2014 AKR	Rodriguez	3.5 Motion for summary adjudication, revise draft and research same Prep Motion for Partial Summary Adjudication, con with cocounsel and review/revise legal sections; review separate statement at
10/23/2014 AKR	Rodriguez	10.6 same
10/24/2014 AKR	Rodriguez	0.6 Review Proposed Order and recommend edits to same to CP
10/24/2014 AKR	Rodriguez	4.5 Prep motion for summary adjudication and con with cocounsel re filing and last revisions
10/24/2014 BGL	Rodriguez	3 Printing out MSJs, evidence, declarations, for Anne R and put in binders for argument
10/24/2014 BGL	Rodriguez	1.2 Filing withdrawal of AR from HSR
10/25/2014 AKR	Rodriguez	2.5 Review City, Nadir, and Gomez MSJs
10/25/2014 AKR	Rodriguez	2.2 Review final MSA and con with cocounsel
10/26/2014 AKR	Rodriguez	8.5 Opposition to motion to decertify the class; research re same. Review motions for summary judgment, motion to decertify the class. Tel call with cocounsel re dividing up responsibilities and re
10/26/2014 AKR	Rodriguez	4.5 four briefs
10/27/2014 AH	Rodriguez	3.8 Research on motion to decertify (SOL and mootness)
10/27/2014 AKR	Rodriguez	10.2 Prep opposition to motion to decertify and research re same
10/27/2014 AKR	Rodriguez	1.2 Direct co-counsel's research and answer questions regarding oppositions to motions for summary judgment
10/27/2014 BGL	Rodriguez	2.6 Con with Anne R re MSJ filings and prepare opposition format for same
10/27/2014 BGL	Rodriguez	0.8 Calendar dates for MSJ, MSA
10/27/2014 AKR	Rodriguez	0.5 Instruct BGL on documents to upload and file
10/28/2014 AH	Rodriguez	9 Drafting statute of limitations section of opposition motion to decertify
10/28/2014 AKR	Rodriguez	5.2 Revise opp to motion for decertification and con with cocounsel re same
10/28/2014 BGL	Rodriguez	2.5 Download and file corrections to Rodriguez deposition, discovery documents
10/28/2014 BGL	Rodriguez	1.4 Download briefs/evidence to Ne:Docs and con with AR re logistics of documents to be filed in opposition
10/29/2014 AH	Rodriguez	2 Preparing exhibits of motion to decertify
10/29/2014 AH	Rodriguez	6.5 Revision of opposition to decertification motion
10/29/2014 AKR	Rodriguez	2.1 Review evidence for exhibits to support opposition to motion for summary judgment
10/29/2014 AKR	Rodriguez	3.3 Con with cocounsel re oppositions to motions for summary judgment
10/29/2014 AKR	Rodriguez	0.5 Con with Dexter and Mohammad re database to calculate and collect information regarding numbers of class members served
10/29/2014 DR	Rodriguez	0.8 Discussed data entry assignment with A. Richardson, M. Tajsar re: new project, using data from service records to ascertain clas
10/29/2014 DR	Rodriguez	4.1 Began compiling data from service records into spreadsheet to ascertain number and identity of class members
10/29/2014 BGL	Rodriguez	4.2 Preparing/printing Compendium of Evidence in support of opposition to motion for summary adjudication
10/29/2014 BGL	Rodriguez	0.2 Email Anne R re compendium of evidence
10/30/2014 AH	Rodriguez	4 Revisions of opposition to class decertification motion
10/30/2014 AH	Rodriguez	1 Rereading of motion for class decertification to determine whether we had missed any issues
10/30/2014 AH	Rodriguez	2 Research on California immunities law
10/30/2014 AH	Rodriguez	2 Drafting opposition to motion to decertify
10/30/2014 AH	Rodriguez	2 Revision of opposition to decertification motion
10/30/2014 AKR	Rodriguez	7.2 Revisions to opposition to motion to decertify the class; con with cocounsel re exhibits, citations to same, and filing of all necessa
10/31/2014 AH	Rodriguez	0.8 Call with Anne, Dexter, and co-counsel on oppositions to the three MSJs, finalizing opp to decertification
10/31/2014 AH	Rodriguez	4 Research on California immunities law
10/31/2014 AH	Rodriguez	0.5 Call with Hadsell attorneys (Acivi, Mohammed) strategizing on responding to immunities arguments (prosecutorial, discretionary,
10/31/2014 AH	Rodriguez	2 Outlining opposition to City's MSJ
10/31/2014 AH	Rodriguez	4 Research on immunities for opposition to MSJs
10/31/2014 AH	Rodriguez	4.5 Research on opposition for City's MSJ
10/31/2014 AKR	Rodriguez	1.5 prepare objections to motions for summary judgment, and review final filing
10/31/2014 DR	Rodriguez	6.2 Posted records and summaries to Netdocs for team's reference, continued analyzing data to identify class members
11/1/2014 AH	Rodriguez	7.5 Drafting opposition to city's MSJ
11/2/2014 AH	Rodriguez	9.3 Drafting opposition to city's MSJ
11/2/2014 AH	Rodriguez	0.8 Conference call with Anne, Hadsell co-counsel (Cindy, Acivi, Mohammad) and Olu Orange handling issues in the three oppositi
11/2/2014 AKR	Rodriguez	7.5 Prep section for opp to MSJ on damages, research re same
11/2/2014 AKR	Rodriguez	3.2 Review Acivi's, Alisa's sections on oppositions to motions for summary judgment and revise same
11/3/2014 AH	Rodriguez	1 Editing Nadir opposition brief
11/3/2014 AH	Rodriguez	4 Researching prosecutorial and discretionary immunities under California law
11/3/2014 AH	Rodriguez	3 Revising opposition to City's MSJ
11/3/2014 AH	Rodriguez	0.5 Call with co-counsel (Hadsell, Stormer and Olu Orange)
11/3/2014 AH	Rodriguez	2.3 Revising opposition to City's MSJ
11/3/2014 AKR	Rodriguez	5.2 Research re 5.2.1 and con with Barry Litt, Peter Bibring re same
11/3/2014 AKR	Rodriguez	3.1 Review drafts of oppositions, make revisions, con with co-counsel
11/4/2014 AH	Rodriguez	7.8 Drafting state law immunities section of briefs
11/4/2014 AKR	Rodriguez	4.5 Revise oppositions to Nadir, Gomez motions for MSJ
11/4/2014 DR	Rodriguez	10.8 Analyzed data from service records to ascertain class size and members
11/4/2014 BGL	Rodriguez	0.3 Con with Anne R re status of evidence, briefs, and who will be filing what documents
11/4/2014 AKR	Rodriguez	0.2 Call NM re document preparation for MSJ
11/5/2014 AH	Rodriguez	0.3 Meeting with Anne re immunities issues
11/5/2014 AH	Rodriguez	0.7 Call with Hadsell, Stormer co-counsel and Olu re oppositions

11/5/2014 AH	Rodriguez	7 Drafting state law immunities sections of Nadir, City oppositions
11/5/2014 AKR	Rodriguez	2.1 Objection and Motion to Strike Gomez Joinder in Motion for Decertification
11/5/2014 AKR	Rodriguez	7.9 Separate statement of City, add cites, cases; finalize objections to Gomez; read opps to MSJ of Nadir, Gomez, City
11/5/2014 DR	Rodriguez	9.6 Analyzed data from service records to ascertain class size and members
11/5/2014 BGL	Rodriguez	3.6 Fixing, formatting brief, converting sections from WP
11/5/2014 BGL	Rodriguez	1.8 Preparing proposed orders for Gomez, Nadir, City
11/5/2014 BGL	Rodriguez	0.4 Call re logistics with Hadsell firm on filing opposition material
11/6/2014 AH	Rodriguez	1 Editing Gomez opposition brief
11/6/2014 AH	Rodriguez	0.8 Call with co-counsel re finalizing oppositions
11/6/2014 AH	Rodriguez	5 Cite-checking opposition to City's MSJ
11/6/2014 AKR	Rodriguez	10.2 Finalize section on immunities; get cites, review separate statement of Nadir, Gomez, City and make corrections; con with team
11/6/2014 BGL	Rodriguez	3.2 Cite checking Opp to MSJ
11/6/2014 BGL	Rodriguez	4.8 Prep TOC/TOA on Opp to City's MSJ
11/7/2014 AKR	Rodriguez	6.5 Finalize opp to City MSJ; review other opps, separate statements, and con w team re same
11/7/2014 BGL	Rodriguez	4.2 Prep TOC/TOA on Opp to Gomez' MSJ
11/7/2014 BGL	Rodriguez	2.2 Proofreading Opp to City's MSJ and con with Anne R re last minute changes
11/7/2014 BGL	Rodriguez	1.3 Filing Opp to City's MSJ
11/10/2014 DR	Rodriguez	8.2 Analyzed data from service records to ascertain class size and members
11/10/2014 BGL	Rodriguez	2.9 Prep notebooks for oral argument for Anne R on motion for class decertification Conf. call with A. Richardson, A. Hartz, C. Panuco, D. Stormer, O. Orange, M. Tajsar, A. Coromelas re: Rodriguez strategy and u
11/11/2014 DR	Rodriguez	0.8 size data project
11/12/2014 AH	Rodriguez	2.5 Review of and research on opposition to our MSJ
11/12/2014 AH	Rodriguez	1.3 Research on notice requirements for due process violation
11/12/2014 AKR	Rodriguez	3.5 Objection to abstention argument in Reply to motion for decertification
11/13/2014 AH	Rodriguez	8 Drafting reply brief (due process and Bane Act sections)
11/13/2014 AKR	Rodriguez	5.2 Review City's opposition to plaintiffs' motion for summary adjudication and determine division of labor
11/13/2014 AKR	Rodriguez	1.5 Draft motion to strike and send to team
11/13/2014 AKR	Rodriguez	0.6 Review motion to strike and add citations
11/14/2014 DR	Rodriguez	8.7 Analyzed data from service records to ascertain class size and members
11/16/2014 AH	Rodriguez	3.1 Drafting reply brief
11/16/2014 AKR	Rodriguez	2.2 Prep for oral argument
11/17/2014 AH	Rodriguez	1.7 Drafting reply brief
11/17/2014 AKR	Rodriguez	3.2 Research for oral argument on motion for class decertification
11/19/2014 AKR	Rodriguez	1.2 Review emails re opposition, reply for MSA's and con with cocounsel re date for filing reply
11/19/2014 DR	Rodriguez	8.1 Analyzed data from service records to ascertain class size and members
11/20/2014 AH	Rodriguez	1 Moot oral argument with Anne and co-counsel from Hadsell Stormer (Acivi, Cindy, Mohammad)
11/20/2014 AH	Rodriguez	3 Research on continuing violations cases based on City's decert reply
11/20/2014 AKR	Rodriguez	3.5 Prep for oral argument
11/20/2014 AKR	Rodriguez	2.1 Review database to determine scope of class and prep for class decertification motion
11/20/2014 AKR	Rodriguez	4.5 Moot court and con with cocounsel, research last cites and cases
11/20/2014 BGL	Rodriguez	2.5 Upload documents, discovery to NetDocs
11/21/2014 AH	Rodriguez	1.5 Drafting section of oral argument notes on continuing violations
11/21/2014 AH	Rodriguez	0.5 Finalizing oral argument notes
11/21/2014 AH	Rodriguez	0.7 Hearing before Judge Gee
11/21/2014 AH	Rodriguez	1.5 Drafting reply brief to motion for summary adjudication
11/21/2014 AKR	Rodriguez	1 Travel to/from courthouse
11/21/2014 AKR	Rodriguez	2.2 Prep for oral argument for motion for decertification
11/21/2014 AKR	Rodriguez	3.2 Oral argument on decertification motion and con with cocounsel, clients re same
11/21/2014 DR	Rodriguez	7.8 Used class member data to identify particular subclasses relevant to particular actions and defendants
11/21/2014 BGL	Rodriguez	3.1 Updating file on computer, hard copies
11/23/2014 AH	Rodriguez	0.5 Drafting reply brief to motion for summary adjudication
11/24/2014 AH	Rodriguez	1.2 Drafting reply brief to motion for summary adjudication
11/24/2014 AH	Rodriguez	0.5 Drafting reply brief to motion for summary adjudication
11/24/2014 AH	Rodriguez	0.3 Call with Anne re: MSA
11/24/2014 AH	Rodriguez	0.6 Researching legislative history of Bane Act
11/24/2014 AKR	Rodriguez	3.5 Con with Alisa and review opposition to MSA, reply to City's MSJ; prep reply to MSA
11/25/2014 AH	Rodriguez	3 Drafting reply brief to motion for summary adjudication
11/25/2014 AH	Rodriguez	0.3 Meeting with Anne re reply brief revisions
11/25/2014 AH	Rodriguez	0.4 Revising reply brief to motion for summary adjudication
11/25/2014 AKR	Rodriguez	2.9 Review cases and review/edits to reply brief to MSA
11/26/2014 AH	Rodriguez	3 Revising reply brief (Bane Act)
11/26/2014 AH	Rodriguez	3 Cite checking reply brief for MSA
11/26/2014 AKR	Rodriguez	2.1 Review reply brief and con with Alisa, HSR re same
11/26/2014 DR	Rodriguez	3.3 Cite-checked portions of Rodriguez MSJ reply brief
11/29/2014 AH	Rodriguez	1.2 Meeting at Hadsell Stormer with Anne, Hadsell Stormer Co-Counsel (Acivi, Cindy, Dan, Mohammad), and Olu re settlement/trial
11/29/2014 AKR	Rodriguez	2.5 Meet with team re settlement and strategy for summary judgment and prep for same
12/1/2014 AH	Rodriguez	0.7 Reviewing reply briefs of Gomez and Nadir
12/2/2014 AH	Rodriguez	1.1 Preparing binder for oral argument on cross motions for SJ
12/2/2014 SC	Rodriguez	2.5 prepare briefs for cross-motion for summary judgment
12/2/2014 SC	Rodriguez	1.2 organize files for AKR for cross-motion

12/3/2014 AH	Rodriguez	1.9 Creating chart of defendants' arguments in preparation for oral argument
12/3/2014 SC	Rodriguez	1.5 organize files for cross-motion
12/3/2014 SC	Rodriguez	2 research and print out additional cases for cross-motion
12/4/2014 AH	Rodriguez	1.5 Revising chart of defendants' arguments in preparation for oral argument
12/8/2014 AKR	Rodriguez	6.9 Review briefs, cases cited in all parties' motions for summary judgment to prep for oral argument
12/9/2014 AKR	Rodriguez	3 Moot court, prep for same and con with cocounsel
12/9/2014 AKR	Rodriguez	5.2 Research last cites and cases for motions for summary judgment
12/9/2014 SC	Rodriguez	0.7 organize cases for cross-motion
12/10/2014 AKR	Rodriguez	5.6 Prep for oral argument and additional research to address issues from moot court
12/10/2014 DR	Rodriguez	4.1 Attended oral argument on Rodriguez MSJs before Dist. Judge Gee
12/11/2014 AKR	Rodriguez	9.6 Prep for oral argument and review cocounsel's oral argument notes
12/12/2014 AH	Rodriguez	3 hearing
12/12/2014 AKR	Rodriguez	2.2 Oral argument on motions for summary judgment
12/12/2014 AKR	Rodriguez	3.5 Prep for oral argument and con with cocounsel re same
12/12/2014 AKR	Rodriguez	1.3 Travel to/from oral argument on motions for summary judgment
12/12/2014 SC	Rodriguez	0.3 travel to court for cross-motion for summary judgment hearing
12/12/2014 SC	Rodriguez	2 attend and take notes on cross-motion for summary judgment
12/12/2014 SC	Rodriguez	0.3 Travel back to office from attending cross-motion hearing
12/15/2014 AH	Rodriguez	4 Drafting supplemental court-ordered brief
12/15/2014 AKR	Rodriguez	5.5 Prep supplemental brief on time-bar issue and research re same
12/17/2014 AH	Rodriguez	5 Drafting supplemental court-ordered brief
12/17/2014 AKR	Rodriguez	3.2 Review Alsa's draft of supplemental brief, research, edits
12/17/2014 AH	Rodriguez	0.4 Call with AC and MT re supplemental briefing
12/18/2014 AH	Rodriguez	2 Revision of supplemental court-ordered brief
12/18/2014 AH	Rodriguez	0.7 Finalizing supplemental court-ordered brief
12/18/2014 AKR	Rodriguez	2.1 Review Olu's draft of third amended complaint and con with cocounsel re same
12/18/2014 AKR	Rodriguez	1.2 Review final draft of supplemental brief and con with cocounsel re same
12/19/2014 AKR	Rodriguez	0.6 Con with CP re stipulation with opp counsel re third amended complaint
12/19/2014 AKR	Rodriguez	0.2 Call MT re briefing
1/3/2015 SC	Rodriguez	0.3 download e-filings, upload to internal network
1/5/2015 AKR	Rodriguez	1.1 Review City's opposition to plaintiffs' supplemental brief
1/6/2015 AKR	Rodriguez	0.4 Con with opp counsel, cocounsel re stipulation to continue expert dates
1/7/2015 AH	Rodriguez	0.5 Reviewing City's response to supplemental briefing on statute of limitations issue
1/7/2015 AKR	Rodriguez	0.9 Email with opp counsel, cocounsel re stipulation to continue expert dates
1/8/2015 AKR	Rodriguez	0.3 Sign stip to continue expert dates and con with opp counsel re filing
1/27/2015 AKR	Rodriguez	0.6 Con with opp counsel, cocounsel re scheduling Rule 16 meeting
1/27/2015 AKR	Rodriguez	1 Con with cocounsel re experts and research various possibilities
2/3/2015 AKR	Rodriguez	2.2 Research experts and send emails to cocounsel re same; review emails of CP, MT re same
2/5/2015 AKR	Rodriguez	1 Con with Jim Clark re potential settlement discussions
2/10/2015 AKR	Rodriguez	1.2 Con with cocounsel re experts and selection of same, review emails re same
2/10/2015 SC	Rodriguez	0.3 Update case data to reflect withdrawal of opposing counsel
2/11/2015 AKR	Rodriguez	1.6 Review resumes, emails re experts and con with cocounsel re same
2/13/2015 AKR	Rodriguez	0.5 Con with cocounsel re continuance of expert dates
2/14/2015 AKR	Rodriguez	0.8 Conference call with cocounsel re experts
2/18/2015 AKR	Rodriguez	1 Con with cocounsel regarding experts
2/19/2015 AH	Rodriguez	1.8 Preparing chart of remaining causes of actions and parties in preparation for settlement discussions and trial
2/19/2015 AKR	Rodriguez	1.5 Con with opp counsel re dates for Rule 16 meeting, and confer with cocounsel re same Review Rule 16 and Local Rule 16-2 regarding required disclosures Con with Alisa re determining remaining claims, and con with
2/19/2015 AKR	Rodriguez	1.1 re prep
2/20/2015 AH	Rodriguez	0.6 Compiling list and information on experts in preparation for disclosures
2/20/2015 AKR	Rodriguez	1.2 Con with opp counsel re dates for Rule 16 meeting, settlement discussions, and con with cocounsel re same
2/23/2015 AH	Rodriguez	1 Meeting with Anne and Olu on settlement strategies and demands and trial preparation
2/23/2015 AH	Rodriguez	0.2 Updating chart on causes of action to reflect acceptance of third amended complaint
2/23/2015 AKR	Rodriguez	2.1 Con with cocounsel re settlement strategy and terms and conditions of any injunctive relief/damages fund
2/23/2015 AKR	Rodriguez	0.7 Prep for Rule 16 conference and con with opp counsel re scheduling same
2/23/2015 AKR	Rodriguez	1.5 Con with Humberto Guizar re serving as an expert
2/23/2015 AKR	Rodriguez	1.2 Travel to/from appointment with H Guizar.
2/24/2015 AKR	Rodriguez	1.2 Con with cocounsel re court's rulings, deadlines, experts, and phone call to potential experts
2/24/2015 AKR	Rodriguez	0.4 Con with opp counsel re settlement discussions
2/25/2015 AH	Rodriguez	1.4 Research on cy pres limitations in the 9th Circuit
2/25/2015 AKR	Rodriguez	1.3 Meeting with City Attorney, DS, OO re settlement discussions
2/25/2015 AKR	Rodriguez	0.8 Travel to/from City Hall for settlement discussions
2/25/2015 AKR	Rodriguez	1.2 Con with cocounsel re settlement strategy and terms and conditions of any injunctive relief/damages fund
2/25/2015 AKR	Rodriguez	0.8 Con with opp counsel re pretrial dates, settlement discussions, experts, etc.
2/25/2015 AKR	Rodriguez	1 Tel with Edwina Barvosa re expert testimony and review her CV
2/26/2015 AH	Rodriguez	1 Research on cy pres settlement
2/26/2015 AKR	Rodriguez	3.2 Research re cy pres and con with Alisa re same
2/26/2015 AKR	Rodriguez	1 Con with cocounsel and opp counsel re potential mediators and check availability
2/26/2015 AKR	Rodriguez	0.3 Call with DS and OO re expert Ana Muniz

2/27/2015 AH	Rodriguez	3 Research on incentive rewards and coupon settlements
2/27/2015 AKR	Rodriguez	2.1 Review Barvosa deposition, materials and con with cocounsel re potential experts
2/27/2015 AKR	Rodriguez	1.5 Con with opp counsel re continuance, experts, and settlement discussions and con with cocounsel re same
3/1/2015 AKR	Rodriguez	1.1 Research re potential settlement
3/2/2015 AH	Rodriguez	3.1 Drafting memo on cy pres, incentive award, settlement standards
3/2/2015 AH	Rodriguez	0.3 meeting with Anne on cy pres, incentive award, settlement
3/2/2015 AH	Rodriguez	0.3 Meeting with Lucy on her incentive award research
3/2/2015 AKR	Rodriguez	3.5 Review Alisa's memo on cy pres, incentive payments, and current standards on settlements in the Ninth Circuit and con re same
3/2/2015 AKR	Rodriguez	1 Tel with mediators, opp counsel and cocounsel
3/3/2015 AH	Rodriguez	1.8 Memo on incentive awards
3/3/2015 AH	Rodriguez	1.5 team call on experts and settlement issues
3/3/2015 AH	Rodriguez	1 gathering and modifying expert documents to send to Edwina Barvosa
3/3/2015 AH	Rodriguez	0.5 reserving mediation
3/3/2015 AKR	Rodriguez	4.2 Review Alisa's updated memo and read cases; con with cocounsel re experts and new trial dates; deadlines
3/4/2015 AH	Rodriguez	1 Team call on settlement and trial dates
3/4/2015 AH	Rodriguez	1 Locating additional documents to provide to expert (Sealed dec)
3/4/2015 AKR	Rodriguez	1.8 Conf call with cocounsel re new deadlines, and potential cy pres awards/structure of the settlement
3/4/2015 AKR	Rodriguez	0.5 Email with Edwina Barvosa re additional evidence to review and confidentiality agreement
3/5/2015 AH	Rodriguez	0.7 Call with expert Edwina Barvosa and Anne
3/5/2015 AH	Rodriguez	1.2 Preparing and sending case documents to Edwina
3/5/2015 AKR	Rodriguez	1.5 Review MT's draft stip and edit same; send to opp counsel and discuss continuance
3/5/2015 AKR	Rodriguez	1 Con with Alisa re confirming mediator and con with opp counsel re fee split
3/5/2015 AKR	Rodriguez	1.3 Tel con with Edwina Barvosa re testimony and additional documents, con with Alisa re same, review her CV
3/6/2015 AH	Rodriguez	0.5 mediation logistics
3/9/2015 AH	Rodriguez	0.5 Call with expert Edwina Barvosa and Anne
3/9/2015 AH	Rodriguez	0.3 mediation logistics
3/11/2015 AH	Rodriguez	0.3 Meeting with Anne on contours of settlement proposal
3/15/2015 AH	Rodriguez	2 Drafting Rodriguez settlement memo for use by City Attorney
3/17/2015 AKR	Rodriguez	1 Review Alisa's draft of settlement proposal for City and suggest revisions; email re same
3/18/2015 AH	Rodriguez	1.6 Revising Rodriguez settlement memo for City Attorney
3/19/2015 AKR	Rodriguez	1.5 Review Alisa's draft of settlement proposal for City and make changes, send revised version to cocounsel
3/19/2015 AKR	Rodriguez	0.5 Con with Cindy re mediation brief and exhibits for same, review prior rulings for mediation brief
3/20/2015 AH	Rodriguez	0.5 Revising Rodriguez settlement memo for City Attorney
3/20/2015 AKR	Rodriguez	3.6 Prepare mediation brief and review exhibits, prior briefs
3/20/2015 AKR	Rodriguez	1.2 Tel call with Dan, Olu re cy pres and possible settlement alternatives
3/20/2015 AKR	Rodriguez	0.5 Send settlement letter to City Attorney Thom Peters and review response
3/22/2015 AKR	Rodriguez	1.5 Prepare mediation brief and send to cocounsel with questions; review emails re same
3/22/2015 AKR	Rodriguez	2.2 Prep mediation brief and send to cocounsel for comments; review same, update and revise
3/23/2015 AKR	Rodriguez	2.5 Finalize brief, make edits, review orders, exhibits, con with CP re: exhibits, TOC, service of same
3/23/2015 AKR	Rodriguez	1.2 Review draft of settlement and con with Alisa re same; edits to same
3/24/2015 AKR	Rodriguez	0.7 Review City's mediation brief and send our brief to City
3/26/2015 SC	Rodriguez	0.5 Calculate staff hours for attorney's fees for upcoming mediation
3/27/2015 SC	Rodriguez	0.3 Calculate staff hours for attorney's fees
3/27/2015 AKR	Rodriguez	1.1 Prep for mediation, gather timesheets and costs; review City mediation brief
3/30/2015 AKR	Rodriguez	7.5 Mediation
3/30/2015 AH	Rodriguez	3 Attend portion of Mediation
3/30/2015 AKR	Rodriguez	0.9 Travel to/from Mediation
4/9/2015 AKR	Rodriguez	0.2 Call CP re filing
4/16/2015 AKR	Rodriguez	1.9 Con with Rena and rest of team re City's position on settlement, draft joint statement and circulate to team
4/17/2015 AKR	Rodriguez	1.1 Email with Rena and include City's statement in joint statement; con with team and send final to HSR for filing
4/23/2015 AKR	Rodriguez	0.5 emails w cocounsel re experts and upcoming deadlines
4/24/2015 AKR	Rodriguez	0.5 Con with cocounsel re expert Humberto Guizar
4/29/2015 AH	Rodriguez	2 Conference call with cocounsel re pretrial documents, Rule 16 meeting, and motions in limine
4/29/2015 AKR	Rodriguez	2.2 Conference call with cocounsel re pretrial documents, Rule 16 meeting, and motions in limine, and email to opp counsel re same
5/3/2015 AKR	Rodriguez	1.5 Review expert reports and email with cocounsel re same
5/3/2015 AH	Rodriguez	0.1 email to team re outline and scope of my memo
5/4/2015 AH	Rodriguez	1.5 Review Edwina Barvosa's expert report and compile comments
5/4/2015 AH	Rodriguez	0.5 Call with Edwina Barvosa re expert report
5/4/2015 AKR	Rodriguez	2.5 Con with Edwina Barvosa re: expert report, review draft of same
5/4/2015 AKR	Rodriguez	3.1 Review expert reports of Harper, Griffith, Muniz and con with cocounsel re same
5/5/2015 AKR	Rodriguez	1.2 Review expert report of Barvosa and send for service
5/8/2015 AKR	Rodriguez	0.4 Con with team re memo of contentions of law and fact, objections to jury instructions
5/8/2015 AKR	Rodriguez	0.5 Review Court order on motions for summary judgment and con with team as it relates to trial prep
5/10/2015 AKR	Rodriguez	2.8 Prepare Memo of Contentions of Law and Fact, review prior orders of Court, emails from cocounsel re same
5/13/2015 AKR	Rodriguez	1 Con with cocounsel regarding pretrial prep
5/14/2015 AKR	Rodriguez	1.9 Review MT's draft of objections to Defendants' witness designations and revise same
5/15/2015 AKR	Rodriguez	0.3 Con with expert, opp counsel, and co counsel re availability of experts for depositions
5/18/2015 AKR	Rodriguez	2.2 Con with Edwina Barvosa re: deposition, logistics, answer questions
5/18/2015 AKR	Rodriguez	2.5 prep contentions of law and fact
5/18/2015 AKR	Rodriguez	1.2 Review draft exhibit list, witness list

5/19/2015 AKR	Rodríguez	3.2 Rule 16 meeting and prep for same, con with cocounsel, opp counsel re same
5/19/2015 AKR	Rodríguez	1 Travel to/from City Attorneys' office for Rule 16 meeting
5/19/2015 AKR	Rodríguez	1.5 Prep for Edwina Barvosa depo
5/19/2015 AKR	Rodríguez	2.3 Review witness list, exhibit list, revise contentions
5/19/2015 DR	Rodríguez	4.4 Attended deposition of Humberto Guizar
5/20/2015 AKR	Rodríguez	3.8 Deposition of Edwina Barvosa and con with witness, opp counsel re same
5/20/2015 AKR	Rodríguez	3.2 Travel to/from deposition of Barvosa in Santa Barbara
5/20/2015 AKR	Rodríguez	0.6 Conf call with cocounsel re damages, trial prep
5/21/2015 AH	Rodríguez	8 Researching motion in limine no 1
5/21/2015 AKR	Rodríguez	2.6 Review Pretrial conference order, voir dire, exhibit list, and proposed MILs and make comments re same
5/21/2015 AKR	Rodríguez	1.2 Revise Contentions of Law and Fact and send to cocounsel
5/22/2015 AH	Rodríguez	11 Drafting motion in limine no 1
5/22/2015 AKR	Rodríguez	0.4 Con with MT re pretrial conference order and revisions to same
5/24/2015 AH	Rodríguez	2.5 Drafting motion for preliminary approval
5/25/2015 AKR	Rodríguez	1 Review Motion in Limine number 1 and make edits to same
5/25/2015 AKR	Rodríguez	2.1 Review emails from cocounsel, opp counsel re pretrial documents
5/26/2015 AH	Rodríguez	3.8 Finalizing motions in limine
5/26/2015 AKR	Rodríguez	2.6 Finalize motion in limine number 1 and review motion in limine number 3, make edits, send to cocounsel
5/26/2015 AKR	Rodríguez	1.9 Review exhibit list, witness list, voir dire and proposed statement of the case and make edits, con with cocounsel re same
5/26/2015 AKR	Rodríguez	0.5 Prep for deposition of Switzer, A. Rodriguez and con with AH re same
5/27/2015 AH	Rodríguez	0.5 Reading defendants MILs
5/27/2015 DR	Rodríguez	0.7 Dropped off chamber copies of brief and supporting materials
5/27/2015 DR	Rodríguez	1.1 Met with A. Richardson to discuss Rodriguez assignments
5/28/2015 AH	Rodríguez	0.5 Reviewing motions in limine
5/28/2015 AH	Rodríguez	1 Team call on preparing MIL oppositions
5/28/2015 DR	Rodríguez	4.1 Attended deposition of former San Antonio Police Chief Wiggins
5/29/2015 AH	Rodríguez	3 Researching opposition to MIL 3
5/29/2015 DR	Rodríguez	5.9 Researched and drafted Opposition to Defendants' Motion in Lim #5
5/30/2015 AH	Rodríguez	12 Drafting opposition to MIL 3
5/31/2015 AH	Rodríguez	4 Drafting opposition to MIL 3
6/1/2015 AH	Rodríguez	7.2 Drafting and compiling oppositions to motions in limine 1, 3, 5
6/1/2015 AKR	Rodríguez	3.2 Calls to potential class member witnesses regarding effect of curfew and inform about case status and instruct students on same
6/1/2015 AE	Rodríguez	3.5 Con with Anne R re making phone calls to class members and take notes on class phone calls
6/1/2015 DR	Rodríguez	0.9 Listened to interview with class member
6/1/2015 DR	Rodríguez	8.8 Reviewed edits to MIL opp and made changes
6/2/2015 AH	Rodríguez	8 Drafting and compiling oppositions to motions in limine
6/2/2015 AE	Rodríguez	1.4 Follow up interview with class members
6/2/2015 DR	Rodríguez	0.8 Called class members to discuss injunction impacts
6/2/2015 DR	Rodríguez	1.4 Incorporated new edits to MIL opp
6/2/2015 AKR	Rodríguez	0.6 Call with OO re witnesses not on list
6/2/2015 AKR	Rodríguez	2.8 Make revisions to proposed removal process based on hearing with the Magistrate
6/3/2015 AH	Rodríguez	8 Preparing for Switzer deposition
6/3/2015 AKR	Rodríguez	1.6 Review notes of students regarding interviews of potential class member witnesses; make phone calls to selected potential witne
6/3/2015 AE	Rodríguez	2.2 Take notes and document interviews with class members
6/3/2015 AKR	Rodríguez	5.2 Review and select documents for deposition exhibits and go over deposition questions for Switzer/Rodriguez, con with Alisa re se
6/3/2015 DR	Rodríguez	2.6 Calls with class members to discuss injunction impacts
6/4/2015 AH	Rodríguez	1.3 Preparing for Switzer deposition
6/4/2015 AH	Rodríguez	3 Deposing A Rodríguez
6/4/2015 AH	Rodríguez	3 Deposing M Switzer
6/4/2015 AKR	Rodríguez	3.7 Deposition of A. Rodriguez, prep exhibits for same
6/4/2015 AKR	Rodríguez	3.3 Deposition of Switzer; finalize exhibits for same
6/4/2015 AKR	Rodríguez	0.9 Travel to/from depositions of Switzer and Rodriguez
6/4/2015 AKR	Rodríguez	3.2 Prep for deposition of Switzer, A. Rodriguez and con with AH, DS, CP re same; analyze depositions afterward
6/4/2015 DR	Rodríguez	8.1 Attended depositions of defense witnesses
6/5/2015 AKR	Rodríguez	0.6 Con with DR, AE to discuss calls with class members
6/5/2015 AE	Rodríguez	0.7 Con with DR, AR, regarding calls to class members who had called in to website; review lists
6/5/2015 DR	Rodríguez	0.6 Con with AR and students regarding calls to class members
6/5/2015 AE	Rodríguez	0.5 Call class members with AR to hear sample call
6/5/2015 AE	Rodríguez	2.5 Call class members and interview same re injunction, update on case
6/5/2015 DR	Rodríguez	0.3 Calls with class members to discuss injunction impacts
6/8/2015 AE	Rodríguez	2.2 Calls with class members to interview re injunction, update on case
6/9/2015 AE	Rodríguez	3.2 Calls with class members to interview re curfew impacts and update on case
6/9/2015 DR	Rodríguez	1.2 Call with class member to discuss injunction impacts
6/10/2015 AH	Rodríguez	2.5 Researching cy pres
6/10/2015 DR	Rodríguez	1.1 Wrote up notes from class member interviews
6/11/2015 AH	Rodríguez	2 Researching cy pres
6/11/2015 AKR	Rodríguez	1.2 Con with Alisa re fluid recovery funds and cy pres
6/11/2015 AKR	Rodríguez	1.5 Con with students, DR regarding potential class member witnesses
6/11/2015 AE	Rodríguez	1.1 Con with AR, DR regarding class member phone calls
6/11/2015 AE	Rodríguez	3.5 Call with class members to discuss effects of injunction and damages

6/11/2015 DR	Rodriguez	2.1 Call with class member to discuss injunction impacts
6/12/2015 AKR	Rodriguez	1.2 Review Barvosa corrections to ce-position
6/12/2015 DR	Rodriguez	0.5 Reviewed new specific interview questions
6/12/2015 AE	Rodriguez	0.5 Con with DR, AR to update interview questions for class members
6/12/2015 DR	Rodriguez	1.2 Call with class member to discuss injunction impacts
6/12/2015 AE	Rodriguez	4.3 Called class members to discuss effects of injunction
6/12/2015 AKR	Rodriguez	0.3 Conf call with cocounsel re pretrial conference
6/15/2015 DR	Rodriguez	0.2 Tned to contact class members, left messages
6/15/2015 AE	Rodriguez	2.3 Called class members; interviews, left messages
6/15/2015 AE	Rodriguez	3.1 Write up interview notes from calls with class members
6/16/2015 DR	Rodriguez	1.1 Researched old injunction challenge to verify class member's account
6/16/2015 DR	Rodriguez	1.3 Calls with class members to discuss injunction impacts
6/16/2015 AE	Rodriguez	1.1 Calls with class members to discuss effects of injunction
6/17/2015 AE	Rodriguez	3.2 Calls with class members; interviews; write up notes from same
6/20/2015 AH	Rodriguez	0.7 Team call on division of labor for prcnal conference
6/20/2015 AKR	Rodriguez	0.6 Call with cocounsel regarding follow up to motion in limine rulings
6/21/2015 AH	Rodriguez	10.5 Preparing for pretrial conference
6/22/2015 AH	Rodriguez	9. Preparing for pretrial conference
6/23/2015 AH	Rodriguez	3. Pretrial conference
6/23/2015 AH	Rodriguez	5. Preparation for pre trial conference
6/23/2015 DR	Rodriguez	2.9 Attended case management conference
6/24/2015 AH	Rodriguez	0.3 Call with MT regarding exhibits re gang membership
6/25/2015 AH	Rodriguez	4.5 Reviewing documents for supplement to MIL 1
6/26/2015 AH	Rodriguez	4.8 Drafting and filing supplement to motion in limine No. 1
6/29/2015 AKR	Rodriguez	1.1 Con with AH re Pretrial Conference and remaining briefs to be filed; review Order on MILs
7/1/2015 AKR	Rodriguez	1.1 Meeting with MT and OO regarding Defendants' proposed joint statements on motion in limines
7/1/2015 AKR	Rodriguez	0.9 Conf call with CP, OO regarding what needs to be done
7/6/2015 AKR	Rodriguez	3.6 Review A. Rodriguez, Switzer depositions for sections on juvenile arrests for purposes of sealing deposition excerpts
7/8/2015 AH	Rodriguez	0.5 Reviewing transcripts to determine which portions should be sealed
7/8/2015 AKR	Rodriguez	1. Con with cocounsel re excerpts under seal and proper scope of same
7/9/2015 DR	Rodriguez	2.8 Called class members to update them about final dates
7/9/2015 DR	Rodriguez	0.9 Contacted O Orange re referrals of class members' individual claims
7/10/2015 AKR	Rodriguez	0.5 Send proposed excerpts for sealing transcripts
7/10/2015 SC	Rodriguez	2.3 download e-filings, upload to internal network
7/15/2015 AH	Rodriguez	3. Drafting reply to Gomez supp MIL
7/21/2015 AH	Rodriguez	0.5 Call with Olu re reply to Gomez supp MIL
7/21/2015 AH	Rodriguez	5.4 Drafting reply to Gomez supp MIL
7/21/2015 AKR	Rodriguez	0.7 Con with cocounsel, opp counsel re mediators and selection of Magistrate Walsh
7/22/2015 AH	Rodriguez	7. Drafting reply to Gomez supp MIL
7/23/2015 AH	Rodriguez	2. Editing declaration ISO reply to Gomez supp MIL
7/23/2015 AH	Rodriguez	2. Editing reply to Gomez supp MIL based on comments from Anne and Cindy
7/23/2015 AKR	Rodriguez	1.2 Con with Rena re sealing the depos; review code, review deposition
7/23/2015 AKR	Rodriguez	0.3 Con re Kevin Gilbert's participation in mediation and emails re same
7/23/2015 SC	Rodriguez	0.8 Draft declaration of AH ISO Reply to Def Gomez supplemental brief
7/29/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
7/31/2015 AKR	Rodriguez	1. Con with opp counsel, court reporter, cocounsel re sealing deposition transcripts
8/5/2015 AKR	Rodriguez	0.5 Con with trial consultant re damages strategy for trial and schedule meeting to discuss same
8/12/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
8/17/2015 AKR	Rodriguez	0.9 Con with Dan, Olu re trial and settlement strategy
8/17/2015 AKR	Rodriguez	0.8 Travel to/from Dan's office for strategy meeting
8/18/2015 AH	Rodriguez	1. team call to prepare for mediation
8/18/2015 AKR	Rodriguez	1. Con with cocounsel re mediation strategy, mediation brief deadlines, responsibilities, and content of confidential and nonconfiden
8/25/2015 AKR	Rodriguez	1.2 Review confidential and non-confidential mediation brief, make edits, suggest exhibits
8/26/2015 AKR	Rodriguez	0.4 Review final mediation briefs, exhibits and con with Alisa re same
8/27/2015 AH	Rodriguez	1. PC discussion to brainstorm ideas for settlement
8/27/2015 AKR	Rodriguez	1.1 Con with attorneys in Childrens rights Project, General Counsel re use of settlement money to benefit former gang youth
8/28/2015 AKR	Rodriguez	2.4 Con with trial consultant, Edwina Barvosa, Olu Orange re final strategy, damages
8/28/2015 AKR	Rodriguez	0.5 Update attorneys hours from AH, SC, and DR and prep info for mediation
8/31/2015 AH	Rodriguez	0.5 Travel to mediation
8/31/2015 AH	Rodriguez	1. Mediation prep meeting w AR, Dan, Cindy
8/31/2015 AH	Rodriguez	4. Mediation before Judge Walsh
8/31/2015 AH	Rodriguez	0.7 Post-mediation debrief w/ AR, Dan, Cindy, Olu
8/31/2015 AKR	Rodriguez	0.8 Travel to/from mediation
8/31/2015 AKR	Rodriguez	5.8 Mediation with Magistrate Walsh; con with opp counsel, cocounsl
8/31/2015 AKR	Rodriguez	1. Review files, obtain calculation of attorneys hours for mediation
9/1/2015 AKR	Rodriguez	3.5 Prep brief re: settlement proposal; research same
9/1/2015 AKR	Rodriguez	2.8 Research cy pres caselaw in the Ninth Circuit, review notes on possible organizations to receive cy pres funds, direct relief
9/1/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
9/2/2015 AH	Rodriguez	0.2 Discussion of mediation brief w/ AR
9/2/2015 AKR	Rodriguez	5.2 Prepare supplemental brief on settlement proposal, research and review caselaw, organizations, and con with AH re same

9/3/2015 AH	Rodriguez	0.6 Editing mediation brief
9/3/2015 AH	Rodriguez	0.2 Discussing proposed edits to mediation brief w AR
9/3/2015 AKR	Rodriguez	2.4 Make edits to supplemental mediation brief suggested by OO, AH, and read additional class settlement cy pres cases
9/3/2015 AKR	Rodriguez	0.4 Call opp counsel re supplemental mediation brief and con with Magistrate's clerk re service
9/9/2015 AKR	Rodriguez	0.5 Conf. with Thom Peters from City regarding settlement proposal
9/10/2015 AKR	Rodriguez	0.4 Conf with Thom Peters re putting over City's due date for brief, and reasons for same
9/10/2015 AKR	Rodriguez	0.2 Emails to magistrate, co-counsel re putting over City's due date for settlement brief
9/18/2015 AKR	Rodriguez	1.2 Review City's supplemental mediation brief and con w AH, OO re same
9/18/2015 AKR	Rodriguez	0.5 Con with cocounsel regarding settlement
9/22/2015 AKR	Rodriguez	3.5 Supplemental mediation with Magistrate Walsh; travel to same, con with cocounsel re same
9/25/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
9/28/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
9/30/2015 AKR	Rodriguez	4.2 Review Gomez's motion re survival of Cazarez's claims; research same; begin drafting brief in opposition
9/30/2015 AKR	Rodriguez	0.2 Con with cocounsel re exchange of fees and input remaining timeslips
10/2/2015 AH	Rodriguez	1 Settlement conference before Judge Walsh (telephonic)
10/5/2015 AKR	Rodriguez	3.9 Draft opposition to Gomez' motion re survival of Cazarez' claims; con with CP re filing of same
10/5/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
10/7/2015 AH	Rodriguez	1.5 Revising opposition to motion re survival of claims
10/8/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
10/14/2015 AH	Rodriguez	0.5 Settlement conference before Judge Walsh (telephonic)
10/14/2015 AKR	Rodriguez	1.5 Supplemental mediation phone call with Magistrate Walsh, con with cocounsel re same and prep for same
10/16/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
10/20/2015 AH	Rodriguez	0.7 Travel to gang injunction workgroup
10/20/2015 AH	Rodriguez	3 Gang injunction workgroup meeting at YJC
10/20/2015 AH	Rodriguez	0.8 Reviewing City's draft settlement proposal and drafting questions to send to city
10/20/2015 AKR	Rodriguez	1.2 Review proposal from City and con with cocounsel re same; review questions from Alisa
10/20/2015 AKR	Rodriguez	0.3 Con with Dan, Brian re deposition of expert Fonzi
10/21/2015 AKR	Rodriguez	0.5 Con with Olu re: City proposal
10/21/2015 AKR	Rodriguez	0.4 Send questions to opp counsel in advance of next settlement call
10/21/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
10/22/2015 AKR	Rodriguez	1.3 Con with cocounsel regarding settlement
10/23/2015 AH	Rodriguez	1 Settlement hearing w Judge Walsh (telephonic)
10/23/2015 AKR	Rodriguez	1 Con with cocounsel re further settlement discussions with Walsh
10/23/2015 AKR	Rodriguez	1.5 Further settlement conference with all parties and prep for same
10/26/2015 AH	Rodriguez	2 Meeting w AKR, Olu, Cindy, Dan on response to settlement proposal
10/26/2015 AH	Rodriguez	0.5 Redlining City's settlement proposal
10/26/2015 AKR	Rodriguez	0.5 Redline edits to City's proposed plan; research same and review prior offers from City
10/26/2015 AKR	Rodriguez	2 Meeting re: response to settlement proposals
10/27/2015 AKR	Rodriguez	1.4 Review comments from cocounsel and send final draft to opposing counsel
10/27/2015 AKR	Rodriguez	0.2 Call with OO and CP re edited draft of settlement proposal changes
10/30/2015 AKR	Rodriguez	0.5 Review City's response to plaintiffs' redline edits
10/30/2015 AKR	Rodriguez	0.3 Con with cocounsel re City's response
11/2/2015 AKR	Rodriguez	0.6 Con with OO and AH re our proposed response to City
11/2/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
11/4/2015 AH	Rodriguez	0.3 Meeting w AR on response to City's letter
11/4/2015 AH	Rodriguez	0.7 Settlement hearing w Judge Walsh (telephonic)
11/4/2015 AH	Rodriguez	2 Research on legality of applying settlement to a capped portion of class
11/4/2015 AKR	Rodriguez	1.2 Settlement conference with Judge Walsh, all parties, and prep for same
11/4/2015 AKR	Rodriguez	2.6 Research cases on duties to class and damages and review cases researched by AH
11/4/2015 AKR	Rodriguez	0.4 Con with cocounsel re trial date, resposne to City
11/4/2015 AKR	Rodriguez	0.3 Call with OO re settlement issues
11/5/2015 AH	Rodriguez	4.5 Research on legality of issues raised by City and drafting memo on the same
11/5/2015 AKR	Rodriguez	4.3 Prep letter response to City and incorporate research/caselaw
11/6/2015 AH	Rodriguez	0.7 Integrating cocounsel's changes and formatting letter responding to City's settlement letter response
11/6/2015 AKR	Rodriguez	2.5 Revise letter; send draft to cocounsel and incorporate edits to same; send to opp counsel
11/9/2015 AH	Rodriguez	0.3 Reformatting settlement letter
11/10/2015 AH	Rodriguez	3 Settlement hearing w Judge Walsh in person
11/10/2015 AH	Rodriguez	0.4 Driving to settlement hearing at courthouse
11/10/2015 AH	Rodriguez	0.3 Drafting email to OUL on settlement status
11/10/2015 AKR	Rodriguez	3 Settlement conference in chambers of Judge Walsh
11/10/2015 AKR	Rodriguez	0.9 Travel to/from settlement conference
11/11/2015 AKR	Rodriguez	0.2 Con with OO re question from City Attorney on incentive payments/damages
11/12/2015 AKR	Rodriguez	0.4 Con with OO, AH re settlement issues
11/12/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network
11/13/2015 AH	Rodriguez	2.5 Research on incentive awards and drafting memo on research
11/13/2015 AH	Rodriguez	0.3 Drive to ACLU for discussions with community members
11/13/2015 AH	Rodriguez	2 Discussions with community members
11/13/2015 AKR	Rodriguez	0.5 Con with Alisa Hartz re settlement issues, incentive payments
11/13/2015 AKR	Rodriguez	0.4 Con with Olu re City request on incentive payments
11/16/2015 SC	Rodriguez	0.1 download e-filings, upload to internal network

11/16/2015 AKR	Rodríguez	1.1 Meeting with Allan Cazarez, Chris Rodriguez at Olu's office re settlement proposal and answer questions
11/16/2015 AKR	Rodríguez	0.5 Con with Olu re settlement proposal. City's request, and meeting with plaintiffs
11/16/2015 AKR	Rodríguez	0.2 Con with Dan re settlement proposal
11/17/2015 AKR	Rodríguez	0.5 Con with Dan re settlement process for approval
11/17/2015 AKR	Rodríguez	1.6 Con with Olu, Dan re settlement process and next steps
11/18/2015 AH	Rodríguez	0.4 Email to team re final responsibility for reply brief
11/19/2015 AKR	Rodríguez	0.5 Con with Alisa, Gary, re settlement process and community issues
11/19/2015 AKR	Rodríguez	0.6 Con with Olu re Estate of Alberto Cazarez
11/19/2015 DR	Rodríguez	2.2 Con w/ AR re: class member outreach, emailed A. Engel & R. Berry re: same
11/20/2015 AKR	Rodríguez	2.5 Review hours and ensure entries are correct
11/30/2015 AKR	Rodríguez	0.5 Con with Olu re class member outreach
12/1/2015 AKR	Rodríguez	0.3 Con with DS, CP re prep for telephonic hearing with Magistrate Wednesday
12/1/2015 AKR	Rodríguez	0.2 Call with OO re community organizations and confidentiality issues
12/2/2015 AKR	Rodríguez	0.5 Further settlement conference with all parties and Magistrate Walsh
12/2/2015 AKR	Rodríguez	0.4 Con with DS, CP, AH re class representatives and Estate issues
12/2/2015 AKR	Rodríguez	0.3 Email to team re class member notification and input
12/2/2015 AH	Rodríguez	0.5 Hearing
12/2/2015 AH	Rodríguez	0.3 Call w AR, CP, DS re settlement notice to class
12/2/2015 SC	Rodríguez	0.1 download e-filings, upload to internal network
12/3/2015 DR	Rodríguez	2.7 Compiled info on class members for planning outreach
12/3/2015 SC	Rodríguez	0.1 download e-filings, upload to internal network
12/3/2015 AKR	Rodríguez	0.4 Call OO re guardian ad litem/probate issues for Cazarez
12/7/2015 AH	Rodríguez	0.3 Preparing materials for potential press release
12/7/2015 AH	Rodríguez	0.3 Obtaining transcript of settlement hearing
12/7/2015 AH	Rodríguez	0.7 Editing potential press release
12/8/2015 AH	Rodríguez	1.1 Obtaining transcript of settlement hearing
12/8/2015 AH	Rodríguez	0.5 Organizing class member meeting
12/8/2015 AH	Rodríguez	0.2 Call w OO re class member meeting
12/8/2015 SC	Rodríguez	0.1 download e-filings, upload to internal network
12/11/2015 AKR	Rodríguez	1.2 Con with team re phone calls with class members and prep for same; emails re same
12/11/2015 DR	Rodríguez	1.1 Con with team re phone calls with class members and prep for same
12/11/2015 AKR	Rodríguez	0.5 Review website for class action and suggest revisions to keep current
12/11/2015 AH	Rodríguez	2.5 Drafting language for class member calls
12/11/2015 AH	Rodríguez	0.5 Call w AR, DS, OO, CP re class member meeting
12/11/2015 AKR	Rodríguez	0.7 Call with OO re class members
12/14/2015 AKR	Rodríguez	1.1 Review notes and make edits for phone calls with class members
12/15/2015 AKR	Rodríguez	1.5 Call with class members to request input on potential issues in settlement
12/15/2015 AKR	Rodríguez	0.3 Con with AH re call with class members on potential issues in settlement
12/15/2015 DR	Rodríguez	1.5 Call w/ class members re: settlement
12/15/2015 AH	Rodríguez	1.2 Call w class members, AR, DS, OO
12/15/2015 AH	Rodríguez	1.1 Prep for call w class members
12/15/2015 AH	Rodríguez	0.4 Call with CP and DS regarding conference call with class members on status of the case
12/16/2015 AKR	Rodríguez	0.4 Con with OO and email community groups regarding important issues for class members
12/21/2015 AKR	Rodríguez	0.9 Tel call for class members for input on potential issues in settlement, con with Dan and Olu re same
1/4/2016 AKR	Rodríguez	1.1 Review transcript of hearing on settlement and send to opp counsel
1/6/2016 AKR	Rodríguez	1.2 Further settlement conference with all parties and Magistrate Walsh
1/6/2016 AH	Rodríguez	0.3 Status conference before Judge Walsh
1/7/2016 AH	Rodríguez	0.2 Con w/ Marie re media interest in settlement
1/7/2016 AH	Rodríguez	0.2 Emails to obtain settlement hearing transcript
1/11/2016 AKR	Rodríguez	1.1 con re communications strategy for responding to media questions about settlement
1/11/2016 AH	Rodríguez	0.5 Con w AR and Marie re settlement press
1/11/2016 AH	Rodríguez	0.3 Con w AR re settlement terms
1/13/2016 AKR	Rodríguez	0.5 Con with Olu, Dan re attorneys fees
1/13/2016 DR	Rodríguez	0.4 Call w/ class member re: settlement
1/14/2016 AKR	Rodríguez	1.1 Con with Olu, Dan, Cindy re: settlement issues and Magistrate's request to hold conference
1/14/2016 AKR	Rodríguez	1.2 Con with NBC re embargoed news story
1/15/2016 AKR	Rodríguez	0.3 Further conference with all parties and Magistrate Walsh
1/15/2016 AKR	Rodríguez	1.1 Draft email for experts about possibility of settlement
1/15/2016 AKR	Rodríguez	0.5 Email to/from Edwina Barvosa about possibility of settlement
1/15/2016 AKR	Rodríguez	1.1 Update attorneys hours and costs
1/15/2016 DR	Rodríguez	0.4 Call w/ class member re: settlement
1/18/2016 AH	Rodríguez	0.3 Con w team re press and other issues
1/21/2016 AH	Rodríguez	0.3 Editing press release
1/22/2016 AH	Rodríguez	0.8 Editing press release
1/25/2016 AH	Rodríguez	0.2 Call w OO re settlement terms
1/25/2016 AH	Rodríguez	0.2 Con w AR re press release
1/25/2016 AH	Rodríguez	0.3 Con w Marie re press release
1/25/2016 AKR	Rodríguez	0.7 Con with cocounsel re status of case
1/26/2016 AKR	Rodríguez	0.8 Con with community members regarding concept of jobs programs and issues with City's programs
2/2/2016 SC	Rodríguez	0.1 download e-filings, upload to internal network

2/2/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
2/2/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
2/5/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
2/5/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
2/9/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
2/16/2016 AKR	Rodriguez	1.2 Further settlement telephonic conference with the parties and Judge Walsh regarding status of settlement
2/16/2016 AH	Rodriguez	0.2 Call with court and AR, OO, CP
2/16/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
2/17/2016 AKR	Rodriguez	0.8 Further settlement telephonic conference with the parties re: likely timing of City approval and prep for same
2/17/2016 AH	Rodriguez	0.3 Call re press release w/ AR, city
2/17/2016 AKR	Rodriguez	0.6 Call with OO, RS re press, draft settlement documents, who will do what
2/18/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
2/22/2016 AH	Rodriguez	0.8 Editing press release
2/23/2016 AH	Rodriguez	0.4 Editing press release
2/25/2016 AH	Rodriguez	0.2 Email to team re status of press release and need for input
2/25/2016 AH	Rodriguez	0.6 Organizing participation in community group roundtable on gang injunctions
2/26/2016 AKR	Rodriguez	1 Con with Rena re language in settlement agreement and make suggested revisions to same
2/26/2016 AH	Rodriguez	0.3 Call w Rena and City, AR, OO re joint press
2/26/2016 AH	Rodriguez	5.5 Drafting settlement agreement
2/27/2016 AH	Rodriguez	1.2 Editing joint press release and emails to team re same
2/29/2016 AKR	Rodriguez	2.5 Con with cocounsel and City Attorneys to resolve conflicts on settlement issues
2/29/2016 AKR	Rodriguez	1.2 Con with cocounsel and Rena S re: new language on jobs program to resolve conflicts on settlement issues
2/29/2016 AH	Rodriguez	3 Editing and commenting on City's proposed notice and appendixes
2/29/2016 AH	Rodriguez	0.3 Con w OO re proposed notice and appendixes
2/29/2016 AH	Rodriguez	2.5 Drafting settlement agreement
2/29/2016 AH	Rodriguez	0.3 Call w OO, Rena, AR re settlement documents
2/29/2016 AH	Rodriguez	0.5 Drafting email to community partners re settlement
2/29/2016 AH	Rodriguez	0.1 Email to team re settlement issues and nonenforcement of GI provisions
2/29/2016 AKR	Rodriguez	1.6 Call with cocounsel regarding differences with the City in settlement terms
3/1/2016 AKR	Rodriguez	0.5 Con with cocounsel re: City's issues with settlement
3/1/2016 AKR	Rodriguez	0.6 Con with cocounsel re settlement conference
3/2/2016 AKR	Rodriguez	1.1 Research on City jobs programs' requirements regarding convictions and suggest language to avoid same, con with cocounsel
3/2/2016 AH	Rodriguez	1 Researching criminal background issue
3/2/2016 AH	Rodriguez	0.3 Call re settlement claims release
3/2/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
3/2/2016 AKR	Rodriguez	0.3 Con with cocounsel re next conference with Judge Walsh
3/3/2016 AKR	Rodriguez	0.9 Conf with cocounsel re settlement conference
3/4/2016 AKR	Rodriguez	2.6 Further conference with all parties and Magistrate Walsh
3/4/2016 AKR	Rodriguez	0.9 Travel to/from settlement conference
3/4/2016 AH	Rodriguez	0.3 Reviewing city's proposed settlement appendix and summarizing for team
3/7/2016 AH	Rodriguez	0.4 Email to team re City's office of reentry to incorporate in settlement
3/7/2016 AH	Rodriguez	2.4 Drafting settlement agreement
3/8/2016 AH	Rodriguez	2 Drafting settlement agreement
3/11/2016 AKR	Rodriguez	2 Further settlement conference with all parties and Magistrate Walsh
3/11/2016 AKR	Rodriguez	0.9 Travel to/from settlement conference
3/14/2016 AKR	Rodriguez	2.1 prepare and review draft of press release; con with cocounsel re same
3/15/2016 AH	Rodriguez	0.1 Emails to AR and team re communication w community groups on settlement
3/15/2016 AH	Rodriguez	0.1 Email to team re community groups
3/16/2016 AKR	Rodriguez	4.5 Answer press questions regarding settlement; prepare for and con with cocounsel re same
3/16/2016 AH	Rodriguez	0.2 Email to community groups re settlement
3/21/2016 AH	Rodriguez	0.8 Rodriguez settlement
3/23/2016 AKR	Rodriguez	2.3 Obtain draft notices and con re various exhibits to settlement agreement
3/23/2016 AKR	Rodriguez	0.8 Interview with La Opinion about settlement
3/23/2016 AH	Rodriguez	4.1 Drafting class notice
3/24/2016 AKR	Rodriguez	1.4 Con with cocounsel re: attorneys fees and application for same, research
3/24/2016 AKR	Rodriguez	0.5 Con with community groups about settlement
3/25/2016 AKR	Rodriguez	1 Conf call with court re: status of settlement; drafting of documents; confidentiality of proceedings
3/28/2016 AKR	Rodriguez	2.5 Con with community members regarding concept of jobs programs, removal process, and input on settlement
3/28/2016 AKR	Rodriguez	1.2 Travel to/from community meeting
3/29/2016 AKR	Rodriguez	1.5 Prep draft of Appendix to settlement for gang injunction removal process
3/29/2016 AKR	Rodriguez	0.3 Con with cocounsel, community groups re scheduling meeting
3/30/2016 AKR	Rodriguez	1.2 Research standard for removal from gang injunctions for settlement agreement exhibit
3/31/2016 AKR	Rodriguez	2.5 Prep exhibit on removal from gang injunctions and send to cocounsel
3/31/2016 AKR	Rodriguez	1.9 Review settlement agreement and make edits to same, send to cocounsel
4/1/2016 AKR	Rodriguez	1.6 Con with cocounsel regarding edits to settlement agreement and attachments
4/1/2016 AKR	Rodriguez	3.5 Revise settlement agreement, add procedural history, and revise exhibits to settlement
4/1/2016 AKR	Rodriguez	0.3 Send draft settlement agreement to opp counsel and draft cover email re same
4/4/2016 AKR	Rodriguez	2.1 Revise draft of class notice, review suggested edits by DS, CP, OO and AH and send revised draft to cocounsel, opp counsel
4/4/2016 AKR	Rodriguez	2.3 Revise draft of exhibit on removal from gang injunctions, review suggested edits by CP, OO and AH and send revised draft to opp
4/4/2016 AKR	Rodriguez	0.2 Con with cocounsel, court re conference on Friday

4/4/2016 AH	Rodriguez	0.5 Editing notice to class members, removal procedure
4/7/2016 AKR	Rodriguez	1.1 Con with class member regarding whether he is in the class; review documents sent to same and review database to see if he is
4/8/2016 AKR	Rodriguez	2.2 Conf with community groups, individuals regarding settlement, answering questions and hearing concerns
4/8/2016 AKR	Rodriguez	1.2 Travel to/from conference with community groups
4/8/2016 AH	Rodriguez	1.2 Travel to/from conference with community groups
4/8/2016 AH	Rodriguez	2.2 Conf with community groups, individuals regarding settlement, answering questions and hearing concerns
4/8/2016 AH	Rodriguez	0.3 Review language of settlement in light of questions from community groups
4/11/2016 AH	Rodriguez	0.6 Summarizing community meeting on 4/8
4/20/2016 AKR	Rodriguez	0.3 Con w opposing counsel regarding getting together to answer questions regarding how the job training component will work in lig
4/22/2016 AKR	Rodriguez	1.1 Review Rena's proposed changes to the exhibits and settlement agreement and con with AH re same
4/22/2016 AH	Rodriguez	2 Reviewing jobs proposal and drafting questions to send to City
4/22/2016 AH	Rodriguez	0.8 Reviewing revised settlement documents and preparing redlines
4/25/2016 AKR	Rodriguez	1.5 Review redlines to exhibits and con with cocounsel re same
4/25/2016 AH	Rodriguez	1.8 Commenting on and editing revised settlement documents
4/26/2016 AH	Rodriguez	0.2 Preparing settlement documents for AR review
4/26/2016 AKR	Rodriguez	1.1 Email to opp counsel with questions regarding jobs program and con with cocounsel re same
4/26/2016 AH	Rodriguez	0.8 Call w AKR, DS, CP OO re settlement documents
4/28/2016 AKR	Rodriguez	0.5 Con with opp counsel re stipulation to vacate trial date and set dates for motion for preliminary approval
4/28/2016 AKR	Rodriguez	0.9 Collect and review costs from Public Counsel and review invoices for same to confirm
42492 AA	Rodriguez	5 Researching and drafting memo re. potential for attorneys fees eligibility
5/2/2016 AH	Rodriguez	0.2 Call w AKR AA CM re attorney's fees
5/2/2016 AH	Rodriguez	5.8 Research on attorney's fees
42493 AA	Rodriguez	0.2 call with AKR, AH and Caitlan re. research assignments on fee issues
42493 AA	Rodriguez	1.5 Finishing research and drafting of memo re. attorneys fees
5/3/2016 AKR	Rodriguez	0.3 Review stip and con with cocounsel re meetings to discuss settlement terms
5/3/2016 AKR	Rodriguez	0.2 Con with Alisa, Adelaide, Caitlin regarding plaintiffs' entitlement to fees
5/4/2016 AH	Rodriguez	3 Drafting memo on attorney's fees
5/4/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
42495 AA	Rodriguez	0.2 call with AKR, AH, Dan and Caitlan re. finalizing research assignments on fee issues
5/5/2016 AKR	Rodriguez	0.2 Con with DS, AA, AH, CM re attorneys fees
5/5/2016 AH	Rodriguez	0.2 Con w AKR and call re attorney's fees
42496 AA	Rodriguez	0.4 updated memo on fees per AKR edits
42496 AA	Rodriguez	0.1 reviewing team emails re. fee research
5/6/2016 AKR	Rodriguez	0.5 Review memo on attorneys fees in similar cases
5/9/2016 AKR	Rodriguez	0.3 Con with Margaret Morrow re probate court, guardian ad litem, estate issue for Alberto Cazarez
5/10/2016 AKR	Rodriguez	2.1 Conf call with opposing counsel going through the proposed changes to the draft settlement agreement and exhibits to same
5/10/2016 AKR	Rodriguez	0.3 Call with cocounsel regarding attorneys fees and upcoming meeting with opp counsel to negotiate same
5/10/2016 AH	Rodriguez	2 Call w City on settlement documents and con w AKR DS CP OO re same
5/10/2016 AH	Rodriguez	1.5 Editing settlement documents
5/11/2016 AH	Rodriguez	1 Editing settlement documents
5/11/2016 AH	Rodriguez	0.2 Call w CM re attorney's fees memo
5/12/2016 AH	Rodriguez	1 Research on attorney's fees and call w CM re same
5/13/2016 AKR	Rodriguez	0.3 Review comments from community groups re settlement
5/13/2016 AH	Rodriguez	1 Reviewing community group input on settlement and con w AKR and email to team re same
5/13/2016 AH	Rodriguez	0.2 Call w CM re attorney's fees memo
5/13/2016 AH	Rodriguez	0.3 Editing attorney's fees memos
5/16/2016 AH	Rodriguez	4 Drafting motion for preliminary approval
5/17/2016 AKR	Rodriguez	0.2 Email community groups regarding next steps on settlement
5/18/2016 AKR	Rodriguez	0.2 Tel Call with community groups regarding concerns on settlement
5/21/2016 AKR	Rodriguez	0.2 Review comments from community groups regarding questions on next steps, timeframe, and respond to same
5/23/2016 AKR	Rodriguez	3.5 Review and redline new draft of settlement agreement, Exhibit A, B, and C and con with AH re same
5/23/2016 AKR	Rodriguez	0.2 Email new versions of settlement agreement to opp counsel, cocounsel
5/23/2016 AKR	Rodriguez	0.2 Con with AH re scheduling conference with Magistrate re gang removal process
5/23/2016 AH	Rodriguez	0.3 Contacting court re hearing on removal procedures and con w AKR re same
5/25/2016 AH	Rodriguez	4.5 Drafting motion for preliminary approval
5/25/2016 SC	Rodriguez	0.3 Update Rodriguez time
5/26/2016 AH	Rodriguez	4 Drafting motion for preliminary approval
5/27/2016 AKR	Rodriguez	0.3 Con with cocounsel, opp counsel re meeting with City/Mr. Sainz, and prep for same
5/27/2016 AH	Rodriguez	2.1 In person meeting with opp counsel, Robert Sainz from the City, cocounsel, regarding the Jobs and Education Program
5/27/2016 AH	Rodriguez	0.8 Travel to/from meeting with City Attorney's office about Jobs and Education Program
5/27/2016 AKR	Rodriguez	2.1 Meeting with City Attorney, Robert Sainz, Capri Young, and cocounsel regarding contours of the Jobs Program
5/27/2016 AKR	Rodriguez	0.7 Travel to/from meeting at City Attorney's office
5/27/2016 AKR	Rodriguez	0.4 Con with OO re attorneys fees and annuity for daughters of named class members
5/31/2016 AH	Rodriguez	0.2 Con w AKR re prep for hearing on removal process
5/31/2016 AH	Rodriguez	0.5 Preparing for hearing on removal process
5/31/2016 AH	Rodriguez	1.2 Hearing on removal process w AKR OO CP
5/31/2016 AH	Rodriguez	0.3 Con w AKR re letter on Exhibit B
5/31/2016 AH	Rodriguez	0.8 Drafting letter re Exhibit B
5/31/2016 AKR	Rodriguez	0.5 Review changes made by City to plaintiff's proposed removal process and con with AH to confirm the positions of the parties

5/31/2016 AKR	Rodriguez	1.2 Conf call with Magistrate, opp counsel and cocounsel regarding the process for removal from gang injunctions
5/31/2016 AKR	Rodriguez	0.3 Con with Alisa re sending letter to City advising regarding elements of the Jobs program to be described in greater detail
6/1/2016 AKR	Rodriguez	1.5 Review AH draft of motion for preliminary approval and make edits/comments
6/2/2016 AH	Rodriguez	1.5 Revising motion for preliminary approval
6/2/2016 AH	Rodriguez	0.5 Drafting letter re Exhibit B
6/2/2016 AH	Rodriguez	0.4 Drafting joint stipulation re continuing date for filing motion
6/2/2016 AH	Rodriguez	0.3 Filing stipulation
6/2/2016 AKR	Rodriguez	0.2 Review proposed stip and order to continue date for filing motion for preliminary approval and email opp counsel re same
6/2/2016 AKR	Rodriguez	0.5 Review and revise letter re describing jobs program in greater detail
6/3/2016 AH	Rodriguez	0.5 Delivering courtesy copy of stipulation to continue hearing date
6/3/2016 AH	Rodriguez	0.2 Calls and emails to courtroom deputy re stipulation to continue hearing date
6/3/2016 AH	Rodriguez	0.1 Con w AKR re stipulation to continue hearing date filing
6/6/2016 AH	Rodriguez	0.3 Revising motion for preliminary approval
6/6/2016 AH	Rodriguez	2 Editing Exhibit B to settlement agreement
6/6/2016 AH	Rodriguez	0.3 Con w AKR re Exhibit B to settlement agreement
6/6/2016 AKR	Rodriguez	0.6 Con with OO, DS re attorneys fees and structuring payments for daughters of named class reps
6/6/2016 AKR	Rodriguez	1.1 Review City's new Exhibit B regarding jobs program and make revisions, con with AH re same
6/8/2016 AKR	Rodriguez	1.1 Con with AH regarding all settlement documents, exhibits
6/8/2016 AH	Rodriguez	1 Gathering and filing current settlement documents
6/9/2016 SC	Rodriguez	0.2 Run staff time
6/9/2016 AH	Rodriguez	1.4 Drafting AKR dec ISO motion for preliminary approval
6/17/2016 AH	Rodriguez	0.3 Reviewing and proposing changes for website
6/20/2016 AH	Rodriguez	1 Drafting motion for preliminary approval
6/20/2016 AH	Rodriguez	0.4 Con w AKR re settlement, contacting Olu and Rena to set up meeting on removal procedures
6/20/2016 AH	Rodriguez	0.5 Con w AKR and Olu re settlement documents
6/21/2016 AKR	Rodriguez	1.5 Con with AH re: claims remaining for motion for preliminary approval; review motion, settlement agreement and exhibits to send I
6/21/2016 AH	Rodriguez	0.4 Reviewing and summarizing outstanding issues with removal procedures and email to team re same
6/21/2016 AH	Rodriguez	0.2 Con w Cindy re settlement documents
6/21/2016 AH	Rodriguez	5.3 Revising settlement documents
6/21/2016 AH	Rodriguez	0.4 Con w AKR re settlement documents
6/21/2016 AH	Rodriguez	0.3 Con w AKR and Olu re settlement documents
6/22/2016 AH	Rodriguez	0.3 Drafting edited text for class website
6/23/2016 AKR	Rodriguez	1.5 Con with City Attorneys regarding gang removal process and conf with cocounsel re same
6/23/2016 AKR	Rodriguez	0.3 Compose email to cocounsel/opp counsel re remaining issues to be handled by Magistrate Judge
6/23/2016 AH	Rodriguez	1.6 Meeting with AKR, defendants on removal policies
6/23/2016 AH	Rodriguez	0.2 Drafting email to court
6/23/2016 AH	Rodriguez	0.3 Drafting notes on disputed areas
6/23/2016 AH	Rodriguez	0.8 Drafting AKR's dec ISO motion for preliminary approval
6/23/2016 AH	Rodriguez	0.3 Revising exhibit C
6/24/2016 AKR	Rodriguez	0.5 Email opp counsel re gang removal process and con with cocounsel re same
6/27/2016 AKR	Rodriguez	0.2 Review portions of settlement agreement revised from last version by opp counsel
6/27/2016 AH	Rodriguez	0.7 Drafting email to court
6/27/2016 AH	Rodriguez	0.2 Editing AKR dec ISO motion for preliminary approval
6/27/2016 AH	Rodriguez	0.5 Call with AKR and Olu, Cind
6/27/2016 AH	Rodriguez	2.5 Editing settlement documents
6/28/2016 AKR	Rodriguez	0.8 Court call with Magistrate Judge Walsh, opp counsel, cocounsel regarding remaining issues on gang injunction removal process
6/28/2016 AKR	Rodriguez	0.5 Prep for hearing with Magistrate Walsh, review documents
6/28/2016 AH	Rodriguez	0.5 Telephonic hearing
6/28/2016 AH	Rodriguez	3.8 Editing settlement documents
6/29/2016 AH	Rodriguez	5.5 Editing settlement documents
6/30/2016 AKR	Rodriguez	0.3 Emails to/from Alisa and Olu regarding final changes to motion for preliminary approval and negotiations with opp counsel
6/30/2016 AH	Rodriguez	7.8 Editing settlement documents
7/1/2016 AKR	Rodriguez	0.5 Con with Alisa, Olu regarding final agreements as to motion for preliminary approval
7/1/2016 AH	Rodriguez	8.5 Finalizing and filing settlement documents
7/5/2016 AKR	Rodriguez	0.3 Con with community groups about settlement and motion for preliminary approval
7/22/2016 AKR	Rodriguez	0.4 Con with Rena re Spanish translation and con with JC re translating notice into Spanish
7/25/2016 SC	Rodriguez	1.5 Briefing binder for AR
7/27/2016 AKR	Rodriguez	1.2 Prep with cocounsel for hearing on preliminary approval
7/27/2016 AH	Rodriguez	2.8 Meeting w AKR, co-counsel to prep for prelim approval hearing and travel to/from Hadsell Stormer
7/28/2016 AKR	Rodriguez	2.5 Review all documents in support of preliminary approval and prepare for hearing
7/28/2016 AH	Rodriguez	0.7 Preparing list of post-attorney's fees enforcement actions
7/29/2016 AKR	Rodriguez	2.5 Hearing on motion for preliminary approval and con with cocounsel before, after same
7/29/2016 AKR	Rodriguez	1.3 Review Rena's proposed changes to the Notice in light of Court's comments at hearing, and revise same; con with cocounsel re
7/29/2016 AH	Rodriguez	0.4 Hearing re preliminary approval
7/29/2016 AH	Rodriguez	0.5 pre-hearing team meeting
7/29/2016 AH	Rodriguez	0.5 Editing class notice
7/30/2016 AH	Rodriguez	0.3 Editing class notice
8/1/2016 AH	Rodriguez	0.7 Editing class notice
8/1/2016 AH	Rodriguez	0.3 Drafting and preparing email to court
8/1/2016 AH	Rodriguez	0.1 Call w Olu re class notice

8/1/2016 AH	Rodriguez	0 2 Email re number of class members and call w Cindy
8/2/2016 SC	Rodriguez	0.1 download e-filings, upload to internal network
8/2/2016 AH	Rodriguez	0.2 Drafting email to court
8/4/2016 AH	Rodriguez	0.5 Reviewing class notice and notice logistics
8/8/2016 AH	Rodriguez	0.8 Updating website
8/10/2016 SC	Rodriguez	0.3 Calendar court dates for AH, AR
8/13/2016 AKR	Rodriguez	1.6 Conf with cocounsel regarding tasks to be done for final approval and mediation, legal research, and declarations for attorneys fe
8/13/2016 AH	Rodriguez	1.8 Team meeting w AKR
8/15/2016 AH	Rodriguez	0.3 Drafting to-do list and emails
8/15/2016 AH	Rodriguez	0.4 Requesting transcript
8/17/2016 AKR	Rodriguez	1 Con with OO, AH and Margaret Morrow re Estate of Alberto Cazarez
8/17/2016 AH	Rodriguez	0.5 Meeting w AKR, Olu, Margaret re probate issue
8/22/2016 AKR	Rodriguez	0.7. Tel con with former probate supervising attorney Sandra Riley re: probate
8/23/2016 AKR	Rodriguez	0.5 Tel con with Sandra Riley, OO, AH re probate issues
8/23/2016 AKR	Rodriguez	0.1 Email and phone call to attorney LeAnne Maillian re: probate
8/23/2016 SC	Rodriguez	0.4 Talk w AH, VC re website
8/23/2016 SC	Rodriguez	0.4 Talk w AH re website markup
8/23/2016 SC	Rodriguez	0.4 Correspond w developer re website
8/24/2016 AKR	Rodriguez	0.7 Tel con with Leanne Maillian re probate issues, and send documents re same
8/24/2016 AH	Rodriguez	0.3 Class member phone calls
8/29/2016 AKR	Rodriguez	0.5 Tel con with Olu Orange, Leanne Maillian re: probate issues
8/29/2016 AKR	Rodriguez	1.1 Prep factual portion of document for probate court petition
8/30/2016 AKR	Rodriguez	1.8 Prep factual portion of petition and attach relevant exhibits; send to LeAnne
8/30/2016 AH	Rodriguez	0.5 Calls with class members
9/1/2016 AH	Rodriguez	0.3 Class member phone calls
9/5/2016 AH	Rodriguez	1 Drafting outline for attorney's fees motion
9/6/2016 AKR	Rodriguez	1.1 Conf call with team regarding attorneys fees motion and prep for same
9/6/2016 AKR	Rodriguez	0.4 Con with AH regarding status of attorneys fees research and evidentiary support
9/6/2016 AH	Rodriguez	0.5 Responding to class member calls re settlement notice
9/6/2016 AH	Rodriguez	0.4 Meeting w AKR re attorney's fees motion
9/6/2016 AH	Rodriguez	1 Team meeting re attorney's fees motion w AKR
9/7/2016 AH	Rodriguez	0.2 Call w Olu re class member
9/7/2016 AH	Rodriguez	0.5 Meeting with Vin re class member calls
9/9/2016 AKR	Rodriguez	0.5 Conf with Olu regarding attorneys to represent class members for getting off gang injunctions
9/12/2016 AKR	Rodriguez	0.4 Con with Olu regarding declarabons in support of fee motion
9/14/2016 AKR	Rodriguez	2.5 Prep AR declaration in support of attorneys fees and research re same
9/14/2016 AKR	Rodriguez	0.5 Correspond with potential declarants regarding submitting declarations in support of motion
9/14/2016 AH	Rodriguez	0.1 Arranging for notice to class member
9/15/2016 AKR	Rodriguez	0.5 Con with DS, BO, OO and AH regarding content of fee declarations and timeline for filing motion
9/15/2016 AKR	Rodriguez	0.3 Review City's mailing regarding completion of notice
9/16/2016 AKR	Rodriguez	2.1 Review timesheets for accuracy
9/19/2016 AH	Rodriguez	0.3 Obtaining transcript of settlement hearing
9/20/2016 AKR	Rodriguez	2 Prep AR declaration and review timesheets for time spent by each employee
9/20/2016 AH	Rodriguez	2.1 Research on attorney's fees motion
9/21/2016 AH	Rodriguez	5.2 Research on attorney's fees motion
9/22/2016 AKR	Rodriguez	1.5 Prep AR declaration and make billing judgment deductions from time
9/22/2016 AKR	Rodriguez	0.2 Call with OO re class member calls
9/22/2016 AH	Rodriguez	0.8 Research on attorney's fees motion and on w AKR re same
9/22/2016 AH	Rodriguez	0.1 Call w classmember re settlement
9/23/2016 AH	Rodriguez	1.5 Researching and drafting attorney's fees motion
9/24/2016 AH	Rodriguez	5.2 Drafting attorney's fees motion
9/25/2016 AH	Rodriguez	10.1 Drafting attorney's fees motion
9/26/2016 AKR	Rodriguez	1.1 Call with declarants re: declarations ISO motion for attorneys fees
9/26/2016 AKR	Rodriguez	1.3 Review AH draft of motion for attorneys fees and make edits/comments re same
9/26/2016 AH	Rodriguez	4.7 Drafting attorney's fees motion
9/27/2016 AKR	Rodriguez	0.6 Review costs and breakdown fo: same
9/28/2016 AKR	Rodriguez	0.4 Tel con with DS, OO re attorneys fees and costs
9/29/2016 AH	Rodriguez	2.2 Researching and editing of attorney's fees motion
9/30/2016 AH	Rodriguez	5.8 Drafting attorney's fees motion
9/30/2016 AH	Rodriguez	0.5 Processing PC time for production to City
10/3/2016 AKR	Rodriguez	1.7 Review legal argument from B Olney and make comments
10/4/2016 AKR	Rodriguez	0.9 Tel call with cocounsel regarding remaining tasks for attorneys fee motion; legal issues; declarations in support; filing and notice
10/5/2016 AKR	Rodriguez	1.1 Supply information to S. Rohde for Declaration and discuss same
10/5/2016 AKR	Rodriguez	2.2 Con with cocounsel regarding attorneys fee rates and drafting sections of Richardson Dec re rates of other attorneys; complexity
10/7/2016 AKR	Rodriguez	0.5 Make requested revisions to Rohde Declaration and send back for signature
10/8/2016 AKR	Rodriguez	0.5 Con with Olu regarding time deductions
10/10/2016 AKR	Rodriguez	0.8 Con with Olu, Brian regarding attorneys fee motion, legal arguments, procedural history, declarations
10/10/2016 AKR	Rodriguez	0.9 Review Barry Litt Declaration and supply information to questions asked
10/10/2016 AKR	Rodriguez	1.1 Review legal argument in motion for fees

10/11/2016 AH	Rodriguez	0.7 Team call on attorney's fees motion with AKR
10/11/2016 AH	Rodriguez	1.5 Researching expert statements for attorney's fees motion
10/11/2016 AKR	Rodriguez	0.8 Conf call with team on filing of motion, declarations, billing judgment, and exhibits
10/11/2016 AKR	Rodriguez	0.6 Make requested revisions to Lit Declaration; tell call to BL, and send back for signature
10/11/2016 AKR	Rodriguez	1.2 Review final fee entries and make final billing judgments
10/11/2016 AKR	Rodriguez	1.2 Drafting portions of procedural history, work done by associates
10/11/2016 AH	Rodriguez	2.5 Preparing Public Counsel billing documents
10/11/2016 AKR	Rodriguez	4 Preparing declarations and exhibits in support of attorney's fees motion,
10/11/2016 AH	Rodriguez	1.2 Researching attorney's fees motion

**Public Counsel Law Center
Summary of Costs
Rodriguez Case #788257
September 2014 - Aug 2016**

<u>Description</u>	<u>Amount</u>
Copies	\$3,070.50
Phone Costs	11.56
Transcripts	206.02
Mediation Fees	1731.67
Parking/Mileage	290.35
Office Supplies	71.74
Total Costs	<u>\$ 5,381.84</u>

Public Counsel
Transaction Detail By Account
All Transactions

	Type	Date	Num	Name	Source Name	Memo	Debit	
Non-Personnel								
Litigation Costs								
	Internal Charge			788257	Public Counsel	Copies	3,070.50	3,070.50
	Bill	03/19/2015	Bill	788257	Hadsell Stormer & Renick LLP	Mediation Fees	1,731.67	1,731.67
	Internal Charge			788257	Public Counsel	Office Supplies	71.74	71.74
	Check	11/30/2014	Paycheck	788257	Richardson, Anne K	Parking/Mileage	26.00	
	Check	02/28/2015	Paycheck	788257	Richardson, Anne K	Parking/Mileage	35.50	
	Check	05/15/2015	Paycheck	788257	Hartz, Alisa L	Parking/Mileage	14.52	
	Check	07/15/2015	Paycheck	788257	Richardson, Anne K	Parking/Mileage	17.79	
	Check	08/31/2015	Paycheck	788257	Richardson, Anne K	Parking/Mileage	19.75	
	Check	08/31/2016	Paycheck	788257	Richardson, Anne K	Parking/Mileage	33.25	
	Check	09/30/2015	Paycheck	788257	Hartz, Alisa L	Parking/Mileage	17.22	
	Check	10/15/2015	Paycheck	788257	Richardson, Anne K	Parking/Mileage	32.38	
	Check	11/30/2015	Paycheck	788257	Richardson, Anne K	Parking/Mileage	19.75	
	Check	03/31/2016	Paycheck	788257	Richardson, Anne K	Parking/Mileage	39.50	
	Check	08/15/2016	Paycheck	788257	Hartz, Alisa L	Parking/Mileage	34.69	290.35
	Internal Charge			788257	Public Counsel	Phone Costs	11.56	11.56
	Credit Card Charge	01/04/2016		788257	Courthouse Services	Transcripts	144.70	
	Bill	09/20/2016	20160070	788257	Kielwasser, Anne	Transcripts	61.32	206.02
Total Litigation Costs							<u>5,381.84</u>	<u>5,381.84</u>
Total Non-Personnel							<u>5,381.84</u>	<u>5,381.84</u>
TOTAL							<u>5,381.84</u>	<u>5,381.84</u>

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

HONORABLE DOLLY M. GEE, JUDGE PRESIDING

CHRISTIAN RODRIGUEZ, et al.,)	
)	
)	
)	
Plaintiffs,)	
)	No. 11-1135DMG
VS)	
)	
CITY OF LOS ANGELES, et al.,)	
)	
)	
Defendants.)	

Reporter's Transcript of Proceedings
PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT
Los Angeles, California
FRIDAY, JULY 29, 2016

ANNE KIELWASSER, CRR, RPR, CSR
Federal Official Court Reporter
312 North Spring Street, Room 432
Los Angeles, California 90012
Telephone: (213) 894-2969
anne.kielwasser@gmail.com
AKtranscripts.com

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFFS:

Olu K Orange
Orange Law Offices
3435 Wilshire Boulevard Suite 2900
Los Angeles, CA 90010
213-736-9900
Fax: 213-417-8800
E-mail: Oluorange@att.net

Dan Stormer
Cindy Panuco
Hadsell Stormer Richardson and Renick LLP
128 North Fair Oaks Avenue
Pasadena, CA 91103
626-585-9600
Fax: 626-577-7079
E-mail: Dstormer@hadsellstormer.com

Alisa Louise Hartz
Anne K Richardson
Public Counsel
610 South Ardmore Avenue
Los Angeles, CA 90005
213-359-2977
Fax: 213-385-9089 Map
E-mail: Ahartz@publiccounsel.org

ON BEHALF OF THE DEFENDANTS:

Rena M Shahandeh
Michael R Amerian
Los Angeles City Attorneys Office
City Hall East
200 North Main Street 6th Fl
Los Angeles, CA 90012
213-978-7047
Fax: 213-978-8785
E-mail: Rena.shahandeh@lacity.org

1 FRIDAY, JULY 28, 2016 11:00 A.M.

2 ~ ~ ~

3 P R O C E E D I N G S

4 ~ ~ ~

5 COURT CLERK: Calling Item No. 3. CV 11-1135DMG
6 Christian Rodriguez, et al., versus City of Los Angeles, et
7 al.

8 Counsel, your appearances please.

9 MR. ORANGE: Good morning, Your Honor.

10 Olu Orange, Dan Stormer, Anne Richardson,
11 Cindy Panuco and Alisa Hartz on behalf of plaintiff,
12 Christian Rodriguez, the estate of Albert Gonzalez and the
13 class.

14 And, Your Honor, we're also joined in the
15 court today by Mr. Rodriguez.

16 THE COURT: Good morning.

17 MS. SHAHANDEH: Good morning, Your Honor.

18 Rena Shahandeh and Michael Amerian appearing
19 on behalf of defendants, the City of Los Angeles, Charles
20 Beck and Carmen Trutanich.

21 THE COURT: Good morning.

22 Well, I'm certainly happy to have you appear
23 before me on an unopposed motion.

24 Thank you for the very well done motion. I
25 have read it and am very impressed with the settlement that

1 the parties have reached after many, many months of hard
2 work. I really commend you and congratulate you on this
3 remarkable, creative and innovative settlement.

4 I just have a couple of questions. First of
5 all, has there been a claims administrator that had been
6 selected for this settlement?

7 **MS. SHAHANDEH:** Yes, Your Honor. It's CAC
8 Services.

9 **THE COURT:** All right, and the children of the
10 named plaintiffs, those -- each of them have one daughter?

11 **MS. RICHARDSON:** Correct, Your Honor.

12 **THE COURT:** Okay. And so, the annuity will be in
13 the name of the two daughters, then; is that correct?

14 **MR. ORANGE:** That's correct, Your Honor.

15 **THE COURT:** All right. With regard to the
16 settlement amount, what determines whether the amount spent
17 per year will be the minimum of one point two hundred fifty
18 -- one -- \$1,250,000 or \$7,500,000?

19 **MS. SHAHANDEH:** Your Honor, the amount actually is
20 1.125 million minimum.

21 **THE COURT:** Oh, I'm sorry, I misspoke. 1.125
22 minimum.

23 **MS. SHAHANDEH:** I've made that mistake myself.

24 It's dependent on how many people want to
25 take advantage of the jobs and education programs.

1 **THE COURT:** So, it depends on the response of the
2 class members.

3 **MS. SHAHANDEH:** Correct.

4 **THE COURT:** Okay. All right, are there any new
5 issues that you wish to raise that were not raised in the
6 motion?

7 **MS. RICHARDSON:** Yes, we just wanted to schedule
8 the actual fairness hearing, and we also have been discussing
9 a briefing schedule for the attorneys' fees motion.

10 **THE COURT:** All right, well, I think I'm going to
11 be addressing that in my oral ruling.

12 **MS. RICHARDSON:** Very good.

13 **THE COURT:** All right.

14 As I said, I want to congratulate all of you
15 as well as the Magistrate Judge Patrick Walsh on reaching
16 this settlement. Frankly, I think this is a much better
17 result than could possibly have been achieved in a trial of
18 this matter.

19 The Court makes a preliminary finding that
20 the class settlement is fair and reasonable and meets the
21 requirements under Rule 23(e).

22 The proposed settlement agreement appears to
23 be the result of serious, noncollusive arm's length
24 negotiation by skilled and experienced attorneys following
25 substantial discovery and extensive motion practice, which

1 included a motion for preliminary injunction, motion for
2 class certification, motion to decertify, multiple motions
3 for summary judgment, motions in limine, and an interlocutory
4 appeal to the Ninth Circuit.

5 The terms of the settlement agreement were
6 reached in part over the course of 17 mediation sessions
7 before the Honorable Patrick Walsh.

8 Following these sessions, Judge Walsh offered
9 effusive praise of both parties -- both sides' counsel, as
10 well as the settlement agreement.

11 Expressing his confidence in counsel for both
12 sides, he said: "It's one of the best lawyering I've seen in
13 15 years on the job. You guys have done a hell of a job on
14 both sides." He called the proposed settlement: "The best
15 settlement I've ever seen."

16 Chief among the remaining issues for trial
17 were injunctive relief and damages for federal and state due
18 process violations arising from the enforcement of the curfew
19 provision.

20 Following a review of the available evidence
21 of damages, class counsel determined that although a large
22 jury award could be possible at trial, so too could the award
23 of nominal damages.

24 In light of this uncertainty, plaintiff's
25 counsel believes that the resolution of this case is in the

1 best interest of the class, and that the settlement is fair,
2 reasonable and will benefit the class.

3 Similarly, although defendant, City of Los
4 Angeles, admits no wrongdoing and believes an award of
5 damages would be unfounded, it desires a full and final
6 resolution of the matter, and to avoid further protracted
7 litigation.

8 Having reviewed the terms of the settlement
9 and class counsel's recommendation, the Court preliminarily
10 finds that the terms of the settlement agreement are fair and
11 reasonable and adequate.

12 The Court also approves preliminarily the
13 \$20,000 incentive award for the benefit of the children of
14 the named plaintiffs.

15 In bringing this action, Mr. Rodriguez and
16 Mr. Cazarez, as well as the family of Mr. Cazarez, expended a
17 great deal of time and effort working with counsel over the
18 course of this litigation by participating in meetings, being
19 deposed and attending hearings.

20 This award is appropriate given the time and
21 effort that they exerted in bringing and prosecuting this
22 action as well as the risk inherent in associating themselves
23 with gang injunction litigants. The Court therefore
24 preliminarily approves the incentive awards.

25 The Court also approves, preliminarily

1 approves a maximum of \$150,000 for the claims administrator.

2 The Court preliminarily approves the proposed
3 agreement to resolve attorneys' fees and costs informally, or
4 in the alternative, submit a motion for attorneys' fees and
5 costs prior to final approval of the proposed settlement,
6 provided that it is filed and posted sufficiently in advance
7 of the final approval hearing in order that class members can
8 have access to it at least two weeks prior to the deadline
9 for filing objections.

10 The Court further finds that the proposed
11 notice of settlement comports with the requirements of Rule
12 23(e)(1) in that it includes, among other things, the
13 material terms of the settlement, attorneys' fees and costs,
14 details about the court's hearing and how class members can
15 object or obtain additional information.

16 The Court --

17 The parties' proposal for distribution of the
18 notice is reasonably calculated to reach class members.

19 The Court does not wish, however, to receive
20 class members' objections and on filings in this case. So,
21 typically what I require is that the notice be changed so
22 that all such objections and opt-outs be sent to both sides'
23 counsel and to the claims administrator, and it will be the
24 obligation of class counsel in their motion for final
25 approval to summarize and provide copies of the objections

1 and opt-outs if any.

2 All right? So, I don't believe that the
3 parties have submitted a Word version of the notice. So,
4 after this hearing, if you could submit that to the clerk so
5 that the Court can review it and provide you with feedback on
6 any edits that might be necessary.

7 The final approval hearing is scheduled to
8 take place on December 2, 2016 at 10:00 o'clock A.M. That is
9 slightly more than a 120 days from today.

10 All right? Does either side have any
11 questions?

12 **MS. RICHARDSON:** I just want a clarification, Your
13 Honor.

14 For the objections, you said that you wanted
15 them sent to both sides' counsel and the claims
16 administrator, and for class counsel to summarize them or
17 to --

18 **THE COURT:** Right, to provide a copy of them and
19 summarize as you usually do in a motion for final approval,
20 how many objections and how many opt-outs there are, and then
21 append or attach copies of any written materials that were
22 submitted.

23 **MS. RICHARDSON:** Will do.

24 **THE COURT:** All right? And are there any other
25 questions or issues that need to be clarified?

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MS. RICHARDSON: Does Your Honor --

I think we submitted a Word version of the proposed order.

THE COURT: Yes. That will be issued either today or Monday at the latest.

MS. RICHARDSON: I think that is it, Your Honor.

THE COURT: All right, congratulations to both sides. As I said, I think this is an excellent solution, and I hope that in December when we have the results of the class notice, we'll find that the class finds it to be appropriate settlement as well.

MS. RICHARDSON: Thank you, Your Honor.

MR. ORANGE: Thank you.

COURT CLERK: This Court is adjourned.

~ ~ ~

(Proceedings concluded.)

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C E R T I F I C A T E

I hereby certify that the foregoing is a true and correct transcript of the stenographically recorded proceedings in the above matter.

Fees charged for this transcript, less any circuit fee reduction and/or deposit, are in conformance with the regulations of the judicial conference of the United States.

/S/Anne Kielwasser	09/19/2016
<hr/> Anne Kielwasser, CRR, RPR, CSR Official Court Reporter	<hr/> Date

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DECLARATION OF OLU K. ORANGE

I, OLU K. ORANGE, declare as follows:

1. I am an attorney at law, duly licensed to practice in the Supreme Court of the United States, all of the Courts of the State of California, the United States Court of Appeals for the Ninth Circuit, the United States District Court for the Central District of California, United States District Court for the Eastern District of Missouri, and the United States District Court for the Northern District of Texas. I am over 18 years of age. If called and sworn as a witness, I could and would competently testify to the following based on personal knowledge and on my review of files regularly maintained by my office:

Legal Background, Scholarship and Teaching

2. I am a 1998 graduate of the Howard University School of Law. At Howard, I earned advocacy honors including the Huver I. Brown Medal for Excellence in Trial Advocacy, the Earl Davis Award for Excellence in Public Interest Advocacy and two consecutive Lewis F. Powell Medals for Excellence in Trial Advocacy from the American College of Trial Lawyers (ACTL) and the American Bar Association (ABA).
3. Since 2001, I have taught trial advocacy at the University of Southern California where I am now the Director of the nationally ranked USC Dornsife Trial Advocacy Program. I authored USC’s trial advocacy curriculum. Since 2006, I have also taught trial advocacy to law students at Harvard Law School, in Cambridge, Massachusetts, as invited faculty during the regularly scheduled full-credit winter clinical trial advocacy course. At Harvard, I have been

1 selected to perform faculty demonstrations, including the closing arguments in
2 2006 and 2007, the opening statement in 2008, and the cross-examination in
3 2009.

4
5 4. In 2008, the National Institute of Trial Advocacy (NITA) and Martindale-
6 Hubbell collaborated to bestow upon me the "NITA Faculty" designation. The
7 NITA Faculty designation is awarded nationwide to a limited number of
8 highly skilled advocates who also demonstrate mastery in advocacy
9 instruction.

10
11 5. During the few years leading up to my Martindale-Hubbell NITA Faculty
12 designation, I taught trial advocacy and deposition skills to more than one
13 hundred Deputies Attorney General for the California Attorney General's
14 Office in Sacramento, San Diego, Los Angeles and other branch offices
15 throughout the State. I also taught trial advocacy skills at the United States
16 Department of Justice in Washington, D.C., where I was the top-rated NITA
17 instructor in 2007. I have similarly taught trial advocacy and deposition skills
18 at multiple AmLaw Top 20 firms nationwide.

19
20 6. In addition to University, government agency and law firm advocacy
21 instruction, I also dedicate significant time to advocacy instruction for public
22 interest law organizations. For example, I taught the following seminars:

- 23 • "Closing Arguments", National Disability Rights Network: Annual
24 Conference, Los Angeles, CA, Fall 2010
25 • "Using Creative Problem Solving Negotiations to Prepare for Trial (and
26 Lighten your Load)", National Legal Aid & Defender Association
27 (NLADA) Centennial Conference, Washington, D.C., Fall 2011
28

- 1 • "Tipping the Scales with Effective Trial Techniques: Direct and Cross
- 2 Examination of Expert Witnesses", California Association for Parent-Child
- 3 Advocacy, Los Angeles, CA, Summer 2012
- 4 • "The Time for Pure Advocacy: Closing Argument", Inaugural Closing
- 5 Argument Lecture for NITA Studio 71, National Institute For Trial
- 6 Advocacy, Boulder, CO, Spring 2013
- 7

8 7. Moreover, this year, I am honored to be scheduled as upcoming litigation

9 faculty in Birmingham, Alabama at the Southern Poverty Law Center – our

10 nation’s preeminent nonprofit civil rights law firm.

11

12 **Civil Rights, Class Action and Gang Litigation Experience**

13

14 8. In 2015, I was honored with a California Lawyer Attorney of the Year

15 ("CLAY") Award in the Civil Rights category. I earned the CLAY Award for

16 briefing, arguing and winning *Chaudhry v. Los Angeles* (9th Circ. No. 11-

17 55820) in the Ninth Circuit Court of Appeals. *Chaudhry* established Ninth

18 Circuit precedent that pre-death pain and suffering damages are recoverable by

19 decedents' estates when federal civil rights violations cause death - thus ending

20 the practice of making it effectively cheaper for a police officer to kill rather

21 than injure a victim of excessive force. *Chaudhry* is also one of the Ninth

22 Circuit's oft-cited cases on attorneys fees and mandatory duties of government

23 officials. At the trial level, I served as lead trial counsel and secured a seven-

24 figure verdict and a malice finding against the LAPD. Later, *Chaudhry* was

25 identified as one of only three wins against the City of Los Angeles in Chief

26 Deputy City Attorney William Carter's review of forty-one civil trial outcomes

27 in his "Partial Response of the City Attorney's Office to the Third Financial

28 Status Report (FSR) for FY 2010/11."

1 9. In the years before and after Chaudhry, I have litigated multiple complex
2 multi-party civil rights cases and class action matters, including but not limited
3 to the following:

4
5 (a) I am currently co-counsel in a wage and hour class action brought to
6 recover compensation due healthcare professionals employed at the local
7 branch of a nationwide mental health services and treatment provider
8 (*Valerie Alberts, et al vs. Aurora Behavioral Health Care, et al*, LASC Case
9 No. BC419340).

10
11 (b) I served as co-counsel in the class action filed in response to the "May
12 Day Melee" wherein LAPD officers brutalized men, women and children
13 peacefully picnicking in Mac Arthur Park in Los Angeles, California
14 (*MIWON. v. Los Angeles*, CACD No. CV 07-3072). The case resulted in a
15 \$12.8 million dollar recovery.

16
17 (c) I was selected by the United Food and Commercial Workers Union,
18 Local 1442, to represent several of its members in a multi-plaintiff civil
19 rights action against three cities and several police officers were violating the
20 workers' rights while on the picket lines. I served as lead counsel on the
21 matter (*Gina Boyd, et al v. City of Hermosa Beach, et al*, CACD No. CV04-
22 10528). Hundreds of thousands of dollars were recovered for the picketers.

23
24 (d) I served as lead counsel in a 42 U.S.C. §1983 Fourth Amendment case
25 involving excessive force and perjury by Los Angeles County Sheriff's
26 Department deputies in East Los Angeles. (*Christopher Gray v. County of*
27 *Los Angeles, et al*, CACD Case No. CV13-7597 CAS). The case resulted in
28 a recovery of hundreds of thousands of dollars.

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(e) I served as lead trial counsel in a state law battery and wrongful death case involving excessive force by Los Angeles County Sheriff's Department deputies in Compton. (*Trayshawn Earl v. County of Los Angeles, et al*, LASC Case No. TC027438). The case resulted in a 2015 verdict of \$8 million dollars (consolidated with two other cases).

(f) I argued and won *Millender v. County of Los Angeles* (9th Circ. No. 07-55518), a blended 4th and 2nd Amendment case, before an *en banc* panel of the Ninth Circuit Court of Appeals. The central issue in the case was whether an officer should be afforded qualified immunity for seeking a magistrate's approval of a warrant that facially exceeded the scope of the underlying probable cause affidavit. The items sought were firearms and indicia of gang membership. Later, for the U.S. Supreme Court proceedings on *Millender* (10-704), I served as second chair and a briefing attorney -- and was joined by both the NRA and ACLU as *amici curiae* against 26 states and the U.S. Solicitor General.

10. In addition to litigating federal and state civil rights cases in and around the State of California, I have also litigated gang related issues for more than the past fifteen years - first as a Deputy Public Defender for the County of Orange, and then as a member of the Los Angeles County Indigent Criminal Defense Appointments Panel. Indeed, the instant case for which this declaration is submitted began as one of my gang cases on the Panel. My work with gang cases has given me a unique perspective on how to develop, position and present gang issues to decision-makers in court and other formal proceedings. Moreover, my work with persons involved in gang cases, has enabled me to develop a familiarity with the socio-economic issues, legal issues, and the

1 cross-over between those issues that clients and advocates involved in gang
2 cases must navigate.

3
4 *Recognition and Prominence In the Community*

5
6 11. As my most recent honor since last year's CLAY Award, I have been selected
7 by the editorial staff of the Daily Journal newspaper as one of this year's Top
8 100 Lawyers in California in the civil rights and entertainment specialties. I
9 was recognized for my civil rights work, as well as my success in untangling
10 and resolving competing intellectual property claims regarding Sammy Davis,
11 Jr. – and collaborating with Lionel Richie to lay the groundwork for a biopic
12 about Mr. Davis, slated to be produced by Lorenzo di Bonaventura.

13
14 12. In 2013, 2015 and 2016, I have been selected by Thomson Reuters as a
15 Southern California 'Super Lawyer' in the Civil Rights and First Amendment
16 categories.

17
18 13. In 2014, I was selected by The National Trial Lawyers to its 'Top 100' list.

19
20 14. From 2011 to the present, the University of Southern California has
21 recognized me and holds me out in its expert directory as, "An expert on
22 criminal and constitutional law, courtroom procedure, DNA evidence, and
23 police misconduct."

24
25 15. I also have achieved prominence in the probate legal community. In 2010, I
26 tried and won the "dueling wills" case over the Estate of Sammy Davis, Jr.
27 Thus, I was featured in many major-market media news stories. A few years
28 later, I gained further probate/entertainment notoriety by successfully

1 reconciling adverse intellectual property claims for heirs of Motown Records’
2 most prolific music producer, Hal Davis. Mr. Davis produced for artists such
3 as Michael Jackson, the Jackson 5, Diana Ross and Stevie Wonder.
4

5 16. My successful work litigating iconic entertainers’ estate-related intellectual
6 property disputes, taken together with the fact that I am the attorney who
7 established the precedent in the Ninth Circuit permitting pre-death pain and
8 suffering damages awards for decedents’ estates when federal civil rights
9 violations cause death, has earned me cross-over recognition for complex
10 litigation in the probate community. As such, my services are now sought by
11 clients who will pay me the hourly rate I am requesting for my work on the
12 instant case. While this case was in active litigation, I was unable to accept
13 many new cases. However, I recently accepted an engagement as litigation
14 counsel for the Estate of Andrew Rork Getty -- at my currently requested rate.
15

16 **Representation and Resources Dedicated to the Instant Case**
17

18 17. I researched, drafted and filed this case; recruited the team necessary to make
19 it successful; worked with my team and clients to devote our best efforts and
20 significant resources to it; then developed and implemented a plan for a
21 remarkably beneficial resolution for all 5700+ of our clients.
22

23 *Starting the Case – Then Recruiting the Team*
24

25 18. In June of 2009, I was assigned to represent Christian Rodriguez in a Los
26 Angeles Indigent Criminal Defense Appointment Panel (“bar panel”) case
27 brought against him for violating the Culver City Boys gang injunction. I met
28 him in custody and through discussions with him about his case, and reading

1 the court file, learned that his detention was unconstitutional – and, that he
2 wanted to fight for his own freedom, and for the freedom of others from such
3 wrongful seizures. Later, Mr. Rodriguez introduced me to his very best friend,
4 Alberto Cazarez, whom he considered to be his brother – and who was arrested
5 at the same time Mr. Rodriguez was arrested in the bar panel case. In later
6 discussions with Messrs. Rodriguez and Cazarez, I learned that they were both
7 “A” students in high school who were also enrolled in college by way of
8 Housing Authority scholarships. They were both extremely well read,
9 particularly about the civil rights movement. Their teacher at Central High
10 School, Vitaly, focused heavily on civil rights in his classroom lessons.
11 Messrs. Rodriguez and Cazarez asked me if there was a way that they could
12 fight the gang injunction for everyone because they believed it was violating
13 everyone’s civil rights and they didn’t want their siblings to have to suffer
14 under it. I told them that the way to do that would be to bring a class action
15 case and that I would help them do that if they wanted. Thereafter, they said
16 that they’d like to bring such a case – and I got started with researching and
17 drafting a complaint.

18
19 19. Within days of final dismissal of Mr. Rodriguez’ bar panel case, in February
20 of 2011, I filed the instant class action lawsuit in federal court. At the time I
21 filed the case, my estimate was that there were at least 300 potential class
22 members being impacted daily. There were likely two to three thousand
23 persons who fell within the limitations period. And, possibly several thousand
24 persons who could have been served with the injunctions since their inception
25 decades ago. It was clear to me that I needed more accurate information. So, I
26 contacted law firms, community organizations and legal organizations in Los
27 Angeles attempting to find assistance with pinpointing the size of the class and
28 handling the firestorm of litigation that I knew would be coming.

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20. My initial efforts were not met with much cooperation. I contacted the Los Angeles County Public Defender’s Office and Homeboy Industries to obtain assistance. Neither organization provided any assistance. I was later informed that Homeboy Industries did not want to assist on a case that would be seen as antagonistic to its relationship with the LAPD. I also contacted at least a dozen civil rights law firms in Los Angeles about co-counseling on the case. Even the ACLU declined to accept the case. At every civil rights firm I contacted, the invitation to co-counsel a class action on behalf of purported gang members was rejected -- often with incredulity that I would bring such a case. At the same time, I also contacted multiple so-called ‘Big Law’ firms with the hope of handling the case with them through their pro-bono programs. They also declined.

21. During my outreach, Dan Stormer of Hadsell, Stormer & Renick finally got a long enough break in his schedule for me to meet with him about the case. Years prior, I co-counseled with Mr. Stormer on behalf of UFCW Local 1442 on a First Amendment case brought during the massive Los Angeles area grocery worker’s strike. Unlike every other person or organization I had approached for assistance, Mr. Stormer was very excited to become involved, wanted to meet Messrs. Rodriguez and Cazarez, saw the case as having high social importance, and expressed no reservations about political implications. Thereafter, I met with Mr. Stormer and Anne Richardson (who later joined Public Counsel, but stayed on the case), and they agreed to co-counsel the case with me. Ms. Richardson was also enthusiastic about fighting for justice in this case. I was particularly heartened that Ms. Richardson would be part of our team on this case because I recalled her sharp analysis and substantial contribution to the grocery workers’ case. Together, we filed a first amended

1 complaint in April of 2011. Hadsell, Stormer & Renick LLP assigned various
2 associates and other staff to the case over the years. Our offices collaborated to
3 litigate this vigorously defended case.

4
5 *Building Community Support and Litigating the Case*

6
7 22. Once we formed our plaintiffs' counsel team, I continued my efforts in the
8 community while also litigating discovery matters – both as an effort to better
9 assess the contours of the class. We made contact with, and received very
10 useful assistance from, the Youth Justice Coalition, Homies Unidos, the
11 Strategy Center, and the Peace Treaty Coalition, among others.

12
13 23. In order to obtain further information as to how many class members there
14 were, and who they were – I authored, litigated and argued all of the discovery
15 initially served upon the City of Los Angeles and the State of California
16 (including but not limited to demands, motions to compel, joint stipulation
17 materials, *inter alia*). This yielded thousands of pages of service records
18 showing the numerosity and identities of the class members – including from
19 the City of Los Angeles' files, as well as the State of California's CalGang
20 database. Compliance from the City of Los Angeles required supplemental
21 proceedings, resulting in production on a 3TB (three terabyte) hard disk drive.
22 Compliance from the State of California also required a motion for an order to
23 show cause.

24
25 24. I also participated in reviewing, drafting and responding to other discovery;
26 all amendments to my original complaint; meetings and telephone calls with
27 clients and class members; preparing for and taking certain depositions;
28 collaborating with others in their preparation for depositions; recruiting and

1 preparing expert witnesses; drafting and editing the motions and replies for
2 class certification and preliminary injunction.

3
4 25. Ms. Richardson and I argued successfully at the hearing on the motion for a
5 preliminary injunction, which also addressed class certification issues. I
6 handled issues regarding typicality and commonality. Ms. Richardson handled
7 the *Los Angeles v. Lyons* issue of whether threatened harm is immediate and
8 not speculative. Shortly thereafter in February 2013, both motions were
9 granted in part, and Ms. Richardson and I were certified by this court as Co-
10 Lead Class Counsel.

11
12 26. I assisted Ms. Richardson with preparation for the Ninth Circuit argument in
13 this case and second chaired the argument. I drafted and/or edited plaintiffs'
14 motions for summary adjudication and portions of all the oppositions to
15 motions for summary judgment, as well as the opposition to the motion for
16 class decertification. I was also involved in all pretrial preparation, including
17 motions in limine, oppositions thereto, and all CACD LR-16 materials -- and
18 prepared for trial so as to be ready if settlement negotiations were
19 unsuccessful. I also argued at the hearing on the motions in limine, secured
20 and consulted with experts for trial, provided input on and edited the motion
21 for preliminary approval of the settlement and the exhibits thereto, as well as
22 researched and edited, the motion for attorneys fees to which this declaration is
23 attached. I have maintained my readiness to go to trial in short order, if for
24 some reason trial should become necessary.

25
26 *Resolving the Case*

27
28 27. Our plaintiffs' counsel team litigated this case in preparation for trial from

1 beginning to end, even during settlement negotiations. So did the other side.
2 Eventually, this case was successfully mediated before the Hon. Patrick J.
3 Walsh. Our team requested Judge Walsh because of his reputation for being
4 knowledgeable, intellectually agile, and having a no nonsense approach to
5 getting things done. Defense counsel agreed to mediate before Judge Walsh
6 and we all worked out an inspiring injunctive relief resolution to this case.
7

8 28. The jobs and education program that is the centerpiece of our settlement of
9 this case has its genesis in discussions I had with my clients on multiple
10 occasions, community members at informational meetings, and multiple
11 government services professionals. Prior to mediating the case with Judge
12 Walsh, the parties had earnest, but unsuccessful, mediations with Hon. John E.
13 McDermott and Hon. Louis M. Meisinger (Ret.), as well as face-to-face
14 settlement discussions with all counsel, including City Attorney Mike Feuer. It
15 became apparent to me that because of the political negativity that the word
16 “gang” has been given, City of Los Angeles officials would never pay money
17 to the class to settle this case, and that any cash money secured for the class
18 would have to be taken from the City by way of a trial verdict – and be subject
19 to appeals *ad infinitum*. Thus, my thoughts began to focus on ways to settle the
20 case which would bring a greater and more lasting benefit to class members,
21 particularly via a jobs and education program. Indeed, a frequent topic my
22 clients brought up, and which was addressed often at community meetings,
23 was getting a job in order to have a better life.
24

25 29. In mapping out the contours of the jobs and education program, I spoke to a
26 number of people I know from Washington, D.C. They all had familiarity with
27 the youth summer jobs program implemented by the former Mayor, Marion
28 Barry, during his fourth term. During one such discussion with a family

1 member from D.C., but who has held various high level positions with the City
2 of Los Angeles, I explained that I needed to know what the feasibility of doing
3 something similar in Los Angeles would be, but with a guaranteed level of
4 assessment, education, training and post-training employment. Without
5 disclosing what the financial value of the guarantees would be, I posed this
6 query because he had experience as a General Manager, Department Chief,
7 and union contract negotiator opposite the City for several years. He explained
8 a lot me about what the City could do employment-wise, training-wise, what
9 aspects of it might raise union concerns, benefits concerns, and other pertinent
10 issues.

11
12 30. Thereafter, I explored the idea with my co-counsel team and we began to
13 build out the jobs and education, and each of the other components of the
14 program. We did this first among ourselves, then traded proposals with our
15 colleagues on the other side of the case, then mediated the differences between
16 the proposals to reach the settlement we have proposed to the Court. I
17 personally participated and advocated effectively in the numerous mediation
18 sessions with Judges Walsh, McDermott and Meisinger (Ret.), and discussions
19 with representatives of the City of Los Angeles. Though explained in short
20 order herein, this process was long, intricate, intense, difficult and adversarial
21 (but collegial and professional in every manner).

22
23 **Plaintiffs' Counsel Obtained Excellent Results**

24
25 31. I believe that the settlement of this case for an injunctive relief commitment of
26 up to \$30 million of transferrable job and education benefits, along with
27 additional injunctive relief for class members seeking removal from the gang
28 injunction, is a remarkable resolution of the class claims. A jury in this case

1 could have determined that the damages to class members were only nominal
2 (e.g., one dollar per person), or close to nominal.

3
4 32. Based on my knowledge of this case, my experience presenting gang issues in
5 court, and my experience litigating civil rights and class action matters, I
6 believe that the settlement contemplated by the parties in this case maximizes
7 benefits to each class member, minimizes risk of non-recovery, and presents a
8 transformative opportunity for class members which is indicative of the very
9 best work by all involved counsel, as well as Los Angeles City officials' most
10 sincere efforts to constructively right a wrong and simultaneously make this
11 City a better place for all.

12
13 33. My assessment of the settlement is consistent with statements made by Hon.
14 Patrick J. Walsh during the settlement negotiations between the parties. During
15 those negotiations, Judge Walsh commented (see Docket No. 379):

16
17 (a) "[I]n all the cases I've participated in this is the best settlement I've ever
18 seen."

19 (b) "Having spent some time with the parties and with their counsel over the
20 last month, I am confident that the lawyers know what they're doing. And
21 they're doing the best they can be on behalf of their clients."

22 (c) "I can't tell you enough. It's some of the best lawyering I've seen in 15 years
23 on this job. You guys have done a hell of a job on both sides."

24 (d) [This settlement] "could be a big sea change in the world starting with Los
25 Angeles where rather than lock these folks up and have injunctions against
26 them, you invest \$30 million."

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36. I also observed systemic disdain toward Mr. Rodriguez based upon his alleged status as a gang member by the so-called “People of the State of California” during the bar panel case when the court heard my motion to dismiss the curfew violation charge. At that time, Mr. Rodriguez was a pretrial detainee, convicted of no crime, but the People of the State of California, through prosecutor Allan Nadir, brazenly demanded that the court ignore and “disregard *stare decisis*” as to precedent which would favor Mr. Rodriguez. Nonetheless, LASC Commissioner Mark Zuckman stood firm on the rule of law and did not comply with Mr. Nadir’s demand that he ignore it.

37. Moreover, on frequent occasions my clients would call me to explain that persons in the community chastised them for bringing the case and would communicate messages from the police that they were going to “get” them. In fact, Mr. Rodriguez was very frequently surveilled during this case. He was also arrested for no reason on multiple occasions, in response to which I necessarily had to take action.

38. Furthermore, in my experience as a public defender and indigent criminal defense attorney on the bar panel, representing any person who is actually, or perceived to be, involved with a gang requires a special level of preparation. In doing so, it has been my observation that courts have found that evidence of gang involvement is almost always prejudicial and that there is always the possibility that community members will be influenced by their negative feelings toward gangs.

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Inability To Accept Other Cases

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39. Though I have accepted some new civil cases during the pendency of this case, I have been unable to accept most of those that have come my way. Since eighty percent of the civil cases I take are on contingency, I will experience a long-term lapse before my case flow is normalized. Initially, when potential clients called, I would simply tell them that I am too busy with current commitments to be able to assist them. But, that bothered me because a lot of the people who call me really need help. So, then I started giving them names of other lawyers. After that, I attempted accepting cases so long as I could co-counsel with other attorneys on them. But, that also proved unworkable. My latest effort has been to channel all of them to my former student, now attorney, Leticia Kimble. At the outset, I explained to her that I simply do not have the time to assist the persons who have asked me for help, and asked her if she'd handle them. She agreed – and I have heard back from clients I have sent to her that she does a wonderful job. Please see Ms. Kimble's declaration attached hereto as EXHIBIT E.

40. Additionally, my ability to continue my bar panel work has also been substantially impaired, even though the opportunity to pursue justice in this case arose from Mr. Rodriguez' initial bar panel criminal case. Each year since the filing of the instant civil case, I have only been able to keep and work approximately thirty percent of the duty days which I have been assigned. My inability to accept bar panel cases has financially impacted my firm beyond lost indigent appointment fees because many of my criminal defense clients would very often request that I bring cases to address civil rights issues that arose from their criminal matters – such as Section 1983 cases arising from successful motions to suppress, *inter alia*.

My Time Recording Methodology, Notations and Reports

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41. Using a computerized time entry program, I contemporaneously recorded my time, and created the notated time report attached to this declaration as EXHIBIT A. The attached notated time report accurately reflects the time I spent working on this case up through and including the last date reflected thereon. EXHIBIT A also contains an itemization of the costs my office reasonably expended in litigating this case, the total of which are set forth in Chart 1 herein below.

42. I supervised a number of my USC students who worked on this case as law clerks. They performed valuable services summarizing gang injunction service records and arrest reports. See Docket No. 89 -- 7:25 through 8:2. However, I supervised their document review work and spent significant time cross-checking and verifying it for accuracy. Thus, I am only seeking compensation for my time checking their work, rather for their work itself.

43. One of my law clerks, Arpine Sardaryan, was assigned duties which expanded far beyond document review. Though I am not requesting fees for her document review work, I am requesting fees for her other work on the case because she made a valuable contribution to its success. Her work was recorded contemporaneously on the same computerized system on which mine was recorded. Her time summary is set forth on Chart 1 below. Her notated time report is attached as EXHIBIT B.

44. I have spent a total of 2178.7 hours on this case for which I am seeking fees. I am requesting the rate of \$765 per hour for my time on this case. As explained in the declarations of Carol Sobel, Barry Litt, Stephen Rohde, Christopher

Tayback and William Hake, the requested rate is reasonable and below the market average for a person of my skill, reputation and experience in Los Angeles. Also, that is my current hourly retainer rate. Thus, I request fees at the rate of \$765 per hour for my time worked on this case as set forth in Chart 1 below. (Mr. Tayback’s declaration is attached hereto as EXHIBIT F / the other declarations are attached to the Motion). The declarations also support the rate of \$150 per hour for the work of my law clerks. So, aside from work performed on document review, I request that rate for law clerk work. Additionally, I request a fee enhancement multiplier of 2.0 based upon the grounds set forth in all the declarations, exhibits and other evidence filed in support of plaintiffs’ motion for attorneys fees.

Requested Fees & Costs

Chart 1.

Worker	Rate	Hours Worked	Hours Billed	Lodestar
Olu K. Orange (Attorney)	\$765/hr	2178.7	2178.7	\$1,666,705.50
Arpine Sardaryan (Clerk)	\$150/hr	114.8	108.3	16,245.00
Sarah Ayad (Clerk)	\$150/hr	12.1	NO BILL	0
Mitchell Diesko (Clerk)	\$150/hr	11.5	NO BILL	0
Min Ji Gal (Clerk)	\$150/hr	12.4	NO BILL	0
Lauren Ige (Clerk)	\$150/hr	6.1	NO BILL	0
Angel Lopez (Clerk)	\$150/hr	7.6	NO BILL	0
SUB-TOTAL				\$1,682,950.50
<i>5% Additional Billing Judgment</i>				<i>- \$84,147.53</i>

1	SUB-TOTAL	\$1,598,802.97
2	<i>Multiplier</i>	x 2.0
3	SUB-TOTAL	\$3,197,605.94
4	<i>Deduction of Fee Motion Hours From Multiplier</i>	- \$24,327.00
5	TOTAL FEES REQUESTED TO DATE	\$3,173,278.94
6	TOTAL COSTS REQUESTED TO DATE	\$6,894.42

7
8 45. Additionally, because I am not seeking enhancement by a multiplier of time
9 spent working on the motion for attorneys fees, I tallied up all of the entries on
10 my notated time report which recorded time spent on the fee motion, this
11 declaration and/or tasks related thereto. Those entries occurred between
12 September 6, 2016, and October 11, 2016 and comprised 31.8 hours – at \$765
13 per hour, for a total of \$24,327.00 in fees. Subtracting that amount from the
14 sub-total left after the application of the 2.0 multiplier results in the removal of
15 the multiplier. This process is reflected and accounted for in the fee total in
16 Chart 1 above.

17
18 **Billing Judgment**

19
20 46. As explained above, rather than seeking fees for my student law clerks’ work
21 reviewing documents, I am instead seeking fees for my work supervising,
22 reviewing and cross-checking their work. Their names and time worked are
23 reflected in Chart 1 above, and “no bill” is shown for their hours worked. The
24 document review work of the one clerk who also performed multiple other
25 case-related tasks, Arpine Sardayan, is reflected as “no bill” in her attached
26 time notations and a reduction in her hours is reflected on Chart 1 above. Fees
27 are only requested for her non-document review hours.

1 47. Moreover, I have additionally applied a 5% voluntary billing judgment
 2 “haircut” (borrowing the term from *Moreno v. City of Sacramento*, 534 F.3d
 3 1106 (9th Cir. 2008)) to all of the hourly fees my office seeks to account for
 4 any redundant, duplicative or unnecessary time. To be certain that 5% was the
 5 appropriate cut, I examined my notated billing records to seek out time
 6 dedicated to work on the Bane Act claim and defendant Allan Nadir – even
 7 though my work on those two issues was inextricably linked to other issues
 8 upon which we were successful. I next went through my billing records and
 9 shaded in gray the time entries dedicated to the Bane Act claim and defendant
 10 Nadir. I tallied up all of the time I dedicated to them. The total is 57.6 hours –
 11 which at \$765 per hour totals \$44,064.00. The 5% haircut totals \$84,147.53.
 12 The comparative result is shown in Chart 2 below.

13
14 **Chart 2.**

Bane Act & Nadir	5% “Haircut”
\$44,064.00	\$84,147.53
(57.6 hrs X \$765/hr)	(\$1,682,950.50 X 0.05)

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21 48. As shown in Chart 2 above, the 5% voluntary haircut is nearly twice the
 22 amount of a reduction to account for work done on issues surrounding
 23 plaintiffs’ Bane Act claim and defendant Nadir. Thus, the 5% haircut should
 24 be sufficient to account for work on the Bane Act, defendant Nadir and any
 25 other issues for which there was arguably any redundant, duplicative or
 26 unnecessary time spent.

1 *Additional Time Necessary For Final Approval and Enforcement*
2

3 49. Additional time will necessarily be spent by plaintiffs' counsel up through the
4 hearing on the motion for final approval on December 2, 2016. I estimate very
5 conservatively that the additional amount of hours that I will spend in that
6 period of time will be 45 hours. This time will be spent responding to class
7 members' calls and questions from community members, working on probate
8 matters for the Estate of Alberto Cazarez, reviewing and responding to any
9 objections, engaging in a mediation regarding attorneys' fees, preparing a
10 reply to the City's Opposition, and preparation for and appearance at the Final
11 Approval Hearing. Thus, I estimate that there will be an additional \$34,425
12 expended through the Final Approval Hearing (which is not included in the
13 charts above or the exhibit attached hereto). Adding this amount to the totals
14 requested for fees and costs results in a grand total of \$3,214,598.36.

15
16 50. Moreover, there will be many hours that will have to be spent by plaintiffs'
17 counsel to implement this settlement over the next four years. Defendants have
18 taken the position that counsel should estimate their hours over the next four
19 years and seek the total attorneys' fee award now. For many reasons, however,
20 I do not believe that is possible, and I request instead that my co-counsel and I
21 be permitted to seek fees during the course of the implementation of the
22 settlement.

23
24 51. While we have agreed to coordinate representation for the injunction removal
25 hearings, we are not presently able to estimate how many people will seek
26 removal, nor do we know how many requests the City will grant outright, and
27 how many the City will force to a hearing. We also do not know what
28 problems class members will and will not face in the jobs and education

1 program. Accordingly, my co-counsel and I are requesting that this Court
2 retain jurisdiction over this case for a period of no less than the duration of the
3 period within which the settlement is implemented so that we can apply for
4 reasonable attorneys fees for performing further services as to this case.

5
6 *Courage of Mr. Rodriguez, Mr. Cazarez and My Co-counsel*
7

8 52. As a final, and very important note, I offer the following observations.
9

10 53. Christian Rodriguez and Alberto Cazarez, two high school students at the time
11 they became the class representatives in this case, shouldered the social and
12 psychological burdens of a broad-based challenge to one of the most
13 entrenched policies of oppression and exclusion wrought upon minority youth
14 by state and local governments in California, and many other states nation-
15 wide. Unlike many of the heroes in the civil rights struggles of our past, these
16 two young men – heroes – did not begin their fight for fairness at the behest of,
17 or with the support of, a civil rights organization, legal fund, etc. Rather, they
18 had only the excellent upbringing their families gave them, a phenomenal
19 education and work ethic from their high school teacher, and the friendship of
20 one another. Upon that foundation, they made the decision to bring this case
21 because they had been wronged, it was unfair, and they did not want their
22 family members, friends or anyone else to suffer any longer.
23

24 54. As public awareness of this case increased, the social, safety and “quality of
25 life” costs to Messrs. Rodriguez and Cazarez also increased. On occasions too
26 numerous to count, often while I was teaching my night class at USC, I
27 received phone calls from either or both of them about being followed by
28 police officers, while on foot and/or in cars. Sometimes, the officers would

1 make brief contact with them to harass them. Other times, the officers would
2 eerily pass by and call out their names. This conduct occurred against the
3 backdrop of numerous occasions upon which people in their neighborhood
4 would tell them that officers wanted the message to be passed along that
5 officers would “get them.” Mr. Rodriguez particularly, has been harassed not
6 only by the “usual” officers, but also by officers from other divisions around
7 the City. On multiple occasions, he has also been arrested, charged with
8 nothing, and then released – when a supervisor arrived.

9
10 55. For a time, Messrs. Rodriguez and Cazarez were able to confide in, and draw
11 support from, each other. But, after Mr. Cazarez’ unfortunate death in a car
12 accident in July of 2014, Mr. Rodriguez had to soldier on – and he certainly
13 did soldier on, with the ongoing support of Mr. Cazarez family and brother,
14 Alan. Mr. Rodriguez’ enduring strength and courage have underpinned and
15 supported everything that has been done to successfully resolve this case.

16
17 56. This case was resolved successfully because my co-counsel made great
18 sacrifices to stand tall with Mr. Rodriguez, Mr. Cazarez and me when no one
19 else would. They are superlative practitioners, courageous advocates and
20 committed human beings. They believe in the value of community-wide
21 fairness so intensely that when invited to challenge one of the most firmly
22 entrenched, best-funded and politically accepted polices of unfairness
23 confronting minority communities – they enthusiastically said, “yes.” Yes – to
24 several years of heavy litigation against an opponent with virtually limitless
25 resources. Yes – to spending tens, and possibly hundreds, of thousands of
26 dollars of their own money on costs which may not be recoverable. Yes – to
27 trading time with friends and family for time to work on a case for which there
28 would be public disapproval and vilification, no matter the outcome.

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57. But, my co-counsel stood – and they certainly delivered. They delivered a quality and quantity of work that made the proposed resolution of this case possible. It is truly exemplary. Other cities, are following the City of Los Angeles’ example set in this case. Almost immediately after our settlement became national news, officials in Houston dropped a proposed gang injunction and replaced it with a jobs and education program. See here: <http://www.houstonchronicle.com/news/houston-texas/houston/article/Houston-news-7969303.php>.

58. Through their efforts, my co-counsel brought life to Charles Hamilton Houston’s famous words, "A lawyer's either a social engineer or [s]/he's a parasite on society." I am tremendously thankful and honored to have had the opportunity to work with them on this case.

59. This declaration, the exhibits to it and the fee motion with which it is filed truly and accurately reflect the time reasonably spent working on this case. All exhibits to this declaration are true and correct copies of original documents.

I declare, under penalty of perjury under the laws of the State of California and the United States of America, that the foregoing is true and correct, and that this declaration was executed this 12th day of October, 2016, at Los Angeles, California.

Respectfully submitted,
DATE: OCTOBER 12, 2016

ORANGE LAW OFFICES

FOR PUBLIC RELEASE
Olu K. Orange, Declarant