

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION**

**J.O.P., et al.,**

Plaintiffs,

v.

**U.S. DEPARTMENT OF HOMELAND  
SECURITY, et al.,**

Defendants.

Civil Action No. 8:19-CV-01944-SAG

**PLAINTIFFS' MOTION FOR ATTORNEY FEES AND EXPENSES**

Plaintiffs move for an award of attorney's fees and expenses pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412. Plaintiffs seek a fees award of \$ 1,820,206, as well as expenses in the amount of \$ 4,812. The legal and factual grounds for the present motion are set forth in the accompanying memorandum.

Dated: December 24, 2024

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES  
AND EXPENSES**

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## I. INTRODUCTION

This certified class action challenged a policy issued by Defendants in 2019 that limited access to asylum protections for applicants who arrived in the United States and were placed in removal proceedings as “unaccompanied alien children” (“UC”)—that is, under 18 and without an available parent or legal guardian in the United States. After more than five years of litigation and settlement discussions, counsel appointed to represent the class (“Class Counsel”) obtained a final settlement agreement that provides comprehensive relief to the Plaintiff class of young asylum seekers whom Defendants previously determined to be UC. Plaintiffs now move the Court to award attorneys’ fees and expenses pursuant to the Equal Access to Justice Act (“EAJA”), 28 U.S.C. § 2412, to be paid by the Defendants U.S. Department of Homeland Security (“DHS”), U.S. Citizenship and Immigration Services (“USCIS”), and U.S. Immigration and Customs Enforcement (“ICE”).<sup>1</sup> Plaintiffs seek a fee award of \$1,830,206 for 4910.79 hours worked from 2019 through mid-December 2024,<sup>2</sup> as well as expenses in the amount of \$ 4,812

Plaintiffs are entitled to a fee award because they are the prevailing party in this litigation, Defendants’ position was not substantially justified, and no special circumstances make an award unjust. As shown in the supporting contemporaneous time records and detailed declarations, Plaintiffs request fees that are reasonable in light of the nature of the litigation and the relief

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<sup>1</sup> Pursuant to the settlement agreement, the Court will retain jurisdiction to monitor Defendants’ compliance with the terms of the settlement agreement. Plaintiffs reserve the right to seek recovery of additional attorneys’ fees, costs, and expenses related to any issues that may arise related to Defendants’ compliance with the settlement agreement.

<sup>2</sup> In preparing their supporting declarations filed herewith, Andrew Freeman, Esq., and Catherine Weiss, Esq. reviewed Class Counsel’s time records from inception of the lawsuit through September 30, 2024. Wylegala Decl. ¶28. This motion is supported by additional time records reflecting time worked through December 15, 2024. *Id.* Matt Adams, Esq. reviewed Class Counsel’s time records from inception of the lawsuit through December 15, 2024 in preparing his supporting declaration filed herewith. Adams Decl. ¶13.



obtained. Plaintiffs challenged a national policy promulgated in violation of the Administrative Procedure Act (“APA”) and class members’ due process rights; obtained a preliminary injunction against that policy; spent numerous hours addressing violations of the preliminary injunction; and reached favorable settlement terms after more than three years of negotiation. Awarding Plaintiffs the reasonable attorneys’ fees and expenses requested would further EAJA’s purpose of encouraging litigation that serves the public interest—in this case, litigation on behalf of a population Congress has recognized as particularly vulnerable: unaccompanied children.

## **II. BACKGROUND**

### **A. Defendants’ Unlawful Policy Restricted Children’s Access to Asylum Protection**

Several young asylum seekers who fled to this country as unaccompanied children brought this class action on behalf of similarly situated young people to challenge a policy that restricted their access to asylum protections. By statute, USCIS is vested with initial jurisdiction to consider asylum applications filed by UCs in a non-adversarial interview, rather than in an adversarial courtroom process, and UCs are exempt from a one-year filing deadline applicable to other asylum cases. *See* 8 U.S.C. § 1158(b)(3)(C), (a)(2)(E). From June 2013 to May 2019, USCIS policy was to exercise initial jurisdiction over, and exempt from the one-year filing deadline, asylum applications filed by individuals with prior UC determinations, even if the applicant had reunified with a parent or guardian or reached age 18 before applying for asylum. *See* ECF No. 138-9 at 2.<sup>3</sup> In 2019, USCIS reversed this policy—without honoring APA requirements for notice and comment—by requiring re-vetting of all UC asylum applications (including those that had been

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<sup>3</sup> “ECF” refers to the docket in this matter. “CA4 ECF” refers to the docket in the U.S. Court of Appeals for the Fourth Circuit, case 21-1187, the recently dismissed appeal arising from this matter.

pending with USCIS for years) and stripping UC protections from applicants who applied after turning 18 or joining a parent or guardian. ECF No. 138-37 at 2–3. Children deemed to no longer merit UC protections would be retroactively subjected to the one-year filing deadline and required to present their asylum claims in an adversarial and potentially re-traumatizing court hearing in the first and only instance. Had the 2019 policy not been halted, it would have deprived tens of thousands of children of the child-appropriate asylum adjudication procedures a unanimous Congress created in 2008, and forced children into an accelerated timeline for preparing their claims. Further, it would have barred many children from asylum altogether due to their having filed more than a year after their entry, making them vulnerable to the imminent risk of deportation to countries where they feared persecution.

**B. Plaintiffs’ Successful Challenge to Defendants’ Unlawful Policies**

Plaintiffs promptly filed suit, alleging that the 2019 policy reversal violated the APA, the Due Process Clause, and immigration law, and seeking a temporary restraining order (“TRO”) to halt the policy change. ECF Nos. 1, 14. After a hearing during which Defendants conceded that the four named plaintiffs were entitled to a TRO prohibiting retroactive application of the 2019 policy to them, the Court granted a nationwide TRO on August 2, 2019, enjoining Defendants from applying the 2019 policy and ordering them to retract all adverse decisions rendered pursuant to it. ECF Nos. 54, 55. Upon Plaintiffs’ consent motions, the Court renewed the TRO several times and then converted it into a preliminary injunction. ECF Nos. 60, 63, 66, 71.

Defendants then sought dismissal or summary judgment in the alternative, claiming that the action was moot because Defendants had consented to the injunction of the 2019 policy. ECF No. 73-1. After filing a motion to enforce the preliminary injunction, ECF Nos. 75, 76, and opposing the motion to dismiss, ECF No. 95, Plaintiffs amended their complaint to add ICE as a

Defendant, alleging that DHS attorneys were actively subverting the preliminary injunction by advocating in UCs' immigration court proceedings against USCIS's initial asylum jurisdiction, and that USCIS continued to reject applications pursuant to the enjoined policy. ECF No. 91. Defendants then filed a second motion to dismiss which Plaintiffs opposed. ECF Nos. 101, 109.

On June 3, 2020, the Court denied Defendants' first motion to dismiss as moot, calling their legal theory "paradoxical and contradictory." ECF No. 115 at 15. The Court also denied the second motion to dismiss, noting that Defendants "in effect ask the Court to look past the allegations in the Amended Complaint, [and] accept a different and mostly unsubstantiated set of factual assertions." *Id.* at 28. In the same decision, the Court ordered Defendants to produce an administrative record, *id.* at 40, and denied Plaintiffs' motion to enforce the preliminary injunction without prejudice, concluding that the motion was effectively superseded by allegations in the amended complaint that USCIS's rejection of asylum applications in deference to immigration judges' ("IJ") jurisdictional determinations stemmed from the enjoined 2019 policy, *id.* at 24.

In July 2020, Plaintiffs renewed their challenge to USCIS's deference to IJ determinations in a motion to amend the preliminary injunction ("MAPI"). ECF No. 124. The MAPI also asked the Court to prohibit DHS attorneys from advocating in class members' immigration court proceedings against postponements or against USCIS jurisdiction, and to prohibit USCIS from rejecting class member asylum applications on the basis of certain database notations. On December 21, 2020, the Court granted Plaintiffs' motion to certify a nationwide class. ECF No. 144. Simultaneously, the Court granted Plaintiffs' MAPI in part, enjoining USCIS from deferring to IJ jurisdictional determinations and enjoining DHS from advocacy in immigration court against USCIS jurisdiction. ECF Nos. 143, 144. The Court declined to enjoin USCIS from rejecting jurisdiction due to certain database notations because such conduct was not alleged in the amended

complaint, but granted Plaintiffs leave to amend the complaint, ECF No. 143, 144, which Plaintiffs did, ECF No. 145.

**C. Defendants' Repeated Violations of the Preliminary Injunction**

Throughout the course of this litigation, Class Counsel spent numerous hours responding to, investigating, and working to resolve Defendants' violations of the preliminary injunction. Immigration practitioners representing class members frequently contacted Class Counsel to seek assistance in resolving suspected violations of the preliminary injunction, such as USCIS's rejection of their clients' asylum applications claiming lack of jurisdiction, or DHS's conduct in class members' immigration court proceedings that thwarted the preliminary injunction. *See* Mendez Decl. ¶43. Class Counsel regularly received these requests for assistance from class members, sometimes receiving multiple requests a week. *Id.* For each such request, a member of the Class Counsel team would collect additional information and documentation from the class member, prepare and send correspondence to Defendants about the violation, and then engage with Defendants and follow up until the issue was resolved. *Id.* Despite Plaintiffs' repeated communications to Defendants about violations of the preliminary injunction and suggestions that they take certain actions to prevent future violations, violations continued to occur. *See, e.g., id.*

**D. Settlement Negotiations**

In early 2021, the parties began negotiating a settlement that would take more than three years to conclude. After several months of diligent and persistent efforts by Plaintiffs to move negotiations forward, Plaintiffs voiced concern that Defendants were not adequately engaged in the settlement process after Defendants failed to provide responses within agreed timeframes and backtracked on previously agreed terms. CA4 ECF Nos. 22, 24–26. Plaintiffs proposed mediation, CA4 ECF No. 26, and this case was referred to magistrate-supervised mediation in January 2022

upon the parties' joint request, ECF No. 162. During more than two years of mediation, Class Counsel prepared for and participated in 15 remote mediation sessions, drafted numerous mediation statements, and prepared many drafts of the proposed settlement agreement. Plaintiffs repeatedly expressed concern, including during a March 6, 2023 status conference with the Court, that Defendants were not sufficiently committed to timely resolution of the case, in light of Defendants' short-notice cancellations of scheduled mediation sessions, failure to bring necessary decision makers to sessions, and failure to timely provide revised settlement drafts. *See, e.g.*, ECF Nos. 169, 174, 176; CA4 ECF Nos. 33–34, 39.

In the fall of 2023, the magistrate judge scheduled the parties for a two-day in-person settlement conference in March 2024. Several months after the March 2024 conference, the parties reached a settlement agreement, which this Court preliminarily approved on August 22, 2024. ECF No. 203. On November 25, 2024, this Court held a fairness hearing and granted the parties' joint motion for final approval of the settlement agreement. ECF No. 205.

**E. Class Counsel's Legal Work**

Plaintiffs seek a fee award of \$1,830,206 for 4,911 hours worked over approximately five and a half years, as well as expenses in the amount of \$4,812. The fast pace of initiating the suit and seeking emergency injunctive relief, and the ongoing demands of effectively litigating a complex, nationwide immigration class action called for multiple organizations to join their resources to staff this case. Each of the non-profit co-counsel organizations runs a leanly staffed litigation program, so the attorneys appearing here had various duties beyond this case. Wylegala Decl. ¶21; Mendez Decl. ¶38. In addition to ensuring responsive coverage for the case and subject matter expertise, each of the nonprofit organizations brought particular contributions: Public Counsel has extensive class action experience, Jackson Decl. ¶¶5, 18–19; the National

Immigration Project has a prominent track record in immigration and due process litigation, Mendez Decl. ¶4; and Kids in Need of Defense, with a legal staff of approximately 330, has expansive contact with thousands of class members and prospective class members, Wylegala Decl., ¶¶5, 10. Goodwin Procter LLP took on the case pro bono in partnership with the non-profit organizations to contribute its extensive federal litigation experience.<sup>4</sup> DeJong Decl. ¶¶4, 8–9, 16. Securing the settlement agreement against sophisticated government counsel for defendants in this case required the contributions of all co-counsel entities. Mendez Decl. ¶¶39–40.

### III. ARGUMENT

#### A. Plaintiffs Are the Prevailing Party

Plaintiffs<sup>5</sup> are the prevailing party because they obtained a final, enforceable settlement agreement after successfully litigating to obtain a years-long preliminary injunction. “Plaintiffs may be considered ‘prevailing parties’ for attorney’s fees purposes if they succeed on any significant issue in litigation which achieves some of the benefit the parties sought in bringing suit.” *Farrar v. Hobby*, 506 U.S. 103, 109 (1992) (cleaned up). The Fourth Circuit has summarized the “prevailing party” standard as requiring a plaintiff to obtain “(1) a judgment, consent decree, or similar order, (2) that grants him some relief on the merits, (3) that materially alters the legal relationship between him and the defendant, and (4) that is enforceable by the court.” *Ge v. U.S. Citizenship & Immigr. Servs.*, 20 F.4th 147, 153 (4th Cir. 2021). The Supreme Court has long

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<sup>4</sup> In addition, Bet Tzedek Legal Services brought its expertise to bear in 2023 when Mary Tanagho Ross joined the organization after departing Public Counsel. Ross Decl. ¶10.

<sup>5</sup> Each named Plaintiff is an “individual whose net worth did not exceed \$2,000,000 at the time the civil action was filed.” 28 U.S.C. § 2412(d)(2)(B). Wylegala Decl. ¶29; Mendez Decl. ¶32. Class Counsel performed all work in this matter at no charge to any of the Plaintiffs. Plaintiffs agreed in their respective retainers that any fees and costs recovered by agreement or through a petition to this Court will be payable to their counsel. Wylegala Decl. ¶30.

recognized that a favorable settlement agreement can confer prevailing party status. *See, e.g., Maher v. Gagne*, 448 U.S. 122, 129 (1980); *Farrar*, 506 U.S. at 111 (recognizing that to be a prevailing party a plaintiff “must obtain an enforceable judgment against the defendant from whom fees are sought . . . or comparable relief through a consent decree or *settlement*” (emphasis added)); *Buckhannon Bd. & Care Home, Inc. v. W. Va. Dep’t of Health & Hum. Res.*, 532 U.S. 598, 604 n.7 (2001).

The Court’s final approval of the settlement agreement provided Plaintiffs and the class complete relief on the merits. The court-approved settlement agreement not only incorporates the preliminary injunction’s protections, but also affords class members significant protections not found there. *Compare* ECF No. 199-2 §§ III.A–B, D–E, H, *with* ECF No. 144 ¶¶6(a)–(d), 7; Adams Decl. ¶12. For example, the settlement agreement provides for a stay of removal for class members with final removal orders while they await USCIS’s adjudication of their pending asylum claims, ECF No. 199-2 § III.I, allows class members with removal orders whom USCIS grants asylum to generally avoid the time and number bars governing motions to reopen, *id.* § III.J, provides special expedite provisions for certain class members, *id.* § III.G, and generally requires Defendants to facilitate termination of class members’ removal proceedings, *id.* § III.H.

The settlement agreement materially alters the parties’ legal relationship by modifying Defendants’ behavior in a way that directly benefits Plaintiffs and the class. *See Farrar*, 506 U.S. at 111–12. For example, Defendants must accept jurisdiction over class members’ asylum applications, adjudicate them on the merits, and hold them exempt from the one-year filing deadline. ECF No. 199-2 §§ III.B–D. Defendants must retract previous jurisdictional rejections issued to certain class members. *Id.* §§ III.B, III.E.2. Defendants must refrain from deporting class members and must generally facilitate termination of their removal proceedings. *Id.* §§ III.I, H.

The settlement agreement in this case easily meets the prevailing party test, as it resulted in an enforceable order with a similar “judicial *imprimatur*” to a consent decree. *See Ge*, 20 F.4th at 153 (quoting *Buckhannon*, 532 U.S. at 605). The settlement was reached during the parties’ participation in court-ordered mediation conducted by a magistrate judge. *See Bone v. Univ. of N.C. Health Care Sys.*, No. 1:18-CV-994, 2024 WL 1014164, at \*10 (M.D.N.C. Mar. 8, 2024). In approving the agreement under the procedures set forth in Federal Rule of Civil Procedure 23(e), the Court determined that the agreement was “fair, reasonable, and adequate” after considering specified factors including whether relief afforded to the class is adequate. Fed. R. Civ. P. 23(e)(2); *see* ECF No. 205 at 1. Further, the Court incorporated the terms of the settlement agreement into its approval order. *See* ECF No. 205 at 3; ECF No. 199-2 § V.A; *see also Palacios-Benitez v. Jaddou*, No. 2:21-1155-RMG, 2022 WL 1570733, at \*4 (D.S.C. May 18, 2022) (“The Court finds that Plaintiff was a prevailing party under EAJA as a result of the settlement agreement reached between the parties, which was then incorporated into the Court’s order.”).

Moreover, the settlement agreement is enforceable by the Court, as it provides for this Court’s jurisdiction to enforce its terms. ECF No. 199-2 §§ V.A, V.D. “The Fourth Circuit has described this exercise of a district court’s power to enforce a settlement agreement as one that has the practical effect of entering a judgment by consent.” *Bone*, 2024 WL 1014164, at \*10 (quoting *Hensley v. Alcon Lab’ys, Inc.*, 277 F.3d 535, 540 (4th Cir. 2002)) (cleaned up). All of these features of the agreement result in it providing “judicially sanctioned and enforceable final relief.” *Ge*, 20 F.4th at 154 (quoting *J.D. ex rel. Davis v. Kanawha Cnty Bd. of Educ.*, 571 F.3d 381, 387 (4th Cir. 2009)).

Plaintiffs are also the “prevailing party” because they successfully obtained injunctive relief. The TRO and preliminary injunction enjoined Defendants from applying the 2019 policy



and from rejecting jurisdiction over asylum applications that would have been accepted under the preceding policy, and it required Defendants to retract adverse decisions already rendered. The injunction thus allowed Plaintiffs to once again have USCIS consider their asylum applications on the merits rather than reject them for lack of jurisdiction—the precise relief Plaintiffs sought in bringing suit. Both the initial preliminary injunction and the expanded preliminary injunction issued in 2020, ECF No. 144, materially altered Defendants’ legal relationship with Plaintiffs by “modifying the defendant’s behavior in a way that directly benefit[ted] the plaintiff[s].” *Farrar*, 506 U.S. at 111–112; see *Stinnie v. Holcomb*, 77 F.4th 200, 206 (4th Cir. 2023) (en banc), cert. granted sub nom. *Lackey v. Stinnie*, 144 S. Ct. 1390 (2024).

In sum, Plaintiffs are the prevailing party because they obtained a favorable settlement that resulted in relief to the certified class and because they had successfully obtained injunctive relief that blocked Defendants’ unlawful policies.

**B. Defendants’ Position Underlying and During This Litigation Was Not Substantially Justified**

Under the EAJA, an award of attorneys’ fees to a prevailing party “is mandatory *unless* the government can demonstrate that its position was substantially justified, or that special circumstances make an award unjust.” *Hyatt v. Barnhart*, 315 F.3d 239, 244 (4th Cir. 2002) (cleaned up). The government bears the burden as to both showings. *See id.* Plaintiffs know of no circumstances that would make an award unjust, and Defendants will be unable to show that their position was substantially justified.

To be “substantially justified” under the EAJA, the government’s position must be “justified to a degree that could satisfy a reasonable person,” and must have “a reasonable basis in both law and fact.” *Pierce v. Underwood*, 487 U.S. 552, 564–65 (1988). Both the government’s conduct during civil litigation, and the underlying agency action that led to the litigation, must

satisfy this standard. 28 U.S.C. § 2412(d)(1)(A). In this analysis, “a court does not separately consider every position the Government has taken, but instead makes one determination for the action as a whole.” *Nken v. Holder*, 385 F. App’x 299, 301 (4th Cir. 2010) (citing *Comm’r, INS v. Jean*, 496 U.S. 154, 161–62 (1990)).

**1. Defendants Cannot Establish Substantial Justification for Their Pre-Litigation Conduct**

“[W]hen the government’s unjustified prelitigation position forces a lawsuit, the petitioner may recover fees under the EAJA for the entire suit, even if the government’s litigation position was reasonable.” *United States v. 515 Granby, LLC*, 736 F.3d 309, 316 (4th Cir. 2013). Even if Defendants’ litigation conduct were reasonable (which it was not), Plaintiffs can recover fees for the entire suit because Defendants cannot show that their issuance of the 2019 policy prompting this litigation was substantially justified, for at least three reasons.

First, Defendants failed to comport with the APA, at minimum by failing to engage in the required notice-and-comment process. In granting the TRO which later became a preliminary injunction, this Court found Plaintiffs likely to succeed in their APA claims, finding that “even though the [2019] policy is likely a legislative rule, Defendants did not engage in the notice-and-comment process, which would violate the APA.” ECF No. 54 at 11; *see also* ECF No. 143 at 12 (stating that part of the Court’s basis for ordering retraction of adverse decisions under the 2019 policy was “finding that Plaintiffs were likely to succeed on claims that Defendants violated the APA by failing to use notice-and-comment rulemaking”).

Second, there was no justification for issuing the 2019 policy with *retroactive* effect. *See* ECF No. 15-2 at 2 (policy applies “to any USCIS decision issued on or after the effective date of this memorandum”). By making the 2019 policy expressly applicable to all forthcoming USCIS decisions, Defendants ensured it would apply retroactively to individuals who had applied for

asylum under the 2013 policy and were awaiting USCIS adjudication—for many years in some cases—as well as intending applicants who were determined to be UCs while a predecessor policy was in effect. Both for intending applicants and for those with pending applications, the policy’s retroactive effect was repugnant to the Due Process Clause, and upset settled reliance interests engendered by the 2013 policy. *See* ECF No. 54 at 8, 13. Moreover, an internal memorandum prepared in contemplation of issuing the new policy reflects that the USCIS Office of Chief Counsel recognized that the new policy would upset settled reliance interests, yet USCIS nonetheless issued the 2019 memo with retroactive effect. ECF No. 138-24 at 4 (noting that Office of Chief Counsel recommended applying the 2013 policy to applications filed by a specified date by those encountered as UCs up until 30 days after rescission of the 2013 memo).

Third, in adopting the 2019 policy, Defendants were effectively reconstituting a policy they had previously adopted (in 2009) and then rejected (in 2013) after it proved unworkable, without substantial justification. As this Court noted in finding Plaintiffs likely to prevail in their claim that the adoption of the 2019 policy was arbitrary and capricious, “agencies may change their policies, [but] they must provide ‘a reasoned explanation’ for the shift.” ECF No. 54 at 12. Under its 2009 policy, USCIS would, irrespective of a previous UC determination, redetermine whether an asylum applicant met the UC definition on the date of filing their application. ECF No. 138-5 at 4. In April 2013, USCIS’s deputy director explained the decision to retreat from the 2009 policy, which had led to unnecessary adjudication delays, and to instead adopt existing UC determinations made by CBP or ICE, obviating the need for independent determinations by USCIS in most cases. ECF No. 138-8 at 3. The 2013 memorandum was written with the benefit of, and in response to, a September 2012 CIS Ombudsman report which critiqued the “delay and confusion” caused by the 2009 redetermination policy, drawing on interviews with asylum office staff and other stakeholders

throughout the country. ECF No. 138-6 at 2–3. Yet in 2019, Defendants revived the failed 2009 redetermination policy, without grappling with any of the factors addressed in the 2012 Ombudsman report or the 2013 Deputy Director memorandum.

In short, Plaintiffs are entitled to a fee award for the entire litigation because Defendants cannot show substantial justification for their position in unlawfully promulgating the policies that prompted this case. *See, e.g., Nken*, 385 F. App'x at 302 (agency decision at odds with clearly established law was not substantially justified).

## **2. Defendants Cannot Show Substantial Justification for Their Litigation Conduct**

Even if Defendants' pre-litigation conduct was reasonable (which, as explained above, it was not), Plaintiffs can recover fees for the entire case because Defendants cannot show that their litigation approach was reasonable nor that they were substantially justified in their defense of the 2019 policy. Whether the government acted reasonably in its stance during the litigation is likewise evaluated by considering the “totality of the circumstances.” *Hyatt*, 315 F.3d at 244–45 (declining to reverse finding that agency was not substantially justified in defending its interpretation of a settlement agreement).

Although Defendants conceded at the TRO hearing that the policy's retroactive effect was unconstitutional, DeJong Decl. Ex. B (July 19, 2019 Hearing Tr.) at 5:12 – 6:13, USCIS then continued to apply the 2019 policy to decline jurisdiction over asylum applications of individuals with UC determinations, including those who had filed before the 2019 policy's effective date, as Plaintiffs substantiated in a July 30, 2019 letter to the Court. ECF No. 49. In seeking dismissal of the original complaint, Defendants asserted that “plaintiffs have obtained everything they sought.” ECF No. 73-1 at 7. Yet as the Court noted, this was untrue: Plaintiffs' complaint asked the Court to declare the 2019 memo unlawful, vacate it, and enjoin Defendants from “enforcing or applying

any aspect” of it. ECF No. 115 at 32 (citing ECF No. 1 at 31). The Court went on to reject Defendants’ arguments for dismissal of the amended complaint as “unpersuasive, premature, or unsupported by necessary evidence.” ECF No. 115 at 40.

Long after the Court enjoined application of the 2019 policy, Plaintiffs documented at least three ways in which Defendants continued to act in furtherance of that policy. First, Plaintiffs documented USCIS’s rejection of an asylum application on the sole basis of deference to an IJ’s jurisdictional determination, as instructed in the 2019 policy memo. *See* ECF No. 76 at 9; ECF No. 91 ¶137. Second, Plaintiffs alleged that ICE regularly advocated in immigration court against USCIS’s exercise of initial jurisdiction, including by not agreeing to postponements to allow USCIS to exercise jurisdiction. *See* ECF No. 91 ¶140. Third, it is undisputed that USCIS rejected jurisdiction over properly filed applications solely on the basis of notations in government records reflecting a child’s age or reunification. *See* ECF No. 124-1 at 20–21; ECF No. 199-2 § I.H. Plaintiffs obtained injunctive relief against two of these practices, and amended the complaint to pursue relief from the third—but not before Defendants vigorously defended their unlawful practices across two motions to dismiss and opposition to Plaintiffs’ motions to enforce or amend the preliminary injunction. ECF Nos. 88, 101, 127.

Defendants’ substantially unjustified position continued in the settlement phase. For example, in December 2022, Defendants unilaterally canceled long-scheduled mediation sessions on four days’ notice and declined to set a timeline for providing a revised settlement proposal. ECF No. 174. In exchanging settlement drafts, Defendants repeatedly failed to meet agreed timelines or commit to new timelines, and departed from previously agreed terms. CA4 ECF Nos. 22–26. Yet Defendants initially deflected Plaintiffs’ proposal to seek Court-supervised mediation. *See* CA4 ECF No. 26. Despite commitments for necessary decision makers to attend mediation

sessions, Defendants stated that certain decisions would require review by persons not in attendance. CA4 ECF. Nos. 33 n.1, 34, n.1. In seeking continued abeyance of their appellate briefing schedule, Defendants repeatedly expressed optimism about settlement, CA4 ECF Nos. 22–26, even as their conduct impeded progress.

For at least these reasons, Defendants cannot show that their litigation conduct was substantially justified.

**C. Plaintiffs Request Fees at Reasonable Hourly Rates for Hours Reasonably Worked**

Because Plaintiffs have met the threshold conditions for an award under the EAJA, the Court must determine whether the requested fees are reasonable. *Hyatt*, 315 F.3d at 253. A court determines reasonable attorneys’ fees by evaluating the lodestar calculation of the hourly rates applied to the hours worked. *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983); *Comm’r INS v. Jean*, 496 U.S. 154, 161 (1990) (holding that the *Hensley v. Eckerhart* analysis applies to EAJA awards). In circumstances where the plaintiff “has obtained excellent results, his attorney should recover a fully compensatory fee.” *Hensley v. Eckerhart*, 461 U.S. at 435. This will typically “encompass all hours reasonably expended on the litigation, and indeed in some cases of exceptional success an enhanced award may be justified.” *Id.* Plaintiffs view the result here as an exceptional success, and contend that the special factor of Class Counsel’s expertise warrants an enhanced award. Plaintiffs therefore ask the Court to award fees for the hours worked at adjusted EAJA rates—and for three members of the counsel team, at enhanced rates reflecting their distinctive knowledge and specialized skill necessary for this litigation.

The Fourth Circuit instructs district courts to consider and make detailed findings with regard to twelve *Johnson* factors<sup>6</sup> relevant to the determination of reasonable attorneys' fees. *Barber v. Kimbrell's, Inc.*, 577 F.2d 216, 226 (4th Cir. 1978) (citing *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714 (5th Cir. 1974)). The *Johnson* factors overwhelmingly support Plaintiffs' entitlement to the amount of attorneys' fees claimed and expenses incurred. This is especially true because the Plaintiffs have made substantial reductions to the hours claimed in the exercise of billing judgment, and because the rates sought are reasonable for complex class action litigation and in light of three attorneys' distinctive knowledge and specialized skill.

**1. Plaintiffs Expended the Hours Reasonably Necessary to Successfully Pursue the Litigation and Settlement**

Each of the relevant *Johnson* factors weighs in favor of awarding Plaintiffs their requested fees. The first *Johnson* factor considers the time and labor expended by Class Counsel, which in this case was commensurate with the significant and complex issues that arose during this five-year litigation. Wylegala Decl. ¶22; Weiss Decl. ¶22. The scope of issues expanded during the litigation, Wylegala Decl. ¶22, requiring Plaintiffs to twice amend the complaint after communications from class members and the administrative record revealed a broader reach of the challenged policy. *See* ECF Nos. 91, 145. Plaintiffs successfully defended against two motions to

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<sup>6</sup> The twelve factors, are: (1) the time and labor expended; (2) the novelty and difficulty of the questions raised; (3) the skill required to properly perform the legal services rendered; (4) the attorney's opportunity costs in pressing the instant litigation; (5) the customary fee for like work; (6) the attorney's expectations at the outset of the litigation; (7) the time limitations imposed by the client or circumstances; (8) the amount in controversy and the results obtained; (9) the experience, reputation, and ability of the attorney; (10) the undesirability of the case within the legal community in which the suit arose; (11) the nature and length of the professional relationship between attorney and client; and (12) attorneys' fees award in similar cases. *See Johnson*, 488 F.2d at 717–19. Several of the factors entail considerations that are not present in this case, so this brief discusses the factors or aspects of factors that are most applicable in this case.

dismiss, briefed a motion for a TRO, a motion for class certification, and the MAPI. *See* ECF Nos. 14-1, 116, 117-1, 124-1. The mediation process required Plaintiffs to prepare multiple mediation statements and over a dozen settlement drafts, *see* ECF Nos. 169–174, 176, 182, and prepare for 15 remote mediation sessions and two all-day in-person mediation sessions, *see* ECF Nos. 194, 195. Throughout, Class Counsel spent hundreds of hours fielding inquiries from class members regarding their rights under the injunction, often advocating with Defendants for resolution of these issues.

Class Counsel kept contemporaneous records of the work performed categorized by litigation phase, including “Class Counsel Duties” as an additional category to denote the time spent providing technical assistance and education about the *J.O.P.* litigation to immigration practitioners representing class members and responding to requests for assistance from class members regarding suspected violations of the preliminary injunction. Mendez Decl. ¶¶43–44. Class Counsel also provided quarterly fee letters to Defendants beginning in May 2022, after Defendants first requested quarterly statements. Ross Decl. ¶18.

In keeping with this Court’s guidelines, Plaintiffs carefully examined their fee records considering that on a multi-office litigation team, members’ scheduling demands, shifting workloads, and coordination among team members may lead to some redundancies. Plaintiffs have implemented the guidance of Appendix B of the Local Rules as relevant to the demands of the case and reduced the number of hours for which they are requesting compensation. Ross Decl. ¶18. Court hearings and court telephonic conferences were few, and consistent with the Local Rules, Plaintiffs seek fees only for attorneys who spoke on the record. *See* Ross Decl. ¶18. Development of case strategy, ongoing case administration, redressing class members’ rights, and allocating work amongst organizations required regular communication among team members.



*See, e.g.*, L.R., Appx. B at 1(b)(i). To this collaborative end, Class Counsel held regular calls once or twice weekly throughout the duration of the case. Although robust attendance served strategy development and coordination, Plaintiffs generally seek fees for only one attorney participating in such calls from each organization.<sup>7</sup> *See* Ross Decl. ¶18.

While the Court's guidelines do not speak directly to billing for mediation sessions or settlement conferences, Plaintiffs seek fees for each attorney who participated in mediation sessions and settlement conferences. Throughout the series of virtual and in-person mediation sessions, which ultimately yielded the settlement agreement, to effectively anticipate and respond to Defendants' positions, Plaintiffs divided case issues by subject matter, allocating responsibility for several topics to each team member. Ross Decl. ¶18. In addition, the majority of the work drafting the agreement and exhibits, and crafting solutions for impasses, fell to Plaintiffs. Ross Decl. ¶18. Any redundancy was minimal, so Class Counsel believes that fee recovery for all work relating to mediation is appropriate.

In addition, Class Counsel exercised sound billing judgment to reduce their claimed hours further. Notably they claimed the time of only one attorney for each of Public Counsel, KIND, National Immigration Project, and Bet Tzedek for work on all court filings—aside from those related to mediation—even where additional attorneys at each office contributed to the documents. Ross Decl. ¶18. They excluded all work on their November 2019 motion to enforce, ECF No. 75, because the Court denied it without prejudice, ECF No. 115.<sup>8</sup> They similarly excluded all work

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<sup>7</sup> In some instances, fees are requested for more than one Goodwin Procter attorney attending a team call, particularly early in the matter when the team was actively developing arguments to raise in the Complaint and subsequent motions. DeJong Decl. ¶19.

<sup>8</sup> Spring 2020 time entries for a planned motion to enforce are included because they reflect arguments and declarations developed for Plaintiffs' successful MAPI. Ross Decl. ¶18.

on motions for substitution of counsel and status reports related to the recently dismissed appeal. Ross Decl. ¶18. They excluded non-legal work performed by Class Counsel, including the compilation of time records for submission to Defendants. Ross Decl. ¶18. They also excluded the time of many attorneys and support staff altogether. For example, Goodwin Procter elected to claim time for four (4) attorneys, leaving six (6) other attorneys' time out of the calculus. DeJong Decl. ¶17; *see also* Ross Decl. ¶18 (excluding time of another biller).

The novelty and difficulty of the questions raised (*Johnson* factor 2), the skill required to properly perform the legal services rendered (*Johnson* factor 3) and the experience, reputation, and ability of the attorneys (*Johnson* factor 9) further support the reasonableness of Plaintiffs' fees request. The questions raised in this litigation grew more challenging as Defendants' practices toward the class, and their corresponding rationales, shifted over time. Wylegala Decl. ¶22. Law and policy defining the rights of unaccompanied children has transformed sharply in the past decade, with nuances often eluding even those proficient in immigration law. *See* Wylegala Decl. ¶7. Moreover, interviewing, counseling, and assessing the interests of child clients demands honed experience. Mendez Decl. ¶45; Wylegala Decl. ¶¶6–7. Unaccompanied children—given their age, vulnerabilities, and capacities—require more hands-on assistance to navigate the questions raised in this case, Wylegala Decl. ¶6, demanding skill to counsel the named plaintiffs and guide lawyers supporting other class members. As a nationwide class action, the case required counsel to carefully evaluate potential impacts on the interest of thousands of class members. *See* Wylegala Decl. ¶¶20, 22; Weiss Decl. ¶18. Against sophisticated and experienced government counsel, Class Counsel obtained—and eventually expanded—injunctive relief for the class and reached a favorable settlement that includes class-wide enforcement. Freeman Decl. ¶17; Wylegala Decl. ¶22; Mendez Decl. ¶39. Each of the organizations brought additional particular skills to the counsel

team from their experience in federal, due process, and class action litigation and in working with unaccompanied children. Mendez Decl. ¶¶38–39; Adams Decl. ¶10. Plaintiffs’ success in this case is due to the experience and abilities of Class Counsel, each of whom played a crucial role in developing and executing case strategy. Freeman Decl. ¶17; Weiss Decl. ¶20; Mendez Decl. ¶¶40–41; Wylegala Decl. ¶¶21–22.

The attorneys’ opportunity costs in pressing the litigation (*Johnson* factor 4) further support awarding fees to Plaintiffs. Taking on a case of this scale impacted both Public Counsel and the National Immigration Project as they could have engaged in other complex litigation opportunities related to protecting non-citizen rights. *See* Mendez Decl. ¶46; Jackson Decl. ¶28. Only a handful of nonprofit organizations could bring the litigation experience and national scale needed to pursue this litigation, *see* Adams Decl. ¶9, and few firms in the Maryland community would have found the case desirable given its scope and duration (*Johnson* factor 10). *See* Freeman Decl. ¶¶11, 15.

The time limitations imposed by the circumstances surrounding the challenged policy (*Johnson* factor 7) further highlight the reasonableness of the hours Plaintiffs expended. Because the challenged policy entailed little notice and retroactive effect, Plaintiffs filed their complaint and motion for emergency injunctive relief under time pressure. *See* ECF Nos. 1, 14; Weiss Decl. ¶18. Rapid action was necessary to protect class members navigating removal proceedings where they could be scheduled for a final hearing on the merits—and potentially removed—without getting their day in front of an asylum officer. The uncertainty caused by the challenged 2019 policy reversal only intensified as Defendants engaged in practices that effectively revived the enjoined 2019 policy until Plaintiffs amended their complaint and obtained an expanded preliminary injunction. *See* ECF Nos. 91, 144. In an effort to resolve the controversy and establish some certainty for their clients, Class Counsel vigorously pursued settlement.

Finally, the results from the litigation (a part of *Johnson* factor 8) confirm the reasonableness of the Plaintiffs' fees request. Although no monetary amount was in controversy, the stakes in this litigation were significant for unaccompanied children in need of asylum. The settlement restores the rights of unaccompanied children that the policy infringed. *See* ECF No. 199-2 §§ III.A, B; Wylegala Decl. ¶22; Weiss Decl. ¶18. Taken as a whole, in light of the relevant *Johnson* factors and Plaintiffs' exercise of billing judgment, the number of hours for which Plaintiffs seek fees is reasonable.

## **2. Plaintiffs' Request for Recovery at Adjusted EAJA Rates Is Reasonable**

Plaintiffs seek, at a minimum, recovery at EAJA rates adjusted for the cost of living.<sup>9</sup> *See* 28 U.S.C. § 2412(d)(2)(A)(ii) (noting "an increase in the cost of living" may provide the basis for attorneys' fees above the EAJA rate). Plaintiffs computed attorney fees for each year of this litigation by multiplying the \$125 hourly EAJA rate by the average annual consumer price index (CPI-U) for the Baltimore-Columbia-Towson, Maryland area, divided by 153, the CPI-U value for March 1996, when the EAJA rate was adopted. Ross Decl. ¶16; *Coreen I. T. v. Comm'r Soc. Sec.*, No. CV PJM-17-2260, 2019 WL 244586, at \*2 (D. Md. Jan. 17, 2019) (describing calculation of cost-of-living adjustment). The EAJA does not specify an hourly rate for paralegals, so Plaintiffs propose \$115 for all years, which is approximately the average of one-half of the attorney rate for each year.

Plaintiffs seek fees at the following hourly EAJA rates adjusted for each year:

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<sup>9</sup> As discussed in the section that follows, Plaintiffs request fees at enhanced rates for three attorneys having distinctive knowledge and specialized skill necessary for this litigation.

<b>Year Work Performed</b>	<b>Adjusted EAJA Rate</b>
<i>Attorneys' Rates</i>	
2019	\$209.88
2020	\$211.99
2021	\$220.76
2022	\$240.89
2023	\$250.01
2024	\$255.27
<i>Paralegals' Rates</i>	
All Years	\$115.00

See Ross Decl. ¶15.

Plaintiffs' adjusted EAJA rates are reasonable. Courts routinely find awards at the EAJA rate with a cost-of-living adjustment to be reasonable. *See, e.g., Roth v. Comm'n Social Security*, No. SAG-14-62, 2015 WL 567168, at \*3 (D. Md. Feb. 10, 2015); *Al Daniel v. Colvin*, No. SAG-11-1318, 2015 WL 1125542, at \*2 n.4 (D. Md. Mar. 11, 2015). Further, adjusted EAJA rates are at the lower end of the rates ranges referenced in this District's local rules. In this case, Plaintiffs seek fees for attorneys admitted to the bar for at least nine years, ranging to more than twenty years. *See* DeJong Decl. ¶¶ 5, 17, 20-21; Jackson Decl. ¶30; Mendez Decl. ¶49; Ross Decl. ¶15; Wylegala Decl. ¶26. For attorneys practicing for that range of time, this Court's guidelines (last updated in 2014) recognize as appropriate hourly rates between \$225 and \$475. *See* L.R., Appx. B at 3(c–e). The highest adjusted EAJA rate of \$255.27 for 2024 is near the lower end of that range. Likewise, the proposed paralegal rate of \$115 falls near the low end of the \$95.00 to \$150.00 range reflected in this Court's guidelines. *See* L.R. Appx. B at 3(f). Finally, all of the proposed adjusted EAJA attorney and paralegal rates are substantially lower than prevailing rates charged by Maryland attorneys and paralegals of comparable skill and expertise. Freeman Decl. ¶¶8, 13–14. Plainly, awarding Plaintiffs fees at the EAJA rate adjusted for cost of living is warranted. Freeman Decl. ¶16; *see* Weiss Decl. ¶24.

### 3. The Distinctive Knowledge and Specialized Skill of Three Attorneys Warrants Fee Recovery at Enhanced Rates

Above the baseline of adjusted EAJA rates, and for the reasons spelled out below, Plaintiffs seek enhanced rates for attorneys Kristen Jackson, Michelle Mendez, and Wendy Wylegala. The hourly rates requested for these three attorneys are derived from the high end of the range of rates for lawyers with comparable years in practice found in this Court’s “Guidelines Regarding Hourly Rates” (Local Rules, Appendix B), adjusted for increases in the cost of living. Ross Decl. ¶15. Specifically, Ms. Jackson and Ms. Wylegala were admitted to practice in 2003, so the high end of the relevant range in the Guidelines is \$425 for 2019–2022 and \$475 for 2023–2024; for Ms. Mendez, who was admitted in 2008, the relevant numbers are \$350 and \$425. Jackson Decl. ¶30, Wylegala Decl. ¶26, Mendez ¶49. According to the Guidelines, “[o]ne factor that would support an adjustment to the applicable range is an increase in the cost of legal services since the adoption of the Guidelines.” L.R., Appx. B at 127 (fn). Because the Guidelines were adopted in July 2014, to account for increased costs, Plaintiffs have multiplied the above rates by each year’s annual average Consumer Price Index – All Urban Residents (CPI-U) for Maryland, then dividing the product by 240.797, the CPI-U factor for July 2014. The adjusted rates range from \$453 per hour for 2019 to \$616.36 per hour in 2024 for Ms. Jackson and Ms. Wylegala, and \$373 per hour in 2019 to \$551.48 per hour in 2024 for Ms. Mendez. Ross Decl. ¶15. Although these requested rates represent an enhancement over the statutory EAJA rates, they are still below the prevailing market rates for lawyers of comparable skill and expertise. Freeman Decl. ¶¶8–10, 12.

The EAJA provides that a “special factor” may justify rates in excess of the statutory cap, giving as one example the “limited availability of qualified attorneys for the proceedings involved.” 28 U.S.C. § 2412(d)(2)(A)(ii). The Supreme Court has held that this standard may be satisfied when counsel to the prevailing party has “some distinctive knowledge or specialized skill

needful for the litigation in question—as opposed to an extraordinary level of the general lawyerly knowledge and ability useful in all litigation.” *Pierce*, 487 U.S. at 572.

Few attorneys are as qualified to serve the interests of the Plaintiff class as Kristen Jackson, Michelle Mendez, and Wendy Wylegala—three attorneys widely recognized as having an unusual degree of distinctive knowledge and specialized skill in unaccompanied children’s asylum law and practice. Weiss Decl. ¶16; *see* Freeman Decl. ¶11. This case “did not involve merely a ‘straightforward application’ of the rules of immigration law.” *Nadarajah v. Holder*, 569 F.3d 906, 914 (9th Cir. 2009) (quoting *Thangaraja v. Gonzales*, 428 F.3d 870, 876 (9th Cir. 2005)). Instead, it demanded expertise in unaccompanied children’s asylum law and practice, a niche area of immigration law in which most attorneys, including experienced immigration attorneys, lack expertise. This special factor—which encompasses expertise in arcane policy nuances, practical experience in counseling an extraordinarily vulnerable client population, and training and education outside the field of American law—warrants an award of fees at rates above the statutory cap.

Ms. Jackson, Ms. Mendez, and Ms. Wylegala gained their expertise through study, training, and practical experience—time and effort that is not required of attorneys in other practice areas, including immigration law generally. Ms. Jackson and Ms. Wylegala have devoted their careers, since 2003 and 2008 respectively, to the legal rights of immigrant children. Wylegala Decl. ¶7; Jackson Decl. ¶¶6, 9. This has also been a central focus of Ms. Mendez’s career. Mendez Decl. ¶¶11–28.

Collectively the three have interviewed thousands of children who traveled to the United States unaccompanied, developing command of trauma-informed interviewing methods; commitment to child-centered legal services; attention to ethics issues particular to representing

children; and cultural sensitivity, including to the factors that drive children to migrate and the cumulative impacts of their status as children, as migrants, and as survivors of violence and other harms. Wylegala Decl. ¶¶9–10, 16; Jackson Decl. ¶9; Mendez Decl. ¶¶12, 14. They have collectively represented or mentored the representatives of hundreds of children in proceedings before USCIS, the Executive Office for Immigration Review (“EOIR”), state courts, and federal courts of appeals. Wylegala Decl. ¶9–10; Jackson Decl. ¶10; Mendez Decl. ¶¶15–16; *see* Weiss Decl. ¶¶11, 16. All three practiced immigration law prior to the advent of the Trafficking Victims Protection Reauthorization Act of 2008 (“TVPRA”) and its protections for unaccompanied children. They have tracked in real time various federal agencies’ interpretations of the TVPRA in their policies and practices, while they and their organizations have advocated for the fullest measure of protections in view of the vulnerabilities of children who migrate alone. Wylegala Decl. ¶¶4–5, 13–14; Jackson Decl. ¶11; Mendez Decl. ¶¶12, 18.

This case is not the first time that the three attorneys have focused their advocacy on protections for those previously determined to be unaccompanied children who have reached the age of 18 or joined with a parent or guardian. All three were involved in efforts in their respective states of New York, California, and Maryland to ensure that special immigrant juvenile status (“SIJS”), which protects survivors of child abuse, neglect, or abandonment and is available under federal law to those under age 21, would not be foreclosed to youth over age 18 by limitations in state law. Wylegala Decl. ¶¶8, 14; Jackson Decl. ¶17; Mendez Decl. ¶¶19–21. Ms. Mendez, for example, spearheaded the drive for a 2014 change in Maryland law to affirm the authority of Maryland state courts to issue findings establishing SIJS eligibility after a child reaches age 18. Mendez Decl. ¶19.



Defendant USCIS, EOIR, the American Bar Association, the Practising Law Institute, the American Immigration Lawyers Association, and state courts nationwide have requested the three attorneys' participation in trainings on unaccompanied children's issues, including on asylum law and practice. Wylegala Decl. ¶16; Jackson Decl. ¶14; Mendez Decl. ¶¶23–25. The three attorneys' extensive expertise in unaccompanied children's asylum law and practice is further reflected in their authoring articles and amicus briefs, such as Ms. Wylegala's work on KIND's amicus brief that the Fourth Circuit cited in its *en banc* decision instructing the Board of Immigration Appeals to apply child-sensitive standards to their evaluation of facts giving rise to a claim of persecution. Wylegala Decl. ¶¶12–14; Jackson Decl. ¶¶13, 21; Mendez Decl. ¶28; Weiss Decl. ¶15. Moreover, the three have received awards for their work in this specialty, including the ABA's recognition to Ms. Jackson as their April 2021 Fearless Children's Lawyer. *See* Jackson Decl. ¶22; Mendez Decl. ¶10, Wylegala Decl. ¶17. They are recognized for significant expertise and a high degree of specialization in unaccompanied children's asylum law and practice. *See* Weiss Decl. ¶16; Freeman Decl. ¶11.

The distinctive knowledge and specialized skill of these attorneys was needful for this litigation. From the outset, knowledge of the history of policies implementing the TVPRA, and the impact of those policies on unaccompanied children, was a requisite for timely recognizing the need to address the 2019 policy through litigation. Without this expertise, counsel would not have secured a TRO on an exigent basis. *See* Weiss Decl. ¶18; *see also Nat. Res. Def. Council, Inc. v. Winter*, 543 F.3d 1152, 1160 (9th Cir. 2008). Their knowledge and skill were core to the team's successes. They were able to identify viable plaintiffs and important declarants through their deep roots in the children's asylum arena. Jackson Decl. ¶27; Wylegala Decl. ¶20; Mendez Decl. ¶41. Their grasp of asylum practice allowed them to detect and ultimately convince the Court to enjoin

Defendants’ practices that followed on the heels of the TRO. Throughout the litigation, up to and including settlement, these attorneys’ facility in evaluating how various litigation positions and settlement proposals would impact the members of a large class occupying differing postures was essential. *See* Wylegala Decl. ¶20, 22; Jackson Decl. ¶27; Mendez Decl. ¶40.

Specialized expertise in unaccompanied children’s asylum law and practice, not general immigration law, was essential for this case just as the Ninth Circuit and Seventh Circuit found that specific immigration specializations were necessary in *Nadarajah* and *Muhur v. Ashcroft*, 382 F.3d 653 (7th Cir. 2004). In *Nadarajah*, counsel was required to navigate the “new and relatively obscure statutory provisions governing the detention of people alleged to be threats to national security.” 569 F.3d at 914. Similarly, this case called for knowledge of the 2008 TVPRA statutory framework, its legislative history, and its implementation within the U.S. Department of Health and Human Services and four components of DHS, plus changes in unaccompanied children’s asylum policy before the immigration courts. Wylegala Decl. ¶7. In *Muhur*, counsel successfully represented an asylum seeker on a petition for review that required knowledge of “esoteric nooks and crannies of immigration law.” 382 F.3d at 656. Similarly, the area of unaccompanied children’s asylum law and practice is driven by the unique procedural postures in which an unaccompanied child could have an asylum application pending with USCIS and active removal proceedings before EOIR, or even an order of removal order from EOIR. Mendez Decl. ¶18.

This essential expertise and specialization merits enhanced fees under guiding precedent. In *Pierce*, the Supreme Court gave as two examples of distinctive knowledge or specialized skill “an identifiable practice specialty such as patent law” or those who have knowledge of “foreign law or language.” *Pierce*, 487 U.S. at 572. When applying *Pierce*, the Fourth Circuit has observed that it “need not determine whether *Pierce* contemplates *either* an identifiable practice specialty

not easily acquired by a reasonably competent attorney *or* a specialty requiring technical or other education *outside* the field of American law.” *Hyatt*, 315 F.3d at 251. Ms. Jackson, Ms. Mendez, and Ms. Wylegala’s expertise is both an identifiable practice specialty not easily acquired *and* a specialty requiring education outside the field of American law, and thus under either approach they warrant an award of fees above the statutory cap.

First, unaccompanied children’s asylum law and practice is an identifiable practice specialty not easily acquired by a reasonably competent attorney, and accordingly merits enhanced rates. Authority is divided as to whether immigration law itself constitutes a practice specialty comparable to, for example, patent law. But this Court need not determine whether immigration law itself is an identifiable practice specialty for EAJA purposes. Instead, it can easily find that the narrower field of unaccompanied children’s asylum law and practice is such a practice specialty not easily acquired in the course of a general legal practice, nor even “through a diligent study of the governing legal principles.” *Cf. Hyatt*, 315 F.3d at 250; *see also Thangaraja*, 428 F.3d at 876 (declining to adopt per se rule that immigration law should be classified as a specialty similar to patent law, but recognizing that immigration law may have its own specializations). This is because the practice specialty demands skills and experience that encompass trauma-informed, child-centered, and culturally competent practice, as well as technical knowledge of the TVPRA and implementing policies. *See Mendez Decl.* ¶¶17, 44; *Weiss Decl.* ¶¶18, 20. The dearth of attorneys practicing in this specialty area is reflected by the fact that, as of October 10, 2024, only 58 percent of those determined to be unaccompanied children benefitted from legal representation in immigration court. *Mendez Decl.* ¶16. The expertise and skills entailed in unaccompanied children’s asylum law and practice are in many ways akin to those developed by a patent lawyer;

this specialty requires expertise with a complex statutory scheme as well as understanding of the needs of a particular class of clients and how their needs can best be met under the existing statute.

Second, unaccompanied children’s asylum law and practice requires education outside the field of American law, thus justifying enhanced rates for the three attorneys. Courts may rely upon counsel’s “technical or other education *outside* the field of American law” to award enhanced fees. *See Hyatt*, 315 F.3d at 249 (quoting *Waterman S.S. Corp. v. Mar. Subsidy Bd.*, 901 F.2d 1119, 1124 (D.C. Cir. 1990)). To represent this vulnerable population, attorneys engaged in unaccompanied children’s asylum law and practice draw on qualifications derived from training in basic child development and psychological concepts, as well as cultivating effective interviewing techniques and familiarity with the conditions that drive migration by unaccompanied children. Wylegala Decl. ¶6; Jackson Decl. ¶9; Mendez Decl. ¶20; Weiss Decl. ¶18. Training on, and experience in, trauma-informed, culturally sensitive, and child-appropriate measures allows attorneys to build trust to allow the client to transcend cumulative traumas that would otherwise inhibit their effective participation in the legal process.<sup>10</sup> A level of expertise in trauma-informed interviewing and related concepts highlights the value of the TVPRA protections threatened by the policy challenged in this litigation. In this way, counsel’s specialized training and education from outside the field of American law informed the strategy choices in this litigation. Counsel understood the harm caused by depriving class members of access to an asylum interview with a USCIS officer trained in trauma-informed, culturally sensitive, and child-appropriate measures, and the value of class members’ exemption from the one-year filing deadline. Weiss Decl. ¶18;

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<sup>10</sup> Proving the importance of these qualifications, an EOIR-affiliated Justice Americorps Legal Services for Unaccompanied Children training included panels on “Working with Children and Victims of Trauma” and “Cross-cultural Lawyering” that discussed trauma-informed and culturally appropriate models of interacting with unaccompanied children. Mendez Decl. ¶23.

Wylegala Decl. ¶¶20, 22–23; Jackson Decl. ¶27; Mendez Decl. ¶39. This expertise, and its clear value to the litigation, justify departing from the standard EAJA rates. *See* Weiss Decl. ¶23.

In sum, the work of Ms. Jackson, Ms. Mendez, and Ms. Wylegala warrants recovery at the enhanced rates that range from \$373 to \$616.36 over the course of this case.

**D. Plaintiffs Seek Recovery of Modest Expenses**

Plaintiffs also seek \$4,812 for expenses incurred during the course of this litigation, for travel to court hearings and mediations and the cost of Spanish translation of the class notices. Jackson Decl. Ex. B; Mendez Decl. Ex. B; Wylegala Decl. Ex. B. Attorney travel expenses may be recovered as "expenses" under the EAJA. *See Shuler v. Comm'r of Soc. Sec. Admin.*, No. 8:21-CV-00852-JDA, 2022 WL 14968099, at \*2 (D.S.C. July 26, 2022) (noting that attorney travel qualifies as an expense under the EAJA statute); *see also Int'l Woodworkers of Am. v. Donovan*, 792 F.2d 762, 767 (9th Cir. 1985) (upholding award of expenses for attorney travel under EAJA).

**IV. CONCLUSION**

For the foregoing reasons, Plaintiffs respectfully request that the Court award them attorneys' fees of \$1,830,206 and expenses of \$4812.

Dated: December 24, 2024

Respectfully submitted,

/s/ Brian T. Burgess

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*Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION

J.O.P., *et al.*,

*Plaintiffs,*

v.

U.S. Department of Homeland Security, *et al.*,

*Defendants.*

Civil Action No.  
8:19-CV-01944-SAG

DECLARATION OF WENDY WYLEGALA IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES

I, Wendy Wylegala, declare:

1. I am an attorney licensed to practice law in the State of New York and have appeared in this Court *pro hac vice*. I make this declaration in support of Plaintiffs' motion as prevailing party for recovery of attorneys' fees. I have personal knowledge of the facts in this declaration and if called on to testify, I could and would testify competently to the facts herein.

2. I am Senior Director, Legal Strategy, at KIND, Inc., d/b/a Kids in Need of Defense (KIND), an international organization devoted to the protection of migrant children. I have been co-counsel to the named plaintiffs in this litigation from its inception. The Court appointed KIND as one of the counsel to the certified plaintiff class in December 2020.

***KIND's Services to Unaccompanied Children***

3. KIND's primary legal practice in the United States involves providing free legal representation to unaccompanied or separated children in proceedings before the immigration courts and the Board of Immigration Appeals, in administrative proceedings before Defendant

U.S. Citizenship and Immigration Services (USCIS), in ancillary proceedings in state courts, and occasionally before federal courts of appeal. KIND provides these services in part through its staff attorneys, and in part by conducting legal screenings and placing cases with attorneys in private practice who represent children pro bono with training and support from KIND.

4. Founded in 2008, KIND now has sixteen offices across the United States as well as programming in Europe, Mexico, and Central America. KIND and its pro bono partners have provided legal representation to approximately 16,000 unaccompanied or separated children who came to the United States from 80 different countries. KIND also provides psychosocial support to children and families, works to address the root causes of child migration, and advocates for laws, policies, and practices to improve the protection of unaccompanied children within the U.S. and abroad.

5. Many clients served by KIND seek asylum based on harm experienced in their countries of origin. Since May 31, 2019, when the policy challenged in this case was announced, more than 1,800 clients of KIND or its pro bono attorneys have applied for asylum. KIND currently serves approximately 1,000 young people who were previously determined to be unaccompanied children and who have pending applications for asylum.

6. Clients who flee to the United States as unaccompanied children present particular needs and vulnerabilities. As children, their cognitive development is still in progress, and as victims of persecution and other violence, they are often traumatized. For these reasons, as compared with others in the immigration system, unaccompanied children will require more hands-on assistance in navigating legal questions including those raised in this case. KIND is committed to a child-centered practice that empowers children to participate in decision-making in their legal matters to the fullest possible extent, consistent with guidelines from the American Bar Association's



Commission on Immigration. KIND staff are trained and experienced in providing services that are trauma-informed, culturally sensitive, and child-appropriate. Among other resources, KIND provides its staff with regular (at least once monthly) training programs specific to the representation of children, including training in trauma-informed and child-sensitive interviewing, the ethics of representing child clients, and forms of humanitarian relief available to children. KIND partners with the American Bar Association to host a national training conference specifically dedicated to unaccompanied children's representation every other year. KIND staff regularly speak at local and national events as experts on children's asylum claims and other aspects of representing unaccompanied children. KIND also maintains an electronic resource and learning library for staff with collections dedicated to asylum law and practice.

***My Professional Background, Qualifications, and Expertise in Unaccompanied Children's Asylum Law and Practice***

7. Since 2008, my work has focused almost exclusively on legal protections for unaccompanied and separated children in the United States, and on best practices in delivering legal services to this vulnerable population. This work has spanned a period of evolution in asylum policy towards unaccompanied children, starting before the effective date of the protections for unaccompanied children enacted through the Trafficking Victims Protection Reauthorization Act of 2008, and covering several changes in policy adopted by DHS as well the immigration courts. I have thereby developed expertise in unaccompanied children's asylum law and practice, including detailed knowledge of asylum law and policies, and of child-centered and trauma-informed practices necessary in counseling and representing youth.

8. After graduating from New York University School of Law in 2000, I was an associate at the firm of Cahill, Gordon & Reindel LLP in New York, NY, where I worked on a variety of litigation and corporate matters and several pro bono matters on behalf of unaccompanied

children, earning recognition from the Legal Aid Society for outstanding pro bono service in 2007 and 2008. In 2007, soon after New York state extended the availability of guardianship to children over age 18 and under age 21, I obtained one of the first orders from a New York Family Court that provided a child over age 18 with findings to support eligibility for special immigrant juvenile status, a protective status under federal immigration law for certain children who have experienced abuse, neglect, abandonment, or similar circumstances.

9. In 2008, I joined KIND at its inception to launch KIND's Newark, NJ field office. In 2011, I moved to KIND's New York, NY field office, and served as its supervising attorney from July 2011 through 2015. During my seven years in these two KIND field offices, I interviewed hundreds of detained and released unaccompanied children to assess their eligibility for legal relief; designed training programs and written guidance for pro bono attorneys who are new to the practice of immigration law and the representation of children; mentored pro bono attorneys in the representation of hundreds of children's cases; and supervised dozens of KIND staff and interns.

10. In January 2016, I joined KIND's headquarters as a deputy director for legal technical assistance. In this role, I led KIND's participation in amicus briefing, wrote or co-wrote KIND's comments on numerous proposed immigration regulations, authored more than thirty practice alerts on policy developments, and launched our program of legal technical assistance to KIND's legal services staff, which has since grown to approximately 330 nationwide. I was promoted to director, legal strategy in April 2020, and to senior director in July 2024.

11. In my current role, in addition to legal technical assistance and guidance duties, I lead the litigation program that KIND launched in 2018, with a close focus on seeking redress for policies that negatively impact noncitizen children, such as the policies at issue in this matter, and on

advocating for fair and equitable treatment of unaccompanied children under immigration laws. In addition to our roles in this lawsuit, Scott Shuchart and I were among the counsel to the individual plaintiffs in *Asylumworks v. Wolf*, 1:20-cv-03815 (D.D.C. 2020), which resulted in the vacatur of DHS regulations that restricted the ability of asylum seekers, including unaccompanied children, to obtain employment authorization documents, which are one of the few forms of government-issued identification available to unaccompanied children. We also contributed to KIND's amicus briefing supporting an earlier challenge to the same DHS rules; *see Casa de Maryland*, No. 8:20-cv-02118-PX, Dkt. 39-01 (D. Md. Aug. 3, 2020). Ancillary to this matter, we filed a successful FOIA appeal, *KIND v. USCIS*, No. 1:20-cv-1384 (D.D.C.). In 2023, I joined with pro bono co-counsel to file and successfully resolve a lawsuit on behalf of a parent and child harmed by the 2018 family separation policy; *see M.A.N.H. v. United States*, No. 5:23-cv-00372 (C.D. Ca.).

12. As amicus curiae, we supported a successful petition for rehearing *en banc* in *Portillo Flores v. Garland*, 3 F.4th 615 (4th Cir. 2021), an appeal from the denial of an asylum application filed by a fifteen-year-old who fled violent persecution. The *en banc* Fourth Circuit twice cited KIND's amicus brief to support its holding directing that courts consider a child's age at the time of persecution when evaluating an asylum claim.

13. Between 2020 and 2024, I joined other nonprofits serving unaccompanied children and the firm of Lowenstein Sandler LLP in a series of *amicus curiae* briefs on behalf of youth classified by USCIS as special immigrant juveniles yet at risk of removal from the United States while their opportunities to receive green cards were delayed by years-long backlogs in immigrant visa availability. In amicus briefs to four Circuit Courts and a District Court, we argued, among other things, that the Department of Homeland Security must not circumvent

provisions that Congress enacted to protect vulnerable youth and facilitate their access to permanent immigration status, in recognition of their particular vulnerability and needs for protection. In each of these cases, the Department of Homeland Security agreed to refrain from removing the young person from the United States.

14. I have authored or contributed to numerous other amicus briefs or declarations submitted to state appellate and federal courts on substantive and procedural issues significant to unaccompanied children's rights, including conditions of federal custody; eligibility for special immigrant juvenile status, including for children between the ages of 18 and 21; and the need for continuances during children's removal proceedings.

15. I am admitted to the bar of the state of New York and to the bars of the federal District Courts for the Southern and Eastern Districts of New York and the Court of Appeals for the Ninth Circuit.

16. I have designed, directed, or conducted numerous training programs on substantive law and skills necessary in the representation of unaccompanied children. Among many other presentations, since 2016, I have co-chaired the Practising Law Institute's annual half-day program on representing children in immigration matters. In 2019, I spoke on unaccompanied children's asylum matters at the asylum conference of the American Immigration Lawyers' Association, and co-authored a related advisory, "Child Asylum Seekers and the Erosion of the Best Interests of the Child Standard in the U.S. Asylum System." In 2016, I created and presented guidance on screening youth under the Central American Minors program for staff of USCIS. My short article, "Your Patient and My Client: Perspectives from Legal Work With Unaccompanied Children," appeared in the *Journal of Applied Research on Children: Informing Policy for Children at Risk* (Vol. 10, Issue 1, 2019).

17. From 2021 to 2023, I served as secretary to the Immigration and Nationality Law Committee of the Association of the Bar of the City of New York, and have actively participated in committees of the American Immigration Lawyers' Association's New York chapter. In October 2024, I was one of two recipients of the Juan P. Osuna Memorial Award, given annually by KIND in honor of the late director of the Executive Office for Immigration Review.

***Attorney Scott Shuchart's Experience***

18. Scott Shuchart joined KIND in December 2018, and served as KIND's Senior Director of Legal Strategy and co-counsel to the named plaintiffs and plaintiff class in this matter from its inception until May 2022. After graduating from Yale Law School in 2003, he clerked for the Hon. Marsha Berzon at the Court of Appeals for the Ninth Circuit. Mr. Shuchart has extensive experience in federal administrative litigation. Prior to joining KIND, among other roles, Mr. Shuchart was an associate at Boies, Schiller Flexner LLP and at Altshuler Berzon LLP; and a clinical lecturer and fellow at the Yale Law School Supreme Court Advocacy Clinic, where his successful matters included the landmark asylum case of *Negusie v. Holder*. For eight years he served as senior advisor to the Officer for Civil Rights and Civil Liberties within the Department of Homeland Security. In May 2022 he returned to government service and is now the Assistant Director for Regulatory Affairs and Policy at U.S. Immigration and Customs Enforcement.

***Work Performed by KIND in This Matter***

19. KIND seeks to recover legal fees for three employees: Scott Shuchart and me as attorneys, and paralegal Arty Xiomara Pineda-Aguirre, who joined KIND's legal team in 2024, and is a graduate of Yale University. She has supported the team since June 2024 with legal research on attorneys' fees quality control and consistency of time records, and lodestar

calculations. KIND does not seek recovery for any work relating to this matter by lawyers who have represented plaintiffs in this matter in their individual immigration matters.

20. Soon after issuance of the policy memorandum at issue in this litigation, KIND convened the members of the co-counsel team to explore a response, up to and including litigation. KIND staff reviewed the facts of numerous children's cases to identify three individuals represented by KIND who became plaintiffs in this action, and ensured that they were counseled on the potential ramifications of serving as plaintiffs. Throughout this matter, KIND collaborated with our co-counsel to formulate case strategy, prepare pleadings and motions, interview declarants who provided declarations in support of our filings, confer with counsel to class members about suspected violations of the preliminary injunction, communicate with opposing counsel about such class member issues and other matters, analyze the administrative record, draft the settlement agreement, prepare for and conduct virtual and in-person mediation sessions, and provide guidance on the preliminary injunction and settlement to immigration practitioners through announcements, webinars, written guidance, individual consultations, and advocacy with Defendants' counsel in unresolved cases. I also served as the primary contact on the class counsel team for four plaintiffs and their immigration counsel, working to support their understanding of developments in the litigation and seeking their input.

21. Because legal services to clients is the primary focus of KIND's legal work, KIND's small strategic litigation program is leanly staffed, primarily by me and Mr. Shuchart during his tenure at KIND. KIND's other obligations would not have permitted us to litigate a nationwide class action singlehandedly. We chose to collaborate with long-time pro bono partner, Goodwin Procter LLP, for their federal court litigation expertise as well as their knowledge of the issues in play gained in prior collaborations, and with trusted nonprofit partners having extensive

experience tracking the development of asylum law relevant to unaccompanied children and serving unaccompanied children in asylum matters. Throughout this litigation, members of the team have divided the workload, contributed analysis from our particular perspectives, reviewed the team's work product to ensure its quality, and provided backup during scheduling conflicts.

22. The time KIND expended on this case was commensurate with the demands of the complex issues in controversy and the needs of class members in varying postures. These efforts contributed to our success in obtaining class-wide injunctive relief and in negotiating with experienced government counsel for a settlement agreement that restores the rights infringed by the challenged policy and provides robust protections for the class. The questions raised in this litigation grew more challenging as Defendants' practices toward the class, and their corresponding rationales, shifted over time. The issues presented drew heavily on class counsel's expertise in unaccompanied children's law and practice, making it unlikely that the case could have been resolved successfully and efficiently by alternative counsel without the same level of expertise.

23. KIND chose to pursue this litigation to seek redress for a policy with potential to harm thousands of youth we serve and thousands more similarly situated. Over a five-year period, the counsel team pursued the case without any certainty of recovering fees.

***KIND's and Co-Counsel's Time and Expense Records***

24. KIND is a nonprofit organization whose central mission in the United States entails providing legal and psychosocial services to unaccompanied and separated children, most of whom have very limited financial means. Public and private funding sources enable KIND to offer these services free of charge. Recovery of attorneys' fees as a prevailing party in this lawsuit would help to sustain KIND's program of free services.

25. Attached to this declaration as Exhibit A is a table of itemized entries describing tasks KIND staff performed in this matter. Each entry includes the timekeeper's name, a short description of the work performed, the date and duration of each task, and the requested fee recovery based on a requested hourly rate. Except for work tracked manually in the initial months of the litigation, the table is based on contemporaneous records kept with electronic time-tracking tools whose output has been edited for form, clarity, and consistency.

26. In the ordinary course of our work, I and other KIND legal staff do not prepare billing statements for clients and therefore do not have customary hourly rates set by KIND. In requesting reimbursement for fees incurred in this matter, we have proposed rates consistent with the EAJA and with Appendix B to this Court's local rules. Scott Shuchart and I were both admitted to practice in 2003. For Mr. Shuchart's work, we request reimbursement at the EAJA rate adjusted according to the consumer price index (CPI-U) for Maryland. In keeping with my experience in asylum law and practice relating to unaccompanied children, a specialized skill essential for this litigation, I have requested reimbursement based on rate guidelines in the local rules for attorneys with sixteen to over twenty years in practice. Because the rule amendments setting forth the current rate guidelines took effect in July 2014, we have requested an adjustment of those 2014 rates using the average annual consumer price index (CPI-U) for Maryland.

27. Attached to this declaration as Exhibit B is a table itemizing \$1329.15 in expenses incurred by KIND for travel in connection with the July 2019 TRO hearing, the canceled June 2023 in-person mediation, the March 2024 in-person mediation, and the November 2024 fairness hearing. For each expense, the date, purpose, payee, and amount are set forth. KIND has retained receipts documenting each of these expenditures.



28. Attached to this declaration as Exhibit C are tables showing (1) the total hours and amounts billed in this matter through December 15, 2024 by each of the class counsel organizations and by the class counsel team in total; and (2) the hours billed through December 15, 2024 in each litigation phase by each organization and by the class counsel team in total. In connection with Plaintiffs' petition for attorneys' fees, I requested supporting declarations from Catherine Weiss, Esq. and Andrew Freeman, Esq. In connection with their declarations, they received class counsel's time records for the period June 2019 through September 30, 2024. Each of the class counsel organizations has since supplemented their fee records to include work performed through December 15, 2024.

***About the Named Plaintiffs***

29. I serve as the primary contact on the class counsel team to three of the current named plaintiffs: J.O.P., M.E.R.E., and L.M.Z. Each has confirmed that his net worth did not exceed two million dollars at the time this lawsuit was filed, nor at any other time.

30. Each of the named Plaintiffs received legal services in this matter without charge, and each agreed in their respective retainers to assign any fee award to the legal team for distribution consistent with the terms of a co-counsel agreement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed December 21, 2024 in Roxbury, New York.

/s/Wendy Wylegala  
Wendy Wylegala  
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# Exhibit A

Kids in Need of Defense (KIND) Time Records, *J.O.P. v. DHS*, 2019 through 12.15.24

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Scott Shuchart	6/22/2019	1.75	\$ 209.88	\$ 367.29	Client outreach; draft client declaration talking points; review case materials	Case development
Scott Shuchart	6/25/2019	3.00	\$ 209.88	\$ 629.64	Research claims; arrange retainers and co-counsel agreement; revise retention documents	Case development
Scott Shuchart	6/27/2019	2.33	\$ 209.88	\$ 489.02	Draft and revise briefing for temporary restraining order (TRO)	Motions practice
Scott Shuchart	6/29/2019	0.75	\$ 209.88	\$ 157.41	Correspondence and research re: client declarations; revise briefing	Motions practice
Scott Shuchart	6/30/2019	2.00	\$ 209.88	\$ 419.76	Revise pleadings, declarations; correspondence re: same	Motions practice
Scott Shuchart	7/1/2019	1.50	\$ 209.88	\$ 314.82	Correspondence re: finalizing pleadings	Pleadings
Scott Shuchart	7/8/2019	1.00	\$ 209.88	\$ 209.88	Team call re upcoming motions and arguments	Motions practice
Scott Shuchart	7/15/2019	0.25	\$ 209.88	\$ 52.47	Correspondence re client contact; filing questions	Motions practice
W. Wylegala	7/18/2019	4.00	\$ 453.00	\$ 1,812.00	Prepare for and moot for TRO hearing, confer with co-counsel	Motions practice
Scott Shuchart	7/20/2019	1.75	\$ 209.88	\$ 367.29	Correspondence and drafting re: supplemental letter to court	Case development
Scott Shuchart	7/21/2019	0.83	\$ 209.88	\$ 174.20	Team call re: post-hearing letter and responses	Motions practice
Scott Shuchart	7/22/2019	0.17	\$ 209.88	\$ 35.68	Review Defendants' letter to Court	Motions practice
Scott Shuchart	7/30/2019	1.00	\$ 209.88	\$ 209.88	Review and edit supplemental court letter	Motions practice
Scott Shuchart	8/2/2019	2.25	\$ 209.88	\$ 472.23	Review court order; correspondence and discussions re same	Motions practice
Scott Shuchart	8/6/2019	1.00	\$ 209.88	\$ 209.88	Conference call to discuss class definition, addition of plaintiffs; correspondence re same	Case development
W. Wylegala	8/7/2019	0.50	\$ 453.00	\$ 226.50	Call & emails S. Shuchart re potential plaintiffs, preliminary injunction (PI) language, shape of relief	Case development
Scott Shuchart	8/7/2019	0.42	\$ 209.88	\$ 88.15	Call with W. Wylegala on relief	Case development
W. Wylegala	8/8/2019	1.50	\$ 453.00	\$ 679.50	Call & emails counsel team re Defendants' request to extend time	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Scott Shuchart	8/8/2019	0.50	\$ 209.88	\$ 104.94	Correspondence re timing strategy	Case development
W. Wylegala	8/8/2019	1.00	\$ 453.00	\$ 453.00	Review draft guidance to field on TRO	Class counsel duties
Scott Shuchart	8/9/2019	1.50	\$ 209.88	\$ 314.82	Team call re: amended complaint, new plaintiffs, response to government seeking relief from TRO compliance deadline	Case development
W. Wylegala	8/9/2019	0.80	\$ 453.00	\$ 362.40	Draft short-form guidance to field on TRO, emails co-counsel re same	Class counsel duties
Scott Shuchart	8/10/2019	0.75	\$ 209.88	\$ 157.41	Review and exchange correspondence re: responsive pleading for government motion for extension of time.	Motions practice
Scott Shuchart	8/11/2019	0.25	\$ 209.88	\$ 52.47	Correspondence re: responsive filing to government's motion to extend time to comply with TRO	Motions practice
Scott Shuchart	8/12/2019	2.75	\$ 209.88	\$ 577.17	Conduct file research and draft correspondence re: possible additional named plaintiffs; correspondence re: responsive pleading to court; conduct legal research re: class definition; attend weekly co-counsel teleconference	Case development
Scott Shuchart	8/13/2019	2.00	\$ 209.88	\$ 419.76	Attend co-counsel meeting; attend meeting re: additional plaintiffs; draft practitioner notice of TRO extension	Case development
Scott Shuchart	8/13/2019	0.30	\$ 209.88	\$ 62.96	Attend telephonic conference with Court	Attending court hearings
Scott Shuchart	8/14/2019	0.75	\$ 209.88	\$ 157.41	Review and exchange correspondence and attend conference calls re: government compromise offer	Case development
Scott Shuchart	8/15/2019	0.25	\$ 209.88	\$ 52.47	Review correspondence re conference w Ds	Case development
Scott Shuchart	8/19/2019	0.50	\$ 209.88	\$ 104.94	Team conference call	Case development
W. Wylegala	8/20/2019	1.80	\$ 453.00	\$ 815.40	Review Ds correspondence and settlement proposal, team call re same	ADR
W. Wylegala	8/20/2019	0.10	\$ 453.00	\$ 45.30	Email team confirming client updates	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	8/21/2019	1.50	\$ 453.00	\$ 679.50	Draft discussion document on settlement terms, emails team re confer w Ds.	ADR
W. Wylegala	8/26/2019	1.50	\$ 453.00	\$ 679.50	Team call, review correspondence of Ds, plan for conference with Ds, review Flores regs	ADR
W. Wylegala	8/26/2019	0.50	\$ 453.00	\$ 226.50	team call w A. Loucks re progress of TRO compliance	Case development
Scott Shuchart	8/28/2019	0.25	\$ 209.88	\$ 52.47	Review draft TRO extension; correspondence re: final order	Motions practice
W. Wylegala	8/29/2019	1.80	\$ 453.00	\$ 815.40	Review proposed order, team call re same	ADR
W. Wylegala	8/30/2019	0.20	\$ 453.00	\$ 90.60	Review Ds website notice of TRO	Case development
W. Wylegala	9/3/2019	1.00	\$ 453.00	\$ 453.00	Team call re settlement terms	ADR
W. Wylegala	9/3/2019	1.50	\$ 453.00	\$ 679.50	Revise proposed settlement document	ADR
Scott Shuchart	9/3/2019	0.92	\$ 209.88	\$ 193.09	Call with co-counsel re strategy and order	Case development
W. Wylegala	9/5/2019	0.20	\$ 453.00	\$ 90.60	Review draft proposed settlement document	ADR
W. Wylegala	9/6/2019	1.00	\$ 453.00	\$ 453.00	Team call re draft order	ADR
W. Wylegala	9/7/2019	0.70	\$ 453.00	\$ 317.10	Annotate proposed order for discussion	ADR
W. Wylegala	9/9/2019	0.50	\$ 453.00	\$ 226.50	Call with nonprofits co-counsel re finalizing proposed order	ADR
W. Wylegala	9/11/2019	1.20	\$ 453.00	\$ 543.60	Annotate position on proposed settlement	ADR
Scott Shuchart	9/12/2019	0.50	\$ 209.88	\$ 104.94	Review counterproposals, correspondence regarding final order and PI	Case development
W. Wylegala	9/13/2019	0.30	\$ 453.00	\$ 135.90	Team call re strategy	Case development
W. Wylegala	9/25/2019	1.00	\$ 453.00	\$ 453.00	Review proposed settlement order, emails co-counsel	ADR
W. Wylegala	9/27/2019	1.00	\$ 453.00	\$ 453.00	Review annotated settlement proposal, emails team re same	ADR
Scott Shuchart	10/7/2019	1.25	\$ 209.88	\$ 262.35	Review correspondence re injunction violations; team call re same	Case development
W. Wylegala	11/4/2019	1.00	\$ 453.00	\$ 453.00	Team call	Case development
W. Wylegala	11/13/2019	1.00	\$ 453.00	\$ 453.00	Call w/ counsel team & team call w/ A. Loucks	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	11/15/2019	1.00	\$ 453.00	\$ 453.00	Team call, emails re next steps	Case development
W. Wylegala	11/25/2019	0.50	\$ 453.00	\$ 226.50	Team call	Case development
Scott Shuchart	12/2/2019	7.00	\$ 209.88	\$ 1,469.16	Attend internal conference call; research and draft amended complaint	Pleadings
W. Wylegala	12/3/2019	0.30	\$ 453.00	\$ 135.90	Email outreach re potential plaintiffs	Case development
Scott Shuchart	12/3/2019	2.25	\$ 209.88	\$ 472.23	Attend conference call re complaint amendment; correspondence re amendment and class representatives; draft amended complaint	Pleadings
Scott Shuchart	12/6/2019	1.50	\$ 209.88	\$ 314.82	Review correspondence, attend conference call re: pleadings and amended deadlines	Pleadings
Scott Shuchart	12/9/2019	1.00	\$ 209.88	\$ 209.88	Attend conference call re amended complaint; review correspondence re: additional class representatives and claims	Pleadings
W. Wylegala	12/18/2019	4.50	\$ 453.00	\$ 2,038.50	Revise opposition to motion to dismiss (MTD); emails prospective declarants w/ outline of declaration	Motions practice
W. Wylegala	12/19/2019	4.00	\$ 453.00	\$ 1,812.00	Review & revise draft declarations & amended complaint, emails declarants & team	Pleadings
W. Wylegala	12/20/2019	3.00	\$ 453.00	\$ 1,359.00	Team call re filings, revisions to MTD opposition & amended complaint	Pleadings
W. Wylegala	1/14/2020	0.50	\$ 457.97	\$ 228.99	Outline of MTD opposition	Motions practice
W. Wylegala	1/17/2020	0.50	\$ 457.97	\$ 228.99	Team call re MTD opposition	Motions practice
W. Wylegala	1/18/2020	1.50	\$ 457.97	\$ 686.96	Revise draft MTD opposition	Motions practice
Scott Shuchart	1/22/2020	1.00	\$ 211.99	\$ 211.99	Group call re pending papers	Case development
W. Wylegala	2/12/2020	0.60	\$ 457.97	\$ 274.78	Emails w/ attorney re compliance issue, emails co-counsel same	Class counsel duties
W. Wylegala	3/6/2020	0.60	\$ 457.97	\$ 274.78	Team call	Case development
W. Wylegala	3/6/2020	0.30	\$ 457.97	\$ 137.39	Emails plaintiffs' counsel re updating plaintiffs on status, declarations, next steps	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	3/9/2020	1.70	\$ 457.97	\$ 778.55	Revise outline for plaintiff declaration, emails team re same; emails plaintiffs' counsel re fact updates	Motions practice
W. Wylegala	3/16/2020	0.80	\$ 457.97	\$ 366.38	Team call and emails re class cert motion & decs	Motions practice
W. Wylegala	3/17/2020	1.00	\$ 457.97	\$ 457.97	Draft plaintiff decs, emails translator, co-counsel, & counsel to plaintiffs.	Motions practice
W. Wylegala	3/18/2020	1.00	\$ 457.97	\$ 457.97	Review class cert motion; prepare cert. of translation, emails translator.	Motions practice
W. Wylegala	3/30/2020	0.30	\$ 457.97	\$ 137.39	Team call	Case development
W. Wylegala	4/1/2020	0.30	\$ 457.97	\$ 137.39	Revise draft correspondence re violation	Case development
W. Wylegala	4/10/2020	0.90	\$ 457.97	\$ 412.17	Team call re compliance issues; emails co-counsel & class member counsel re same	Case development
W. Wylegala	4/13/2020	1.50	\$ 457.97	\$ 686.96	Team call & emails re draft correspondence to Ds re violation, analysis of issue	Case development
W. Wylegala	4/13/2020	1.00	\$ 457.97	\$ 457.97	Draft declaration re violation, emails class member counsel re proposed strategy, confidentiality	Case development
W. Wylegala	4/14/2020	1.00	\$ 457.97	\$ 457.97	Review draft dec of class counsel & confidentiality waiver, emails co-counsel and class member counsel re same	Case development
W. Wylegala	4/17/2020	0.50	\$ 457.97	\$ 228.99	Team call	Case development
W. Wylegala	4/22/2020	0.30	\$ 457.97	\$ 137.39	Review Ds' dec in response to reported violation, emails team & class member counsel re same	Case development
W. Wylegala	4/24/2020	1.00	\$ 457.97	\$ 457.97	Team call & emails	Case development
W. Wylegala	4/27/2020	0.90	\$ 457.97	\$ 412.17	Team call re raising violations, etc.	Case development
W. Wylegala	4/27/2020	0.30	\$ 457.97	\$ 137.39	Email class member counsel & co-counsel re possible motion	Case development
W. Wylegala	4/29/2020	1.30	\$ 457.97	\$ 595.36	Review case docs & attorney declaration, revise draft ltr to Ds re class member issue	Case development
W. Wylegala	5/1/2020	0.70	\$ 457.97	\$ 320.58	Team call re planning for filings	Case development
W. Wylegala	5/1/2020	0.30	\$ 457.97	\$ 137.39	Review attorney dec re violation, emails team same	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	5/5/2020	0.40	\$ 457.97	\$ 183.19	Revisions to attorney dec	Motions practice
W. Wylegala	5/8/2020	1.00	\$ 457.97	\$ 457.97	Call & emails co-counsel re MTE, revise dec & email class member counsel re same	Motions practice
W. Wylegala	5/12/2020	0.20	\$ 457.97	\$ 91.59	Review Ds' correspondence re case processing	Case development
W. Wylegala	5/13/2020	2.00	\$ 457.97	\$ 915.94	Re 2nd MTE: Review proposed declarations, review related policy provisions, confer via email with counsel re same	Motions practice
W. Wylegala	5/14/2020	1.70	\$ 457.97	\$ 778.55	Re MTE: emails and call with class member counsel re factual predicate, review declaration. Emails counsel team re same, re corres with Ds, and re court rules	Motions practice
W. Wylegala	5/15/2020	0.70	\$ 457.97	\$ 320.58	Emails counsel team re MTE and correspondence with Ds	Motions practice
W. Wylegala	5/17/2020	0.40	\$ 457.97	\$ 183.19	Email declarant re declaration iso MTE	Motions practice
W. Wylegala	5/19/2020	0.50	\$ 457.97	\$ 228.99	Review outline of prospective declaration iso 2nd MTE	Motions practice
W. Wylegala	5/20/2020	1.50	\$ 457.97	\$ 686.96	Review outline of prospective declaration, review caselaw, email co-counsel re same	Motions practice
W. Wylegala	5/21/2020	0.80	\$ 457.97	\$ 366.38	Read draft MTE & email team re same	Motions practice
W. Wylegala	5/22/2020	1.00	\$ 457.97	\$ 457.97	Team call re strategy	Case development
W. Wylegala	5/22/2020	4.00	\$ 457.97	\$ 1,831.88	Re 2nd MTE: review and revise motion	Motions practice
W. Wylegala	5/25/2020	0.70	\$ 457.97	\$ 320.58	Review comments to draft MTE, emails co-counsel re same	Motions practice
W. Wylegala	5/26/2020	0.70	\$ 457.97	\$ 320.58	Research on terminology in policy	Case development
W. Wylegala	5/26/2020	0.50	\$ 457.97	\$ 228.99	Team call re strategy	Case development
W. Wylegala	5/27/2020	0.30	\$ 457.97	\$ 137.39	Analysis of memo terminology	Case development
W. Wylegala	5/30/2020	3.00	\$ 457.97	\$ 1,373.91	Re 2nd MTE: Review declaration, draft points for declaration, email co-counsel re same.	Motions practice
W. Wylegala	6/1/2020	0.40	\$ 457.97	\$ 183.19	Team call re motion, decs	Motions practice



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	6/1/2020	0.70	\$ 457.97	\$ 320.58	Review and comment on proposed declaration iso 2nd MTE	Motions practice
W. Wylegala	6/3/2020	2.00	\$ 457.97	\$ 915.94	Review decision on motions, summarize, emails co-counsel and declarant re same	Motions practice
W. Wylegala	6/5/2020	1.00	\$ 457.97	\$ 457.97	Team call re court rulings & strategy	Case development
W. Wylegala	6/8/2020	0.50	\$ 457.97	\$ 228.99	Emails co-counsel team in prep for meet & confer	Motions practice
W. Wylegala	6/9/2020	0.50	\$ 457.97	\$ 228.99	Read case law	Case development
W. Wylegala	6/9/2020	0.50	\$ 457.97	\$ 228.99	Meet & confer call with opposing counsel	Motions practice
W. Wylegala	6/10/2020	1.00	\$ 457.97	\$ 457.97	Team call	Motions practice
W. Wylegala	6/12/2020	2.00	\$ 457.97	\$ 915.94	Review and revise draft motion for class cert, emails co-counsel re same	Motions practice
W. Wylegala	6/15/2020	1.00	\$ 457.97	\$ 457.97	Team call re strategy	Case development
W. Wylegala	6/15/2020	1.70	\$ 457.97	\$ 778.55	Review class counsel declaration iso class cert	Motions practice
W. Wylegala	6/15/2020	0.50	\$ 457.97	\$ 228.99	Emails plaintiff counsel re declaration iso class cert & re motion planning	Motions practice
W. Wylegala	6/16/2020	0.20	\$ 457.97	\$ 91.59	Emails re prospective declaration iso PI motion, emails co-counsel re status.	Motions practice
W. Wylegala	6/16/2020	0.40	\$ 457.97	\$ 183.19	Review motion and proposed PI order	Motions practice
W. Wylegala	6/17/2020	0.10	\$ 457.97	\$ 45.80	Emails re proposed PI order	Motions practice
W. Wylegala	6/18/2020	1.00	\$ 457.97	\$ 457.97	Call with and emails co-counsel re class cert, answer, scheduling, and strategy.	Case development
W. Wylegala	6/18/2020	0.70	\$ 457.97	\$ 320.58	Call with declarant, emails co-counsel, review prior decs iso PI motion	Motions practice
W. Wylegala	6/19/2020	0.40	\$ 457.97	\$ 183.19	Call, emails re prospective declaration iso PI	Motions practice
W. Wylegala	6/22/2020	0.10	\$ 457.97	\$ 45.80	Emails plaintiffs' counsel re their status	Case development
W. Wylegala	6/22/2020	1.00	\$ 457.97	\$ 457.97	Team call re strategy	Case development
W. Wylegala	6/22/2020	0.20	\$ 457.97	\$ 91.59	Emails re potential declaration iso PI	Motions practice
W. Wylegala	6/23/2020	0.30	\$ 457.97	\$ 137.39	Review of potential declarations, proposed scheduling order	Motions practice
W. Wylegala	6/24/2020	0.20	\$ 457.97	\$ 91.59	Emails re prospective declaration, redactions	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	6/25/2020	0.30	\$ 457.97	\$ 137.39	Emails plaintiffs' counsel re their status, emails co-counsel re prospective declaration.	Motions practice
W. Wylegala	6/26/2020	0.30	\$ 457.97	\$ 137.39	Emails re schedule, declarations	Motions practice
W. Wylegala	6/26/2020	1.00	\$ 457.97	\$ 457.97	Call & emails with team re strategy	Motions practice
Scott Shuchart	6/29/2020	0.92	\$ 211.99	\$ 195.03	Team call	Case development
W. Wylegala	7/1/2020	0.23	\$ 457.97	\$ 105.33	Prep for call with plaintiff immigration counsel	Class counsel duties
W. Wylegala	7/1/2020	0.67	\$ 457.97	\$ 306.84	Review FIRRPs declarations, emails FIRRPs and team	Motions practice
W. Wylegala	7/1/2020	3.00	\$ 457.97	\$ 1,373.91	Review motion to amend PI	Motions practice
W. Wylegala	7/1/2020	1.12	\$ 457.97	\$ 512.93	Review counsel declarations, emails declarant and team	Motions practice
W. Wylegala	7/2/2020	0.97	\$ 457.97	\$ 444.23	Tel plaintiff's immigration counsel re status, counseling	Class counsel duties
W. Wylegala	7/2/2020	0.87	\$ 457.97	\$ 398.43	Call co-counsel re motion to amend the PI (MAPI)	Motions practice
W. Wylegala	7/2/2020	0.58	\$ 457.97	\$ 265.62	Draft section & revise MAPI, email team re same	Motions practice
W. Wylegala	7/6/2020	0.54	\$ 457.97	\$ 247.30	Team call re MAPI	Motions practice
W. Wylegala	7/7/2020	0.80	\$ 457.97	\$ 366.38	Review MAPI declarations, emails declarants and team	Motions practice
W. Wylegala	7/7/2020	1.90	\$ 457.97	\$ 870.14	Review motion papers	Motions practice
W. Wylegala	7/8/2020	0.72	\$ 457.97	\$ 329.74	Review Answer	Pleadings
W. Wylegala	7/13/2020	1.05	\$ 457.97	\$ 480.87	Team strategy call	Case development
W. Wylegala	7/13/2020	0.50	\$ 457.97	\$ 228.99	Emails team re reported violations	Class counsel duties
W. Wylegala	7/14/2020	0.28	\$ 457.97	\$ 128.23	Research on govt memo	Case development
W. Wylegala	7/15/2020	1.27	\$ 457.97	\$ 581.62	Review Ds' opposition to class cert	Motions practice
W. Wylegala	7/15/2020	0.21	\$ 457.97	\$ 96.17	Team strategy call re class cert	Motions practice
W. Wylegala	7/16/2020	0.35	\$ 457.97	\$ 160.29	Emails re reported violations	Class counsel duties
W. Wylegala	7/16/2020	1.20	\$ 457.97	\$ 549.56	Research & emails re issues in motions	Motions practice
W. Wylegala	7/20/2020	0.15	\$ 457.97	\$ 68.70	Team emails re rescission of 2019 memo	Case development
W. Wylegala	7/20/2020	1.17	\$ 457.97	\$ 535.82	Team strategy call	Motions practice
W. Wylegala	7/21/2020	0.06	\$ 457.97	\$ 27.48	Research & emails team re issues in motions	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	7/23/2020	0.42	\$ 457.97	\$ 192.35	Review correspondence with Ds & emails team re class member issue	Class counsel duties
W. Wylegala	7/23/2020	0.43	\$ 457.97	\$ 196.93	Review opposition to class cert motion	Motions practice
W. Wylegala	7/23/2020	2.04	\$ 457.97	\$ 934.26	Review class cert reply	Motions practice
W. Wylegala	7/23/2020	1.00	\$ 457.97	\$ 457.97	Research & emails re issues in motions	Motions practice
W. Wylegala	7/24/2020	1.28	\$ 457.97	\$ 586.20	Counsel strategy call	Motions practice
W. Wylegala	7/25/2020	0.56	\$ 457.97	\$ 256.46	Administrative record (AR) review	Case development
W. Wylegala	7/27/2020	1.19	\$ 457.97	\$ 544.98	Review protective order, emails team	Case development
W. Wylegala	7/27/2020	1.40	\$ 457.97	\$ 641.16	AR review	Case development
W. Wylegala	7/27/2020	0.74	\$ 457.97	\$ 338.90	Review MAPI opposition	Motions practice
W. Wylegala	7/27/2020	1.22	\$ 457.97	\$ 558.72	Counsel strategy call	Motions practice
W. Wylegala	7/28/2020	0.72	\$ 457.97	\$ 329.74	AR review	Case development
W. Wylegala	7/28/2020	1.00	\$ 457.97	\$ 457.97	Review draft protective order, confer team re same	Case development
W. Wylegala	7/28/2020	0.33	\$ 457.97	\$ 151.13	Draft correspondence to Ds re redaction error	Case development
W. Wylegala	7/29/2020	0.56	\$ 457.97	\$ 256.46	Team strategy call	Case development
W. Wylegala	7/29/2020	2.60	\$ 457.97	\$ 1,190.72	AR review	Case development
W. Wylegala	7/30/2020	1.40	\$ 457.97	\$ 641.16	AR review	Case development
W. Wylegala	7/30/2020	0.22	\$ 457.97	\$ 100.75	Correct redaction of AR	Case development
W. Wylegala	7/31/2020	0.69	\$ 457.97	\$ 316.00	Team strategy call	Case development
W. Wylegala	7/31/2020	6.00	\$ 457.97	\$ 2,747.82	AR review	Case development
W. Wylegala	8/3/2020	2.43	\$ 457.97	\$ 1,112.87	AR review	Case development
Scott Shuchart	8/10/2020	0.58	\$ 211.99	\$ 122.95	Correspondence re revisions to protective order and administrative record	Motions practice
W. Wylegala	8/11/2020	0.20	\$ 457.97	\$ 91.59	Emails re team re protective order	Case development
W. Wylegala	8/17/2020	0.76	\$ 457.97	\$ 348.06	Team call	Case development
W. Wylegala	8/20/2020	0.09	\$ 457.97	\$ 41.22	AR review	Case development
W. Wylegala	8/21/2020	1.04	\$ 457.97	\$ 476.29	Review Ds response re AR deficiencies	Case development
W. Wylegala	8/21/2020	1.53	\$ 457.97	\$ 700.69	Team call, emails re AR deficiencies	Case development
W. Wylegala	8/21/2020	3.00	\$ 457.97	\$ 1,373.91	AR review	Case development
W. Wylegala	8/21/2020	0.70	\$ 457.97	\$ 320.58	research re AR omissions	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	8/21/2020	0.57	\$ 457.97	\$ 261.04	emails team re raising PI compliance issue	Class counsel duties
W. Wylegala	8/24/2020	0.75	\$ 457.97	\$ 343.48	analyze Ds' response re AR deficiencies	Case development
W. Wylegala	8/24/2020	1.00	\$ 457.97	\$ 457.97	JOP team call & emails	Case development
W. Wylegala	8/24/2020	0.38	\$ 457.97	\$ 174.03	Analyze AR deficiencies	Case development
W. Wylegala	8/28/2020	0.90	\$ 457.97	\$ 412.17	JOP team call & emails	Case development
W. Wylegala	8/30/2020	3.07	\$ 457.97	\$ 1,405.97	Review 2nd ltr re record deficiencies	Case development
W. Wylegala	8/31/2020	1.17	\$ 457.97	\$ 535.82	Analyze record deficiencies	Case development
W. Wylegala	8/31/2020	1.17	\$ 457.97	\$ 535.82	Team call & emails	Case development
W. Wylegala	9/1/2020	3.00	\$ 457.97	\$ 1,373.91	Analysis of AR	Case development
W. Wylegala	9/2/2020	2.18	\$ 457.97	\$ 998.37	Finalize deficiencies ltr, review case docs & emails re receipt errors	Case development
Scott Shuchart	9/2/2020	0.75	\$ 211.99	\$ 158.99	Research on administrative record documents	Case development
W. Wylegala	9/11/2020	0.41	\$ 457.97	\$ 187.77	Analysis of DHS docs	Case development
W. Wylegala	9/11/2020	1.25	\$ 457.97	\$ 572.46	Tel with nonprofit co-counsel	Case development
W. Wylegala	9/13/2020	4.85	\$ 457.97	\$ 2,221.15	Draft guidance for field on asylum office (AO) jurisdiction	Class counsel duties
W. Wylegala	9/14/2020	1.23	\$ 457.97	\$ 563.30	co-counsel call & emails	Case development
W. Wylegala	9/14/2020	0.42	\$ 457.97	\$ 192.35	Emails co-counsel re class member issues	Class counsel duties
W. Wylegala	9/15/2020	1.00	\$ 457.97	\$ 457.97	Tel counsel to prospective plaintiff, emails team	Case development
W. Wylegala	9/15/2020	0.25	\$ 457.97	\$ 114.49	Emails co-counsel re field guidance	Class counsel duties
W. Wylegala	9/16/2020	0.17	\$ 457.97	\$ 77.85	Review draft correspondence to Ds	Case development
W. Wylegala	9/17/2020	0.25	\$ 457.97	\$ 114.49	Emails team re prospective plaintiff, class issues	Class counsel duties
W. Wylegala	9/21/2020	1.60	\$ 457.97	\$ 732.75	Team call, emails re adding plaintiff & co-counsel agrmts for new plaintiff	Pleadings
W. Wylegala	9/22/2020	0.35	\$ 457.97	\$ 160.29	Draft correspondence to Ds re PI violations	Class counsel duties
W. Wylegala	9/24/2020	1.25	\$ 457.97	\$ 572.46	Prospective plaintiff and next friend -calls, emails	Pleadings
W. Wylegala	9/28/2020	0.25	\$ 457.97	\$ 114.49	Emails new plaintiff counsel	Pleadings
W. Wylegala	9/28/2020	1.27	\$ 457.97	\$ 581.62	Call re case strategy, plaintiffs	Pleadings
W. Wylegala	10/9/2020	0.33	\$ 457.97	\$ 151.13	Emails plaintiff's counsel re facts, conflict check	Pleadings
W. Wylegala	10/13/2020	0.75	\$ 457.97	\$ 343.48	Review/revise second amended complaint (SAC)	Pleadings

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	10/14/2020	1.00	\$ 457.97	\$ 457.97	Review SAC	Pleadings
W. Wylegala	10/15/2020	0.78	\$ 457.97	\$ 357.22	Review guidance to field, emails team re same & class member issues	Class counsel duties
W. Wylegala	10/16/2020	1.01	\$ 457.97	\$ 462.55	Review draft corres to Ds re compliance issues, emails team	Class counsel duties
W. Wylegala	10/16/2020	0.72	\$ 457.97	\$ 329.74	Team call	Class counsel duties
W. Wylegala	10/16/2020	1.72	\$ 457.97	\$ 787.71	Review draft correspondence to Ds re compliance issues	Class counsel duties
W. Wylegala	10/22/2020	0.65	\$ 457.97	\$ 297.68	Research re affirmative acts	Case development
W. Wylegala	10/23/2020	0.75	\$ 457.97	\$ 343.48	Team call	Case development
W. Wylegala	10/26/2020	0.76	\$ 457.97	\$ 348.06	AR analysis	Case development
W. Wylegala	10/26/2020	0.89	\$ 457.97	\$ 407.59	Team call	Case development
W. Wylegala	10/29/2020	0.25	\$ 457.97	\$ 114.49	Analyze possible violation	Class counsel duties
W. Wylegala	10/30/2020	0.52	\$ 457.97	\$ 238.14	Analyze possible violations	Class counsel duties
W. Wylegala	11/2/2020	1.58	\$ 457.97	\$ 723.59	JOP team call	Case development
W. Wylegala	11/5/2020	0.17	\$ 457.97	\$ 77.85	Email re JSR	Case development
W. Wylegala	11/9/2020	0.45	\$ 457.97	\$ 206.09	Team call	Case development
W. Wylegala	11/9/2020	0.49	\$ 457.97	\$ 224.41	Email re violations, notes re response	Class counsel duties
W. Wylegala	11/13/2020	0.50	\$ 457.97	\$ 228.99	Review Ds' emails, confer team	Case development
W. Wylegala	11/16/2020	0.50	\$ 457.97	\$ 228.99	Team call	Case development
W. Wylegala	11/23/2020	1.00	\$ 457.97	\$ 457.97	Team call	Case development
W. Wylegala	11/30/2020	0.68	\$ 457.97	\$ 311.42	Team call	Case development
W. Wylegala	12/7/2020	0.71	\$ 457.97	\$ 325.16	Team call	Case development
W. Wylegala	12/14/2020	0.28	\$ 457.97	\$ 128.23	Team call	Case development
W. Wylegala	12/21/2020	0.50	\$ 457.97	\$ 228.99	Team call	Case development
W. Wylegala	12/21/2020	0.33	\$ 457.97	\$ 151.13	Email counsel of potential plaintiff	Case development
Scott Shuchart	12/21/2020	1.50	\$ 211.99	\$ 317.99	Review and annotate court opinion on class certification etc.; correspondence re same	Motions practice
W. Wylegala	12/22/2020	1.57	\$ 457.97	\$ 719.01	Prepare client counseling points	Case development



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Scott Shuchart	12/22/2020	0.33	\$ 211.99	\$ 69.96	Correspondence re court order response; addressing violation cases	Motions practice
W. Wylegala	12/22/2020	0.42	\$ 457.97	\$ 192.35	Emails co-counsel re SAC	Pleadings
W. Wylegala	12/23/2020	0.17	\$ 457.97	\$ 77.85	Emails co-counsel re SAC	Pleadings
W. Wylegala	12/28/2020	1.83	\$ 457.97	\$ 838.09	Review decs, work on SAC, emails re plaintiffs	Pleadings
W. Wylegala	12/28/2020	1.07	\$ 457.97	\$ 490.03	Team counsel call	Pleadings
W. Wylegala	12/30/2020	0.28	\$ 457.97	\$ 128.23	Emails w co-counsel re violations	Class counsel duties
W. Wylegala	12/31/2020	4.30	\$ 457.97	\$ 1,969.27	Review SAC	Pleadings
W. Wylegala	1/4/2021	1.05	\$ 476.91	\$ 500.76	Counsel team call	Pleadings
W. Wylegala	1/4/2021	0.51	\$ 476.91	\$ 243.22	Emails counsel for plaintiffs re status, retainer	Pleadings
W. Wylegala	1/5/2021	3.00	\$ 476.91	\$ 1,430.73	Emails class member counsel and co-counsel re consent re PI violation & writeup re PI violation	Class counsel duties
W. Wylegala	1/5/2021	1.53	\$ 476.91	\$ 729.67	Emails counsel to new plaintiff re facts for SAC, next friend	Pleadings
W. Wylegala	1/5/2021	1.30	\$ 476.91	\$ 619.98	Tel & emails next friend & counsel of new plaintiff re retainer, next steps	Pleadings
Scott Shuchart	1/6/2021	0.25	\$ 220.76	\$ 55.19	Edit and review correspondence with Ds	Case development
W. Wylegala	1/6/2021	3.17	\$ 476.91	\$ 1,511.80	Emails w co-counsel re violations	Class counsel duties
W. Wylegala	1/7/2021	0.33	\$ 476.91	\$ 157.38	Emails co-counsel re policy	Case development
W. Wylegala	1/8/2021	0.73	\$ 476.91	\$ 348.14	Team call	Case development
W. Wylegala	1/8/2021	0.42	\$ 476.91	\$ 200.30	Review & confer re retainers for new plaintiffs	Pleadings
W. Wylegala	1/8/2021	0.55	\$ 476.91	\$ 262.30	Emails plaintiffs' counsel	Pleadings
W. Wylegala	1/10/2021	1.75	\$ 476.91	\$ 834.59	Review SAC	Pleadings
W. Wylegala	1/11/2021	2.13	\$ 476.91	\$ 1,015.82	Finalize SAC	Pleadings
W. Wylegala	1/15/2021	1.50	\$ 476.91	\$ 715.37	Counsel call, review Ds' email, research	Case development
Scott Shuchart	1/25/2021	0.25	\$ 220.76	\$ 55.19	Review and revise opposition to motion for extension of time etc.	Motions practice
W. Wylegala	1/26/2021	0.25	\$ 476.91	\$ 119.23	Emails re holding rejections	Case development
W. Wylegala	1/26/2021	0.33	\$ 476.91	\$ 157.38	Review proposed stipulation with Ds	Case development
W. Wylegala	1/29/2021	1.00	\$ 476.91	\$ 476.91	Counsel call, emails re steps to resolve case	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	1/29/2021	1.50	\$ 476.91	\$ 715.37	Team tels & emails re settlement proposal	ADR
W. Wylegala	1/29/2021	0.25	\$ 476.91	\$ 119.23	Emails team re stipulation	Case development
W. Wylegala	1/31/2021	3.00	\$ 476.91	\$ 1,430.73	Memo re issues for settlement	ADR
W. Wylegala	2/1/2021	1.25	\$ 476.91	\$ 596.14	Team call	ADR
Scott Shuchart	2/1/2021	0.75	\$ 220.76	\$ 165.57	Prep for team call	Case development
W. Wylegala	2/2/2021	0.25	\$ 476.91	\$ 119.23	Settlement - emails	ADR
W. Wylegala	2/2/2021	0.78	\$ 476.91	\$ 371.99	Team emails re violation	Class counsel duties
W. Wylegala	2/3/2021	3.20	\$ 476.91	\$ 1,526.11	Review settlement draft, emails team same	ADR
W. Wylegala	2/4/2021	2.17	\$ 476.91	\$ 1,034.89	Review settlement draft, emails team	ADR
W. Wylegala	2/8/2021	0.83	\$ 476.91	\$ 395.84	Team call	ADR
W. Wylegala	2/8/2021	1.00	\$ 476.91	\$ 476.91	Review settlement terms	ADR
W. Wylegala	2/9/2021	0.48	\$ 476.91	\$ 228.92	Review settlement terms	ADR
W. Wylegala	2/11/2021	0.20	\$ 476.91	\$ 95.38	Review settlement terms	ADR
Scott Shuchart	2/12/2021	0.66	\$ 220.76	\$ 145.70	Team call	Case development
W. Wylegala	2/12/2021	1.25	\$ 476.91	\$ 596.14	Tel class member, confer co-counsel	Class counsel duties
W. Wylegala	2/17/2021	0.50	\$ 476.91	\$ 238.46	Tel re settlement proposal draft	ADR
W. Wylegala	2/19/2021	2.50	\$ 476.91	\$ 1,192.28	Review settlement terms	ADR
W. Wylegala	2/22/2021	1.10	\$ 476.91	\$ 524.60	Review settlement terms, team call	ADR
Scott Shuchart	2/22/2021	0.30	\$ 220.76	\$ 66.23	Correspondence	Case development
W. Wylegala	2/23/2021	0.33	\$ 476.91	\$ 157.38	Review settlement terms	ADR
Scott Shuchart	2/23/2021	0.50	\$ 220.76	\$ 110.38	Review and revise settlement proposal drafts	ADR
W. Wylegala	2/24/2021	0.38	\$ 476.91	\$ 181.23	Confer team re PI violation	Class counsel duties
Scott Shuchart	2/25/2021	0.57	\$ 220.76	\$ 125.83	Review settlement proposal summary, related documents	ADR
W. Wylegala	2/26/2021	1.00	\$ 476.91	\$ 476.91	Review settlement and communications with Ds counsel	ADR
Scott Shuchart	2/26/2021	0.55	\$ 220.76	\$ 121.42	JOP team call	Case development
W. Wylegala	3/1/2021	0.83	\$ 476.91	\$ 395.84	Review settlement terms	ADR
W. Wylegala	3/1/2021	0.57	\$ 476.91	\$ 271.84	Team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Scott Shuchart	3/4/2021	0.33	\$ 220.76	\$ 72.85	Review final version of "term sheet" discussion document	ADR
Scott Shuchart	3/5/2021	0.68	\$ 220.76	\$ 150.12	JOP team call	Case development
W. Wylegala	3/15/2021	0.50	\$ 476.91	\$ 238.46	Discussion of impacted cases	Class counsel duties
W. Wylegala	3/19/2021	1.10	\$ 476.91	\$ 524.60	Team call, emails re violation	Class counsel duties
Scott Shuchart	4/9/2021	0.33	\$ 220.76	\$ 72.85	Review Ds' response to term sheet	ADR
W. Wylegala	4/12/2021	3.00	\$ 476.91	\$ 1,430.73	Review Ds' response to settlement terms	ADR
W. Wylegala	4/13/2021	1.95	\$ 476.91	\$ 929.97	JOP Ds' response to settlement & class member rejection	ADR
W. Wylegala	4/15/2021	0.25	\$ 476.91	\$ 119.23	JOP Ds' response to proposal	ADR
W. Wylegala	4/16/2021	0.67	\$ 476.91	\$ 319.53	Tel re review settlement proposal	ADR
Scott Shuchart	4/19/2021	0.98	\$ 220.76	\$ 216.34	JOP settlement strategy discussion	Case development
Scott Shuchart	4/19/2021	0.91	\$ 220.76	\$ 200.89	JOP team meeting - prepare and review correspondence	Case development
Scott Shuchart	4/23/2021	0.65	\$ 220.76	\$ 143.49	Weekly team meeting call	Case development
W. Wylegala	5/3/2021	1.22	\$ 476.91	\$ 581.83	Call re correspondence with Ds	ADR
W. Wylegala	5/6/2021	0.50	\$ 476.91	\$ 238.46	Team emails re scheduling, client updates	Case development
W. Wylegala	5/10/2021	0.25	\$ 476.91	\$ 119.23	Team emails	Case development
W. Wylegala	5/10/2021	0.42	\$ 476.91	\$ 200.30	Team call	Case development
W. Wylegala	5/11/2021	1.17	\$ 476.91	\$ 557.98	Updates for plaintiffs and counsel	Case development
W. Wylegala	5/12/2021	1.50	\$ 476.91	\$ 715.37	Research on post 18; confer class counsel	Case development
Scott Shuchart	5/17/2021	1.50	\$ 220.76	\$ 331.14	Review, revise draft settlement principles and related correspondence	ADR
W. Wylegala	5/17/2021	0.50	\$ 476.91	\$ 238.46	Team call	Case development
W. Wylegala	5/18/2021	0.25	\$ 476.91	\$ 119.23	Team emails re correspondence to Ds	Case development
Scott Shuchart	5/18/2021	1.00	\$ 220.76	\$ 220.76	Team call re: settlement principles	Case development
W. Wylegala	5/19/2021	2.42	\$ 476.91	\$ 1,154.12	Review settlement proposal, USCIS memo, correspondence	ADR
Scott Shuchart	5/19/2021	0.33	\$ 220.76	\$ 72.85	Revise settlement principles	ADR
W. Wylegala	5/20/2021	0.67	\$ 476.91	\$ 319.53	Review settlement proposal	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	5/24/2021	2.07	\$ 476.91	\$ 987.20	Review settlement proposal	ADR
W. Wylegala	5/24/2021	0.18	\$ 476.91	\$ 85.84	Emails counsel team re settlement	ADR
W. Wylegala	6/16/2021	0.25	\$ 476.91	\$ 119.23	Emails re case status	Case development
W. Wylegala	6/28/2021	0.60	\$ 476.91	\$ 286.15	JOP team call	Case development
W. Wylegala	7/1/2021	0.98	\$ 476.91	\$ 467.37	Review Ds reply re settlement, class member case	ADR
Scott Shuchart	7/2/2021	0.73	\$ 220.76	\$ 161.15	Team meeting re: settlement developments	Case development
W. Wylegala	7/2/2021	0.12	\$ 476.91	\$ 57.23	Emails team re unresolved violation	Class counsel duties
Scott Shuchart	7/6/2021	2.06	\$ 220.76	\$ 454.77	Review settlement proposal; attend team meeting on same	ADR
Scott Shuchart	7/9/2021	0.17	\$ 220.76	\$ 37.53	Review notes re: settlement discussion	ADR
Scott Shuchart	7/12/2021	0.58	\$ 220.76	\$ 128.04	Team meeting	Case development
W. Wylegala	7/19/2021	0.25	\$ 476.91	\$ 119.23	Tel S. Shuchart re settlement status	ADR
W. Wylegala	7/19/2021	0.50	\$ 476.91	\$ 238.46	Emails and analysis re violation	Class counsel duties
W. Wylegala	7/20/2021	0.25	\$ 476.91	\$ 119.23	Email from Ds and to co-counsel re violation	Class counsel duties
Scott Shuchart	7/21/2021	0.17	\$ 220.76	\$ 37.53	Review appellate filings and order	Motions practice
W. Wylegala	7/23/2021	0.98	\$ 476.91	\$ 467.37	Tel co-counsel violation, revise email re same	Class counsel duties
W. Wylegala	7/26/2021	0.83	\$ 476.91	\$ 395.84	JOP settlement discussion emails	ADR
W. Wylegala	7/29/2021	1.00	\$ 476.91	\$ 476.91	Revise settlement proposal	ADR
W. Wylegala	8/2/2021	1.50	\$ 476.91	\$ 715.37	Revise settlement discussion doc	ADR
W. Wylegala	8/4/2021	0.22	\$ 476.91	\$ 104.92	Emails from Ds and to co-counsel re violation	Class counsel duties
W. Wylegala	8/5/2021	0.33	\$ 476.91	\$ 157.38	Emails plaintiff re status	Class counsel duties
W. Wylegala	8/5/2021	0.50	\$ 476.91	\$ 238.46	Emails team & class member counsel re violation	Class counsel duties
W. Wylegala	8/6/2021	0.33	\$ 476.91	\$ 157.38	Emails team & class member counsel re violation	Class counsel duties
Scott Shuchart	8/9/2021	0.70	\$ 220.76	\$ 154.53	JOP team call	Case development
W. Wylegala	8/10/2021	0.60	\$ 476.91	\$ 286.15	Team emails re appeal	Case development
Scott Shuchart	8/10/2021	0.17	\$ 220.76	\$ 37.53	Draft and review correspondence re settlement and injunction violations	Motions practice
W. Wylegala	8/11/2021	0.70	\$ 476.91	\$ 333.84	Emails re settlement, JSR	ADR
Scott Shuchart	8/11/2021	0.50	\$ 220.76	\$ 110.38	Draft and review correspondence re settlement and injunction violations	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	8/12/2021	1.81	\$ 476.91	\$ 863.21	JOP settlement draft	ADR
W. Wylegala	8/13/2021	1.46	\$ 476.91	\$ 696.29	Markup settlement proposal, circulate	ADR
W. Wylegala	8/16/2021	1.00	\$ 476.91	\$ 476.91	Tel re settlement next steps	ADR
W. Wylegala	8/19/2021	0.40	\$ 476.91	\$ 190.76	Emails class member counsel & team re violation	Class counsel duties
W. Wylegala	8/20/2021	2.25	\$ 476.91	\$ 1,073.05	Revise draft settlement proposal section	ADR
W. Wylegala	8/20/2021	1.24	\$ 476.91	\$ 591.37	JOP call re settlement draft	ADR
W. Wylegala	8/23/2021	1.38	\$ 476.91	\$ 658.14	JOP team call, review revised settlement doc	ADR
W. Wylegala	8/24/2021	1.00	\$ 476.91	\$ 476.91	Review settlement doc, emails re same	ADR
W. Wylegala	8/25/2021	0.83	\$ 476.91	\$ 395.84	Correspondence with Ds re settlement	ADR
W. Wylegala	8/30/2021	0.93	\$ 476.91	\$ 443.53	Team call re violation, open settlement terms	Class counsel duties
Scott Shuchart	9/8/2021	0.25	\$ 220.76	\$ 55.19	Review correspondence and drafts re: status report, injunction violations	Motions practice
W. Wylegala	9/20/2021	1.25	\$ 476.91	\$ 596.14	Team call & emails	Class counsel duties
W. Wylegala	9/24/2021	3.30	\$ 476.91	\$ 1,573.80	Review settlement agreement	ADR
W. Wylegala	9/24/2021	0.25	\$ 476.91	\$ 119.23	Emails re violation case	Class counsel duties
W. Wylegala	9/27/2021	0.92	\$ 476.91	\$ 438.76	Team call	ADR
Scott Shuchart	9/27/2021	1.50	\$ 220.76	\$ 331.14	Review and revise settlement draft; correspondence re: same	ADR
W. Wylegala	9/30/2021	0.48	\$ 476.91	\$ 228.92	Emails team re violation	Class counsel duties
W. Wylegala	10/1/2021	1.31	\$ 476.91	\$ 624.75	JOP team emails re settlement and violations	ADR
W. Wylegala	10/5/2021	0.80	\$ 476.91	\$ 381.53	Review draft email re violation; confer team re same and re 10/4 tel with Ds, next steps	Case development
W. Wylegala	10/8/2021	2.13	\$ 476.91	\$ 1,015.82	JOP team email re settlement timing, call re draft	ADR
W. Wylegala	10/15/2021	0.17	\$ 476.91	\$ 81.07	Email team re & tel K. DeJong re outstanding violations	Class counsel duties
Scott Shuchart	10/18/2021	0.75	\$ 220.76	\$ 165.57	Team call - settlement	Case development
W. Wylegala	10/21/2021	0.25	\$ 476.91	\$ 119.23	Emails team re violation	Class counsel duties
Scott Shuchart	11/8/2021	0.33	\$ 220.76	\$ 72.85	Correspondence re: PI violations	Motions practice
Scott Shuchart	11/11/2021	0.33	\$ 220.76	\$ 72.85	Review and revise correspondence re settlement drafts	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	11/11/2021	0.48	\$ 476.91	\$ 228.92	Emails co-counsel re violation, correspondence with Ds	Class counsel duties
W. Wylegala	11/18/2021	0.17	\$ 476.91	\$ 81.07	Email re jdxn denial	Class counsel duties
Scott Shuchart	11/22/2021	0.33	\$ 220.76	\$ 72.85	Review Ds' settlement draft	ADR
W. Wylegala	11/22/2021	0.25	\$ 476.91	\$ 119.23	Emails re unresolved violation	Class counsel duties
W. Wylegala	11/24/2021	1.78	\$ 476.91	\$ 848.90	Review Ds settlement draft	ADR
W. Wylegala	11/24/2021	1.00	\$ 476.91	\$ 476.91	Team call re settlement draft	ADR
W. Wylegala	11/24/2021	0.50	\$ 476.91	\$ 238.46	Email class member counsel re correspondence w Ds	Class counsel duties
W. Wylegala	11/29/2021	0.92	\$ 476.91	\$ 438.76	Confer co-counsel re settlement status	ADR
Scott Shuchart	12/1/2021	0.75	\$ 220.76	\$ 165.57	Review and edit settlement draft and related correspondence	ADR
Scott Shuchart	12/3/2021	0.83	\$ 220.76	\$ 183.23	Team call; review correspondence on settlement	Case development
Scott Shuchart	12/6/2021	0.58	\$ 220.76	\$ 128.04	Team call (settlement, violations)	Case development
W. Wylegala	12/8/2021	1.10	\$ 476.91	\$ 524.60	Tel class member counsel re jdxnl denial, email re same	Class counsel duties
W. Wylegala	12/13/2021	2.00	\$ 476.91	\$ 953.82	Review Ds' correspondence, review draft response and JSR	ADR
W. Wylegala	12/13/2021	0.58	\$ 476.91	\$ 276.61	Team tel re settlement goals, JSR, correspondence with Ds	ADR
Scott Shuchart	12/13/2021	1.17	\$ 220.76	\$ 258.29	Correspondence re client updates and consent to counsel substitution; call	Case development
W. Wylegala	12/14/2021	0.25	\$ 476.91	\$ 119.23	Review Ds correspondence and email team re same	ADR
Scott Shuchart	12/14/2021	0.33	\$ 220.76	\$ 72.85	Review correspondence re: updates to class reps; correspondence re settlement	Case development
W. Wylegala	12/14/2021	0.07	\$ 476.91	\$ 33.38	Emails re class member issue	Class counsel duties
W. Wylegala	12/14/2021	1.57	\$ 476.91	\$ 748.75	Revise info for clients re change in counsel	Class counsel duties
W. Wylegala	12/16/2021	1.00	\$ 476.91	\$ 476.91	Talking points, emails, and tel K. DeJong in preparation for call with Ds	ADR
W. Wylegala	12/16/2021	0.55	\$ 476.91	\$ 262.30	Tel AUSAs re mediation, stay	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	12/16/2021	1.08	\$ 476.91	\$ 515.06	Tel K. DeJong re AUSA call, summarize for team	ADR
W. Wylegala	12/20/2021	0.80	\$ 476.91	\$ 381.53	Team call	ADR
W. Wylegala	12/22/2021	0.30	\$ 476.91	\$ 143.07	Review client agreement re counsel change, team emails re same	Case development
W. Wylegala	12/22/2021	0.25	\$ 476.91	\$ 119.23	Get translation of client consent to counsel change	Case development
W. Wylegala	1/3/2022	1.28	\$ 520.41	\$ 666.12	Call w/ plaintiffs' counsel re status, consents to representation change	ADR
W. Wylegala	1/3/2022	0.62	\$ 520.41	\$ 322.65	Team call	Case development
W. Wylegala	1/4/2022	0.25	\$ 520.41	\$ 130.10	Seeking intel re mediation	ADR
Scott Shuchart	1/4/2022	1.29	\$ 240.89	\$ 310.75	Settlement agreement - call and edit document	ADR
W. Wylegala	1/5/2022	1.10	\$ 520.41	\$ 572.45	Review, revise settlement draft	ADR
W. Wylegala	1/6/2022	2.52	\$ 520.41	\$ 1,311.43	Consult private practitioners re mediation experience, schedule & report back re same	ADR
Scott Shuchart	1/6/2022	0.25	\$ 240.89	\$ 60.22	Review documents and correspondence re: D Md magistrates and mediation options	ADR
W. Wylegala	1/7/2022	0.85	\$ 520.41	\$ 442.35	Team call & emails re mediation	ADR
W. Wylegala	1/7/2022	0.67	\$ 520.41	\$ 348.67	Emails from practitioners re mediation experience	ADR
W. Wylegala	1/7/2022	3.95	\$ 520.41	\$ 2,055.62	Review & revise settlement draft	ADR
W. Wylegala	1/11/2022	0.27	\$ 520.41	\$ 140.51	Seek plaintiff consents, emails plaintiffs' counsel	Case development
Scott Shuchart	1/19/2022	1.09	\$ 240.89	\$ 262.57	Settlement agreement - call and review document	ADR
Scott Shuchart	1/20/2022	0.25	\$ 240.89	\$ 60.22	Correspondence re client updates and consent to counsel substitution	Case development
Scott Shuchart	1/21/2022	0.80	\$ 240.89	\$ 192.71	Settlement agreement - call	Case development
Scott Shuchart	1/27/2022	0.50	\$ 240.89	\$ 120.45	Review and edit settlement draft	ADR
Scott Shuchart	1/28/2022	0.52	\$ 240.89	\$ 125.26	Team call: planning mediation letter	Case development
Scott Shuchart	2/1/2022	0.25	\$ 240.89	\$ 60.22	Review correspondence re settlement conference	ADR
W. Wylegala	2/4/2022	0.58	\$ 520.41	\$ 301.84	JOP counsel call re settlement, Mendez Rojas protections for class, class member request re jdxn	ADR
Scott Shuchart	2/4/2022	1.25	\$ 240.89	\$ 301.11	Review, revise settlement draft; review guidance to class counsel on Mendez Rojas interaction	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Scott Shuchart	2/12/2022	0.33	\$ 240.89	\$ 79.49	Review documents and correspondence re possible JOP member violation and CA4 joint statement	Case development
Scott Shuchart	2/14/2022	0.97	\$ 240.89	\$ 233.66	Settlement agreement - call and correspondence	Case development
W. Wylegala	2/17/2022	0.80	\$ 520.41	\$ 416.33	Outreach to plaintiffs re settlement authority	ADR
Scott Shuchart	2/17/2022	0.08	\$ 240.89	\$ 19.27	Review correspondence re PI violation and resolution	Motions practice
W. Wylegala	2/18/2022	0.62	\$ 520.41	\$ 322.65	Team call	Case development
Scott Shuchart	2/23/2022	1.10	\$ 240.89	\$ 264.98	Draft settlement conference letter to magistrate	ADR
Scott Shuchart	2/24/2022	0.33	\$ 240.89	\$ 79.49	Draft settlement conference letter to magistrate; review correspondence re PI violation	ADR
W. Wylegala	2/25/2022	2.00	\$ 520.41	\$ 1,040.82	Review ex parte draft	ADR
Scott Shuchart	2/25/2022	0.80	\$ 240.89	\$ 192.71	Draft settlement conference letter to magistrate	ADR
W. Wylegala	2/25/2022	0.83	\$ 520.41	\$ 431.94	JOP counsel team call	Case development
W. Wylegala	2/25/2022	1.25	\$ 520.41	\$ 650.51	Revise update for plaintiffs re potential for settlement	Case development
W. Wylegala	2/27/2022	1.55	\$ 520.41	\$ 806.64	Revise update for plaintiffs re potential for settlement	ADR
W. Wylegala	3/1/2022	1.19	\$ 520.41	\$ 619.29	Contact to plaintiffs, counsel re settlement authority	ADR
Scott Shuchart	3/2/2022	1.60	\$ 240.89	\$ 385.42	Draft settlement conference letter to magistrate	ADR
W. Wylegala	3/3/2022	0.46	\$ 520.41	\$ 239.39	Review ex parte letter to magistrate	ADR
Scott Shuchart	3/4/2022	0.92	\$ 240.89	\$ 221.62	JOP team call	Case development
Scott Shuchart	3/5/2022	1.20	\$ 240.89	\$ 289.07	Draft settlement conference letter to magistrate	ADR
Scott Shuchart	3/6/2022	0.54	\$ 240.89	\$ 130.08	Draft settlement conference letter to magistrate	ADR
Scott Shuchart	3/7/2022	0.28	\$ 240.89	\$ 67.45	Revise settlement letter to magistrate and engage in correspondence with team and defendants on same	ADR
W. Wylegala	3/8/2022	0.75	\$ 520.41	\$ 390.31	Confer counsel to class reps	ADR
W. Wylegala	3/8/2022	0.65	\$ 520.41	\$ 338.27	Counseling tel w plaintiff & counsel	ADR
W. Wylegala	3/8/2022	0.18	\$ 520.41	\$ 93.67	Field class member query re federal appeal	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	3/14/2022	0.50	\$ 520.41	\$ 260.21	Team call, including re open class member request	Case development
Scott Shuchart	3/16/2022	0.55	\$ 240.89	\$ 132.49	Review government settlement draft response	ADR
Scott Shuchart	3/17/2022	0.28	\$ 240.89	\$ 67.45	Attempt to contact magistrate chambers; prepare for same; review summary chart	ADR
Scott Shuchart	3/18/2022	0.69	\$ 240.89	\$ 166.21	Team call re: settlement and ongoing individual cases	Case development
W. Wylegala	3/18/2022	0.22	\$ 520.41	\$ 114.49	Guidance to JOP class member	Class counsel duties
Scott Shuchart	3/20/2022	1.90	\$ 240.89	\$ 457.69	Draft and revise supplemental mediation statement	ADR
Scott Shuchart	3/21/2022	1.20	\$ 240.89	\$ 289.07	Team call re: settlement and ongoing individual cases	Case development
W. Wylegala	3/28/2022	0.50	\$ 520.41	\$ 260.21	Review mediation issues	ADR
W. Wylegala	3/28/2022	1.00	\$ 520.41	\$ 520.41	Team call re mediation issues	ADR
W. Wylegala	3/28/2022	1.83	\$ 520.41	\$ 952.35	Prepare mediation talking points	ADR
W. Wylegala	3/30/2022	0.26	\$ 520.41	\$ 135.31	Confer co-counsel re mediation planning	ADR
W. Wylegala	3/30/2022	1.72	\$ 520.41	\$ 895.11	Review, revise mediation talking points	ADR
W. Wylegala	3/31/2022	1.58	\$ 520.41	\$ 822.25	Review, revise mediation talking points	ADR
Scott Shuchart	4/1/2022	0.22	\$ 240.89	\$ 53.00	Prepare for mediation conference; draft and revise written materials for use at same	ADR
Scott Shuchart	4/1/2022	0.18	\$ 240.89	\$ 43.36	Team call re: settlement and ongoing individual cases	Case development
W. Wylegala	4/4/2022	2.50	\$ 520.41	\$ 1,301.03	Revise mediation outline	ADR
W. Wylegala	4/4/2022	1.00	\$ 520.41	\$ 520.41	Team call re mediation planning	ADR
W. Wylegala	4/4/2022	0.50	\$ 520.41	\$ 260.21	Tracking resolved injunction violations	Class counsel duties
W. Wylegala	4/5/2022	0.25	\$ 520.41	\$ 130.10	Correspondence from Ds and emails co-counsel re mediation process	ADR
W. Wylegala	4/5/2022	1.50	\$ 520.41	\$ 780.62	Mediation prep	ADR
W. Wylegala	4/6/2022	2.25	\$ 520.41	\$ 1,170.92	Prep & attend Parties tel con with magistrate, confer post	ADR
W. Wylegala	4/7/2022	1.37	\$ 520.41	\$ 712.96	Review draft settlement	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	4/8/2022	0.67	\$ 520.41	\$ 348.67	Tel team re mediation response & schedule	ADR
W. Wylegala	4/8/2022	0.42	\$ 520.41	\$ 218.57	Emails co-counsel & plaintiff's next friend re status	Case development
W. Wylegala	4/11/2022	1.37	\$ 520.41	\$ 712.96	Review settlement draft to send 4/11, team call re same + platform, fees, class member case	ADR
W. Wylegala	4/14/2022	0.41	\$ 520.41	\$ 213.37	review Ds' correspondence re mediation schedule and confer re same	ADR
W. Wylegala	4/18/2022	0.33	\$ 520.41	\$ 171.74	Tel co-counsel re mediation plan, fees	ADR
W. Wylegala	4/21/2022	0.50	\$ 520.41	\$ 260.21	Review Ds correspondence, emails re mediation and noncompliance	ADR
Scott Shuchart	4/25/2022	0.66	\$ 240.89	\$ 158.99	Team conference call (settlement planning)	Case development
W. Wylegala	5/2/2022	0.67	\$ 520.41	\$ 348.67	emails & tel conferring with counsel team	ADR
W. Wylegala	5/2/2022	0.17	\$ 520.41	\$ 88.47	emails co-counsel re class member issue	Class counsel duties
W. Wylegala	5/3/2022	0.23	\$ 520.41	\$ 119.69	email Class member counsel & co-counsel re CM issue	Class counsel duties
W. Wylegala	5/6/2022	0.75	\$ 520.41	\$ 390.31	team strategy call	Case development
W. Wylegala	5/9/2022	1.00	\$ 520.41	\$ 520.41	team call	Case development
W. Wylegala	5/10/2022	0.10	\$ 520.41	\$ 52.04	email cocounsel re landing page	Class counsel duties
W. Wylegala	5/13/2022	0.93	\$ 520.41	\$ 483.98	notes in prep for mediation, emails team re same & fee stmts	ADR
W. Wylegala	5/13/2022	1.62	\$ 520.41	\$ 843.06	team call re mediation planning	ADR
W. Wylegala	5/15/2022	1.41	\$ 520.41	\$ 733.78	prep notes for mediation, emails team	ADR
W. Wylegala	5/15/2022	1.25	\$ 520.41	\$ 650.51	prep notes for mediation, emails team	ADR
W. Wylegala	5/16/2022	0.50	\$ 520.41	\$ 260.21	confer with team re mediation planning	ADR
W. Wylegala	5/16/2022	3.25	\$ 520.41	\$ 1,691.33	Mediation with Defendants	ADR
W. Wylegala	5/16/2022	0.50	\$ 520.41	\$ 260.21	confer with counsel team during mediation	ADR
W. Wylegala	5/16/2022	3.50	\$ 520.41	\$ 1,821.44	Mediation with Defendants	ADR
W. Wylegala	5/16/2022	0.50	\$ 520.41	\$ 260.21	confer with team re next steps	ADR
W. Wylegala	5/16/2022	1.70	\$ 520.41	\$ 884.70	revise settlement draft based on mediation session	ADR
W. Wylegala	5/18/2022	0.17	\$ 520.41	\$ 88.47	emails team re ADR next steps	ADR
W. Wylegala	5/23/2022	0.95	\$ 520.41	\$ 494.39	prep for and attend team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	5/23/2022	0.88	\$ 520.41	\$ 457.96	emails with plaintiff's immigration counsel & class counsel re status and next steps	Class counsel duties
W. Wylegala	5/25/2022	0.08	\$ 520.41	\$ 41.63	emails team re mediation plans	ADR
W. Wylegala	5/27/2022	1.00	\$ 520.41	\$ 520.41	team call	Case development
W. Wylegala	5/27/2022	0.25	\$ 520.41	\$ 130.10	emails re mediation planning, amend talking points	ADR
W. Wylegala	5/27/2022	2.70	\$ 520.41	\$ 1,405.11	revise mediation notes, emails with team	ADR
W. Wylegala	5/31/2022	0.23	\$ 520.41	\$ 119.69	review of email re injunction and Doyle memo for class members	Class counsel duties
W. Wylegala	5/31/2022	0.25	\$ 520.41	\$ 130.10	review class member query& emails counsel team	Class counsel duties
W. Wylegala	5/31/2022	0.56	\$ 520.41	\$ 291.43	team emails re agenda and scheduling	Case development
W. Wylegala	5/31/2022	1.00	\$ 520.41	\$ 520.41	counsel team call re mediation planning, class member issues	Case development
W. Wylegala	6/2/2022	0.12	\$ 520.41	\$ 62.45	emails JOP team re planning for mediation	Case development
W. Wylegala	6/3/2022	0.78	\$ 520.41	\$ 405.92	team call	Case development
W. Wylegala	6/6/2022	1.00	\$ 520.41	\$ 520.41	counsel team call re mediation planning, class member issues	Case development
W. Wylegala	6/6/2022	0.42	\$ 520.41	\$ 218.57	JOP class member queries	Class counsel duties
W. Wylegala	6/9/2022	0.05	\$ 520.41	\$ 26.02	class member query re jdxn	Class counsel duties
W. Wylegala	6/10/2022	1.08	\$ 520.41	\$ 562.04	team call & emails on class member queries and mediation planning	Case development
W. Wylegala	6/10/2022	0.70	\$ 520.41	\$ 364.29	review, respond to, and track class member queries; email MMendez re same	Class counsel duties
W. Wylegala	6/13/2022	1.71	\$ 520.41	\$ 889.90	review mediation talking points	ADR
W. Wylegala	6/13/2022	0.53	\$ 520.41	\$ 275.82	JOP mediation scheduling	ADR
W. Wylegala	6/20/2022	1.43	\$ 520.41	\$ 744.19	review outline re status of mediation	ADR
W. Wylegala	6/20/2022	0.80	\$ 520.41	\$ 416.33	team call	Case development
W. Wylegala	6/22/2022	0.23	\$ 520.41	\$ 119.69	class member query on dismissal	Class counsel duties
W. Wylegala	7/10/2022	0.28	\$ 520.41	\$ 145.71	review team emails, selection of mediation dates	ADR
W. Wylegala	7/10/2022	2.08	\$ 520.41	\$ 1,082.45	review Dfdts' settlement draft	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	7/11/2022	0.92	\$ 520.41	\$ 478.78	prep for mediation and confer with team re same	ADR
W. Wylegala	7/11/2022	3.28	\$ 520.41	\$ 1,706.94	mediation with defendants	ADR
W. Wylegala	7/11/2022	0.57	\$ 520.41	\$ 296.63	review notes re mediation, emails team	ADR
W. Wylegala	7/12/2022	0.70	\$ 520.41	\$ 364.29	confer team re mediation prep	ADR
W. Wylegala	7/12/2022	3.00	\$ 520.41	\$ 1,561.23	mediation with Defendants	ADR
W. Wylegala	7/12/2022	0.58	\$ 520.41	\$ 301.84	confer co-counsel post mediation, update notes	ADR
W. Wylegala	7/13/2022	0.50	\$ 520.41	\$ 260.21	emails class member counsel & team re OPLA issue	Class counsel duties
W. Wylegala	7/13/2022	0.85	\$ 520.41	\$ 442.35	draft email re class member OPLA issue	Class counsel duties
W. Wylegala	7/13/2022	1.48	\$ 520.41	\$ 770.21	review settlement draft	ADR
W. Wylegala	7/15/2022	0.83	\$ 520.41	\$ 431.94	review settlement draft & tel with team re same	ADR
W. Wylegala	7/20/2022	0.50	\$ 520.41	\$ 260.21	review class member documents and corres, email team re raising issue	Class counsel duties
W. Wylegala	7/20/2022	0.70	\$ 520.41	\$ 364.29	emails team and class member counsel re OPLA issue	Class counsel duties
W. Wylegala	7/25/2022	1.00	\$ 520.41	\$ 520.41	co-counsel team call	ADR
W. Wylegala	7/28/2022	0.35	\$ 520.41	\$ 182.14	emails AUSA, team, class member counsel re issue raised	Class counsel duties
W. Wylegala	7/28/2022	0.23	\$ 520.41	\$ 119.69	emails team and CM counsel re OPLA communication	Class counsel duties
W. Wylegala	7/29/2022	0.98	\$ 520.41	\$ 510.00	co-counsel team call	ADR
W. Wylegala	8/1/2022	1.18	\$ 520.41	\$ 614.08	review draft agreement and team call re same	ADR
W. Wylegala	8/3/2022	0.25	\$ 520.41	\$ 130.10	emails team re responses to class member issues	Class counsel duties
W. Wylegala	8/5/2022	2.00	\$ 520.41	\$ 1,040.82	review draft agreement and team call re same	ADR
W. Wylegala	8/7/2022	0.63	\$ 520.41	\$ 327.86	email discussion of disclosures to class counsel	Class counsel duties
W. Wylegala	8/8/2022	0.25	\$ 520.41	\$ 130.10	draft message re class member advocacy	Class counsel duties
W. Wylegala	8/8/2022	1.10	\$ 520.41	\$ 572.45	team call	Case development
W. Wylegala	8/8/2022	0.25	\$ 520.41	\$ 130.10	email with MMendez re class member advocacy	Class counsel duties
W. Wylegala	8/9/2022	0.50	\$ 520.41	\$ 260.21	email with MMendez re class member advocacy	Class counsel duties
W. Wylegala	8/12/2022	4.00	\$ 520.41	\$ 2,081.64	work on draft settlement provision and emails team re same	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	8/12/2022	0.07	\$ 520.41	\$ 36.43	email team re class member issue	Class counsel duties
W. Wylegala	8/15/2022	1.00	\$ 520.41	\$ 520.41	team call	Case development
W. Wylegala	8/16/2022	0.22	\$ 520.41	\$ 114.49	final review of draft agrmt, email team re same	ADR
W. Wylegala	8/16/2022	0.37	\$ 520.41	\$ 192.55	team emails re ADR issue	ADR
W. Wylegala	8/19/2022	1.50	\$ 520.41	\$ 780.62	prep for and participate in team call re mediation planning	ADR
W. Wylegala	8/22/2022	1.10	\$ 520.41	\$ 572.45	review and finalize notes for mediation	ADR
W. Wylegala	8/22/2022	1.00	\$ 520.41	\$ 520.41	team call	ADR
W. Wylegala	8/23/2022	0.50	\$ 520.41	\$ 260.21	prep for mediation	ADR
W. Wylegala	8/23/2022	3.08	\$ 520.41	\$ 1,602.86	mediation session of parties	ADR
W. Wylegala	8/23/2022	0.89	\$ 520.41	\$ 463.16	confer team & draft email re notices to class members	ADR
W. Wylegala	8/23/2022	0.30	\$ 520.41	\$ 156.12	review and post notes from mediation	ADR
W. Wylegala	8/24/2022	1.43	\$ 520.41	\$ 744.19	team call, review agrmt draft & emails team re same	ADR
W. Wylegala	8/24/2022	0.75	\$ 520.41	\$ 390.31	prep for mediation	ADR
W. Wylegala	8/25/2022	0.75	\$ 520.41	\$ 390.31	confer in prep for mediation session	ADR
W. Wylegala	8/25/2022	3.54	\$ 520.41	\$ 1,842.25	mediation session of parties, confer with team	ADR
W. Wylegala	9/1/2022	0.78	\$ 520.41	\$ 405.92	confer with team re draft agreement	ADR
W. Wylegala	9/12/2022	1.07	\$ 520.41	\$ 556.84	Team call; emails team re drafts	ADR
W. Wylegala	9/26/2022	0.40	\$ 520.41	\$ 208.16	corres re plaintiff	Class counsel duties
W. Wylegala	9/26/2022	1.00	\$ 520.41	\$ 520.41	team call	ADR
W. Wylegala	9/26/2022	0.53	\$ 520.41	\$ 275.82	email plaintiff's counsel	Class counsel duties
W. Wylegala	9/29/2022	0.50	\$ 520.41	\$ 260.21	revise agreement section, email team	ADR
W. Wylegala	9/30/2022	1.00	\$ 520.41	\$ 520.41	revise talking points	ADR
W. Wylegala	10/18/2022	1.10	\$ 520.41	\$ 572.45	emails K Jackson, update outline for mediation	ADR
W. Wylegala	10/19/2022	2.60	\$ 520.41	\$ 1,353.07	update outline in prep for mediation	ADR
W. Wylegala	10/19/2022	0.40	\$ 520.41	\$ 208.16	review caselaw	ADR
W. Wylegala	10/20/2022	1.00	\$ 520.41	\$ 520.41	team call in prep for mediation	ADR
W. Wylegala	10/20/2022	0.80	\$ 520.41	\$ 416.33	review authorities in prep for mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	10/20/2022	1.80	\$ 520.41	\$ 936.74	mediation with Defendants	ADR
W. Wylegala	10/20/2022	0.40	\$ 520.41	\$ 208.16	tel team re mediation session	ADR
W. Wylegala	10/20/2022	1.20	\$ 520.41	\$ 624.49	compile notes of mediation discussion, email to team	ADR
W. Wylegala	10/21/2022	0.50	\$ 520.41	\$ 260.21	update outline with 10/20 mediation results	ADR
W. Wylegala	10/21/2022	1.00	\$ 520.41	\$ 520.41	team call re Defendants' draft	ADR
W. Wylegala	10/21/2022	0.30	\$ 520.41	\$ 156.12	review questions for Defendants, emails team	ADR
W. Wylegala	10/24/2022	0.80	\$ 520.41	\$ 416.33	update outline with 10/20 mediation results	ADR
W. Wylegala	10/24/2022	1.00	\$ 520.41	\$ 520.41	team call	ADR
W. Wylegala	10/24/2022	0.50	\$ 520.41	\$ 260.21	review Defendants' agreement edits and update outline	ADR
W. Wylegala	10/25/2022	0.40	\$ 520.41	\$ 208.16	review proposed agreement provision, emails co-counsel	ADR
W. Wylegala	10/25/2022	0.60	\$ 520.41	\$ 312.25	review Defendants' agreement edits, revise mediation outline, emails co-counsel	ADR
W. Wylegala	10/25/2022	0.50	\$ 520.41	\$ 260.21	team call re mediation	ADR
W. Wylegala	10/25/2022	2.80	\$ 520.41	\$ 1,457.15	mediation with Defendants	ADR
W. Wylegala	10/25/2022	1.30	\$ 520.41	\$ 676.53	compile notes of session, email team	ADR
W. Wylegala	10/26/2022	0.30	\$ 520.41	\$ 156.12	emails with class member's counsel re inquiry	Class counsel duties
W. Wylegala	10/27/2022	0.60	\$ 520.41	\$ 312.25	emails with team re class member issues	Class counsel duties
W. Wylegala	10/31/2022	1.00	\$ 520.41	\$ 520.41	team call	ADR
W. Wylegala	10/31/2022	1.10	\$ 520.41	\$ 572.45	review settlement agreement revisions, email team re same	ADR
W. Wylegala	11/1/2022	0.30	\$ 520.41	\$ 156.12	review of and emails re draft settlement agreement	ADR
W. Wylegala	11/8/2022	0.20	\$ 520.41	\$ 104.08	review proposed agreement provision	ADR
W. Wylegala	11/14/2022	1.00	\$ 520.41	\$ 520.41	review agreement provision, emails team re same	ADR
W. Wylegala	11/14/2022	0.90	\$ 520.41	\$ 468.37	team call	ADR
W. Wylegala	11/17/2022	0.50	\$ 520.41	\$ 260.21	emails team re query to Defendants' counsel	ADR
W. Wylegala	11/21/2022	0.50	\$ 520.41	\$ 260.21	team call	ADR
W. Wylegala	12/1/2022	0.40	\$ 520.41	\$ 208.16	emails with class member's counsel	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	12/2/2022	0.50	\$ 520.41	\$ 260.21	emails team re class member counsel query	Class counsel duties
W. Wylegala	12/5/2022	0.30	\$ 520.41	\$ 156.12	email class member counsel re issue	Class counsel duties
W. Wylegala	12/5/2022	0.30	\$ 520.41	\$ 156.12	team call	ADR
W. Wylegala	12/5/2022	0.70	\$ 520.41	\$ 364.29	revise mediation outline	ADR
W. Wylegala	12/7/2022	1.90	\$ 520.41	\$ 988.78	review docs from class member's counsel, email team re case issues	Class counsel duties
W. Wylegala	12/8/2022	0.30	\$ 520.41	\$ 156.12	emails team re class member issue	Class counsel duties
W. Wylegala	12/9/2022	0.40	\$ 520.41	\$ 208.16	team call discussing class member issue	Class counsel duties
W. Wylegala	12/9/2022	0.30	\$ 520.41	\$ 156.12	emails class member counsel re issue	Class counsel duties
W. Wylegala	12/13/2022	0.50	\$ 520.41	\$ 260.21	tel with team re Dfdts' notice	ADR
W. Wylegala	12/14/2022	0.20	\$ 520.41	\$ 104.08	review status report for 4th Cir, emails team re same	Case development
W. Wylegala	12/14/2022	0.30	\$ 520.41	\$ 156.12	review email from class member counsel	Class counsel duties
W. Wylegala	12/20/2022	0.10	\$ 520.41	\$ 52.04	emails team re class member issue	Class counsel duties
W. Wylegala	12/21/2022	0.50	\$ 520.41	\$ 260.21	draft status report, email to team	Case development
W. Wylegala	12/22/2022	0.30	\$ 520.41	\$ 156.12	emails with team re corres with Dfdts re class member issue	Class counsel duties
W. Wylegala	1/9/2023	0.67	\$ 603.64	\$ 404.44	team call	Case development
W. Wylegala	1/13/2023	0.20	\$ 603.64	\$ 120.73	draft status report, 4th Cir	Case development
W. Wylegala	1/23/2023	0.30	\$ 603.64	\$ 181.09	review guidance on class member query	Class counsel duties
W. Wylegala	1/23/2023	0.85	\$ 603.64	\$ 513.09	team call	Case development
W. Wylegala	1/23/2023	0.20	\$ 603.64	\$ 120.73	review mediation notes	ADR
W. Wylegala	1/26/2023	1.15	\$ 603.64	\$ 694.19	emails team re class member issue	Class counsel duties
W. Wylegala	1/30/2023	1.00	\$ 603.64	\$ 603.64	team call	Case development
W. Wylegala	2/3/2023	0.62	\$ 603.64	\$ 374.26	emails team re 2 class member issues	Class counsel duties
W. Wylegala	2/6/2023	1.08	\$ 603.64	\$ 651.93	team call re settlement draft	ADR
W. Wylegala	2/7/2023	0.32	\$ 603.64	\$ 193.16	emails team re class member issue	Class counsel duties
W. Wylegala	2/9/2023	0.43	\$ 603.64	\$ 259.57	emails MT Ross re agreement provision	ADR
W. Wylegala	2/9/2023	0.43	\$ 603.64	\$ 259.57	review query from class member counsel	Class counsel duties
W. Wylegala	2/9/2023	3.14	\$ 603.64	\$ 1,895.43	research & draft response to class member counsel	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	2/10/2023	1.12	\$ 603.64	\$ 676.08	revise draft response, email team re class member counsel query	Class counsel duties
W. Wylegala	2/10/2023	0.42	\$ 603.64	\$ 253.53	review corres with 2 class member counsel, emails team re same	Class counsel duties
W. Wylegala	2/13/2023	0.22	\$ 603.64	\$ 132.80	emails team re class member issue	Class counsel duties
W. Wylegala	2/13/2023	0.93	\$ 603.64	\$ 561.39	review discussion draft re settlement	ADR
W. Wylegala	2/13/2023	1.02	\$ 603.64	\$ 615.71	team call	ADR
W. Wylegala	2/13/2023	0.89	\$ 603.64	\$ 537.24	reply to class member counsel query	Class counsel duties
W. Wylegala	2/17/2023	0.21	\$ 603.64	\$ 126.76	emails team re class member issue	Class counsel duties
W. Wylegala	2/17/2023	1.08	\$ 603.64	\$ 651.93	team call	ADR
W. Wylegala	2/22/2023	0.60	\$ 603.64	\$ 362.18	review class member queries	Class counsel duties
W. Wylegala	2/23/2023	0.42	\$ 603.64	\$ 253.53	revise class member webinar announcement	Class counsel duties
W. Wylegala	2/23/2023	0.33	\$ 603.64	\$ 199.20	review corres from Defendants, emails team	ADR
W. Wylegala	2/24/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	2/24/2023	0.50	\$ 603.64	\$ 301.82	tel with plaintiff's next friend and counsel	Case development
W. Wylegala	2/27/2023	0.92	\$ 603.64	\$ 555.35	team call	Case development
W. Wylegala	2/27/2023	0.92	\$ 603.64	\$ 555.35	tel RS & MTR re webinar for class member counsel	Class counsel duties
W. Wylegala	2/28/2023	0.25	\$ 603.64	\$ 150.91	planning & scheduling for mediation	ADR
W. Wylegala	3/1/2023	1.25	\$ 603.64	\$ 754.55	team call re mediation progress & 3/2 call	ADR
W. Wylegala	3/2/2023	0.48	\$ 603.64	\$ 289.75	prepare notes for call with govt attorneys	ADR
W. Wylegala	3/2/2023	0.50	\$ 603.64	\$ 301.82	team call	ADR
W. Wylegala	3/2/2023	1.17	\$ 603.64	\$ 706.26	tel with AUSA and OIL attorneys	ADR
W. Wylegala	3/2/2023	0.42	\$ 603.64	\$ 253.53	team call re call results and next steps	ADR
W. Wylegala	3/2/2023	0.20	\$ 603.64	\$ 120.73	review email and schedule for resuming mediation	ADR
W. Wylegala	3/4/2023	0.40	\$ 603.64	\$ 241.46	review status conference notes	Case development
W. Wylegala	3/6/2023	0.25	\$ 603.64	\$ 150.91	team call	Case development
W. Wylegala	3/13/2023	0.96	\$ 603.64	\$ 579.49	team call	Case development
W. Wylegala	3/14/2023	0.50	\$ 603.64	\$ 301.82	internal KIND discussion re ADR status	ADR
W. Wylegala	3/16/2023	2.18	\$ 603.64	\$ 1,315.94	outline for webinar for class member counsel	Class counsel duties
W. Wylegala	3/17/2023	2.84	\$ 603.64	\$ 1,714.34	revise slides for webinar for class member counsel	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	3/20/2023	1.00	\$ 603.64	\$ 603.64	prepare notes for 3/27 mediation	ADR
W. Wylegala	3/20/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	3/22/2023	1.00	\$ 603.64	\$ 603.64	tel RS & MTR re prep for webinar	Class counsel duties
W. Wylegala	3/22/2023	0.47	\$ 603.64	\$ 283.71	revise slides for webinar	Class counsel duties
W. Wylegala	3/27/2023	0.50	\$ 603.64	\$ 301.82	review Defendants' draft agreement	ADR
W. Wylegala	3/27/2023	0.65	\$ 603.64	\$ 392.37	team call and prepare notes for mediation	ADR
W. Wylegala	3/27/2023	0.58	\$ 603.64	\$ 350.11	review notes for mediation	ADR
W. Wylegala	3/27/2023	3.25	\$ 603.64	\$ 1,961.83	mediation with govt and magistrate	ADR
W. Wylegala	3/27/2023	0.75	\$ 603.64	\$ 452.73	review notes of mediation session and emails with team	ADR
W. Wylegala	3/28/2023	0.15	\$ 603.64	\$ 90.55	review dec iso class member, email team re same	Class counsel duties
W. Wylegala	4/3/2023	1.20	\$ 603.64	\$ 724.37	review draft settlement agreement	ADR
W. Wylegala	4/3/2023	0.95	\$ 603.64	\$ 573.46	team call in prep for mediation	ADR
W. Wylegala	4/3/2023	0.70	\$ 603.64	\$ 422.55	prep & call with MTR, RS re webinar on class member rights	Class counsel duties
W. Wylegala	4/4/2023	1.47	\$ 603.64	\$ 887.35	prep for and present webinar on class member rights	Class counsel duties
W. Wylegala	4/4/2023	0.57	\$ 603.64	\$ 344.07	team call re 4/5 draft	ADR
W. Wylegala	4/5/2023	0.65	\$ 603.64	\$ 392.37	review draft settlement agreement	ADR
W. Wylegala	4/10/2023	1.20	\$ 603.64	\$ 724.37	update mediation outline	ADR
W. Wylegala	4/10/2023	0.25	\$ 603.64	\$ 150.91	tel MTR, RS re planning for 4/26 session	ADR
W. Wylegala	4/10/2023	0.70	\$ 603.64	\$ 422.55	update talking points for next mediation	ADR
W. Wylegala	4/17/2023	1.00	\$ 603.64	\$ 603.64	team call	Case development
W. Wylegala	4/17/2023	0.50	\$ 603.64	\$ 301.82	review draft mediation statement	ADR
W. Wylegala	4/17/2023	0.90	\$ 603.64	\$ 543.28	emails and tel with counsel re possible class member issues, emails team re same	Class counsel duties
W. Wylegala	4/18/2023	1.20	\$ 603.64	\$ 724.37	review and revise mediation statement	ADR
W. Wylegala	4/19/2023	0.96	\$ 603.64	\$ 579.49	research, team emails re mediation statement	ADR
W. Wylegala	4/21/2023	2.30	\$ 603.64	\$ 1,388.37	Revise mediation talking points	ADR
W. Wylegala	4/21/2023	1.55	\$ 603.64	\$ 935.64	review mediation statement	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	4/30/2023	0.77	\$ 603.64	\$ 464.80	review notes of mediation	ADR
W. Wylegala	4/30/2023	0.40	\$ 603.64	\$ 241.46	review Ds revisions to agreement	ADR
W. Wylegala	4/30/2023	0.25	\$ 603.64	\$ 150.91	emails team re caselaw	Case development
W. Wylegala	5/1/2023	1.06	\$ 603.64	\$ 639.86	team call	Case development
W. Wylegala	5/1/2023	0.78	\$ 603.64	\$ 470.84	review documents and email MTR re plan for mediation	ADR
W. Wylegala	5/2/2023	0.40	\$ 603.64	\$ 241.46	emails with plttf's counsel & co-counsel team	Case development
W. Wylegala	5/3/2023	1.25	\$ 603.64	\$ 754.55	review draft agreement provision, emails MTR	ADR
W. Wylegala	5/4/2023	2.10	\$ 603.64	\$ 1,267.64	work on sections of draft agreement	ADR
W. Wylegala	5/5/2023	0.98	\$ 603.64	\$ 591.57	team call	ADR
W. Wylegala	5/5/2023	0.30	\$ 603.64	\$ 181.09	tel class member's counsel & email team re issue	Class counsel duties
W. Wylegala	5/8/2023	0.54	\$ 603.64	\$ 325.97	review draft agreement	ADR
W. Wylegala	5/8/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	5/8/2023	2.00	\$ 603.64	\$ 1,207.28	review & revise draft agreement provisions	ADR
W. Wylegala	5/9/2023	1.00	\$ 603.64	\$ 603.64	team call re draft agreement revisions	ADR
W. Wylegala	5/9/2023	1.30	\$ 603.64	\$ 784.73	revise draft agreement provisions	ADR
W. Wylegala	5/10/2023	0.40	\$ 603.64	\$ 241.46	review draft agreement provision, emails MTR	ADR
W. Wylegala	5/10/2023	0.20	\$ 603.64	\$ 120.73	review team comments on draft agreement	ADR
W. Wylegala	5/11/2023	0.16	\$ 603.64	\$ 96.58	review draft revisions	ADR
W. Wylegala	5/11/2023	1.00	\$ 603.64	\$ 603.64	tel & followup emails to plaintiff's counsel	Class counsel duties
W. Wylegala	5/11/2023	0.83	\$ 603.64	\$ 501.02	review case documents, emails team re plaintiff inquiry	Class counsel duties
W. Wylegala	5/11/2023	0.45	\$ 603.64	\$ 271.64	review settlement drafts	ADR
W. Wylegala	5/15/2023	1.00	\$ 603.64	\$ 603.64	team call	Case development
W. Wylegala	5/18/2023	2.00	\$ 603.64	\$ 1,207.28	update mediation outline	ADR
W. Wylegala	5/19/2023	0.33	\$ 603.64	\$ 199.20	team call	Case development
W. Wylegala	5/22/2023	1.14	\$ 603.64	\$ 688.15	team call	Case development
W. Wylegala	5/22/2023	0.66	\$ 603.64	\$ 398.40	review draft of corres to Ds' counsel	ADR
W. Wylegala	5/23/2023	0.47	\$ 603.64	\$ 283.71	review draft corres to Defendants	Class counsel duties
W. Wylegala	5/31/2023	0.16	\$ 603.64	\$ 96.58	review USCIS notice, email team re same	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	5/31/2023	0.74	\$ 603.64	\$ 446.69	emails class member counsel re case issue	Class counsel duties
W. Wylegala	5/31/2023	0.80	\$ 603.64	\$ 482.91	review case records & emails class rep counsel re updates	Class counsel duties
W. Wylegala	5/31/2023	0.70	\$ 603.64	\$ 422.55	review policy docs & draft corres to Ds re issue affecting class members	Case development
W. Wylegala	6/1/2023	1.35	\$ 603.64	\$ 814.91	review policy docs & draft corres to Ds re issue affecting class members	Case development
W. Wylegala	6/2/2023	0.60	\$ 603.64	\$ 362.18	review draft agreement exhibit	ADR
W. Wylegala	6/2/2023	1.05	\$ 603.64	\$ 633.82	team call	Case development
W. Wylegala	6/2/2023	0.30	\$ 603.64	\$ 181.09	review draft agreement exhibit	ADR
W. Wylegala	6/5/2023	1.00	\$ 603.64	\$ 603.64	team call	Case development
W. Wylegala	6/5/2023	1.28	\$ 603.64	\$ 772.66	review and revise corres to Ds' counsel	Class counsel duties
W. Wylegala	6/6/2023	0.14	\$ 603.64	\$ 84.51	final review, letter to Ds' counsel	Class counsel duties
W. Wylegala	6/9/2023	1.00	\$ 603.64	\$ 603.64	team call	Case development
W. Wylegala	6/9/2023	0.25	\$ 603.64	\$ 150.91	review draft agreement exhibit	ADR
W. Wylegala	6/12/2023	0.63	\$ 603.64	\$ 380.29	team call	Case development
W. Wylegala	6/13/2023	0.50	\$ 603.64	\$ 301.82	review Ds'corres and emails team	ADR
W. Wylegala	6/13/2023	0.25	\$ 603.64	\$ 150.91	emails re draft corres to Ds	ADR
W. Wylegala	6/15/2023	0.30	\$ 603.64	\$ 181.09	revise talking points for mediation	ADR
W. Wylegala	6/16/2023	1.25	\$ 603.64	\$ 754.55	team call	ADR
W. Wylegala	6/16/2023	0.25	\$ 603.64	\$ 150.91	review draft agreement revisions	ADR
W. Wylegala	6/16/2023	0.08	\$ 603.64	\$ 48.29	review corres with Ds, emails team	ADR
W. Wylegala	6/17/2023	3.00	\$ 603.64	\$ 1,810.92	draft mediation statement sections	ADR
W. Wylegala	6/18/2023	1.18	\$ 603.64	\$ 712.30	revise mediation stmt & questions for Dfdts, emails team	ADR
W. Wylegala	6/19/2023	1.20	\$ 603.64	\$ 724.37	revise talking points	ADR
W. Wylegala	6/19/2023	1.25	\$ 603.64	\$ 754.55	team call	ADR
W. Wylegala	6/19/2023	1.70	\$ 603.64	\$ 1,026.19	revise mediation statement	ADR
W. Wylegala	6/20/2023	1.00	\$ 603.64	\$ 603.64	team meeting	ADR
W. Wylegala	6/20/2023	0.38	\$ 603.64	\$ 229.38	revise questions for Defendants	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	6/21/2023	0.25	\$ 603.64	\$ 150.91	review draft corres and emails team	ADR
W. Wylegala	6/22/2023	0.44	\$ 603.64	\$ 265.60	review Ds' corres and webpage	Class counsel duties
W. Wylegala	6/22/2023	1.22	\$ 603.64	\$ 736.44	revise talking points for mediation	ADR
W. Wylegala	6/23/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	6/26/2023	2.00	\$ 603.64	\$ 1,207.28	prepare talking points for 6/28 mediation	ADR
W. Wylegala	6/26/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	6/27/2023	1.30	\$ 603.64	\$ 784.73	revise talking points for mediation	ADR
W. Wylegala	6/27/2023	0.35	\$ 603.64	\$ 211.27	review talking points for mediation	ADR
W. Wylegala	6/27/2023	1.50	\$ 603.64	\$ 905.46	prepare notes for mediation	ADR
W. Wylegala	6/28/2023	0.95	\$ 603.64	\$ 573.46	prepare notes for mediation	ADR
W. Wylegala	6/28/2023	0.50	\$ 603.64	\$ 301.82	team call pre mediation	ADR
W. Wylegala	6/28/2023	3.00	\$ 603.64	\$ 1,810.92	mediation with defendants	ADR
W. Wylegala	6/28/2023	0.25	\$ 603.64	\$ 150.91	team call post mediation	ADR
W. Wylegala	6/28/2023	0.70	\$ 603.64	\$ 422.55	review notes of mediation, email team	ADR
W. Wylegala	7/3/2023	0.70	\$ 603.64	\$ 422.55	review draft settlement agreement for 7/14	Case development
W. Wylegala	7/3/2023	0.60	\$ 603.64	\$ 362.18	team call	ADR
W. Wylegala	7/5/2023	0.20	\$ 603.64	\$ 120.73	reply to team emails	Class counsel duties
W. Wylegala	7/5/2023	1.30	\$ 603.64	\$ 784.73	review draft settlement agreement for 7/14	Case development
W. Wylegala	7/7/2023	0.20	\$ 603.64	\$ 120.73	revise comments on Form I-589	Class counsel duties
W. Wylegala	7/7/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	7/7/2023	3.50	\$ 603.64	\$ 2,112.74	revise comments on Form I-589	Class counsel duties
W. Wylegala	7/10/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	7/13/2023	0.90	\$ 603.64	\$ 543.28	review comments on Form I-589, email KIND team	Class counsel duties
W. Wylegala	7/14/2023	0.90	\$ 603.64	\$ 543.28	team call	ADR
W. Wylegala	7/17/2023	0.30	\$ 603.64	\$ 181.09	email from class member counsel	Class counsel duties
W. Wylegala	7/18/2023	0.20	\$ 603.64	\$ 120.73	review corres from Ds and team	ADR
W. Wylegala	7/18/2023	0.10	\$ 603.64	\$ 60.36	emails with MMendez and class member counsel re inquiry	Class counsel duties
W. Wylegala	7/18/2023	0.60	\$ 603.64	\$ 362.18	revise Form I-589 comments	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	7/19/2023	0.80	\$ 603.64	\$ 482.91	emails & tel with class member counsel re issue, emails MMendez same	Class counsel duties
W. Wylegala	7/19/2023	0.10	\$ 603.64	\$ 60.36	emails team re Form I-589 comments to USCIS	Class counsel duties
W. Wylegala	7/19/2023	0.10	\$ 603.64	\$ 60.36	email class member counsel re issue, email MMendez same	Class counsel duties
W. Wylegala	7/21/2023	1.00	\$ 603.64	\$ 603.64	review corres with Ds and team	Class counsel duties
W. Wylegala	7/21/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	7/24/2023	0.90	\$ 603.64	\$ 543.28	team call	ADR
W. Wylegala	7/27/2023	0.50	\$ 603.64	\$ 301.82	emails team re guidance for class member counsel	Class counsel duties
W. Wylegala	7/31/2023	0.30	\$ 603.64	\$ 181.09	update docs for mediation, email team	ADR
W. Wylegala	7/31/2023	0.40	\$ 603.64	\$ 241.46	review corres from Ds & case law, email team	ADR
W. Wylegala	8/1/2023	1.10	\$ 603.64	\$ 664.00	review corres from Ds, emails with team re reply	Class counsel duties
W. Wylegala	8/1/2023	0.80	\$ 603.64	\$ 482.91	review class member corres and case docs, emails team	Class counsel duties
W. Wylegala	8/7/2023	0.80	\$ 603.64	\$ 482.91	team call	ADR
W. Wylegala	8/14/2023	0.70	\$ 603.64	\$ 422.55	team call re mediation plans, class issues	ADR
W. Wylegala	8/16/2023	0.30	\$ 603.64	\$ 181.09	review document, emails team re issues affecting class	Class counsel duties
W. Wylegala	8/24/2023	1.20	\$ 603.64	\$ 724.37	class member issue - review docs, email team	Class counsel duties
W. Wylegala	8/24/2023	0.60	\$ 603.64	\$ 362.18	review draft agreement	ADR
W. Wylegala	8/25/2023	0.60	\$ 603.64	\$ 362.18	review drafts for mediation	ADR
W. Wylegala	8/25/2023	1.00	\$ 603.64	\$ 603.64	team call	Case development
W. Wylegala	8/25/2023	0.30	\$ 603.64	\$ 181.09	research re drafting question, email team	ADR
W. Wylegala	8/25/2023	1.00	\$ 603.64	\$ 603.64	revise corres re class member issue	Class counsel duties
W. Wylegala	8/26/2023	2.80	\$ 603.64	\$ 1,690.19	draft sections of mediation statement, emails team	ADR
W. Wylegala	8/28/2023	0.60	\$ 603.64	\$ 362.18	review questions for Ds and draft mediation stmt	ADR
W. Wylegala	8/28/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	8/28/2023	0.30	\$ 603.64	\$ 181.09	email class member counsel re issues	Class counsel duties
W. Wylegala	8/29/2023	0.60	\$ 603.64	\$ 362.18	review case documents and email team re class member issue	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	8/29/2023	0.30	\$ 603.64	\$ 181.09	review draft and email team re class member issue	Class counsel duties
W. Wylegala	9/1/2023	1.20	\$ 603.64	\$ 724.37	team call	ADR
W. Wylegala	9/2/2023	1.70	\$ 603.64	\$ 1,026.19	draft talking points for mediation	ADR
W. Wylegala	9/4/2023	1.70	\$ 603.64	\$ 1,026.19	prepare discussion points for mediation	ADR
W. Wylegala	9/5/2023	1.40	\$ 603.64	\$ 845.10	revise discussion points for mediation	ADR
W. Wylegala	9/5/2023	1.20	\$ 603.64	\$ 724.37	team call	ADR
W. Wylegala	9/5/2023	1.50	\$ 603.64	\$ 905.46	review discussion points for mediation	ADR
W. Wylegala	9/6/2023	3.60	\$ 603.64	\$ 2,173.10	review discussion points for mediation	ADR
W. Wylegala	9/6/2023	0.80	\$ 603.64	\$ 482.91	team call re mediation prep	ADR
W. Wylegala	9/6/2023	3.00	\$ 603.64	\$ 1,810.92	Mediation with defendants	ADR
W. Wylegala	9/6/2023	0.30	\$ 603.64	\$ 181.09	tel with counsel team re next steps	ADR
W. Wylegala	9/6/2023	0.90	\$ 603.64	\$ 543.28	digest notes of mediation	ADR
W. Wylegala	9/8/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	9/11/2023	0.80	\$ 603.64	\$ 482.91	review draft settlement agreement	ADR
W. Wylegala	9/12/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	9/13/2023	2.10	\$ 603.64	\$ 1,267.64	prepare forms and email class rep counsel seeking class rep approval for counsel change	Class counsel duties
W. Wylegala	9/15/2023	1.00	\$ 603.64	\$ 603.64	team meeting	ADR
W. Wylegala	9/18/2023	0.60	\$ 603.64	\$ 362.18	team call	Case development
W. Wylegala	9/18/2023	0.30	\$ 603.64	\$ 181.09	team correspondence	Case development
W. Wylegala	9/22/2023	0.50	\$ 603.64	\$ 301.82	reply to class member inquiry	Class counsel duties
W. Wylegala	9/22/2023	0.30	\$ 603.64	\$ 181.09	review recent team corres and emails with team	Case development
W. Wylegala	9/25/2023	0.10	\$ 603.64	\$ 60.36	emails class member counsel re progress on issue	Class counsel duties
W. Wylegala	9/25/2023	0.50	\$ 603.64	\$ 301.82	team call; emails with team re request to court	Case development
W. Wylegala	9/25/2023	0.20	\$ 603.64	\$ 120.73	review corres re class member, email counsel	Class counsel duties
W. Wylegala	9/28/2023	0.50	\$ 603.64	\$ 301.82	tel M Ross re potential fee settlement process	ADR
W. Wylegala	9/29/2023	0.30	\$ 603.64	\$ 181.09	email counsel and team re class member issue	Class counsel duties
W. Wylegala	10/2/2023	0.28	\$ 603.64	\$ 169.02	corres re plaintiff consent to change in representation	Class counsel duties
W. Wylegala	10/3/2023	0.08	\$ 603.64	\$ 48.29	emails plaintiff's counsel re update	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	10/5/2023	1.25	\$ 603.64	\$ 754.55	update settlement negotiation record	ADR
W. Wylegala	10/6/2023	1.00	\$ 603.64	\$ 603.64	team call	Case development
W. Wylegala	10/6/2023	1.50	\$ 603.64	\$ 905.46	prepare update for KIND mgmt re JOP status	Case development
W. Wylegala	10/6/2023	0.50	\$ 603.64	\$ 301.82	present update to KIND mgmt re JOP status	ADR
W. Wylegala	10/8/2023	2.82	\$ 603.64	\$ 1,702.26	update settlement negotiation record	ADR
W. Wylegala	10/10/2023	0.25	\$ 603.64	\$ 150.91	emails team re mediation prep	ADR
W. Wylegala	10/11/2023	0.10	\$ 603.64	\$ 60.36	review/reply team emails	Case development
W. Wylegala	10/11/2023	0.30	\$ 603.64	\$ 181.09	emails seeking class member data on 589 receipt issues	Class counsel duties
W. Wylegala	10/12/2023	0.20	\$ 603.64	\$ 120.73	emails team re mediation prep	ADR
W. Wylegala	10/13/2023	0.20	\$ 603.64	\$ 120.73	review potential agreement amendments	ADR
W. Wylegala	10/13/2023	1.00	\$ 603.64	\$ 603.64	team call	ADR
W. Wylegala	10/13/2023	0.40	\$ 603.64	\$ 241.46	review Ds' draft, emails with team	ADR
W. Wylegala	10/14/2023	4.58	\$ 603.64	\$ 2,764.67	review Ds' draft, emails with team	ADR
W. Wylegala	10/14/2023	4.78	\$ 603.64	\$ 2,885.40	prepare talking points for mediation	ADR
W. Wylegala	10/15/2023	4.04	\$ 603.64	\$ 2,438.71	review & edit team talking points for mediation	ADR
W. Wylegala	10/16/2023	1.01	\$ 603.64	\$ 609.68	review talking points for mediation	ADR
W. Wylegala	10/16/2023	1.25	\$ 603.64	\$ 754.55	team call in prep for mediation	ADR
W. Wylegala	10/16/2023	3.50	\$ 603.64	\$ 2,112.74	mediation with Defendants	ADR
W. Wylegala	10/16/2023	0.58	\$ 603.64	\$ 350.11	confer with KDJ KJ RS re next steps	ADR
W. Wylegala	10/16/2023	2.17	\$ 603.64	\$ 1,309.90	draft language for settlement agreement exhibit	ADR
W. Wylegala	10/16/2023	0.57	\$ 603.64	\$ 344.07	draft talking points for mediation	ADR
W. Wylegala	10/17/2023	0.50	\$ 603.64	\$ 301.82	revise proposed draft and discussion points for mediation, emails team	ADR
W. Wylegala	10/17/2023	1.00	\$ 603.64	\$ 603.64	confer with KDJ, KJ, RS re mediation plan	ADR
W. Wylegala	10/17/2023	0.58	\$ 603.64	\$ 350.11	review notes and materials for mediation	ADR
W. Wylegala	10/17/2023	0.73	\$ 603.64	\$ 440.66	mediation with Defendants	ADR
W. Wylegala	10/17/2023	0.25	\$ 603.64	\$ 150.91	confer with team re next steps	ADR
W. Wylegala	10/18/2023	0.20	\$ 603.64	\$ 120.73	emails to team & AUSAs re resolution of class member issue	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	10/22/2023	1.25	\$ 603.64	\$ 754.55	consolidate notes of mediation sessions, emails team	ADR
W. Wylegala	10/22/2023	2.43	\$ 603.64	\$ 1,466.85	review and revise settlement draft & exhibits, email team re same	ADR
W. Wylegala	10/24/2023	0.98	\$ 603.64	\$ 591.57	team call re drafts	ADR
W. Wylegala	10/27/2023	0.25	\$ 603.64	\$ 150.91	final review of current settlement draft and exhibits	ADR
W. Wylegala	10/27/2023	0.94	\$ 603.64	\$ 567.42	team call	ADR
W. Wylegala	10/30/2023	0.23	\$ 603.64	\$ 138.84	team call	ADR
W. Wylegala	10/30/2023	0.43	\$ 603.64	\$ 259.57	review status conference outline	Case development
W. Wylegala	10/31/2023	0.25	\$ 603.64	\$ 150.91	status conference with court	Case development
W. Wylegala	10/31/2023	0.10	\$ 603.64	\$ 60.36	confer team post status conference	ADR
W. Wylegala	10/31/2023	0.32	\$ 603.64	\$ 193.16	email team re notes, next steps	ADR
W. Wylegala	11/6/2023	0.80	\$ 603.64	\$ 482.91	review draft class notice	ADR
W. Wylegala	11/6/2023	0.67	\$ 603.64	\$ 404.44	team call	Case development
W. Wylegala	11/6/2023	0.70	\$ 603.64	\$ 422.55	review draft class notice	ADR
W. Wylegala	11/9/2023	0.10	\$ 603.64	\$ 60.36	emails team re statement prep	ADR
W. Wylegala	11/11/2023	3.19	\$ 603.64	\$ 1,925.61	draft mediation statement sections, emails with team	ADR
W. Wylegala	11/13/2023	0.85	\$ 603.64	\$ 513.09	review mediation statement	ADR
W. Wylegala	11/13/2023	0.87	\$ 603.64	\$ 525.17	team call	ADR
W. Wylegala	11/13/2023	1.23	\$ 603.64	\$ 742.48	revise mediation statement	ADR
W. Wylegala	11/14/2023	0.21	\$ 603.64	\$ 126.76	review court rules, email team re death of plaintiff	Case development
W. Wylegala	11/14/2023	1.10	\$ 603.64	\$ 664.00	review mediation statement	ADR
W. Wylegala	11/16/2023	0.58	\$ 603.64	\$ 350.11	emails team re settlement planning	ADR
W. Wylegala	11/16/2023	0.27	\$ 603.64	\$ 162.98	review mediation statement	ADR
W. Wylegala	11/17/2023	2.00	\$ 603.64	\$ 1,207.28	review mediation statement	ADR
W. Wylegala	11/20/2023	0.75	\$ 603.64	\$ 452.73	team call	Case development
W. Wylegala	11/28/2023	1.38	\$ 603.64	\$ 833.02	prepare for and present management briefing on case status	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	11/28/2023	0.38	\$ 603.64	\$ 229.38	request to tech support for settlement implementation needs	Class counsel duties
W. Wylegala	11/29/2023	0.26	\$ 603.64	\$ 156.95	Draft notice re death of plaintiff	Case development
W. Wylegala	11/30/2023	0.42	\$ 603.64	\$ 253.53	revise notice re plaintiff and email team	Case development
W. Wylegala	11/30/2023	0.12	\$ 603.64	\$ 72.44	email late plaintiff's counsel re requesting death record	Case development
W. Wylegala	12/1/2023	0.08	\$ 603.64	\$ 48.29	emails to/from team re case status	ADR
W. Wylegala	12/4/2023	0.13	\$ 603.64	\$ 78.47	review corres re class member issues	Class counsel duties
W. Wylegala	12/4/2023	0.67	\$ 603.64	\$ 404.44	team meeting	Case development
W. Wylegala	12/4/2023	0.33	\$ 603.64	\$ 199.20	revise notice to court and order death certificate	Case development
W. Wylegala	12/6/2023	1.34	\$ 603.64	\$ 808.88	review Ds' settlement drafts	ADR
W. Wylegala	12/7/2023	1.28	\$ 603.64	\$ 772.66	update settlement negotiation record	ADR
W. Wylegala	12/8/2023	0.25	\$ 603.64	\$ 150.91	review guidance to field	Class counsel duties
W. Wylegala	12/8/2023	1.00	\$ 603.64	\$ 603.64	team call	Case development
W. Wylegala	12/11/2023	0.98	\$ 603.64	\$ 591.57	team call	Case development
W. Wylegala	12/11/2023	0.17	\$ 603.64	\$ 102.62	review guidance to field	Class counsel duties
W. Wylegala	12/13/2023	0.50	\$ 603.64	\$ 301.82	review guidance to field	Class counsel duties
W. Wylegala	12/13/2023	0.09	\$ 603.64	\$ 54.33	review status report	Case development
W. Wylegala	12/14/2023	0.68	\$ 603.64	\$ 410.48	emails with 2 class members' counsel re violations	Class counsel duties
W. Wylegala	12/18/2023	0.42	\$ 603.64	\$ 253.53	draft talking points for mediation	ADR
W. Wylegala	12/18/2023	0.50	\$ 603.64	\$ 301.82	emails with 2 class members' counsel re violations	Class counsel duties
W. Wylegala	12/20/2023	0.10	\$ 603.64	\$ 60.36	emails team re class member issue	Class counsel duties
W. Wylegala	12/20/2023	2.70	\$ 603.64	\$ 1,629.83	corres with class member counsel re violations, review case documents, draft email re violations	Class counsel duties
W. Wylegala	12/21/2023	0.40	\$ 603.64	\$ 241.46	emails team re class member issue	Class counsel duties
W. Wylegala	12/21/2023	0.50	\$ 603.64	\$ 301.82	schedule planning for mediation	ADR
W. Wylegala	12/21/2023	0.27	\$ 603.64	\$ 162.98	revise message to Ds' counsel re class member issue	Class counsel duties
W. Wylegala	12/22/2023	0.73	\$ 603.64	\$ 440.66	team call	Case development



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	12/22/2023	0.92	\$ 603.64	\$ 555.35	corres with Ds' counsel and with class members' counsel re class member issues	Class counsel duties
W. Wylegala	1/2/2024	0.33	\$ 616.36	\$ 203.40	review court order, corres with team re next steps	ADR
W. Wylegala	1/4/2024	0.17	\$ 616.36	\$ 104.78	review and reply to emails re class member issues	Class counsel duties
W. Wylegala	1/5/2024	0.33	\$ 616.36	\$ 203.40	corres with class members' counsel	Class counsel duties
W. Wylegala	1/5/2024	0.57	\$ 616.36	\$ 351.33	review agrmt & messages tech team & KDJ re tech requirements of settlement	ADR
W. Wylegala	1/8/2024	0.53	\$ 616.36	\$ 326.67	review agreement edits and notes re clients, email team	Class counsel duties
W. Wylegala	1/8/2024	1.02	\$ 616.36	\$ 628.69	team call	Case development
W. Wylegala	1/8/2024	0.28	\$ 616.36	\$ 172.58	email class member counsel re issue	Class counsel duties
W. Wylegala	1/9/2024	0.08	\$ 616.36	\$ 49.31	corres with Ds and team re drafts	ADR
W. Wylegala	1/10/2024	0.32	\$ 616.36	\$ 197.24	email plaintiffs' counsel	Class counsel duties
W. Wylegala	1/16/2024	1.25	\$ 616.36	\$ 770.45	review and reply to class member counsel query	Class counsel duties
W. Wylegala	1/16/2024	0.53	\$ 616.36	\$ 326.67	emails team re class member issue	Class counsel duties
W. Wylegala	1/16/2024	1.49	\$ 616.36	\$ 918.38	emails team re class member issue	Class counsel duties
W. Wylegala	1/17/2024	0.85	\$ 616.36	\$ 523.91	corres with RS and class member counsel	Class counsel duties
W. Wylegala	1/17/2024	0.43	\$ 616.36	\$ 265.03	corres with RS and class member counsel	Class counsel duties
W. Wylegala	1/17/2024	0.10	\$ 616.36	\$ 61.64	review mediation docs & corres with team	Class counsel duties
W. Wylegala	1/17/2024	0.10	\$ 616.36	\$ 61.64	corres with team re class member corres	Class counsel duties
W. Wylegala	1/18/2024	0.22	\$ 616.36	\$ 135.60	team corres re research on settlement	ADR
W. Wylegala	1/18/2024	0.78	\$ 616.36	\$ 480.76	research and confer on settlement issues	ADR
W. Wylegala	1/19/2024	1.44	\$ 616.36	\$ 887.56	draft points for counseling plaintiffs	Class counsel duties
W. Wylegala	1/19/2024	0.45	\$ 616.36	\$ 277.36	review agreement drafts	ADR
W. Wylegala	1/19/2024	1.00	\$ 616.36	\$ 616.36	team meeting	ADR
W. Wylegala	1/21/2024	1.67	\$ 616.36	\$ 1,029.32	draft points for counseling plaintiffs	Class counsel duties
W. Wylegala	1/22/2024	0.25	\$ 616.36	\$ 154.09	review interim agreement draft, email team	ADR
W. Wylegala	1/22/2024	1.08	\$ 616.36	\$ 665.67	team call re mediation prep	ADR
W. Wylegala	1/24/2024	0.94	\$ 616.36	\$ 579.38	draft points for counseling plaintiffs	Class counsel duties
W. Wylegala	1/25/2024	2.88	\$ 616.36	\$ 1,775.12	review mediation statement draft	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	1/25/2024	0.25	\$ 616.36	\$ 154.09	review and reply to corres from class member counsel	Class counsel duties
W. Wylegala	1/25/2024	0.23	\$ 616.36	\$ 141.76	review and reply to corres from class member counsel	Class counsel duties
W. Wylegala	1/26/2024	2.30	\$ 616.36	\$ 1,417.63	draft points for counseling plaintiffs	Class counsel duties
W. Wylegala	1/26/2024	0.20	\$ 616.36	\$ 123.27	review mediation statement	ADR
W. Wylegala	1/26/2024	1.00	\$ 616.36	\$ 616.36	team call re mediation statement and draft agreement	ADR
W. Wylegala	1/26/2024	0.49	\$ 616.36	\$ 302.02	draft points for counseling plaintiffs	Class counsel duties
W. Wylegala	1/26/2024	1.60	\$ 616.36	\$ 986.18	draft points for counseling plaintiffs	Class counsel duties
W. Wylegala	1/28/2024	1.60	\$ 616.36	\$ 986.18	review mediation statement draft	ADR
W. Wylegala	1/29/2024	0.50	\$ 616.36	\$ 308.18	review mediation statement, email team	ADR
W. Wylegala	1/29/2024	1.02	\$ 616.36	\$ 628.69	team meeting	ADR
W. Wylegala	1/29/2024	0.55	\$ 616.36	\$ 339.00	travel plans for mediation	ADR
W. Wylegala	1/29/2024	0.24	\$ 616.36	\$ 147.93	emails with team re Ds' counsel's message	Case development
W. Wylegala	1/31/2024	0.43	\$ 616.36	\$ 265.03	email class member counsel re inquiry	Class counsel duties
W. Wylegala	2/1/2024	0.10	\$ 616.36	\$ 61.64	review and reply to class member query	Class counsel duties
W. Wylegala	2/1/2024	1.87	\$ 616.36	\$ 1,152.59	review and reply to class member query	Class counsel duties
W. Wylegala	2/2/2024	0.43	\$ 616.36	\$ 265.03	emails team re mediation prep and class member issues	ADR
W. Wylegala	2/2/2024	0.35	\$ 616.36	\$ 215.73	email plaintiff's counsel	Case development
W. Wylegala	2/2/2024	0.67	\$ 616.36	\$ 412.96	review class member case documents and emails team re same	Class counsel duties
W. Wylegala	2/2/2024	0.50	\$ 616.36	\$ 308.18	corres with CM counsel re issue	Class counsel duties
W. Wylegala	2/5/2024	1.07	\$ 616.36	\$ 659.51	review agreement drafts	ADR
W. Wylegala	2/5/2024	0.58	\$ 616.36	\$ 357.49	meeting with RS & KJ	ADR
W. Wylegala	2/5/2024	0.42	\$ 616.36	\$ 258.87	draft and review email to Ds re settlement drafts	ADR
W. Wylegala	2/6/2024	2.23	\$ 616.36	\$ 1,374.48	revise mediation statement	ADR
W. Wylegala	2/6/2024	1.83	\$ 616.36	\$ 1,127.94	revise mediation statement	ADR
W. Wylegala	2/7/2024	0.65	\$ 616.36	\$ 400.63	revise mediation statement, emails team	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	2/7/2024	1.15	\$ 616.36	\$ 708.81	revise client counseling points	ADR
W. Wylegala	2/7/2024	1.12	\$ 616.36	\$ 690.32	revise client counseling points	ADR
W. Wylegala	2/8/2024	1.45	\$ 616.36	\$ 893.72	revise client counseling points	ADR
W. Wylegala	2/8/2024	1.43	\$ 616.36	\$ 881.39	review mediation statement draft	ADR
W. Wylegala	2/9/2024	1.32	\$ 616.36	\$ 813.60	review mediation statement draft	ADR
W. Wylegala	2/9/2024	0.90	\$ 616.36	\$ 554.72	team call	ADR
W. Wylegala	2/9/2024	0.34	\$ 616.36	\$ 209.56	revise mediation statement draft	ADR
W. Wylegala	2/9/2024	0.28	\$ 616.36	\$ 172.58	emails with class member counsel re case issue	Class counsel duties
W. Wylegala	2/9/2024	0.97	\$ 616.36	\$ 597.87	revise mediation statement draft	ADR
W. Wylegala	2/9/2024	0.12	\$ 616.36	\$ 73.96	emails with plaintiffs counsel	Class counsel duties
W. Wylegala	2/9/2024	0.10	\$ 616.36	\$ 61.64	emails counsel re counseling plaintiffs	ADR
W. Wylegala	2/12/2024	0.26	\$ 616.36	\$ 160.25	review mediation statement draft	ADR
W. Wylegala	2/12/2024	0.54	\$ 616.36	\$ 332.83	review draft mediation plan	ADR
W. Wylegala	2/12/2024	0.85	\$ 616.36	\$ 523.91	team meeting	ADR
W. Wylegala	2/12/2024	0.25	\$ 616.36	\$ 154.09	emails with plaintiffs' counsel	ADR
W. Wylegala	2/14/2024	0.50	\$ 616.36	\$ 308.18	confer with Plaintiff's counsel in advance of Plaintiff meeting	Case development
W. Wylegala	2/14/2024	0.83	\$ 616.36	\$ 511.58	recap to counsel team re Plaintiff questions	ADR
W. Wylegala	2/14/2024	1.00	\$ 616.36	\$ 616.36	meet with Plaintiff re potential settlement	ADR
W. Wylegala	2/15/2024	0.50	\$ 616.36	\$ 308.18	tel with Magistrate Sullivan	ADR
W. Wylegala	2/15/2024	1.40	\$ 616.36	\$ 862.90	make notes of call with magistrate, email team	ADR
W. Wylegala	2/15/2024	0.50	\$ 616.36	\$ 308.18	research and analyze USCIS statistics	ADR
W. Wylegala	2/16/2024	1.63	\$ 616.36	\$ 1,004.67	research and analyze USCIS statistics, emails team	ADR
W. Wylegala	2/16/2024	0.52	\$ 616.36	\$ 320.51	review edited mediation statement	ADR
W. Wylegala	2/16/2024	1.00	\$ 616.36	\$ 616.36	team call re mediation statement and prep	ADR
W. Wylegala	2/16/2024	0.50	\$ 616.36	\$ 308.18	review draft mail to Ds and exhibits re processing issue, email team	Class counsel duties
W. Wylegala	2/16/2024	0.58	\$ 616.36	\$ 357.49	final review of mediation statement and exhibits	ADR
W. Wylegala	2/16/2024	0.25	\$ 616.36	\$ 154.09	transmit mediation statement, emails team	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	2/20/2024	0.75	\$ 616.36	\$ 462.27	confer with colleague re mediation process and email team re same	ADR
W. Wylegala	2/21/2024	0.67	\$ 616.36	\$ 412.96	messages to Plaintiff's counsel	Case development
W. Wylegala	2/21/2024	0.50	\$ 616.36	\$ 308.18	tel with Plaintiff's next friend re settlement authority	ADR
W. Wylegala	2/22/2024	0.17	\$ 616.36	\$ 104.78	emails with plaintiffs counsel	ADR
W. Wylegala	2/23/2024	1.00	\$ 616.36	\$ 616.36	team call re mediation prep	ADR
W. Wylegala	2/23/2024	0.25	\$ 616.36	\$ 154.09	hotel arrangements, emails team	ADR
W. Wylegala	2/23/2024	0.25	\$ 616.36	\$ 154.09	tel with plaintiff's immigration counsel	ADR
W. Wylegala	2/26/2024	1.06	\$ 616.36	\$ 653.34	team call	ADR
W. Wylegala	2/26/2024	0.25	\$ 616.36	\$ 154.09	tel plaintiffs' counsel re settlement	ADR
W. Wylegala	2/27/2024	0.45	\$ 616.36	\$ 277.36	messages from/to plaintiff	Case development
W. Wylegala	2/27/2024	2.57	\$ 616.36	\$ 1,584.05	prep talking points for mediation	ADR
W. Wylegala	2/27/2024	0.28	\$ 616.36	\$ 172.58	prep talking points for mediation	ADR
W. Wylegala	2/28/2024	0.10	\$ 616.36	\$ 61.64	emails with team re corres with Ds	Class counsel duties
W. Wylegala	2/28/2024	1.62	\$ 616.36	\$ 998.50	prepare talking points for mediation	ADR
W. Wylegala	2/29/2024	0.52	\$ 616.36	\$ 320.51	tel from Judge Sullivan	ADR
W. Wylegala	2/29/2024	0.95	\$ 616.36	\$ 585.54	email team re tel with magistrate and related mediation issues	ADR
W. Wylegala	3/1/2024	1.03	\$ 616.36	\$ 634.85	team call	ADR
W. Wylegala	3/1/2024	0.68	\$ 616.36	\$ 419.12	review talking points for mediation	ADR
W. Wylegala	3/3/2024	3.00	\$ 616.36	\$ 1,849.08	meet with team re mediation strategy	ADR
W. Wylegala	3/3/2024	1.00	\$ 616.36	\$ 616.36	review mediation prep materials	ADR
W. Wylegala	3/4/2024	7.00	\$ 616.36	\$ 4,314.52	attend mediation	ADR
W. Wylegala	3/4/2024	1.00	\$ 616.36	\$ 616.36	revise settlement documents	ADR
W. Wylegala	3/5/2024	12.50	\$ 616.36	\$ 7,704.50	mediation	ADR
W. Wylegala	3/6/2024	0.45	\$ 616.36	\$ 277.36	review final 3/5 revisions to agreement	ADR
W. Wylegala	3/6/2024	0.25	\$ 616.36	\$ 154.09	corres with class members' counsel re filing issues	Class counsel duties
W. Wylegala	3/6/2024	0.18	\$ 616.36	\$ 110.94	review class member query, emails RS and MM	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	3/7/2024	0.35	\$ 616.36	\$ 215.73	emails with class member counsel & RS re filing issue	Class counsel duties
W. Wylegala	3/8/2024	0.60	\$ 616.36	\$ 369.82	team meeting	Case development
W. Wylegala	3/11/2024	0.45	\$ 616.36	\$ 277.36	tel with RS and KJ	Case development
W. Wylegala	3/13/2024	0.25	\$ 616.36	\$ 154.09	review status report, emails team	Case development
W. Wylegala	3/13/2024	0.08	\$ 616.36	\$ 49.31	reply to Ds' counsel re status report	Case development
W. Wylegala	3/14/2024	0.23	\$ 616.36	\$ 141.76	review class member emails & email RS re receipt issue	Class counsel duties
W. Wylegala	3/14/2024	0.04	\$ 616.36	\$ 24.65	review class member inquiry	Class counsel duties
W. Wylegala	3/15/2024	0.53	\$ 616.36	\$ 326.67	team meeting	Case development
W. Wylegala	3/15/2024	0.12	\$ 616.36	\$ 73.96	email team re sample motions	ADR
W. Wylegala	3/18/2024	0.82	\$ 616.36	\$ 505.42	team meeting	Case development
W. Wylegala	3/22/2024	0.08	\$ 616.36	\$ 49.31	email with plaintiff's counsel	Class counsel duties
W. Wylegala	3/25/2024	0.25	\$ 616.36	\$ 154.09	review class member corres	Class counsel duties
W. Wylegala	3/25/2024	0.22	\$ 616.36	\$ 135.60	review class notice	ADR
W. Wylegala	3/25/2024	0.65	\$ 616.36	\$ 400.63	team call	ADR
W. Wylegala	3/29/2024	0.08	\$ 616.36	\$ 49.31	corres with counsel team re status of projects	ADR
W. Wylegala	4/2/2024	1.00	\$ 616.36	\$ 616.36	call with plaintiff's counsel	Class counsel duties
W. Wylegala	4/2/2024	0.08	\$ 616.36	\$ 49.31	email team re class member issue	Class counsel duties
W. Wylegala	4/4/2024	0.20	\$ 616.36	\$ 123.27	query re class member issue	Class counsel duties
W. Wylegala	4/5/2024	1.00	\$ 616.36	\$ 616.36	team call	Case development
W. Wylegala	4/5/2024	0.30	\$ 616.36	\$ 184.91	emails with plaintiff's counsel re case issues	Class counsel duties
W. Wylegala	4/5/2024	0.12	\$ 616.36	\$ 73.96	emails with class member counsel re query	Class counsel duties
W. Wylegala	4/12/2024	1.00	\$ 616.36	\$ 616.36	team call	Case development
W. Wylegala	4/19/2024	0.47	\$ 616.36	\$ 289.69	team emails & team call	Case development
W. Wylegala	4/21/2024	1.35	\$ 616.36	\$ 832.09	review draft settlement approval orders	ADR
W. Wylegala	4/22/2024	0.97	\$ 616.36	\$ 597.87	team call re approval orders etc.	Case development
W. Wylegala	4/23/2024	0.08	\$ 616.36	\$ 49.31	emails with plaintiff's counsel and co-counsel re plaintiff questions	Case development
W. Wylegala	4/25/2024	0.21	\$ 616.36	\$ 129.44	emails team re class member query	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	4/26/2024	0.99	\$ 616.36	\$ 610.20	team call	ADR
W. Wylegala	4/26/2024	0.70	\$ 616.36	\$ 431.45	review exhibits	ADR
W. Wylegala	4/26/2024	0.12	\$ 616.36	\$ 73.96	review exhibits	ADR
W. Wylegala	4/26/2024	0.69	\$ 616.36	\$ 425.29	review exhibits	ADR
W. Wylegala	5/10/2024	0.10	\$ 616.36	\$ 61.64	review status report, email team	ADR
W. Wylegala	5/10/2024	0.72	\$ 616.36	\$ 443.78	team meeting	ADR
W. Wylegala	5/15/2024	3.49	\$ 616.36	\$ 2,151.10	research on entitlement to fees	Case development
W. Wylegala	5/16/2024	5.72	\$ 616.36	\$ 3,525.58	research on entitlement to fees	Case development
W. Wylegala	5/20/2024	0.38	\$ 616.36	\$ 234.22	read and initial reply to class member query	Class counsel duties
W. Wylegala	5/20/2024	0.23	\$ 616.36	\$ 141.76	corres with team re final agreements	ADR
W. Wylegala	5/20/2024	0.57	\$ 616.36	\$ 351.33	team debrief	ADR
W. Wylegala	5/20/2024	0.63	\$ 616.36	\$ 388.31	review final agreement & email team re corrections	ADR
W. Wylegala	5/21/2024	0.25	\$ 616.36	\$ 154.09	review final exhibits and agreement	ADR
W. Wylegala	5/22/2024	0.57	\$ 616.36	\$ 351.33	data filter to identify class members	Class counsel duties
W. Wylegala	5/22/2024	1.47	\$ 616.36	\$ 906.05	review case docs re class member issue, emails MM and CM counsel	Class counsel duties
W. Wylegala	5/23/2024	1.37	\$ 616.36	\$ 844.41	analysis re potential injunction violation & email team	Class counsel duties
W. Wylegala	5/23/2024	0.33	\$ 616.36	\$ 203.40	review draft class notice, email notes to team	ADR
W. Wylegala	5/24/2024	0.98	\$ 616.36	\$ 604.03	team meeting	ADR
W. Wylegala	5/24/2024	0.97	\$ 616.36	\$ 597.87	draft guidance for email class member counsel, email same	Class counsel duties
W. Wylegala	5/28/2024	0.05	\$ 616.36	\$ 30.82	review corres from Ds	Case development
W. Wylegala	6/3/2024	0.85	\$ 616.36	\$ 523.91	Team call re strategy for next steps	Case development
W. Wylegala	6/7/2024	0.84	\$ 616.36	\$ 517.74	Team call	Case development
W. Wylegala	6/11/2024	0.23	\$ 616.36	\$ 141.76	Email team re anticipated issue for class members	Class counsel duties
W. Wylegala	6/13/2024	0.70	\$ 616.36	\$ 431.45	Review query from class member counsel, email re case details	Class counsel duties
W. Wylegala	6/13/2024	0.65	\$ 616.36	\$ 400.63	Review class member documentation re inquiry	Class counsel duties
W. Wylegala	6/13/2024	0.73	\$ 616.36	\$ 449.94	Reply to query from CM counsel	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	6/14/2024	0.25	\$ 616.36	\$ 154.09	Confer with RS via email re class member issue	Class counsel duties
W. Wylegala	6/14/2024	1.00	\$ 616.36	\$ 616.36	Team meeting re court docs, class member issue, fees neogtiation	Case development
W. Wylegala	6/17/2024	0.12	\$ 616.36	\$ 73.96	email to KIND communications team re media potential	Case development
W. Wylegala	6/17/2024	1.07	\$ 616.36	\$ 659.51	Team call	Case development
W. Wylegala	6/18/2024	0.18	\$ 616.36	\$ 110.94	Emails plaintiffs' counsel re next steps	Case development
W. Wylegala	6/18/2024	2.10	\$ 616.36	\$ 1,294.36	Revise briefing for plaintiffs	Class counsel duties
W. Wylegala	6/18/2024	0.14	\$ 616.36	\$ 86.29	Emails with class member counsel re filing issue	Class counsel duties
W. Wylegala	6/20/2024	1.12	\$ 616.36	\$ 690.32	Review joint approval motion	ADR
W. Wylegala	6/20/2024	1.07	\$ 616.36	\$ 659.51	Call with KIND comms & policy reps re impending settlement	Case development
W. Wylegala	6/20/2024	0.10	\$ 616.36	\$ 61.64	Email counsel team re media planning	Case development
W. Wylegala	6/20/2024	1.12	\$ 616.36	\$ 690.32	Review joint approval motion	ADR
W. Wylegala	6/20/2024	0.32	\$ 616.36	\$ 197.24	Emails with 3 plaintiffs' counsel re client meeting	Case development
W. Wylegala	6/21/2024	0.30	\$ 616.36	\$ 184.91	Review letter to court, add authorities, email team re next steps	Case development
W. Wylegala	6/21/2024	1.00	\$ 616.36	\$ 616.36	Team call re next steps	Case development
W. Wylegala	6/21/2024	0.25	\$ 616.36	\$ 154.09	Email team re tasks to be done	Case development
W. Wylegala	6/24/2024	0.58	\$ 616.36	\$ 357.49	Tel with plaintiff re settlement next steps	Class counsel duties
W. Wylegala	6/28/2024	1.17	\$ 616.36	\$ 721.14	Review joint approval motion	ADR
W. Wylegala	6/28/2024	1.00	\$ 616.36	\$ 616.36	Team call re motion for prelim approval and related steps	Case development
W. Wylegala	7/8/2024	0.18	\$ 616.36	\$ 110.94	review class notice formatting	Class counsel duties
W. Wylegala	7/8/2024	0.87	\$ 616.36	\$ 536.23	team meeting re settlement implementation	Case development
W. Wylegala	7/8/2024	0.25	\$ 616.36	\$ 154.09	email with KIND comms team anticipating court filing	Case development
W. Wylegala	7/10/2024	0.15	\$ 616.36	\$ 92.45	review draft guidance to class	Class counsel duties
W. Wylegala	7/10/2024	0.45	\$ 616.36	\$ 277.36	tel with KIND data specialist re id'ing class member clients	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	7/10/2024	0.57	\$ 616.36	\$ 351.33	review draft guidance to class	Class counsel duties
W. Wylegala	7/12/2024	1.00	\$ 616.36	\$ 616.36	team call re settlement next steps	Case development
W. Wylegala	7/12/2024	0.29	\$ 616.36	\$ 178.74	emails with RScholtz and review issue re counseling class members	Class counsel duties
W. Wylegala	7/15/2024	1.00	\$ 616.36	\$ 616.36	team call	Case development
W. Wylegala	7/19/2024	0.20	\$ 616.36	\$ 123.27	review media information and email team re same	Class counsel duties
W. Wylegala	7/19/2024	0.55	\$ 616.36	\$ 339.00	team call re prelim approval motion and fees request	Case development
W. Wylegala	7/19/2024	0.10	\$ 616.36	\$ 61.64	email comms team re media preparedness	Case development
W. Wylegala	7/23/2024	0.32	\$ 616.36	\$ 197.24	review Ds' edits to joint motion for approval, email team	Case development
W. Wylegala	7/23/2024	0.75	\$ 616.36	\$ 462.27	team call re revisions to preliminary approval motion	ADR
W. Wylegala	7/26/2024	1.00	\$ 616.36	\$ 616.36	team call	Case development
W. Wylegala	7/29/2024	0.94	\$ 616.36	\$ 579.38	team call	Case development
W. Wylegala	7/30/2024	0.27	\$ 616.36	\$ 166.42	tel A. Pender, KIND Communications, re website announcement of proposed settlement	Class counsel duties
W. Wylegala	7/30/2024	0.17	\$ 616.36	\$ 104.78	tel R Scholtz re distributing practice alert	Class counsel duties
W. Wylegala	7/30/2024	0.10	\$ 616.36	\$ 61.64	emails team re pending filing and distributing alert	Class counsel duties
W. Wylegala	7/30/2024	0.25	\$ 616.36	\$ 154.09	compile and edit material for KIND website, email KIND comms staff	Class counsel duties
W. Wylegala	7/30/2024	0.50	\$ 616.36	\$ 308.18	distribute practice advisory to list servs/groups	Class counsel duties
W. Wylegala	7/31/2024	0.57	\$ 616.36	\$ 351.33	review KIND JOP webpage, emails comms team re technical fixes	Class counsel duties
W. Wylegala	8/1/2024	0.67	\$ 616.36	\$ 412.96	review query from class member counsel on rights under settlement	Class counsel duties
W. Wylegala	8/1/2024	1.99	\$ 616.36	\$ 1,226.56	reply to queries from 2 attorneys to class members on rights under settlement	Class counsel duties
W. Wylegala	8/2/2024	0.36	\$ 616.36	\$ 221.89	reply to class member counsel inquiry re settlement	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	8/2/2024	1.73	\$ 616.36	\$ 1,066.30	team call	Case development
W. Wylegala	8/2/2024	0.72	\$ 616.36	\$ 443.78	reply to class member counsel inquiry re settlement	Class counsel duties
W. Wylegala	8/5/2024	0.50	\$ 616.36	\$ 308.18	team call	Case development
W. Wylegala	8/7/2024	0.07	\$ 616.36	\$ 43.15	review letter to court, email team	Case development
W. Wylegala	8/9/2024	0.07	\$ 616.36	\$ 43.15	email team re fee petition and implementation issues	Class counsel duties
W. Wylegala	8/12/2024	1.05	\$ 616.36	\$ 647.18	team call	Case development
W. Wylegala	8/19/2024	1.03	\$ 616.36	\$ 634.85	team call	Case development
W. Wylegala	8/26/2024	0.65	\$ 616.36	\$ 400.63	team call re settlement implementation	Case development
W. Wylegala	8/26/2024	0.73	\$ 616.36	\$ 449.94	review class notice and notifications, email team re comments	ADR
W. Wylegala	8/28/2024	1.58	\$ 616.36	\$ 973.85	review class member counsel query and draft reply	Class counsel duties
W. Wylegala	8/28/2024	0.17	\$ 616.36	\$ 104.78	emails team re posting notice	ADR
W. Wylegala	8/28/2024	0.62	\$ 616.36	\$ 382.14	review website post of class notice and emails RScholtz	ADR
W. Wylegala	8/29/2024	0.48	\$ 616.36	\$ 295.85	corres with counsel to class members re settlement questions	Class counsel duties
W. Wylegala	8/30/2024	0.50	\$ 616.36	\$ 308.18	review class member documents and corres	Class counsel duties
W. Wylegala	8/30/2024	1.00	\$ 616.36	\$ 616.36	reply to class member counsel inquiry re settlement	Class counsel duties
W. Wylegala	9/3/2024	0.17	\$ 616.36	\$ 104.78	emails team and KIND web team re defendants' class notice revisions	ADR
W. Wylegala	9/3/2024	0.28	\$ 616.36	\$ 172.58	emails with team re revised notices, review same	ADR
W. Wylegala	9/4/2024	1.08	\$ 616.36	\$ 665.67	tel RScholtz, MRoss re Ds' and Ps' corrections to class notices, review same; email M Haven re same	ADR
W. Wylegala	9/4/2024	1.00	\$ 616.36	\$ 616.36	tel MRoss and R Scholtz re webinar for class member counsel	Class counsel duties
W. Wylegala	9/4/2024	0.42	\$ 616.36	\$ 258.87	instructions to KIND web team re re-posting Defendants' revised notices	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	9/5/2024	0.25	\$ 616.36	\$ 154.09	review incoming emails re class notice and team email re same	ADR
W. Wylegala	9/5/2024	0.17	\$ 616.36	\$ 104.78	Tel RScholtz re notice distribution	Class counsel duties
W. Wylegala	9/5/2024	0.50	\$ 616.36	\$ 308.18	distribute class notices via list servs, groups	ADR
W. Wylegala	9/5/2024	0.22	\$ 616.36	\$ 135.60	review KIND web page updates and email web staff re corrections	ADR
W. Wylegala	9/5/2024	0.50	\$ 616.36	\$ 308.18	prep materials for web Q&A session for class member counsel	Class counsel duties
W. Wylegala	9/5/2024	0.23	\$ 616.36	\$ 141.76	reply to class member counsel query	Class counsel duties
W. Wylegala	9/6/2024	0.08	\$ 616.36	\$ 49.31	emails team re class member queries	Class counsel duties
W. Wylegala	9/6/2024	0.58	\$ 616.36	\$ 357.49	review and reply to class member query	Class counsel duties
W. Wylegala	9/6/2024	0.58	\$ 616.36	\$ 357.49	review slides and materials for class member counsel web Q&A session	Class counsel duties
W. Wylegala	9/6/2024	0.42	\$ 616.36	\$ 258.87	team call re notice issues and support for class members	ADR
W. Wylegala	9/6/2024	0.18	\$ 616.36	\$ 110.94	review class member counsel query, email M Mendez re same	Class counsel duties
W. Wylegala	9/7/2024	1.15	\$ 616.36	\$ 708.81	emails M Mendez re class member query, draft reply to same	Class counsel duties
W. Wylegala	9/8/2024	1.70	\$ 616.36	\$ 1,047.81	review class member counsel questions and prepare for instructional webinar	Class counsel duties
W. Wylegala	9/9/2024	0.23	\$ 616.36	\$ 141.76	corres with class member counsel	Class counsel duties
W. Wylegala	9/11/2024	0.50	\$ 616.36	\$ 308.18	review and edit webinar announcement (NILA) re settlement and emails team re same	Class counsel duties
W. Wylegala	9/11/2024	1.33	\$ 616.36	\$ 819.76	review class member counsel's email and draft reply	Class counsel duties
W. Wylegala	9/20/2024	0.15	\$ 616.36	\$ 92.45	review draft message to class member inquiries	Class counsel duties
W. Wylegala	9/23/2024	0.25	\$ 616.36	\$ 154.09	revise materials for 9/30 webinar	Class counsel duties
W. Wylegala	9/23/2024	0.78	\$ 616.36	\$ 480.76	review incoming emails from class member counsel	Class counsel duties
W. Wylegala	9/23/2024	0.78	\$ 616.36	\$ 480.76	team meeting	Case development



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	9/23/2024	0.22	\$ 616.36	\$ 135.60	send responses to 4 inquiries re JOP class notice	Class counsel duties
W. Wylegala	9/26/2024	1.00	\$ 616.36	\$ 616.36	prep for 9/30 answer session for class member counsel	Class counsel duties
W. Wylegala	9/27/2024	0.50	\$ 616.36	\$ 308.18	team call with KJ, RS	Case development
W. Wylegala	9/30/2024	2.60	\$ 616.36	\$ 1,602.54	prep for and present web Q&A for counsel to class members	Class counsel duties
W. Wylegala	10/2/2024	0.71	\$ 616.36	\$ 437.62	reply to class member query	Class counsel duties
W. Wylegala	10/7/2024	0.17	\$ 616.36	\$ 104.78	draft email to defendants re preparing final notice	ADR
W. Wylegala	10/7/2024	0.87	\$ 616.36	\$ 536.23	team call	Case development
W. Wylegala	10/11/2024	0.58	\$ 616.36	\$ 357.49	prep for 10/22 informational webinar on settlement for attorneys to class members	Class counsel duties
W. Wylegala	10/15/2024	0.79	\$ 616.36	\$ 486.92	email team re final notice	ADR
W. Wylegala	10/18/2024	0.8	\$ 616.36	\$ 493.09	team call	Case development
W. Wylegala	10/18/2024	0.4	\$ 616.36	\$ 246.54	review draft final notice edits and email M. Haven re same	ADR
W. Wylegala	10/21/2024	0.25	\$ 616.36	\$ 154.09	email team and M. Haven re version of final notice for USCIS corrections	ADR
W. Wylegala	10/21/2024	1	\$ 616.36	\$ 616.36	team call	Case development
W. Wylegala	10/21/2024	0.92	\$ 616.36	\$ 567.05	prep for webinar for class member counsel	Class counsel duties
W. Wylegala	10/23/2024	0.23	\$ 616.36	\$ 141.76	review corres re class member issue	Class counsel duties
W. Wylegala	10/24/2024	0.33	\$ 616.36	\$ 203.40	implement accessibility review of notice per M Haven email	ADR
W. Wylegala	10/30/2024	0.1	\$ 616.36	\$ 61.64	emails with team re class member case	Class counsel duties
W. Wylegala	10/31/2024	1	\$ 616.36	\$ 616.36	research on final approval	Case development
W. Wylegala	10/31/2024	0.33	\$ 616.36	\$ 203.40	email team re final approval hearing	ADR
W. Wylegala	11/11/2024	0.33	\$ 616.36	\$ 203.40	emails co-counsel re changes to USCIS filing instructions and review same	Class counsel duties
W. Wylegala	11/11/2024	1.53	\$ 616.36	\$ 943.03	review, research, and reply to query from class member counsel	Class counsel duties
W. Wylegala	11/12/2024	1.25	\$ 616.36	\$ 770.45	tel KDJ re fairness hearing, fee petition	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	11/13/2024	0.38	\$ 616.36	\$ 234.22	review materials for fairness hearing and emails RS and MM re same	ADR
W. Wylegala	11/13/2024	0.22	\$ 616.36	\$ 135.60	tel M Mendez re hearing prep	Case development
W. Wylegala	11/13/2024	0.72	\$ 616.36	\$ 443.78	outline for hearing prep	ADR
W. Wylegala	11/14/2024	0.13	\$ 616.36	\$ 80.13	tel M Haven and KDeJong re fairness hearing, final notice	ADR
W. Wylegala	11/15/2024	0.25	\$ 616.36	\$ 154.09	consultation re fairness hearing prep	ADR
W. Wylegala	11/15/2024	0.5	\$ 616.36	\$ 308.18	guidance to class member counsel on defensive receipt	Class counsel duties
W. Wylegala	11/15/2024	1.15	\$ 616.36	\$ 708.81	team call re fairness hearing, fee petition	Case development
W. Wylegala	11/17/2024	2.05	\$ 616.36	\$ 1,263.54	review filings and cases for fairness hearing	ADR
W. Wylegala	11/17/2024	0.5	\$ 616.36	\$ 308.18	review final approval documentation	ADR
W. Wylegala	11/17/2024	0.5	\$ 616.36	\$ 308.18	review final notice in Spanish	ADR
W. Wylegala	11/18/2024	0.65	\$ 616.36	\$ 400.63	team call on final approval and post-approval matters	Case development
W. Wylegala	11/18/2024	1.8	\$ 616.36	\$ 1,109.45	review and reply to class member query	Class counsel duties
W. Wylegala	11/19/2024	0.5	\$ 616.36	\$ 308.18	revise final approval order	ADR
W. Wylegala	11/20/2024	1.4	\$ 616.36	\$ 862.90	emails from and to class member counsel and MMendez re query	Class counsel duties
W. Wylegala	11/20/2024	0.12	\$ 616.36	\$ 73.96	email comms team re effectuating final notice to class	ADR
W. Wylegala	11/22/2024	0.72	\$ 616.36	\$ 443.78	multi emails with counsel team members re work in progress	Case development
W. Wylegala	11/22/2024	1.15	\$ 616.36	\$ 708.81	prep for fairness hearing	ADR
W. Wylegala	11/24/2024	0.42	\$ 616.36	\$ 258.87	emails with team re fairness hearing matters	ADR
W. Wylegala	11/24/2024	0.32	\$ 616.36	\$ 197.24	tel M Mendez re final approval matters	ADR
W. Wylegala	11/24/2024	0.27	\$ 616.36	\$ 166.42	emails with team re fairness hearing matters	ADR
W. Wylegala	11/24/2024	0.5	\$ 616.36	\$ 308.18	confer KDJ in prep for JOP hearing	ADR
W. Wylegala	11/24/2024	1	\$ 616.36	\$ 616.36	review materials in prep for hearing	ADR
W. Wylegala	11/25/2024	1	\$ 616.36	\$ 616.36	prep for fairness hearing	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	11/25/2024	0.75	\$ 616.36	\$ 462.27	interview hearing attendees for potential objections and/or class membership	Class counsel duties
W. Wylegala	11/25/2024	0.33	\$ 616.36	\$ 203.40	emails with potential class member and efforts to source legal assistance for same	Class counsel duties
W. Wylegala	11/25/2024	0.17	\$ 616.36	\$ 104.78	emails with counsel to plaintiffs re hearing result	ADR
W. Wylegala	11/25/2024	0.2	\$ 616.36	\$ 123.27	emails counsel team re next steps	ADR
W. Wylegala	11/26/2024	0.25	\$ 616.36	\$ 154.09	emails team re notice distribution and related steps	Class counsel duties
W. Wylegala	11/26/2024	0.1	\$ 616.36	\$ 61.64	emails team re appeal withdrawal	ADR
W. Wylegala	11/26/2024	0.17	\$ 616.36	\$ 104.78	review announcement for list servs and email MM re same	Class counsel duties
W. Wylegala	11/27/2024	1.25	\$ 616.36	\$ 770.45	review format errors in USCIS' version of final notice and emails team re same	ADR
W. Wylegala	11/27/2024	0.17	\$ 616.36	\$ 104.78	tel MMendez re final notice and fee motion tasks	ADR
W. Wylegala	11/27/2024	0.63	\$ 616.36	\$ 388.31	email M Haven re format issues and finalizing notice	ADR
W. Wylegala	12/2/2024	0.69	\$ 616.36	\$ 425.29	prepare notice documents for KIND website post	ADR
W. Wylegala	12/2/2024	0.41	\$ 616.36	\$ 252.71	respond to query from class member counsel	Class counsel duties
W. Wylegala	12/3/2024	0.23	\$ 616.36	\$ 141.76	review corrected notice from Dfdts, emails team & M Haven	ADR
W. Wylegala	12/3/2024	0.7	\$ 616.36	\$ 431.45	provide instructions to digital team for JOP webpage postings	Class counsel duties
W. Wylegala	12/3/2024	0.25	\$ 616.36	\$ 154.09	distribute notice of final settlement	ADR
W. Wylegala	12/4/2024	0.23	\$ 616.36	\$ 141.76	reply to class member counsel query	Class counsel duties
W. Wylegala	12/6/2024	1	\$ 616.36	\$ 616.36	call with class member attorneys re questions re JOP settlement	Class counsel duties
W. Wylegala	12/6/2024	0.45	\$ 616.36	\$ 277.36	tel R Scholtz re class member counsel queries	Class counsel duties
W. Wylegala	12/9/2024	0.49	\$ 616.36	\$ 302.02	emails to team and class member counsel re query	Class counsel duties
W. Wylegala	12/9/2024	0.69	\$ 616.36	\$ 425.29	reply to class member counsel query	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
W. Wylegala	12/10/2024	0.68	\$ 616.36	\$ 419.12	research re class member inquiry and email R Scholtz	Class counsel duties
A.X. Pineda-Aguirre	12/12/2024	5.00	\$ 115.00	\$ 575.00	Prepare fees and expenses exhibits to declarations supporting fee petition	Fee petition prep
W. Wylegala	12/13/2024	3.45	\$ 616.36	\$ 2,126.44	review class member file records and reply to their counsel's query	Class counsel duties
W. Wylegala	12/13/2024	1.6	\$ 616.36	\$ 986.18	review and send initial reply to practitioner query re class member outreach, email team re questions	Class counsel duties
W. Wylegala	12/13/2024	2.3	\$ 616.36	\$ 1,417.63	review 3 queries from practitioners re settlement interpretation, research issues, prepare replies	Class counsel duties
<b>TOTALS</b>		<b>1051.81</b>		<b>\$543,189.00</b>		

# Exhibit B

**Expenses incurred by class counsel relating to *J.O.P. v D.H.S.* : Kids in Need of Defense**

<b>Name</b>	<b>Amount incurred</b>	<b>Date incurred</b>	<b>Paid to</b>	<b>Purpose</b>
Wendy Wylegala	\$192.00	7/18/2019	Amtrak	round trip travel to TRO hearing, NY to DC
Wendy Wylegala	\$28.75	6/23/2023	Amtrak	cancelation fee for 6/26/23 reservation, NY to DC for canceled mediation
Wendy Wylegala	\$20.50	6/23/2023	Amtrak	cancelation fee for 6/29/23 reservation, DC to NY for canceled mediation
Wendy Wylegala	\$68.00	3/2/2024	Amtrak	train to mediation, Hudson to DC
Wendy Wylegala	\$597.24	3/2/2024	Crowne Plaza Hotel, Greenbelt	hotel stay for mediation, 3/2-3/6
Wendy Wylegala	\$18.99	3/6/2024	Lyft	car service from hotel to Amtrak station
Wendy Wylegala	\$126.00	3/6/2024	Amtrak	return train from mediation, DC to NY
Wendy Wylegala	\$20.00	3/6/2024	NYC TLC	taxi returning from mediation trip
Wendy Wylegala	\$41.00	11/15/2024	Amtrak	train from Hudson to New York to attend fairness hearing
Wendy Wylegala	\$76.00	11/15/2024	Amtrak	train from New York to Baltimore to attend fairness hearing
Wendy Wylegala	\$19.00	11/24/2024	Taxi	Taxi from Baltimore Penn train stations to attend fairness hearing
Wendy Wylegala	\$121.67	11/15/2024	Sonesta Baltimore Inner Harbor	hotel stay for fairness hearing, 11/24/24

**TOTAL**                    **\$1,329.15**

# Exhibit C

<b>Total Hours and Billed Amounts Through December 15, 2024, <i>J.O.P. v. DHS</i></b>						
	<b>Public Counsel</b>	<b>KIND</b>	<b>NIPNLG</b>	<b>Bet Tzedek</b>	<b>Goodwin</b>	<b>Totals</b>
<b>Hours Submitted</b>	1350.30	1051.81	1131.98	111.00	1265.70	<b>4910.79</b>
<b>Amount at Hourly Rates</b>	\$ 619,119.36	\$ 543,189.00	\$ 357,071.26	\$ 28,147.19	\$ 282,679.37	<b>\$ 1,830,206.18</b>

<b>Hours Billed by Litigation Phase Through December 15, 2024</b>						
<b>Litigation Phase</b>	<b>Public Counsel hours</b>	<b>KIND hours</b>	<b>NIPNLG hours</b>	<b>Bet Tzedek hours</b>	<b>Goodwin hours</b>	<b>Total for litigation phase</b>
<b>ADR</b>	496.00	505.16	477.30	24.80	310.80	<b>1814.06</b>
<b>Attending court hearings</b>	0.40	0.30	2.42	0.00	11.10	<b>14.22</b>
<b>Case development</b>	489.50	229.30	310.94	77.70	170.60	<b>1278.04</b>
<b>Class counsel duties</b>	103.10	185.61	156.14	7.70	36.70	<b>489.25</b>
<b>Fee petition prep</b>	0.00	5.00	0.00	0.00	4.90	<b>9.90</b>
<b>Motions practice</b>	184.60	81.99	124.16	0.80	563.70	<b>955.25</b>
<b>Pleadings</b>	76.70	44.45	61.02	0.00	167.90	<b>350.07</b>
<b>Totals</b>	1350.30	1051.81	1131.98	111.00	1265.70	
					<b>Overall Total</b>	<b>4910.79</b>



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION

J.O.P., et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, et al.,

Defendants.

Civil Action No. 8:19-CV-01944-SAG

**DECLARATION OF KRISTEN JACKSON IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES**

I, Kristen Jackson, declare:

1. I am an attorney licensed to practice before the courts of the State of California and I have appeared in this Court *pro hac vice*. I have personal knowledge of the facts in this declaration, and if called upon to testify, I could and would testify competently to the facts herein.

2. I am currently serving as the Interim Vice President, Chief of Litigation and Legal Programs at Public Counsel. I have been co-counsel to the named plaintiffs in this litigation from its inception, and the Court appointed Public Counsel as one of the counsel to the Plaintiff Class in December 2020. I make this declaration in support of Plaintiffs' motion as prevailing party for recovery of attorneys' fees and expenses.

**About Public Counsel**

3. Based in Los Angeles, Public Counsel is a nonprofit public interest law firm dedicated to advancing civil rights and racial and economic justice, as well as to amplifying the power of our

clients through comprehensive legal advocacy. Public Counsel depends upon the recovery of attorneys' fees from opposing parties and public and charitable funding sources to support its services. Any fees recovered for legal services provided by Public Counsel directly support our programs; they are not distributed to any Public Counsel staff member or volunteer.

4. Public Counsel's Immigrants' Rights Project ("IRP") provides pro bono placement and direct services to hundreds of immigrants each year. In addition to our services to adult immigrants, this involves providing free legal representation to unaccompanied children in proceedings before the Immigration Courts, in administrative proceedings before defendant U.S. Citizenship and Immigration Services ("USCIS"), and in ancillary proceedings in state courts. In addition to direct representation of clients seeking affirmative immigration relief and defense of those in removal proceedings, we also engage in appellate representation before the Board of Immigration Appeals ("BIA") and the U.S. Court of Appeals for the Ninth Circuit. IRP's children's removal defense team carries a caseload of approximately 200 children at any given time.

5. Public Counsel engages in immigration litigation in federal courts related to the Administrative Procedure Act and constitutional law violations, including seeking redress for policies that negatively affect children such as the policies at issue in this matter. In addition to my cases discussed below, our team's litigation has included *Flores v. Sessions*, CV 85-4544-DMG (C.D. Cal.) (challenging the federal government's family separation policy on constitutional grounds), *J.L. v. Cuccinelli*, CV 18-4914 (N.D. Cal.) (challenging a policy that resulted in denials of special immigrant juvenile classification to petitioners in California), *Franco v. Holder*, CV 10-02211 DMG (C.D. Cal.) (a class action on behalf of hundreds of immigration detainees in California, Arizona, and Washington who suffer from severe mental

disabilities), and *Regents of the University of California v. DHS*, 18-15068 (U.S.) (challenging the Department of Homeland Security's decision to end the Deferred Action for Childhood Arrivals program).

**My Professional Background, Qualifications, and Expertise in Unaccompanied Children's Asylum Law and Practice**

6. After graduating from Yale Law School in 2002, I served as a judicial clerk to the Honorable Raymond C. Fisher on the Ninth Circuit. I joined Public Counsel in 2003, and I have worked there ever since. From 2003 to 2004, I served as an Arthur L. Liman Public Interest Fellow within IRP. In 2004, I transitioned to a Staff Attorney position and I became a Senior Staff Attorney in 2009. I served as IRP's Acting Directing Attorney in 2018, and the following year I served as the Acting Supervising Senior Staff Attorney of our children's removal defense team. I served as the Interim Directing Attorney of our Audrey Irmas Gender Justice Project for six months spanning 2022 and 2023, and in November 2023 I assumed the role of Interim President and Chief Executive Officer. In late July 2024, I took on my current role.

7. I also was employed as a lecturer in law for the University of California Los Angeles School of Law from the spring of 2008 through the spring of 2018. During this time, I co-taught the law school's Asylum Clinic. In this capacity, each spring I ran a twice-weekly seminar focused on client interviewing, cross-cultural communication, declaration and brief writing, and trial advocacy skills. I also supervised student pairs working on asylum cases at Public Counsel, including those of unaccompanied child asylum seekers.

8. I am admitted to the bars of the State of California, the U.S. District Court for the Central District of California, the U.S. Court of Appeals for the Ninth Circuit, and the U.S. Supreme Court.

9. I have devoted my career to representing children in immigration matters, training and supporting attorneys to provide such representation, and advocating for children's interests in a variety of ways—including through federal litigation. Through this work, I have developed an expertise in unaccompanied children's asylum law and practice, which includes deep knowledge of relevant asylum policies as well as child-centered and trauma-informed practices. I have experience interviewing children who traveled to the United States unaccompanied, engaging in trauma-informed interviewing techniques, providing child-centered legal services, navigating ethical issues related to children's representation, and practicing cultural sensitivity and humility. I have also received training in child development and psychology, and the effects of trauma on young people.

10. Over the past two decades, I have directly represented or overseen the representation of hundreds of immigrant children, including many unaccompanied children in removal proceedings before EOIR who also qualified for asylum before USCIS. These children have sought various forms of immigration relief, including asylum and special immigrant juvenile classification, and ultimately in some cases U.S. citizenship. I have represented them before USCIS, the Immigration Courts, and the BIA—as well as before California state courts, federal district courts, and the Ninth Circuit.

11. I began practicing law before the passage of the Trafficking Victims Protection Reauthorization Act of 2008 (“TVPRA”) and its protections for unaccompanied children. Over the years, I have tracked federal agencies' interpretations of the TVPRA in their policies and practices, and advocated for robust protections for children who migrate alone in light of their vulnerabilities.

12. I served as an Asylum Office Liaison with the American Immigration Lawyers Association (“AILA”) from 2010 through 2014, and as a National Benefits Center Liaison for the same organization from 2017 through 2018. I participated in the Federal Interagency Working Group on Unaccompanied Children from 2013 through 2015, and again in 2021. One of my areas of focus was jurisdiction over unaccompanied children’s asylum claims.

13. I have published extensively on children’s immigration issues across a range of topics. My publications that address asylum include:

- a. *Through the Eyes of a Child: Guiding Unaccompanied Children Through the Asylum Labyrinth*, in 2021 AILA ASYLUM VIRTUAL CONFERENCE HANDBOOK 18 (2021).
- b. *Top 10 Pitfalls in Asylum Cases before EOIR and USCIS*, in IMMIGRATION PRACTICE POINTERS: TIPS FOR HANDLING COMPLEX CASES (AILA 2018).
- c. *“Don’t Turn Your Back On Us!”—Representing Unaccompanied Children in Removal Proceedings*, in IMMIGRATION PRACTICE POINTERS: TIPS FOR HANDLING COMPLEX CASES 635 (AILA 2015).
- d. *Representing Children in Removal Proceedings: Ethical and Practical Issues*, in IMMIGRATION PRACTICE POINTERS: TIPS FOR HANDLING COMPLEX CASES 559 (AILA 2014).

14. I have trained national, state, and local audiences on children’s immigration issues across a range of topics, and have reached thousands of people, including state and federal judges, attorneys, social workers, child advocates, and law students. In the past five years, my speaking engagements that addressed asylum include:

- a. “Representing Children: Best Practices in Litigating to Protect the Most Vulnerable Immigrants,” *American Immigration Lawyers Association Colorado Chapter Conference*, February 11, 2022 (viewed statewide).
- b. “Preparing for and Attending Asylum Interviews at USCIS,” *Representing Unaccompanied Children in California Conference*, Practising Law Institute, November 15, 2021 (viewed nationwide).
- c. “Through the Eyes of a Child: Guiding Unaccompanied Children Through the Asylum Labyrinth,” *American Immigration Lawyers Association Asylum Conference*, August 19, 2021 (viewed nationwide).
- d. “Children Are Different: Asylum, SIJS, and Strategies for Removal Proceedings,” *Twelfth Annual Symposium on Family-Based Immigration Law*, Los Angeles County Bar Association, March 7, 2020 (Los Angeles, California).
- e. “Youth Is No Excuse: Unaccompanied Children and the Asylum Transit Bar” & “Fighting to Preserve TVPRA Asylum Protections in 2019 and Beyond,” *National Training on Representation and Advocacy for Unaccompanied Immigrant Children*, American Bar Association and Kids in Need of Defense, December 12, 2019 (Houston, Texas).

In the 16 years prior to these speaking engagements, I spoke on asylum issues at approximately 30 other events, including events organized by state judicial councils and the federal Office of Citizenship and Immigration Services Ombudsman.

15. I have provided technical assistance on children’s immigration issues to hundreds of practitioners. This includes both pro bono attorneys with whom Public Counsel has placed children’s cases, and attorneys nationwide who seek out my advice and counsel because of my

specialized expertise. I have answered questions, reviewed draft forms and court documents, and engaged in detailed strategy sessions to benefit the hundreds, if not thousands, of children served by these practitioners.

16. Over the years, I have provided detailed commentary to the federal government on a host of immigration regulations as well as USCIS and Executive Office for Immigration Review forms. In a number of instances, the federal government has adopted my suggested edits to these regulations and forms.

17. I have also supported legislation to protect immigrant children, including a California state law that expanded access to special immigrant juvenile classification for survivors of child abuse, neglect, or abandonment who had already turned 18 years old but had not yet reached the age of 21.

18. During my time at Public Counsel, I have litigated cases on behalf of immigrants before federal district courts, the Ninth Circuit, and the California state courts. The vast majority of my clients in these cases have been immigrant children.

19. I represented petitioners before the Ninth Circuit in the following published decisions:

- a. *B.R. v. Garland*, 26 F.4th 827 (9th Cir. 2022) (counsel for respondent in case involving suppression of alienage evidence and termination of removal proceedings for a person who entered the United States as a child).
- b. *Hernandez-Galand v. Garland*, 996 F.3d 1030 (9th Cir. 2021) (counsel for mother and child respondents in case involving motion to rescind their *in absentia* removal orders to allow them to pursue asylum).
- c. *C.J.L.G. v. Barr*, 923 F.3d 622, 627 (9th Cir. 2019) (en banc) (counsel for indigent child in case holding that an immigration judge must advise a child in

removal proceedings when there is a “reasonable possibility” the child may be eligible for special immigrant juvenile classification).

- d. *J.E.F.M. v. Lynch*, 837 F.3d 1026 (9th Cir. 2016) (class counsel for indigent children including unaccompanied child asylum seekers in case involving federal constitutional and statutory claims to right to government-appointed counsel in removal proceedings).
- e. *Garcia v. Holder*, 659 F.3d 1261 (9th Cir. 2011) (counsel for respondent in case involving the interplay between special immigrant juvenile classification and cancellation of removal under 8 U.S.C. § 1229b).

20. I represented a petitioner before the California Court of Appeals in *Leslie H. v. Superior Court*, 224 Cal. App. 4th 340 (2014), a case of first impression holding that eligibility for special immigrant juvenile classification may be established in the course of delinquency proceedings.

21. In addition to representing immigrants before the federal courts, I have worked on many amicus briefs filed with EOIR, the federal district courts, and the Ninth Circuit—as well as with state courts, including the Supreme Court of California. My amicus efforts have supported favorable development of the law for immigrant children. For example, I was involved in an amicus brief that led the BIA to hold that children under 18 categorically qualify for the extraordinary circumstances exception to the one-year asylum deadline, and that the age of a person between 18 and 21 remains a relevant factor when determining whether an applicant qualifies for the extraordinary circumstances exception. *See* A-D-, AXXX XXX 526 (BIA May 22, 2017) (unpublished), *available at* <https://www.scribd.com/document/351904250/A-D-AXXX-XXX-526-BIA-May-22-2017>.



22. In recognition of my body of work, the American Bar Association honored me as their Fearless Children's Lawyer for April 2021.

**Work Performed by Public Counsel in Connection With This Matter**

23. Three timekeepers from Public Counsel recorded time on this case from July 1, 2019, through the present. This includes myself, Mary Tanagho Ross—who is now employed by Bet Tzedek Legal Services and whose expertise is outlined in her contemporaneously filed declaration—and a paralegal for whose time we have not requested recovery.

24. Since filing the complaint on July 1, 2019, Public Counsel and co-counsel have engaged in legal research and writing, including drafting pleadings, motions, and other court filings; review and analysis of government documents, including those in the Administrative Record; discussions with declarants and drafting declarations in support of court filings; virtual and in-person mediations; communications with opposing counsel, including communications to provide notice of violations of the preliminary injunction; communication with legal representatives for class members or potential class members on their cases; and education of immigration law practitioners regarding the preliminary injunction and proposed settlement agreement.

25. Given our lean staffing and other obligations, Public Counsel could not have litigated this case on our own. Instead, it was essential that we partner with National Immigration Project (which has an extensive track record in immigration and due process litigation), Kids in Need of Defense (which represents unaccompanied children and has expansive contact with thousands of class members and prospective class members), and Goodwin Procter LLP (which has extensive federal litigation experience). As a team, we divided responsibilities, provided quality control, and accounted for the needs of class members in varying postures.

26. The time and labor that Public Counsel expended in this case was essential to our success and was commensurate with the significant and complex issues that arose during the litigation—which ultimately resulted in a robust settlement agreement negotiated against sophisticated and experienced government counsel. Many of the issues presented were of first impression, and required substantial analysis grounded in our expertise. We had to mentor legal representatives, analyze laws and policies, and field requests from class members regarding their rights under the injunction that often resulted in our advocating with opposing counsel on behalf of our clients. Indeed, unaccompanied children—given their age, vulnerabilities, and overall needs—required more hands-on assistance navigating the questions raised in this case.

27. My expertise in unaccompanied children’s asylum law and practice was essential to this litigation. I employed it to inform the shaping of the original and amended complaints and to craft the proposed temporary restraining order, as well as the supporting briefing and evidence. I identified and worked closely with declarants in support of our various motions, and through my experience was able to help detect and ultimately convince the Court to enjoin Defendants’ practices that emerged after the temporary restraining order and preliminary injunction were in place. I relied upon my expertise to evaluate our litigation options, strategy decisions, and settlement proposals. I employed my specialized training and education from outside the field of American law in a variety of ways, including by focusing on class members’ harm when deprived of access to an asylum interview with a USCIS officer trained in trauma-informed, culturally sensitive, and child-appropriate measures, and on the value of class members’ exemption from the one-year filing deadline.

28. Public Counsel, with our partners, stepped in to litigate this case despite the many challenges of doing so. Over the years, we declined other opportunities to protect our time to

focus on this litigation. We worked tirelessly without any guarantee that we would eventually secure fees, something that most other attorneys are not in a position to do. Had our organizations not stepped in to protect unaccompanied children's rights with this litigation, I am not aware of anyone else who would have done so, leaving these children with no recourse.

29. Attached to this declaration as Exhibit A is a table setting forth itemized entries describing tasks my Public Counsel colleagues and I performed in this matter, the date of the task, and the time spent on each task. The table reflects contemporaneous entries kept with electronic time-tracking tools whose output has been edited for form, clarity, and consistency.

30. In requesting reimbursement for fees incurred in this matter, we have proposed rates consistent with the EAJA and with Appendix B to this Court's local rules. I was admitted to practice in 2003, and Ms. Tanagho Ross was admitted to practice in 2011. For Ms. Tanagho Ross's work, we request reimbursement at EAJA rates with cost-of-living adjustments. In keeping with my experience in asylum law and practice relating to unaccompanied children, a specialized skill essential for this litigation, I have requested reimbursement at rates specified in the local rules for attorneys with between sixteen to over twenty years' practice. Because the rule amendments setting forth the current rate guidelines took effect in July 2014, we have requested an adjustment of those 2014 rates using the average annual consumer price index (CPI-U) for Maryland. These rates are substantially lower than Public Counsel's standard rates for my work. For example, my billing rate is currently \$960.00/hour, and therefore the requested reimbursement rate of \$616.36/hour is approximately a 36% reduction of the standard rate.

31. Attached to this declaration as Exhibit B is a table itemizing expenses incurred by Public Counsel in litigating and settling this matter. We incurred these expenses for travel to the March 2024 mediation and for translation of the class notice. For each expense, the date, purpose,

payee, and amount are set forth. Public Counsel has retained receipts documenting each of these expenditures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed December 23, 2024, in Los Angeles, California.

/s/ Kristen Jackson

Kristen Jackson

Public Counsel

610 South Ardmore Avenue

Los Angeles, California 90005

213-385-2977 ext. 157

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# Exhibit A

Public Counsel Time Records - <i>J.O.P. v. DHS</i> - 2019 through December 15, 2024						
Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	7/1/2019	0.30	\$ 453.00	\$ 135.90	Signed and circulated retainer agreements	Case development
Kristen Jackson	7/8/2019	0.40	\$ 453.00	\$ 181.20	Participated in team call regarding temporary restraining order (TRO) and class certification (CC)	Case development
Mary Tanagho Ross	7/9/2019	0.40	\$ 209.88	\$ 83.95	Responded to emails re case initiation	Case development
Kristen Jackson	7/9/2019	0.70	\$ 453.00	\$ 317.10	Reviewed TRO hearing outline and declaration shell	Motions practice
Kristen Jackson	7/10/2019	0.50	\$ 453.00	\$ 226.50	Discussed case planning with Mary Tanagho Ross (MTR)	Case development
Mary Tanagho Ross	7/10/2019	0.50	\$ 209.88	\$ 104.94	Met with Kristen Jackson (KJ) re case	Case development
Kristen Jackson	7/10/2019	0.30	\$ 453.00	\$ 135.90	Reviewed materials for possible declarations	Motions practice
Kristen Jackson	7/11/2019	0.60	\$ 453.00	\$ 271.80	Participated in team call re declarations	Case development
Kristen Jackson	7/11/2019	1.00	\$ 453.00	\$ 453.00	Worked on TRO support declarations	Motions practice
Kristen Jackson	7/13/2019	1.00	\$ 453.00	\$ 453.00	Reviewed and commented on TRO declarations	Motions practice
Kristen Jackson	7/15/2019	5.00	\$ 453.00	\$2,265.00	Reviewed and commented on TRO declarations	Motions practice
Kristen Jackson	7/15/2019	0.50	\$ 453.00	\$ 226.50	Researched TRO hearing prep questions	Motions practice
Mary Tanagho Ross	7/15/2019	1.90	\$ 209.88	\$ 398.77	Worked on moot questions for TRO hearing	Motions practice
Kristen Jackson	7/16/2019	1.50	\$ 453.00	\$ 679.50	Participated in TRO hearing prep call	Motions practice
Kristen Jackson	7/16/2019	0.50	\$ 453.00	\$ 226.50	Reviewed and commented on TRO declarations	Motions practice
Kristen Jackson	7/17/2019	1.50	\$ 453.00	\$ 679.50	Reviewed TRO hearing argument outline	Motions practice
Kristen Jackson	7/18/2019	1.50	\$ 453.00	\$ 679.50	Participated in TRO hearing moot by phone	Motions practice
Kristen Jackson	7/19/2019	0.50	\$ 453.00	\$ 226.50	Participated in TRO hearing debrief	Case development
Kristen Jackson	7/20/2019	0.70	\$ 453.00	\$ 317.10	SW MTR re hearing and follow up	Case development
Mary Tanagho Ross	7/20/2019	0.70	\$ 209.88	\$ 146.92	Met with KMJ re hearing	Motions practice
Kristen Jackson	7/21/2019	0.80	\$ 453.00	\$ 362.40	Participated in team call	Case development
Kristen Jackson	7/21/2019	0.20	\$ 453.00	\$ 90.60	SW MTR re strategy call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	7/21/2019	0.80	\$ 453.00	\$ 362.40	Edited letter to the court	Case development
Mary Tanagho Ross	7/21/2019	0.20	\$ 209.88	\$ 41.98	Met with KMJ re strategy	Case development
Kristen Jackson	7/21/2019	0.60	\$ 453.00	\$ 271.80	Reviewed class certification materials	Motions practice
Mary Tanagho Ross	7/21/2019	0.70	\$ 209.88	\$ 146.92	Edited class certification materials	Motions practice
Kristen Jackson	7/23/2019	0.60	\$ 453.00	\$ 271.80	Discussed case planning with MTR	Case development
Mary Tanagho Ross	7/23/2019	0.60	\$ 209.88	\$ 125.93	Met with KMJ re case	Case development
Kristen Jackson	7/29/2019	1.20	\$ 453.00	\$ 543.60	Participated in team call	Case development
Kristen Jackson	8/2/2019	2.50	\$ 453.00	\$1,132.50	Followed up on TRO grant	Class counsel duties
Kristen Jackson	8/3/2019	0.50	\$ 453.00	\$ 226.50	Conducted research on preliminary injunction (PI)	Motions practice
Kristen Jackson	8/4/2019	0.60	\$ 453.00	\$ 271.80	Participated in team call	Case development
Kristen Jackson	8/4/2019	0.70	\$ 453.00	\$ 317.10	Drafted class definition and PI language	Motions practice
Kristen Jackson	8/5/2019	1.00	\$ 453.00	\$ 453.00	Participated in team call and worked on class cert and PI language	Case development
Kristen Jackson	8/6/2019	0.40	\$ 453.00	\$ 181.20	Discussed case planning with MTR	Case development
Mary Tanagho Ross	8/6/2019	0.40	\$ 209.88	\$ 83.95	Met with KMJ re case	Case development
Mary Tanagho Ross	8/6/2019	0.70	\$ 209.88	\$ 146.92	Edit class counsel declaration	Motions practice
Kristen Jackson	8/8/2019	2.00	\$ 453.00	\$ 906.00	Revised class counsel declaration	Motions practice
Kristen Jackson	8/9/2019	1.20	\$ 453.00	\$ 543.60	Prepared for and participated in team call	Case development
Kristen Jackson	8/10/2019	1.00	\$ 453.00	\$ 453.00	Reviewed correspondence re TRO	Case development
Kristen Jackson	8/11/2019	3.70	\$ 453.00	\$1,676.10	Reviewed and edited letter to court re motion	Motions practice
Kristen Jackson	8/12/2019	0.50	\$ 453.00	\$ 226.50	Participated in team call	Case development
Kristen Jackson	8/13/2019	1.00	\$ 453.00	\$ 453.00	Prepped for and participated in court call	Case development
Kristen Jackson	8/14/2019	0.50	\$ 453.00	\$ 226.50	Reviewed and commented on proposed order	Motions practice
Mary Tanagho Ross	8/19/2019	0.80	\$ 209.88	\$ 167.90	Participated in team call	Case development
Mary Tanagho Ross	8/28/2019	0.50	\$ 209.88	\$ 104.94	Reviewed extension motion	Motions practice
Kristen Jackson	8/29/2019	3.00	\$ 453.00	\$1,359.00	Reviewed all drafts and correspondence shared during break	Case development
Mary Tanagho Ross	8/29/2019	0.70	\$ 209.88	\$ 146.92	Participated in team call	Case development
Mary Tanagho Ross	8/29/2019	0.40	\$ 209.88	\$ 83.95	Reviewed blast to list serves	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	8/30/2019	0.90	\$ 209.88	\$ 188.89	Reviewed email correspondence and responded	Case development
Kristen Jackson	8/30/2019	1.00	\$ 453.00	\$ 453.00	Reviewed and commented on proposed order	Motions practice
Kristen Jackson	8/31/2019	0.80	\$ 453.00	\$ 362.40	Revised email blast in light of USCIS notices	Class counsel duties
Kristen Jackson	9/1/2019	0.30	\$ 453.00	\$ 135.90	Finalized and sent out email blast	Class counsel duties
Mary Tanagho Ross	9/3/2019	0.60	\$ 209.88	\$ 125.93	Participated in team call	Case development
Mary Tanagho Ross	9/3/2019	0.60	\$ 209.88	\$ 125.93	Emailed KMJ update from call	Case development
Kristen Jackson	9/5/2019	1.50	\$ 453.00	\$ 679.50	Reviewed and edited letter to court re motion	Motions practice
Kristen Jackson	9/6/2019	1.00	\$ 453.00	\$ 453.00	Participated in team call	Case development
Kristen Jackson	9/8/2019	4.50	\$ 453.00	\$2,038.50	Edited proposed order and annotations	Motions practice
Kristen Jackson	9/9/2019	0.50	\$ 453.00	\$ 226.50	Participated in team call	Case development
Kristen Jackson	9/9/2019	0.20	\$ 453.00	\$ 90.60	Circulated proposed order/annotation	Motions practice
Kristen Jackson	9/13/2019	0.30	\$ 453.00	\$ 135.90	Participated in team call	Case development
Kristen Jackson	9/13/2019	1.10	\$ 453.00	\$ 498.30	Reviewed and edited annotated proposed order	Motions practice
Kristen Jackson	9/16/2019	0.40	\$ 453.00	\$ 181.20	Participated in team call	Case development
Mary Tanagho Ross	9/16/2019	0.60	\$ 209.88	\$ 125.93	Emailed with atty re case where USCIS needed to retract jurisdictional denial pursuant to the PI	Case development
Mary Tanagho Ross	9/17/2019	1.30	\$ 209.88	\$ 272.84	Researched cases regarding ICE	Case development
Mary Tanagho Ross	9/19/2019	0.30	\$ 209.88	\$ 62.96	Reviewed email to opposing counsel	Case development
Mary Tanagho Ross	9/24/2019	0.40	\$ 209.88	\$ 83.95	Emailed re retracting of non jurisdiction letters	Case development
Kristen Jackson	9/24/2019	0.30	\$ 453.00	\$ 135.90	Circulated notice regarding TRO extension	Class counsel duties
Mary Tanagho Ross	9/24/2019	0.40	\$ 209.88	\$ 83.95	Emailed re TRO extension to list serve	Class counsel duties
Mary Tanagho Ross	9/26/2019	0.30	\$ 209.88	\$ 62.96	Participated in team call	Case development
Kristen Jackson	9/26/2019	1.00	\$ 453.00	\$ 453.00	Reviewed and edited annotated proposed order	Motions practice
Kristen Jackson	9/28/2019	2.00	\$ 453.00	\$ 906.00	Reviewed and edited annotated proposed order	Motions practice



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	9/29/2019	0.60	\$ 453.00	\$ 271.80	Researched converting TRO into PI	Motions practice
Kristen Jackson	9/30/2019	0.40	\$ 453.00	\$ 181.20	Participated in team call	Case development
Kristen Jackson	9/30/2019	0.50	\$ 453.00	\$ 226.50	Reviewed and edited annotated proposed order	Motions practice
Kristen Jackson	10/7/2019	0.30	\$ 453.00	\$ 135.90	Discussed case developments with Michelle Mendez (MM)	Case development
Kristen Jackson	10/8/2019	0.90	\$ 453.00	\$ 407.70	Participated in team call	Case development
Kristen Jackson	10/8/2019	1.00	\$ 453.00	\$ 453.00	Reviewed and edited PI motion	Motions practice
Mary Tanagho Ross	10/8/2019	0.90	\$ 209.88	\$ 188.89	Reviewed issue re TRO violation	Class counsel duties
Mary Tanagho Ross	10/9/2019	0.20	\$ 209.88	\$ 41.98	Participated in team call	Case development
Kristen Jackson	10/11/2019	1.00	\$ 453.00	\$ 453.00	Spoke with M. Mariscal regarding PI violation	Class counsel duties
Kristen Jackson	10/12/2019	1.10	\$ 453.00	\$ 498.30	Drafted and circulated common interest agreement	Case development
Kristen Jackson	10/14/2019	0.40	\$ 453.00	\$ 181.20	Participated in team call	Case development
Kristen Jackson	10/14/2019	1.20	\$ 453.00	\$ 543.60	Researched issues related to compliance	Case development
Mary Tanagho Ross	10/14/2019	0.40	\$ 209.88	\$ 83.95	Reviewed and edited blast email	Class counsel duties
Mary Tanagho Ross	10/14/2019	0.30	\$ 209.88	\$ 62.96	Evaluated potential TRO violation	Class counsel duties
Mary Tanagho Ross	10/15/2019	0.40	\$ 209.88	\$ 83.95	Reviewed documents related to TRO violation	Class counsel duties
Kristen Jackson	10/16/2019	0.20	\$ 453.00	\$ 90.60	Circulated notice regarding PI	Class counsel duties
Kristen Jackson	10/21/2019	0.60	\$ 453.00	\$ 271.80	Participated in team call	Case development
Mary Tanagho Ross	10/21/2019	1.30	\$ 209.88	\$ 272.84	Corresponded with co-counsel re violation	Class counsel duties
Kristen Jackson	10/24/2019	1.00	\$ 453.00	\$ 453.00	Reviewed potential noncompliance cases and emailed team	Class counsel duties
Mary Tanagho Ross	10/24/2019	0.40	\$ 209.88	\$ 83.95	Corresponded with practitioner re potential violation of the TRO	Class counsel duties
Mary Tanagho Ross	10/29/2019	0.40	\$ 209.88	\$ 83.95	Participated in team call	Case development
Mary Tanagho Ross	10/29/2019	0.50	\$ 209.88	\$ 104.94	Reviewed email from opposing counsel regarding resolving cases in compliance with TRO	Class counsel duties
Kristen Jackson	11/1/2019	1.00	\$ 453.00	\$ 453.00	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	11/1/2019	0.60	\$ 209.88	\$ 125.93	Corresponded re TRO violations	Class counsel duties
Mary Tanagho Ross	11/2/2019	0.80	\$ 209.88	\$ 167.90	Participated in team call	Case development
Kristen Jackson	11/2/2019	1.80	\$ 453.00	\$ 815.40	Reviewed and commented on TRO/PI violations	Class counsel duties
Kristen Jackson	11/4/2019	1.00	\$ 453.00	\$ 453.00	Participated in team call	Case development
Mary Tanagho Ross	11/4/2019	0.70	\$ 209.88	\$ 146.92	Reviewed draft proposed order from defendants	Case development
Kristen Jackson	11/4/2019	0.50	\$ 453.00	\$ 226.50	Reviewed violations email	Class counsel duties
Mary Tanagho Ross	11/4/2019	1.00	\$ 209.88	\$ 209.88	Drafted email to opposing counsel documenting TRO violation	Class counsel duties
Mary Tanagho Ross	11/6/2019	1.00	\$ 209.88	\$ 209.88	Reviewed notes from stakeholder meeting and corresponded with counsel	Class counsel duties
Mary Tanagho Ross	11/7/2019	0.40	\$ 209.88	\$ 83.95	Reviewed documents related to USCIS and Kim Memo	Case development
Mary Tanagho Ross	11/7/2019	1.30	\$ 209.88	\$ 272.84	Reviewed email to defendants re violation of TRO	Class counsel duties
Mary Tanagho Ross	11/8/2019	1.00	\$ 209.88	\$ 209.88	Corresponded with practitioners regarding correcting a notice of denial of jurisdiction	Class counsel duties
Mary Tanagho Ross	11/13/2019	2.00	\$ 209.88	\$ 419.76	Participated in meet and confer call with defendants	Case development
Mary Tanagho Ross	11/13/2019	0.50	\$ 209.88	\$ 104.94	Participated in team call	Case development
Mary Tanagho Ross	11/14/2019	1.50	\$ 209.88	\$ 314.82	Reviewed case for violation of the TRO	Class counsel duties
Kristen Jackson	11/15/2019	1.00	\$ 453.00	\$ 453.00	Participated in team call	Case development
Kristen Jackson	11/17/2019	2.50	\$ 453.00	\$1,132.50	Edited amended complaint	Pleadings
Kristen Jackson	12/1/2019	1.50	\$ 453.00	\$ 679.50	Reviewed and edited amended complaint	Pleadings
Kristen Jackson	12/2/2019	1.20	\$ 453.00	\$ 543.60	Participated in team call	Case development
Kristen Jackson	12/3/2019	2.00	\$ 453.00	\$ 906.00	Reviewed research for amended complaint and possible new named plaintiffs	Pleadings
Kristen Jackson	12/3/2019	0.50	\$ 453.00	\$ 226.50	Spoke with M. Mariscal regarding violation	Class counsel duties
Kristen Jackson	12/4/2019	1.10	\$ 453.00	\$ 498.30	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	12/4/2019	1.00	\$ 453.00	\$ 453.00	Reviewed research for amended complaint	Pleadings
Kristen Jackson	12/5/2019	0.70	\$ 453.00	\$ 317.10	Participated in team call	Case development
Kristen Jackson	12/9/2019	0.80	\$ 453.00	\$ 362.40	Participated in team call	Case development
Kristen Jackson	12/9/2019	0.30	\$ 453.00	\$ 135.90	Reviewed and edited amended complaint	Pleadings
Kristen Jackson	12/13/2019	1.00	\$ 453.00	\$ 453.00	Reviewed materials and participated in team call	Case development
Kristen Jackson	12/18/2019	7.00	\$ 453.00	\$3,171.00	Reviewed and edited amended complaint	Pleadings
Kristen Jackson	12/19/2019	3.00	\$ 453.00	\$1,359.00	Reviewed and edited motion to dismiss (MTD) opposition	Motions practice
Kristen Jackson	1/6/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Kristen Jackson	1/6/2020	1.70	\$ 457.97	\$ 778.55	Reviewed MTD	Motions practice
Mary Tanagho Ross	1/7/2020	0.80	\$ 211.99	\$ 169.59	Reviewed motion to dismiss (MTD)	Motions practice
Mary Tanagho Ross	1/7/2020	1.40	\$ 211.99	\$ 296.79	Conducted research for MTD opposition	Motions practice
Mary Tanagho Ross	1/8/2020	0.70	\$ 211.99	\$ 148.39	Conducted research for MTD opposition	Motions practice
Kristen Jackson	1/9/2020	0.50	\$ 457.97	\$ 228.99	Spoke with MTR re research	Motions practice
Mary Tanagho Ross	1/9/2020	0.50	\$ 211.99	\$ 106.00	Participated in call with KJ re MTD opposition research	Motions practice
Mary Tanagho Ross	1/9/2020	1.50	\$ 211.99	\$ 317.99	Continued research re evidence presented on a MTD	Motions practice
Kristen Jackson	1/10/2020	0.40	\$ 457.97	\$ 183.19	Participated in team call	Case development
Kristen Jackson	1/16/2020	0.30	\$ 457.97	\$ 137.39	Strategized with Rebecca Scholtz (RS) re MTD opposition	Motions practice
Kristen Jackson	1/16/2020	0.70	\$ 457.97	\$ 320.58	Spoke with L. Esterle	Motions practice
Kristen Jackson	1/16/2020	4.00	\$ 457.97	\$1,831.88	Reviewed and edited MTD opposition outline	Motions practice
Kristen Jackson	1/17/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Kristen Jackson	1/17/2020	1.00	\$ 457.97	\$ 457.97	Edited MTD opposition outline	Motions practice
Kristen Jackson	1/17/2020	0.30	\$ 457.97	\$ 137.39	Spoke with RS re MTD opposition	Motions practice
Kristen Jackson	1/18/2020	6.00	\$ 457.97	\$2,747.82	Edited MTD opposition fact section	Motions practice
Kristen Jackson	1/19/2020	0.50	\$ 457.97	\$ 228.99	Reviewed draft of MTD opposition fact section	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	1/19/2020	0.50	\$ 457.97	\$ 228.99	Discussed draft of MTD opposition fact section with RS	Motions practice
Kristen Jackson	1/19/2020	4.00	\$ 457.97	\$1,831.88	Edited MTD opposition fact section	Motions practice
Kristen Jackson	1/20/2020	2.00	\$ 457.97	\$ 915.94	Edited MTD opposition fact section	Motions practice
Kristen Jackson	1/20/2020	1.00	\$ 457.97	\$ 457.97	Finalized MTD opposition fact section	Motions practice
Kristen Jackson	1/21/2020	3.00	\$ 457.97	\$1,373.91	Edited MTD opposition	Motions practice
Kristen Jackson	1/22/2020	6.00	\$ 457.97	\$2,747.82	Edited MTD opposition	Motions practice
Kristen Jackson	1/23/2020	2.00	\$ 457.97	\$ 915.94	Edited MTD opposition	Motions practice
Kristen Jackson	1/24/2020	1.00	\$ 457.97	\$ 457.97	Completed final review of MTD/MTE filings	Motions practice
Kristen Jackson	1/30/2020	0.60	\$ 457.97	\$ 274.78	Discussed case plan with MTR	Case development
Mary Tanagho Ross	1/30/2020	0.60	\$ 211.99	\$ 127.19	Discussed case plan with KMJ	Case development
Kristen Jackson	2/3/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	2/7/2020	1.00	\$ 457.97	\$ 457.97	Reviewed Guilford College decision	Motions practice
Kristen Jackson	2/10/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Kristen Jackson	2/18/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Mary Tanagho Ross	3/3/2020	0.40	\$ 211.99	\$ 84.80	Emailed attorney re I-589 UC application	Class counsel duties
Mary Tanagho Ross	3/4/2020	0.30	\$ 211.99	\$ 63.60	Discussed court hearing with KMJ	Case development
Kristen Jackson	3/4/2020	0.30	\$ 457.97	\$ 137.39	Discussed upcoming court call with MTR	Motions practice
Kristen Jackson	3/6/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Mary Tanagho Ross	3/8/2020	0.80	\$ 211.99	\$ 169.59	Gathered data for class certification declaration	Motions practice
Kristen Jackson	3/9/2020	0.50	\$ 457.97	\$ 228.99	Reviewed E.D.G. materials and corresponded with his attorney	Class counsel duties
Mary Tanagho Ross	3/14/2020	0.40	\$ 211.99	\$ 84.80	Edited hearing outline	Motions practice
Mary Tanagho Ross	3/15/2020	0.50	\$ 211.99	\$ 106.00	Participated in call with KMJ	Case development
Kristen Jackson	3/15/2020	7.70	\$ 457.97	\$3,526.37	Edited class certification motion	Motions practice
Kristen Jackson	3/15/2020	0.50	\$ 457.97	\$ 228.99	Shared thoughts for court call with MTR	Motions practice
Kristen Jackson	3/16/2020	0.70	\$ 457.97	\$ 320.58	Participated in team call	Case development
Mary Tanagho Ross	3/16/2020	0.70	\$ 211.99	\$ 148.39	Emailed re class rep decs	Motions practice
Kristen Jackson	3/17/2020	1.00	\$ 457.97	\$ 457.97	Worked on named plaintiff declarations	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	3/18/2020	4.00	\$ 457.97	\$1,831.88	Edited class certification motion	Motions practice
Kristen Jackson	3/19/2020	0.70	\$ 457.97	\$ 320.58	Edited named plaintiff declarations	Motions practice
Kristen Jackson	3/20/2020	0.50	\$ 457.97	\$ 228.99	Edited class certification declarations	Motions practice
Kristen Jackson	3/21/2020	1.20	\$ 457.97	\$ 549.56	Reviewed potential new claim	Motions practice
Mary Tanagho Ross	3/22/2020	0.70	\$ 211.99	\$ 148.39	Prepare for call by reviewing notes and declaration	Case development
Kristen Jackson	3/22/2020	0.50	\$ 457.97	\$ 228.99	Reviewed Public Counsel class counsel declaration	Motions practice
Mary Tanagho Ross	3/23/2020	0.50	\$ 211.99	\$ 106.00	Participated in team call	Case development
Kristen Jackson	3/23/2020	0.30	\$ 457.97	\$ 137.39	Finalized named plaintiff declarations	Motions practice
Mary Tanagho Ross	3/23/2020	0.40	\$ 211.99	\$ 84.80	Gather info to update class certification declaration	Motions practice
Mary Tanagho Ross	3/24/2020	0.80	\$ 211.99	\$ 169.59	Updated class counsel declaration	Motions practice
Kristen Jackson	3/26/2020	0.20	\$ 457.97	\$ 91.59	Edited class counsel declaration	Motions practice
Kristen Jackson	3/30/2020	0.40	\$ 457.97	\$ 183.19	Participated in team call	Case development
Kristen Jackson	3/30/2020	0.30	\$ 457.97	\$ 137.39	Edited class certification declarations	Motions practice
Kristen Jackson	3/31/2020	0.10	\$ 457.97	\$ 45.80	Edited correspondence regarding PI violation	Class counsel duties
Kristen Jackson	4/6/2020	0.10	\$ 457.97	\$ 45.80	Edited class counsel declaration	Motions practice
Kristen Jackson	4/8/2020	0.10	\$ 457.97	\$ 45.80	Edited class counsel declaration	Motions practice
Mary Tanagho Ross	4/8/2020	0.80	\$ 211.99	\$ 169.59	Emails re noncompliance and next steps	Class counsel duties
Kristen Jackson	4/9/2020	0.50	\$ 457.97	\$ 228.99	Discussed/investigated New Orleans cases	Class counsel duties
Kristen Jackson	4/10/2020	0.70	\$ 457.97	\$ 320.58	Participated in team call	Case development
Kristen Jackson	4/11/2020	1.00	\$ 457.97	\$ 457.97	Edited and circulated memo on violations	Class counsel duties
Mary Tanagho Ross	4/12/2020	0.90	\$ 211.99	\$ 190.79	Review memo on new MTE	Motions practice
Kristen Jackson	4/13/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development
Kristen Jackson	4/13/2020	1.50	\$ 457.97	\$ 686.96	Reviewed and edited counsel declaration	Motions practice
Mary Tanagho Ross	4/13/2020	0.70	\$ 211.99	\$ 148.39	Edited MTE declaration	Motions practice
Kristen Jackson	4/13/2020	2.00	\$ 457.97	\$ 915.94	Created and edited confidentiality waiver	Class counsel duties
Kristen Jackson	4/13/2020	1.50	\$ 457.97	\$ 686.96	Corresponded regarding PI violation	Class counsel duties
Mary Tanagho Ross	4/15/2020	1.00	\$ 211.99	\$ 211.99	Edited MTE declaration	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	4/16/2020	1.50	\$ 457.97	\$ 686.96	Prepared plaintiff declarations for class certification filing	Motions practice
Kristen Jackson	4/16/2020	1.50	\$ 457.97	\$ 686.96	Reviewed new opinions regarding procedural due process violations	Motions practice
Kristen Jackson	4/16/2020	1.50	\$ 457.97	\$ 686.96	Edited memo regarding PI violations	Class counsel duties
Kristen Jackson	4/17/2020	0.70	\$ 457.97	\$ 320.58	Participated in team call	Case development
Kristen Jackson	4/17/2020	0.50	\$ 457.97	\$ 228.99	Discussed potential violation with attorney	Class counsel duties
Kristen Jackson	4/20/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	4/21/2020	0.50	\$ 457.97	\$ 228.99	Discussed case plan with MTR	Case development
Kristen Jackson	4/21/2020	0.30	\$ 457.97	\$ 137.39	Reviewed named plaintiff declarations	Motions practice
Mary Tanagho Ross	4/21/2020	0.50	\$ 211.99	\$ 106.00	Participated in call with KJ re MTE	Motions practice
Mary Tanagho Ross	4/21/2020	0.60	\$ 211.99	\$ 127.19	Emailed with FIRRP for declaration	Motions practice
Kristen Jackson	4/21/2020	1.00	\$ 457.97	\$ 457.97	Edited declarations regarding violations	Class counsel duties
Kristen Jackson	4/22/2020	0.60	\$ 457.97	\$ 274.78	Discussed case developments with MM	Case development
Kristen Jackson	4/22/2020	1.00	\$ 457.97	\$ 457.97	Reviewed and researched affirmative acts	Motions practice
Kristen Jackson	4/22/2020	0.50	\$ 457.97	\$ 228.99	Discussed violation with R. Garcia	Class counsel duties
Kristen Jackson	4/22/2020	0.70	\$ 457.97	\$ 320.58	Worked on violation issues	Class counsel duties
Kristen Jackson	4/23/2020	3.30	\$ 457.97	\$1,511.30	Researched and edited memo in light of new information regarding violation	Class counsel duties
Kristen Jackson	4/24/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	4/24/2020	0.50	\$ 457.97	\$ 228.99	Reviewed violation materials	Class counsel duties
Kristen Jackson	4/27/2020	0.50	\$ 457.97	\$ 228.99	Discussed strategy with MTR	Case development
Kristen Jackson	4/27/2020	0.90	\$ 457.97	\$ 412.17	Participated in team call	Case development
Kristen Jackson	4/27/2020	0.50	\$ 457.97	\$ 228.99	Discussed strategy with MM	Case development
Mary Tanagho Ross	4/27/2020	0.50	\$ 211.99	\$ 106.00	Participated in call with KJ re case strategy	Case development
Kristen Jackson	4/27/2020	1.50	\$ 457.97	\$ 686.96	Discussed declaration with L. Esterle	Motions practice
Kristen Jackson	4/27/2020	1.00	\$ 457.97	\$ 457.97	Revised brainstorm document	Motions practice
Kristen Jackson	4/28/2020	2.00	\$ 457.97	\$ 915.94	Revised declarations regarding L.M.Z.	Motions practice
Kristen Jackson	4/28/2020	2.50	\$ 457.97	\$1,144.93	Created email regarding new violations	Class counsel duties
Mary Tanagho Ross	4/29/2020	0.90	\$ 211.99	\$ 190.79	Edited declarations for MTE	Motions practice



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	4/30/2020	0.80	\$ 211.99	\$ 169.59	Email with FIRRP re compliance issue	Class counsel duties
Kristen Jackson	5/1/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	5/1/2020	0.30	\$ 457.97	\$ 137.39	Edited declaration regarding L.M.Z.	Motions practice
Mary Tanagho Ross	5/1/2020	0.40	\$ 211.99	\$ 84.80	Reviewed MTE declaration	Motions practice
Kristen Jackson	5/3/2020	1.50	\$ 457.97	\$ 686.96	Brainstormed on amending complaint	Pleadings
Kristen Jackson	5/4/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	5/6/2020	1.50	\$ 457.97	\$ 686.96	Edited complaint	Pleadings
Kristen Jackson	5/6/2020	0.50	\$ 457.97	\$ 228.99	Discussed amendments with MM	Pleadings
Kristen Jackson	5/7/2020	0.30	\$ 457.97	\$ 137.39	Adjusted and circulated complaint	Pleadings
Kristen Jackson	5/11/2020	1.00	\$ 457.97	\$ 457.97	Created chart of upcoming EOIR hearing dates	Case development
Kristen Jackson	5/12/2020	0.30	\$ 457.97	\$ 137.39	Reviewed NY case documents	Class counsel duties
Mary Tanagho Ross	5/13/2020	0.50	\$ 211.99	\$ 106.00	Edited declaration for MTE	Motions practice
Kristen Jackson	5/13/2020	0.50	\$ 457.97	\$ 228.99	Drafted reply to defendants regarding violations	Class counsel duties
Mary Tanagho Ross	5/14/2020	0.50	\$ 211.99	\$ 106.00	Participated in call w FIRRP	Case development
Kristen Jackson	5/14/2020	0.30	\$ 457.97	\$ 137.39	Reviewed MTE materials	Motions practice
Kristen Jackson	5/15/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Kristen Jackson	5/18/2020	2.50	\$ 457.97	\$1,144.93	Reviewed declaration regarding MTE	Motions practice
Kristen Jackson	5/20/2020	1.00	\$ 457.97	\$ 457.97	Reviewed materials related to MTE	Motions practice
Kristen Jackson	5/21/2020	1.00	\$ 457.97	\$ 457.97	Discussed MTE with MTR	Motions practice
Mary Tanagho Ross	5/21/2020	1.00	\$ 211.99	\$ 211.99	Participated in call w KJ re MTE	Motions practice
Kristen Jackson	5/22/2020	0.60	\$ 457.97	\$ 274.78	Participated in team call	Case development
Kristen Jackson	5/22/2020	0.30	\$ 457.97	\$ 137.39	Reviewed EOIR hearing dates	Case development
Mary Tanagho Ross	5/26/2020	0.50	\$ 211.99	\$ 106.00	Participated in call re MTE	Motions practice
Mary Tanagho Ross	5/30/2020	1.30	\$ 211.99	\$ 275.59	Edited declaration for MTE	Motions practice
Mary Tanagho Ross	6/1/2020	1.00	\$ 211.99	\$ 211.99	Participated in team call	Case development
Mary Tanagho Ross	6/1/2020	0.50	\$ 211.99	\$ 106.00	Emailed Memphis atty for MTE	Motions practice
Kristen Jackson	6/3/2020	0.50	\$ 457.97	\$ 228.99	Reviewed MTD decision	Case development
Kristen Jackson	6/4/2020	1.00	\$ 457.97	\$ 457.97	Reviewed MTD decision	Case development
Kristen Jackson	6/5/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	6/5/2020	0.50	\$ 457.97	\$ 228.99	Reviewed MTD decision	Case development
Kristen Jackson	6/5/2020	0.30	\$ 457.97	\$ 137.39	Finalized and sent email blast re MTD	Class counsel duties
Kristen Jackson	6/8/2020	0.70	\$ 457.97	\$ 320.58	Spoke with MTR re call with defendants	Case development
Kristen Jackson	6/8/2020	2.40	\$ 457.97	\$1,099.13	Drafted amended PI proposed order	Motions practice
Kristen Jackson	6/8/2020	0.30	\$ 457.97	\$ 137.39	Edited filing schedule	Motions practice
Mary Tanagho Ross	6/9/2020	0.60	\$ 211.99	\$ 127.19	Corresponded with Team re call	Case development
Mary Tanagho Ross	6/9/2020	2.70	\$ 211.99	\$ 572.37	Participated in call with opposing counsel and co-counsel re next steps	Case development
Kristen Jackson	6/10/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	6/13/2020	2.50	\$ 457.97	\$1,144.93	Reviewed and edited class certification motion draft	Motions practice
Kristen Jackson	6/14/2020	0.70	\$ 457.97	\$ 320.58	Finalized class certification motion draft	Motions practice
Kristen Jackson	6/15/2020	0.70	\$ 457.97	\$ 320.58	Discussed amended PI with MTR	Case development
Kristen Jackson	6/15/2020	0.90	\$ 457.97	\$ 412.17	Participated in team call	Case development
Kristen Jackson	6/15/2020	0.30	\$ 457.97	\$ 137.39	Discussed strategy with MM	Case development
Kristen Jackson	6/15/2020	1.00	\$ 457.97	\$ 457.97	Edited draft amended PI order	Motions practice
Mary Tanagho Ross	6/15/2020	0.70	\$ 211.99	\$ 148.39	Participated in call with KJ re motion to amend the PI (MAPI)	Motions practice
Kristen Jackson	6/17/2020	1.80	\$ 457.97	\$ 824.35	Reviewed answer	Case development
Kristen Jackson	6/19/2020	1.00	\$ 457.97	\$ 457.97	Edited amended PI order	Motions practice
Mary Tanagho Ross	6/19/2020	0.40	\$ 211.99	\$ 84.80	Participated in call w W. Wylegala (WW) re declaration edits	Motions practice
Kristen Jackson	6/20/2020	2.00	\$ 457.97	\$ 915.94	Annotated first amended complaint (FAC) with answer information	Pleadings
Kristen Jackson	6/22/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	6/22/2020	1.00	\$ 457.97	\$ 457.97	Prepared declarations in support of motion to amend the PI (MAPI)	Motions practice
Kristen Jackson	6/23/2020	2.50	\$ 457.97	\$1,144.93	Prepared declarations in support of MAPI	Motions practice
Kristen Jackson	6/24/2020	2.00	\$ 457.97	\$ 915.94	Annotated FAC with answer information	Pleadings
Kristen Jackson	6/24/2020	0.50	\$ 457.97	\$ 228.99	SW D. Elder regarding declaration	Motions practice



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	6/24/2020	0.50	\$ 457.97	\$ 228.99	Finalized declarations of D. Elder and M. Mariscal	Motions practice
Kristen Jackson	6/26/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Kristen Jackson	6/30/2020	0.20	\$ 457.97	\$ 91.59	Checked EOIR hearing dates	Case development
Kristen Jackson	7/1/2020	0.90	\$ 457.97	\$ 412.17	Discussed case with MTR	Case development
Mary Tanagho Ross	7/1/2020	0.90	\$ 211.99	\$ 190.79	Participated in call w KJ	Case development
Kristen Jackson	7/1/2020	0.20	\$ 457.97	\$ 91.59	Updated DE declaration	Motions practice
Kristen Jackson	7/2/2020	0.60	\$ 457.97	\$ 274.78	Participated in team call	Case development
Kristen Jackson	7/2/2020	1.00	\$ 457.97	\$ 457.97	Edited MAPI	Motions practice
Kristen Jackson	7/4/2020	1.00	\$ 457.97	\$ 457.97	Reviewed Garcia-Ramirez and corresponded with MM	Case development
Kristen Jackson	7/4/2020	0.50	\$ 457.97	\$ 228.99	Edited MAPI re removal	Motions practice
Kristen Jackson	7/6/2020	4.50	\$ 457.97	\$2,060.87	Brainstormed on contents of certified administrative record (CAR)	Case development
Mary Tanagho Ross	7/6/2020	1.00	\$ 211.99	\$ 211.99	Participated in team call	Case development
Kristen Jackson	7/7/2020	0.20	\$ 457.97	\$ 91.59	Discussed K.R.C. with MM	Case development
Kristen Jackson	7/7/2020	3.00	\$ 457.97	\$1,373.91	Edited, finalized, reviewed MAPI	Motions practice
Kristen Jackson	7/10/2020	1.00	\$ 457.97	\$ 457.97	Discussed implications of Garcia v. Barr with MM	Case development
Kristen Jackson	7/11/2020	1.00	\$ 457.97	\$ 457.97	Reviewed Garcia v. Barr re MAPI	Motions practice
Kristen Jackson	7/11/2020	3.00	\$ 457.97	\$1,373.91	Reviewed Garcia Ramirez v. ICE re ICE	Motions practice
Kristen Jackson	7/12/2020	1.20	\$ 457.97	\$ 549.56	Reviewed protective order materials	Case development
Kristen Jackson	7/13/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development
Kristen Jackson	7/13/2020	5.00	\$ 457.97	\$2,289.85	Drafted protective order	Case development
Kristen Jackson	7/14/2020	1.00	\$ 457.97	\$ 457.97	Drafted protective order	Case development
Kristen Jackson	7/14/2020	1.00	\$ 457.97	\$ 457.97	Reviewed class certification opposition	Motions practice
Kristen Jackson	7/15/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development
Kristen Jackson	7/15/2020	2.00	\$ 457.97	\$ 915.94	Reviewed class certification opposition	Motions practice
Kristen Jackson	7/15/2020	1.00	\$ 457.97	\$ 457.97	Discussed class certification opposition and CAR with MTR	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	7/15/2020	1.00	\$ 211.99	\$ 211.99	Discussed certified administrative record (CAR) and class certification opposition with KMJ	Motions practice
Kristen Jackson	7/18/2020	0.20	\$ 457.97	\$ 91.59	Reviewed edited protective order	Case development
Kristen Jackson	7/20/2020	0.60	\$ 457.97	\$ 274.78	Participated in team call	Case development
Kristen Jackson	7/20/2020	0.20	\$ 457.97	\$ 91.59	Checked EOIR hearing dates	Case development
Kristen Jackson	7/22/2020	1.00	\$ 457.97	\$ 457.97	Reviewed MAPI opposition and discussed with MTR	Motions practice
Mary Tanagho Ross	7/22/2020	1.00	\$ 211.99	\$ 211.99	Participated in call w KJ re MAPI opposition	Motions practice
Mary Tanagho Ross	7/23/2020	1.80	\$ 211.99	\$ 381.58	Performed CAR research	Case development
Kristen Jackson	7/23/2020	1.50	\$ 457.97	\$ 686.96	Reviewed class certification reply	Motions practice
Kristen Jackson	7/23/2020	4.70	\$ 457.97	\$2,152.46	Researched claim for amended complaint	Motions practice
Kristen Jackson	7/24/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development
Kristen Jackson	7/24/2020	8.00	\$ 457.97	\$3,663.76	Edited class certification reply	Motions practice
Kristen Jackson	7/26/2020	1.00	\$ 457.97	\$ 457.97	Edited protective order	Case development
Kristen Jackson	7/26/2020	5.00	\$ 457.97	\$2,289.85	Reviewed CAR and court order	Case development
Kristen Jackson	7/27/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development
Kristen Jackson	7/27/2020	2.00	\$ 457.97	\$ 915.94	Reviewed CAR and discussed with MM	Case development
Kristen Jackson	7/28/2020	0.50	\$ 457.97	\$ 228.99	Reviewed protective order materials	Case development
Kristen Jackson	7/28/2020	2.00	\$ 457.97	\$ 915.94	Researched and drafted privilege log request	Case development
Kristen Jackson	7/28/2020	3.00	\$ 457.97	\$1,373.91	Reviewed and took notes on the CAR	Case development
Kristen Jackson	7/28/2020	0.50	\$ 457.97	\$ 228.99	Reviewed class certification reply	Motions practice
Kristen Jackson	7/29/2020	1.20	\$ 457.97	\$ 549.56	Discussed strategy with Wendy Wylegala (WW)/MTR	Case development
Kristen Jackson	7/29/2020	0.70	\$ 457.97	\$ 320.58	Reviewed CAR	Case development
Mary Tanagho Ross	7/30/2020	2.00	\$ 211.99	\$ 423.98	Worked on CAR chart	Case development
Kristen Jackson	7/31/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development
Kristen Jackson	7/31/2020	2.00	\$ 457.97	\$ 915.94	Reviewed CAR summaries	Case development
Kristen Jackson	8/2/2020	6.00	\$ 457.97	\$2,747.82	Reviewed and edited MAPI reply	Motions practice
Kristen Jackson	8/3/2020	3.00	\$ 457.97	\$1,373.91	Reviewed and edited CAR letter	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	8/3/2020	1.10	\$ 457.97	\$ 503.77	Participated in team call	Case development
Kristen Jackson	8/4/2020	0.50	\$ 457.97	\$ 228.99	Reviewed CAR letter	Case development
Mary Tanagho Ross	8/4/2020	0.20	\$ 211.99	\$ 42.40	Reviewed CAR letter and provided input	Case development
Kristen Jackson	8/4/2020	0.50	\$ 457.97	\$ 228.99	Reviewed and circulated MAPI reply	Motions practice
Kristen Jackson	8/5/2020	0.20	\$ 457.97	\$ 91.59	Corresponded regarding CAR letter	Case development
Kristen Jackson	8/10/2020	0.70	\$ 457.97	\$ 320.58	Participated in team call	Case development
Kristen Jackson	8/10/2020	1.00	\$ 457.97	\$ 457.97	Reviewed protective order materials	Case development
Kristen Jackson	8/10/2020	1.50	\$ 457.97	\$ 686.96	Reviewed case law on CAR	Case development
Kristen Jackson	8/10/2020	0.20	\$ 457.97	\$ 91.59	Checked EOIR hearing dates	Case development
Kristen Jackson	8/11/2020	1.00	\$ 457.97	\$ 457.97	Reviewed draft protective order and regulation on disclosure	Case development
Kristen Jackson	8/12/2020	1.80	\$ 457.97	\$ 824.35	Edited draft protective order	Case development
Kristen Jackson	8/13/2020	1.00	\$ 457.97	\$ 457.97	Reviewed response to CAR letter	Case development
Mary Tanagho Ross	8/13/2020	0.50	\$ 211.99	\$ 106.00	Reviewed CAR letter and provided input	Case development
Kristen Jackson	8/14/2020	4.00	\$ 457.97	\$1,831.88	Reviewed response to CAR letter	Case development
Kristen Jackson	8/15/2020	0.70	\$ 457.97	\$ 320.58	Edited draft protective order and cover email	Case development
Kristen Jackson	8/15/2020	6.50	\$ 457.97	\$2,976.81	Researched CAR letter response	Case development
Kristen Jackson	8/16/2020	4.00	\$ 457.97	\$1,831.88	Researched CAR letter response	Case development
Kristen Jackson	8/17/2020	6.50	\$ 457.97	\$2,976.81	Researched claims	Case development
Kristen Jackson	8/17/2020	0.70	\$ 457.97	\$ 320.58	Participated in team call	Case development
Kristen Jackson	8/19/2020	0.40	\$ 457.97	\$ 183.19	Discussed motion for summary judgment (MSJ) outline with MTR	Motions practice
Kristen Jackson	8/21/2020	1.00	\$ 457.97	\$ 457.97	Researched and corresponded re CAR	Case development
Kristen Jackson	8/21/2020	1.00	\$ 457.97	\$ 457.97	Discussed CAR issues with WW	Case development
Kristen Jackson	8/23/2020	3.00	\$ 457.97	\$1,373.91	Researched CAR issues	Case development
Kristen Jackson	8/24/2020	0.50	\$ 457.97	\$ 228.99	Finalized protective order	Case development
Mary Tanagho Ross	8/24/2020	1.30	\$ 211.99	\$ 275.59	Participated in team call	Case development
Kristen Jackson	8/24/2020	1.50	\$ 457.97	\$ 686.96	Researched claims	Motions practice
Kristen Jackson	8/26/2020	0.80	\$ 457.97	\$ 366.38	Discussed legal theory with RS	Motions practice
Kristen Jackson	8/29/2020	1.20	\$ 457.97	\$ 549.56	Edited CAR letter	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	8/31/2020	1.10	\$ 457.97	\$ 503.77	Participated in team call	Case development
Kristen Jackson	8/31/2020	0.50	\$ 457.97	\$ 228.99	Reviewed materials in advance of team call	Case development
Kristen Jackson	9/2/2020	1.00	\$ 457.97	\$ 457.97	Reviewed/discussed CAR letter	Case development
Mary Tanagho Ross	9/2/2020	0.80	\$ 211.99	\$ 169.59	Drafted email to opposing counsel	Case development
Kristen Jackson	9/8/2020	0.50	\$ 457.97	\$ 228.99	Reviewed correspondence received during my break	Case development
Kristen Jackson	9/8/2020	1.40	\$ 457.97	\$ 641.16	Participated in team call	Case development
Kristen Jackson	9/11/2020	1.10	\$ 457.97	\$ 503.77	Participated in team call	Case development
Kristen Jackson	9/14/2020	1.10	\$ 457.97	\$ 503.77	Participated in team call	Case development
Kristen Jackson	9/14/2020	0.50	\$ 457.97	\$ 228.99	Reviewed outreach materials	Class counsel duties
Mary Tanagho Ross	9/15/2020	0.40	\$ 211.99	\$ 84.80	Participated in call w potential new plaintiff's counsel	Case development
Mary Tanagho Ross	9/15/2020	0.80	\$ 211.99	\$ 169.59	Participated in call w opposing counsel	Case development
Mary Tanagho Ross	9/15/2020	1.00	\$ 211.99	\$ 211.99	Emailed summary of CAR	Case development
Kristen Jackson	9/15/2020	0.70	\$ 457.97	\$ 320.58	Reviewed outreach materials	Class counsel duties
Mary Tanagho Ross	9/15/2020	0.70	\$ 211.99	\$ 148.39	Emailed attys re violation of PI	Class counsel duties
Kristen Jackson	9/16/2020	0.50	\$ 457.97	\$ 228.99	Discussed plaintiff search and call	Pleadings
Mary Tanagho Ross	9/18/2020	1.00	\$ 211.99	\$ 211.99	Reviewed L.M.Z. retainer	Case development
Kristen Jackson	9/21/2020	1.00	\$ 457.97	\$ 457.97	Reviewed and edited CAR letter	Case development
Kristen Jackson	9/21/2020	1.50	\$ 457.97	\$ 686.96	Participated in team call and follow up	Case development
Kristen Jackson	9/22/2020	0.20	\$ 457.97	\$ 91.59	Commented on draft letter	Case development
Kristen Jackson	9/22/2020	2.50	\$ 457.97	\$1,144.93	Drafted letter re PI violations	Class counsel duties
Kristen Jackson	9/25/2020	0.90	\$ 457.97	\$ 412.17	Participated in team call	Case development
Kristen Jackson	9/25/2020	1.30	\$ 457.97	\$ 595.36	Discussed second amended complaint (SAC) amendments with RS	Pleadings
Kristen Jackson	9/25/2020	1.00	\$ 457.97	\$ 457.97	Reviewed MSJ analysis document	Motions practice
Kristen Jackson	9/27/2020	4.00	\$ 457.97	\$1,831.88	Edited SAC	Pleadings
Kristen Jackson	9/28/2020	1.30	\$ 457.97	\$ 595.36	Participated in team call	Case development
Kristen Jackson	9/28/2020	5.00	\$ 457.97	\$2,289.85	Edited SAC	Pleadings
Kristen Jackson	9/28/2020	1.00	\$ 457.97	\$ 457.97	Reviewed research on potential new claims	Pleadings

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	9/29/2020	6.50	\$ 457.97	\$2,976.81	Edited SAC	Pleadings
Kristen Jackson	9/30/2020	7.00	\$ 457.97	\$3,205.79	Edited SAC	Pleadings
Kristen Jackson	9/30/2020	0.80	\$ 457.97	\$ 366.38	Discussed cases with M. Mariscal	Class counsel duties
Kristen Jackson	10/1/2020	4.00	\$ 457.97	\$1,831.88	Edited SAC	Pleadings
Kristen Jackson	10/1/2020	0.50	\$ 457.97	\$ 228.99	Discussed cases with MM & RS	Class counsel duties
Kristen Jackson	10/2/2020	0.50	\$ 457.97	\$ 228.99	Discussed SAC with RS	Pleadings
Kristen Jackson	10/2/2020	3.00	\$ 457.97	\$1,373.91	Edited SAC	Pleadings
Kristen Jackson	10/4/2020	1.20	\$ 457.97	\$ 549.56	Edited and circulated SAC	Pleadings
Kristen Jackson	10/5/2020	2.00	\$ 457.97	\$ 915.94	Reviewed amended CAR	Case development
Kristen Jackson	10/5/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development
Kristen Jackson	10/8/2020	1.50	\$ 457.97	\$ 686.96	Reviewed CAR	Case development
Kristen Jackson	10/9/2020	3.00	\$ 457.97	\$1,373.91	Reviewed Sicard declaration and CAR	Case development
Kristen Jackson	10/9/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	10/14/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	10/14/2020	3.50	\$ 457.97	\$1,602.90	Edited SAC	Pleadings
Kristen Jackson	10/15/2020	1.00	\$ 457.97	\$ 457.97	Participated in call with MTR and RS	Case development
Mary Tanagho Ross	10/15/2020	1.00	\$ 211.99	\$ 211.99	Participated in call w KMJ and R. Scholtz (RS) re compliance letter	Class counsel duties
Kristen Jackson	10/16/2020	0.70	\$ 457.97	\$ 320.58	Participated in team call	Case development
Kristen Jackson	10/16/2020	1.00	\$ 457.97	\$ 457.97	Reviewed CAR document	Case development
Kristen Jackson	10/16/2020	0.50	\$ 457.97	\$ 228.99	Edited PI violation letter	Class counsel duties
Kristen Jackson	10/19/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development
Mary Tanagho Ross	10/19/2020	1.00	\$ 211.99	\$ 211.99	Email L.M.Z.'s counsel	Case development
Kristen Jackson	10/19/2020	2.00	\$ 457.97	\$ 915.94	Reviewed MSJ analysis & evidence	Motions practice
Kristen Jackson	10/23/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	10/26/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Mary Tanagho Ross	10/26/2020	0.50	\$ 211.99	\$ 106.00	Emailed attorney re violation of PI	Class counsel duties
Kristen Jackson	10/27/2020	0.50	\$ 457.97	\$ 228.99	Discussed immigration judge (IJ) deference with RS	Pleadings
Kristen Jackson	11/2/2020	0.50	\$ 457.97	\$ 228.99	Reviewed status of CAR requests	Case development



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	11/2/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Mary Tanagho Ross	11/3/2020	0.70	\$ 211.99	\$ 148.39	Review materials from impacted person re PI violation	Class counsel duties
Kristen Jackson	11/9/2020	0.50	\$ 457.97	\$ 228.99	Reviewed materials re PI	Case development
Kristen Jackson	11/9/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Mary Tanagho Ross	11/10/2020	0.70	\$ 211.99	\$ 148.39	Wrote up summary re violation of PI	Class counsel duties
Kristen Jackson	11/13/2020	1.00	\$ 457.97	\$ 457.97	Reviewed and corresponded re PI violations	Class counsel duties
Mary Tanagho Ross	11/16/2020	0.80	\$ 211.99	\$ 169.59	Participated in team call	Case development
Mary Tanagho Ross	11/16/2020	1.00	\$ 211.99	\$ 211.99	Drafted letter to opposing counsel re misstatements in email	Case development
Kristen Jackson	11/16/2020	1.00	\$ 457.97	\$ 457.97	Reviewed correspondence regarding PI violations	Class counsel duties
Kristen Jackson	11/17/2020	0.50	\$ 457.97	\$ 228.99	Reviewed team call and letter with RS	Case development
Kristen Jackson	11/23/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	11/23/2020	0.20	\$ 457.97	\$ 91.59	Checked EOIR hearing dates	Case development
Mary Tanagho Ross	11/23/2020	0.70	\$ 211.99	\$ 148.39	Review add'l email to opposing counsel re PI violations	Class counsel duties
Mary Tanagho Ross	11/23/2020	0.60	\$ 211.99	\$ 127.19	Emailed atty re violation of PI	Class counsel duties
Kristen Jackson	11/30/2020	0.80	\$ 457.97	\$ 366.38	Participated in team call	Case development
Kristen Jackson	12/4/2020	0.30	\$ 457.97	\$ 137.39	Participated in team call	Case development
Kristen Jackson	12/7/2020	0.50	\$ 457.97	\$ 228.99	Participated in team call	Case development
Mary Tanagho Ross	12/10/2020	0.60	\$ 211.99	\$ 127.19	Drafted summary of PI violation	Class counsel duties
Kristen Jackson	12/14/2020	0.20	\$ 457.97	\$ 91.59	Checked EOIR hearing dates	Case development
Kristen Jackson	12/14/2020	0.30	\$ 457.97	\$ 137.39	Participated in team call	Case development
Mary Tanagho Ross	12/14/2020	0.50	\$ 211.99	\$ 106.00	Participated in call with attorney re violation	Class counsel duties
Kristen Jackson	12/21/2020	0.40	\$ 457.97	\$ 183.19	Participated in team call	Case development
Kristen Jackson	12/21/2020	0.10	\$ 457.97	\$ 45.80	Reviewed court order	Case development
Kristen Jackson	12/21/2020	1.00	\$ 457.97	\$ 457.97	Prepared and disseminated announcement	Class counsel duties
Kristen Jackson	12/22/2020	4.00	\$ 457.97	\$1,831.88	Edited SAC	Pleadings
Kristen Jackson	12/28/2020	1.00	\$ 457.97	\$ 457.97	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	12/28/2020	1.00	\$ 457.97	\$ 457.97	Reviewed E.D.G. materials and spoke with MM	Pleadings
Kristen Jackson	12/29/2020	0.50	\$ 457.97	\$ 228.99	Spoke with MM and followed up with team email	Case development
Kristen Jackson	1/3/2021	0.20	\$ 476.91	\$ 95.38	Edited SAC	Pleadings
Kristen Jackson	1/4/2021	1.00	\$ 476.91	\$ 476.91	Participated in team call	Case development
Mary Tanagho Ross	1/4/2021	0.40	\$ 220.76	\$ 88.30	Email with FIRRP re L.M.Z.	Case development
Kristen Jackson	1/4/2021	1.50	\$ 476.91	\$ 715.37	Discussed SAC with RS	Pleadings
Kristen Jackson	1/4/2021	5.00	\$ 476.91	\$2,384.55	Edited SAC	Pleadings
Mary Tanagho Ross	1/4/2021	0.60	\$ 220.76	\$ 132.46	Email atty re jurisdictional denial	Class counsel duties
Mary Tanagho Ross	1/5/2021	0.60	\$ 220.76	\$ 132.46	Emailed with FIRRP and Young Center (YC) re L.M.Z.	Case development
Mary Tanagho Ross	1/5/2021	0.50	\$ 220.76	\$ 110.38	Call with YC and FIRRP explaining role of next friend (NF)	Case development
Mary Tanagho Ross	1/5/2021	0.80	\$ 220.76	\$ 176.61	Edited letter to opposing counsel	Case development
Kristen Jackson	1/5/2021	0.20	\$ 476.91	\$ 95.38	Edited injunction compliance letter	Class counsel duties
Mary Tanagho Ross	1/6/2021	0.50	\$ 220.76	\$ 110.38	Participated in call with NF for L.M.Z.	Case development
Mary Tanagho Ross	1/6/2021	0.60	\$ 220.76	\$ 132.46	Reviewed facts of new PI violation	Class counsel duties
Mary Tanagho Ross	1/6/2021	0.70	\$ 220.76	\$ 154.53	Participated in call with atty re violation of PI	Class counsel duties
Mary Tanagho Ross	1/7/2021	0.50	\$ 220.76	\$ 110.38	Edited NF retainer	Case development
Kristen Jackson	1/7/2021	1.00	\$ 476.91	\$ 476.91	Edited SAC	Pleadings
Kristen Jackson	1/7/2021	0.50	\$ 476.91	\$ 238.46	Reviewed ICE directive	Pleadings
Kristen Jackson	1/8/2021	0.70	\$ 476.91	\$ 333.84	Participated in team call	Case development
Mary Tanagho Ross	1/8/2021	0.40	\$ 220.76	\$ 88.30	Participated in call w KJ re ICE Directive	Case development
Kristen Jackson	1/8/2021	1.00	\$ 476.91	\$ 476.91	Participated in calls re ICE directive	Pleadings
Kristen Jackson	1/8/2021	1.00	\$ 476.91	\$ 476.91	Edited SAC	Pleadings
Kristen Jackson	1/10/2021	0.50	\$ 476.91	\$ 238.46	Reviewed SAC and motions	Pleadings
Kristen Jackson	1/11/2021	1.00	\$ 476.91	\$ 476.91	Participated in strategy calls with RS	Case development
Kristen Jackson	1/11/2021	1.00	\$ 476.91	\$ 476.91	Participated in team call	Case development
Kristen Jackson	1/11/2021	0.50	\$ 476.91	\$ 238.46	Reviewed SAC	Pleadings

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	1/11/2021	0.80	\$ 220.76	\$ 176.61	Emailed atty re potential PI violation	Class counsel duties
Kristen Jackson	1/14/2021	1.00	\$ 476.91	\$ 476.91	Discussed strategy with RS	Case development
Kristen Jackson	1/15/2021	1.00	\$ 476.91	\$ 476.91	Participated in team call	Case development
Mary Tanagho Ross	1/19/2021	0.80	\$ 220.76	\$ 176.61	Drafted summary of PI violation	Class counsel duties
Mary Tanagho Ross	1/23/2021	0.30	\$ 220.76	\$ 66.23	Reviewed email to opposing counsel	Case development
Mary Tanagho Ross	1/25/2021	0.70	\$ 220.76	\$ 154.53	Participated in team call	Case development
Mary Tanagho Ross	1/29/2021	0.50	\$ 220.76	\$ 110.38	Participated in team call	Case development
Mary Tanagho Ross	1/29/2021	0.30	\$ 220.76	\$ 66.23	Participated in call w KMJ	Case development
Mary Tanagho Ross	1/29/2021	0.50	\$ 220.76	\$ 110.38	Participated in call w RS & WW re settlement	ADR
Mary Tanagho Ross	1/30/2021	1.00	\$ 220.76	\$ 220.76	Drafted plan re settlement proposal	ADR
Mary Tanagho Ross	2/1/2021	1.00	\$ 220.76	\$ 220.76	Participated in team call	Case development
Mary Tanagho Ross	2/2/2021	2.60	\$ 220.76	\$ 573.98	Edited draft settlement terms	ADR
Mary Tanagho Ross	2/8/2021	1.00	\$ 220.76	\$ 220.76	Participated in team call	Case development
Mary Tanagho Ross	2/10/2021	0.80	\$ 220.76	\$ 176.61	Review proposed email to opposing counsel re settlement agreement	ADR
Mary Tanagho Ross	2/11/2021	0.50	\$ 220.76	\$ 110.38	Participated in call with attorney re potential PI violation	Class counsel duties
Mary Tanagho Ross	2/12/2021	0.80	\$ 220.76	\$ 176.61	Participated in team call	Case development
Mary Tanagho Ross	2/17/2021	1.50	\$ 220.76	\$ 331.14	Worked on settlement terms	ADR
Mary Tanagho Ross	2/17/2021	0.50	\$ 220.76	\$ 110.38	Participated in call with RS & WW re settlement agreement draft	ADR
Mary Tanagho Ross	2/19/2021	0.60	\$ 220.76	\$ 132.46	Participated in call w KJ re settlement terms and updates	ADR
Mary Tanagho Ross	2/21/2021	0.70	\$ 220.76	\$ 154.53	Edited on settlement terms	ADR
Mary Tanagho Ross	2/22/2021	1.00	\$ 220.76	\$ 220.76	Participated in team call	Case development
Kristen Jackson	2/23/2021	1.00	\$ 476.91	\$ 476.91	Reviewed and edited settlement document	ADR
Mary Tanagho Ross	2/25/2021	0.80	\$ 220.76	\$ 176.61	Emailed with atty re violation of PI	Class counsel duties
Kristen Jackson	2/26/2021	0.50	\$ 476.91	\$ 238.46	Participated in team call	Case development
Kristen Jackson	2/26/2021	0.50	\$ 476.91	\$ 238.46	Revised settlement document	ADR
Mary Tanagho Ross	3/4/2021	0.60	\$ 220.76	\$ 132.46	Emailed with atty re violation of PI	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	3/4/2021	0.10	\$ 476.91	\$ 47.69	Revised settlement document	ADR
Kristen Jackson	3/5/2021	0.80	\$ 476.91	\$ 381.53	Participated in team call	Case development
Kristen Jackson	3/5/2021	0.40	\$ 476.91	\$ 190.76	Reviewed annotated answer	Pleadings
Mary Tanagho Ross	3/9/2021	0.70	\$ 220.76	\$ 154.53	Reviewed updated fact sheet for practitioners	Class counsel duties
Kristen Jackson	3/9/2021	0.40	\$ 476.91	\$ 190.76	Drafted email re hold during settlement	ADR
Mary Tanagho Ross	3/12/2021	0.40	\$ 220.76	\$ 88.30	Contacted atty re rescission of denial	Class counsel duties
Mary Tanagho Ross	3/15/2021	0.50	\$ 220.76	\$ 110.38	Participated in team call	Case development
Mary Tanagho Ross	3/15/2021	0.20	\$ 220.76	\$ 44.15	Emailed KMJ re call	Case development
Mary Tanagho Ross	3/15/2021	0.40	\$ 220.76	\$ 88.30	Followed up with atty re violation of PI	Class counsel duties
Mary Tanagho Ross	3/17/2021	0.80	\$ 220.76	\$ 176.61	Edited summary of PI violation	Class counsel duties
Mary Tanagho Ross	3/17/2021	0.30	\$ 220.76	\$ 66.23	Review email from opposing counsel re USCIS website and settlement discussion	ADR
Mary Tanagho Ross	3/19/2021	0.50	\$ 220.76	\$ 110.38	Participated in team call	Case development
Mary Tanagho Ross	3/25/2021	0.50	\$ 220.76	\$ 110.38	Corresponded with practitioner re rescission of jurisdictional denial	Class counsel duties
Kristen Jackson	4/9/2021	0.50	\$ 476.91	\$ 238.46	Reviewed settlement counterproposal	ADR
Kristen Jackson	4/9/2021	1.00	\$ 476.91	\$ 476.91	Discussed settlement counterproposal with MTR	ADR
Mary Tanagho Ross	4/9/2021	1.00	\$ 220.76	\$ 220.76	Discussed settlement redlines with KJ	ADR
Mary Tanagho Ross	4/9/2021	1.50	\$ 220.76	\$ 331.14	Reviewed and edited settlement agreement	ADR
Mary Tanagho Ross	4/12/2021	1.00	\$ 220.76	\$ 220.76	Participated in team call	Case development
Mary Tanagho Ross	4/12/2021	0.80	\$ 220.76	\$ 176.61	Reviewed team edits and circulated edits to team	ADR
Mary Tanagho Ross	4/12/2021	1.50	\$ 220.76	\$ 331.14	Drafted additional settlement terms	ADR
Mary Tanagho Ross	4/13/2021	0.50	\$ 220.76	\$ 110.38	Reviewed documents related to PI violation	Class counsel duties
Mary Tanagho Ross	4/13/2021	1.00	\$ 220.76	\$ 220.76	Edited terms in settlement agreement	ADR
Mary Tanagho Ross	4/15/2021	1.00	\$ 220.76	\$ 220.76	Edited and circulated settlement agreement to team	ADR
Mary Tanagho Ross	4/16/2021	0.70	\$ 220.76	\$ 154.53	Participated in team call	Case development
Mary Tanagho Ross	4/19/2021	1.00	\$ 220.76	\$ 220.76	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	4/22/2021	0.70	\$ 220.76	\$ 154.53	Corresponded with practitioner re jurisdictional denial	Class counsel duties
Kristen Jackson	4/23/2021	1.00	\$ 476.91	\$ 476.91	Participated in team call	Case development
Kristen Jackson	4/26/2021	0.60	\$ 476.91	\$ 286.15	Discussed strategy with RS re settlement	ADR
Mary Tanagho Ross	4/27/2021	0.60	\$ 220.76	\$ 132.46	Reviewed email regarding violation of PI	Class counsel duties
Mary Tanagho Ross	4/27/2021	0.50	\$ 220.76	\$ 110.38	Corresponded with individual counsel regarding PI violation	Class counsel duties
Kristen Jackson	4/28/2021	1.00	\$ 476.91	\$ 476.91	Reviewed and edited settlement document	ADR
Mary Tanagho Ross	4/29/2021	0.90	\$ 220.76	\$ 198.68	Reviewed draft email to opposing counsel regarding settlement	ADR
Kristen Jackson	5/3/2021	0.90	\$ 476.91	\$ 429.22	Participated in team call	Case development
Kristen Jackson	5/10/2021	0.50	\$ 476.91	\$ 238.46	Participated in team call	Case development
Mary Tanagho Ross	5/10/2021	0.60	\$ 220.76	\$ 132.46	Participated in team call	Case development
Mary Tanagho Ross	5/10/2021	0.50	\$ 220.76	\$ 110.38	Corresponded with co-counsel regarding response to opposing counsel	Case development
Mary Tanagho Ross	5/11/2021	0.30	\$ 220.76	\$ 66.23	Edited response to opposing counsel	Case development
Mary Tanagho Ross	5/12/2021	1.10	\$ 220.76	\$ 242.84	Participated in team call	Case development
Mary Tanagho Ross	5/13/2021	0.40	\$ 220.76	\$ 88.30	Participated in team call	Case development
Kristen Jackson	5/13/2021	0.10	\$ 476.91	\$ 47.69	Discussed strategy with RS re settlement	ADR
Mary Tanagho Ross	5/13/2021	1.40	\$ 220.76	\$ 309.06	Prepared for settlement call	ADR
Kristen Jackson	5/17/2021	0.50	\$ 476.91	\$ 238.46	Participated in team call	Case development
Kristen Jackson	5/18/2021	0.80	\$ 476.91	\$ 381.53	Participated in team call	Case development
Kristen Jackson	5/18/2021	3.50	\$ 476.91	\$1,669.19	Edited principles document	ADR
Mary Tanagho Ross	5/18/2021	3.00	\$ 220.76	\$ 662.28	Edited settlement document	ADR
Kristen Jackson	5/20/2021	3.00	\$ 476.91	\$1,430.73	Edited principles document	ADR
Mary Tanagho Ross	5/24/2021	0.50	\$ 220.76	\$ 110.38	Participated in team call	Case development
Kristen Jackson	5/27/2021	1.00	\$ 476.91	\$ 476.91	Participated in team call	Case development
Mary Tanagho Ross	5/27/2021	0.70	\$ 220.76	\$ 154.53	Reviewed response from opposing counsel on settlement terms	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	6/8/2021	0.50	\$ 220.76	\$ 110.38	Corresponded with attorney regarding PI Violation	Class counsel duties
Mary Tanagho Ross	6/9/2021	0.40	\$ 220.76	\$ 88.30	Responded to correspondence regarding potential PI violation	Class counsel duties
Kristen Jackson	6/28/2021	0.40	\$ 476.91	\$ 190.76	Participated in team call	Case development
Mary Tanagho Ross	7/1/2021	1.50	\$ 220.76	\$ 331.14	Reviewed and commented on opposing counsel's response to settlement terms	ADR
Kristen Jackson	7/2/2021	0.40	\$ 476.91	\$ 190.76	Participated in team call	Case development
Mary Tanagho Ross	7/2/2021	0.50	\$ 220.76	\$ 110.38	Corresponded with KMJ re next steps	Case development
Mary Tanagho Ross	7/2/2021	0.50	\$ 220.76	\$ 110.38	Reviewed comments to opposing counsel's settlement response	ADR
Kristen Jackson	7/5/2021	1.50	\$ 476.91	\$ 715.37	Reviewed settlement document	ADR
Kristen Jackson	7/5/2021	1.80	\$ 476.91	\$ 858.44	Discussed settlement document with RS	ADR
Kristen Jackson	7/5/2021	0.70	\$ 476.91	\$ 333.84	Commented on settlement document	ADR
Kristen Jackson	7/6/2021	1.50	\$ 476.91	\$ 715.37	Participated in team call	Case development
Mary Tanagho Ross	7/6/2021	1.00	\$ 220.76	\$ 220.76	Reviewed team comments to settlement draft	ADR
Kristen Jackson	7/7/2021	1.00	\$ 476.91	\$ 476.91	Discussed settlement document with RS/MTR	ADR
Mary Tanagho Ross	7/7/2021	1.00	\$ 220.76	\$ 220.76	Participated in settlement discussion with RS and KJ	ADR
Mary Tanagho Ross	7/7/2021	1.50	\$ 220.76	\$ 331.14	Corresponded with team regarding prep for settlement call	ADR
Mary Tanagho Ross	7/22/2021	2.00	\$ 220.76	\$ 441.52	Worked on settlement terms	ADR
Mary Tanagho Ross	7/23/2021	0.70	\$ 220.76	\$ 154.53	Participated in team call	Case development
Mary Tanagho Ross	7/26/2021	1.50	\$ 220.76	\$ 331.14	Edited portions of settlement document	ADR
Mary Tanagho Ross	7/28/2021	0.80	\$ 220.76	\$ 176.61	Participated in call with an atty representing a class member	Class counsel duties
Mary Tanagho Ross	7/28/2021	0.60	\$ 220.76	\$ 132.46	Corresponded with attorney regarding PI violation	Class counsel duties
Mary Tanagho Ross	7/29/2021	1.00	\$ 220.76	\$ 220.76	Reviewed updated settlement document	ADR
Kristen Jackson	8/2/2021	0.80	\$ 476.91	\$ 381.53	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	8/2/2021	0.50	\$ 220.76	\$ 110.38	Edited settlement document and circulated to team	ADR
Mary Tanagho Ross	8/4/2021	0.40	\$ 220.76	\$ 88.30	Corresponded with attorney regarding PI Violation	Class counsel duties
Mary Tanagho Ross	8/4/2021	0.60	\$ 220.76	\$ 132.46	Reviewed opposing counsel's response to settlement document	ADR
Kristen Jackson	8/9/2021	0.80	\$ 476.91	\$ 381.53	Participated in team call	Case development
Mary Tanagho Ross	8/9/2021	0.50	\$ 220.76	\$ 110.38	Corresponded with team regarding email to opposing counsel	Case development
Kristen Jackson	8/9/2021	0.20	\$ 476.91	\$ 95.38	Discussed NY jurisdictional rejection with RS	Class counsel duties
Kristen Jackson	8/10/2021	0.10	\$ 476.91	\$ 47.69	Edited settlement document	ADR
Kristen Jackson	8/15/2021	0.50	\$ 476.91	\$ 238.46	Discussed settlement next steps with RS	ADR
Kristen Jackson	8/16/2021	1.00	\$ 476.91	\$ 476.91	Participated in team call	Case development
Kristen Jackson	8/16/2021	1.60	\$ 476.91	\$ 763.06	Updated settlement document	ADR
Kristen Jackson	8/17/2021	1.00	\$ 476.91	\$ 476.91	Updated settlement document	ADR
Kristen Jackson	8/18/2021	0.50	\$ 476.91	\$ 238.46	Updated settlement document	ADR
Mary Tanagho Ross	8/19/2021	0.70	\$ 220.76	\$ 154.53	Corresponded with attorney representing class member with jurisdictional denial	Class counsel duties
Kristen Jackson	8/19/2021	0.50	\$ 476.91	\$ 238.46	Updated settlement document	ADR
Mary Tanagho Ross	8/19/2021	1.00	\$ 220.76	\$ 220.76	Reviewed settlement document	ADR
Kristen Jackson	8/20/2021	0.50	\$ 476.91	\$ 238.46	Participated in team call	Case development
Kristen Jackson	8/20/2021	1.00	\$ 476.91	\$ 476.91	Updated settlement document	ADR
Kristen Jackson	8/22/2021	3.20	\$ 476.91	\$1,526.11	Updated settlement document	ADR
Kristen Jackson	8/23/2021	0.80	\$ 476.91	\$ 381.53	Participated in team call	Case development
Kristen Jackson	8/23/2021	1.00	\$ 476.91	\$ 476.91	Updated settlement document	ADR
Kristen Jackson	8/24/2021	0.50	\$ 476.91	\$ 238.46	Updated settlement document	ADR
Mary Tanagho Ross	8/27/2021	0.60	\$ 220.76	\$ 132.46	Communicated with FIRRP atty re court case	Class counsel duties
Mary Tanagho Ross	8/28/2021	0.40	\$ 220.76	\$ 88.30	Corresponded with team regarding update to FIRRP case	Case development
Kristen Jackson	8/30/2021	0.80	\$ 476.91	\$ 381.53	Finalized settlement document	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	9/1/2021	0.50	\$ 476.91	\$ 238.46	Participated in team call	Case development
Mary Tanagho Ross	9/11/2021	0.70	\$ 220.76	\$ 154.53	Emailed with KJ re class member with removal order	Case development
Mary Tanagho Ross	9/11/2021	0.90	\$ 220.76	\$ 198.68	Emailed with practitioner re removal order of class member	Class counsel duties
Kristen Jackson	9/13/2021	1.00	\$ 476.91	\$ 476.91	Spoke with RS re case updates	Case development
Mary Tanagho Ross	9/13/2021	0.70	\$ 220.76	\$ 154.53	Participated in team call	Case development
Kristen Jackson	9/13/2021	0.60	\$ 476.91	\$ 286.15	Reviewed settlement document	ADR
Mary Tanagho Ross	9/13/2021	1.00	\$ 220.76	\$ 220.76	Reviewed shell settlement agreement	ADR
Kristen Jackson	9/15/2021	0.50	\$ 476.91	\$ 238.46	Participated in team call	Case development
Kristen Jackson	9/16/2021	0.20	\$ 476.91	\$ 95.38	Spoke with L. Pacheco re class member	Class counsel duties
Mary Tanagho Ross	9/16/2021	0.50	\$ 220.76	\$ 110.38	Participated in call with atty representing class member re removal order	Class counsel duties
Mary Tanagho Ross	9/17/2021	0.60	\$ 220.76	\$ 132.46	Participated in call with RS re class member with BIA denial	Case development
Kristen Jackson	9/20/2021	0.30	\$ 476.91	\$ 143.07	Participated in team call	Case development
Kristen Jackson	9/20/2021	0.50	\$ 476.91	\$ 238.46	Spoke with RS re L. Pacheco class member	Class counsel duties
Kristen Jackson	9/20/2021	0.80	\$ 476.91	\$ 381.53	Reviewed amended PI in light of class member inquiry	Class counsel duties
Kristen Jackson	9/24/2021	0.50	\$ 476.91	\$ 238.46	Revised draft email re L. Pacheco class member	Class counsel duties
Mary Tanagho Ross	9/27/2021	0.80	\$ 220.76	\$ 176.61	Participated in team call	Case development
Kristen Jackson	9/27/2021	0.60	\$ 476.91	\$ 286.15	Reviewed Garcia-Ramirez materials in light of settlement discussions	ADR
Mary Tanagho Ross	9/28/2021	0.50	\$ 220.76	\$ 110.38	Communicated with FIRRP atty re requesting rescission of jurisdictional denial	Class counsel duties
Mary Tanagho Ross	10/4/2021	0.50	\$ 220.76	\$ 110.38	Participated in settlement call with opposing counsel	ADR
Mary Tanagho Ross	10/4/2021	0.40	\$ 220.76	\$ 88.30	Corresponded with team re update from settlement call	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	10/5/2021	0.50	\$ 476.91	\$ 238.46	Participated in team call	Case development
Kristen Jackson	10/5/2021	0.50	\$ 476.91	\$ 238.46	Reviewed and edited settlement document	ADR
Kristen Jackson	10/8/2021	1.00	\$ 476.91	\$ 476.91	Participated in team call	Case development
Kristen Jackson	10/18/2021	0.80	\$ 476.91	\$ 381.53	Participated in team call	Case development
Mary Tanagho Ross	10/18/2021	0.50	\$ 220.76	\$ 110.38	Corresponded with team about individual case	Class counsel duties
Kristen Jackson	11/12/2021	0.30	\$ 476.91	\$ 143.07	Participated in team call	Case development
Kristen Jackson	11/12/2021	0.20	\$ 476.91	\$ 95.38	Participated in team call	Case development
Mary Tanagho Ross	11/12/2021	0.60	\$ 220.76	\$ 132.46	Drafted correspondence to opposing counsel	Case development
Mary Tanagho Ross	11/12/2021	0.40	\$ 220.76	\$ 88.30	Corresponded with class member's counsel	Class counsel duties
Mary Tanagho Ross	11/16/2021	0.30	\$ 220.76	\$ 66.23	Reviewed edits to correspondence to opposing counsel	Case development
Kristen Jackson	11/24/2021	0.30	\$ 476.91	\$ 143.07	Participated in team call	Case development
Kristen Jackson	11/24/2021	0.80	\$ 476.91	\$ 381.53	Reviewed proposed settlement agreement	ADR
Kristen Jackson	11/29/2021	0.60	\$ 476.91	\$ 286.15	Participated in team call	Case development
Kristen Jackson	11/29/2021	0.50	\$ 476.91	\$ 238.46	Discussed proposed settlement agreement with RS	ADR
Kristen Jackson	11/29/2021	0.80	\$ 476.91	\$ 381.53	Reviewed proposed settlement agreement	ADR
Kristen Jackson	12/5/2021	3.50	\$ 476.91	\$1,669.19	Spoke with Kevin DeJong (KD) regarding settlement agreement	Case development
Mary Tanagho Ross	12/5/2021	1.50	\$ 220.76	\$ 331.14	Reviewed edits to settlement agreement and drafted section	ADR
Kristen Jackson	12/8/2021	3.00	\$ 476.91	\$1,430.73	Revised proposed settlement agreement	ADR
Kristen Jackson	12/9/2021	1.00	\$ 476.91	\$ 476.91	Revised proposed settlement agreement	ADR
Mary Tanagho Ross	12/10/2021	0.50	\$ 220.76	\$ 110.38	Participated in team call	Case development
Kristen Jackson	12/10/2021	0.50	\$ 476.91	\$ 238.46	Revised proposed settlement agreement	ADR
Kristen Jackson	12/12/2021	2.00	\$ 476.91	\$ 953.82	Participated in team call	Case development
Mary Tanagho Ross	12/13/2021	0.60	\$ 220.76	\$ 132.46	Participated in team call	Case development
Kristen Jackson	12/13/2021	0.20	\$ 476.91	\$ 95.38	Revised proposed settlement agreement	ADR
Kristen Jackson	12/13/2021	0.50	\$ 476.91	\$ 238.46	Revised proposed settlement agreement	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	12/14/2021	0.60	\$ 220.76	\$ 132.46	Corresponded with atty re potential violation and class member's upcoming hearing	Class counsel duties
Mary Tanagho Ross	12/14/2021	0.70	\$ 220.76	\$ 154.53	Reviewed provisions of settlement agreement and provided input	ADR
Kristen Jackson	12/16/2021	1.00	\$ 476.91	\$ 476.91	Spoke with co-counsel regarding settlement agreement	Case development
Kristen Jackson	12/16/2021	1.00	\$ 476.91	\$ 476.91	Revised proposed settlement agreement	ADR
Kristen Jackson	12/22/2021	2.50	\$ 476.91	\$1,192.28	Reviewed client letter regarding co-counsel change	Case development
Kristen Jackson	12/22/2021	0.10	\$ 476.91	\$ 47.69	Revised proposed settlement agreement	ADR
Mary Tanagho Ross	1/3/2022	0.70	\$ 240.89	\$ 168.62	Participated in team call	Case development
Mary Tanagho Ross	1/4/2022	0.60	\$ 240.89	\$ 144.53	Corresponded with attorney regarding class member's upcoming hearing	Class counsel duties
Kristen Jackson	1/19/2022	1.00	\$ 520.41	\$ 520.41	Signed co-counsel agreement rider	Case development
Kristen Jackson	1/19/2022	0.10	\$ 520.41	\$ 52.04	Reviewed and edited draft settlement agreement	ADR
Kristen Jackson	1/21/2022	0.20	\$ 520.41	\$ 104.08	Participated in team call	Case development
Kristen Jackson	1/21/2022	0.20	\$ 520.41	\$ 104.08	Participated in team call	Case development
Kristen Jackson	1/21/2022	0.50	\$ 520.41	\$ 260.21	Reviewed and edited draft settlement agreement	ADR
Kristen Jackson	1/24/2022	1.00	\$ 520.41	\$ 520.41	Reviewed and edited class counsel motion	Motions practice
Kristen Jackson	1/25/2022	0.70	\$ 520.41	\$ 364.29	Edited draft settlement agreement	ADR
Kristen Jackson	1/27/2022	1.00	\$ 520.41	\$ 520.41	Edited draft settlement agreement	ADR
Kristen Jackson	1/28/2022	0.20	\$ 520.41	\$ 104.08	Participated in team call	Case development
Kristen Jackson	1/28/2022	0.40	\$ 520.41	\$ 208.16	Edited draft settlement agreement	ADR
Kristen Jackson	1/28/2022	0.50	\$ 520.41	\$ 260.21	Edited draft settlement agreement	ADR
Kristen Jackson	1/31/2022	0.20	\$ 520.41	\$ 104.08	Spoke with attorney for detained class member	Class counsel duties
Kristen Jackson	1/31/2022	0.50	\$ 520.41	\$ 260.21	Discussed draft settlement agreement annotations with RS	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	2/1/2022	0.40	\$ 520.41	\$ 208.16	Edited draft settlement agreement	ADR
Kristen Jackson	2/4/2022	0.30	\$ 520.41	\$ 156.12	Participated in team call	Case development
Kristen Jackson	2/4/2022	0.50	\$ 520.41	\$ 260.21	Edited draft settlement agreement	ADR
Kristen Jackson	2/10/2022	0.10	\$ 520.41	\$ 52.04	Edited draft settlement agreement	ADR
Kristen Jackson	2/11/2022	0.70	\$ 520.41	\$ 364.29	Spoke with RS regarding work plan for settlement	ADR
Kristen Jackson	2/13/2022	0.50	\$ 520.41	\$ 260.21	Spoke with RS regarding magistrate letter	ADR
Kristen Jackson	2/15/2022	0.60	\$ 520.41	\$ 312.25	Participated in team call	Case development
Kristen Jackson	2/18/2022	2.50	\$ 520.41	\$1,301.03	Drafted portion of magistrate letter	ADR
Kristen Jackson	2/22/2022	1.00	\$ 520.41	\$ 520.41	Edited portion of magistrate letter	ADR
Kristen Jackson	2/23/2022	0.80	\$ 520.41	\$ 416.33	Participated in team call	Case development
Kristen Jackson	2/25/2022	0.90	\$ 520.41	\$ 468.37	Located attorney fee award orders for magistrate letter	ADR
Kristen Jackson	3/1/2022	2.10	\$ 520.41	\$1,092.86	Edited mediation statement	ADR
Kristen Jackson	3/3/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	3/4/2022	0.30	\$ 520.41	\$ 156.12	Edited mediation statement	ADR
Kristen Jackson	3/7/2022	0.30	\$ 520.41	\$ 156.12	Participated in team call	Case development
Kristen Jackson	3/14/2022	0.70	\$ 520.41	\$ 364.29	Participated in team call	Case development
Kristen Jackson	3/18/2022	0.50	\$ 520.41	\$ 260.21	Reviewed draft settlement agreement	ADR
Kristen Jackson	3/18/2022	1.00	\$ 520.41	\$ 520.41	Edited supplemental mediation statement	ADR
Kristen Jackson	3/20/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	3/21/2022	0.20	\$ 520.41	\$ 104.08	Participated in team call	Case development
Kristen Jackson	3/25/2022	0.20	\$ 520.41	\$ 104.08	Edited settlement agreement	ADR
Kristen Jackson	3/25/2022	0.70	\$ 520.41	\$ 364.29	Discussed settlement agreement with RS	ADR
Kristen Jackson	3/25/2022	1.10	\$ 520.41	\$ 572.45	Participated in team call	Case development
Kristen Jackson	3/28/2022	2.00	\$ 520.41	\$1,040.82	Drafted settlement call talking points	ADR
Kristen Jackson	3/31/2022	0.20	\$ 520.41	\$ 104.08	Participated in team call	Case development
Kristen Jackson	4/1/2022	1.10	\$ 520.41	\$ 572.45	Participated in team call	Case development
Kristen Jackson	4/4/2022	0.20	\$ 520.41	\$ 104.08	Compared SAC to current settlement agreement draft	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	4/4/2022	1.00	\$ 520.41	\$ 520.41	Annotated settlement agreement draft	ADR
Kristen Jackson	4/4/2022	0.70	\$ 520.41	\$ 364.29	Edited settlement call talking points and annotated settlement agreement draft	ADR
Kristen Jackson	4/4/2022	1.40	\$ 520.41	\$ 728.57	Discussed settlement materials/mediation call with KD	ADR
Kristen Jackson	4/5/2022	0.50	\$ 520.41	\$ 260.21	Discussed settlement session strategy with RS	ADR
Kristen Jackson	4/7/2022	0.50	\$ 520.41	\$ 260.21	Participated in team call	Case development
Kristen Jackson	4/8/2022	1.10	\$ 520.41	\$ 572.45	Participated in team call	Case development
Kristen Jackson	4/11/2022	0.60	\$ 520.41	\$ 312.25	Edited settlement agreement	ADR
Kristen Jackson	4/11/2022	0.90	\$ 520.41	\$ 468.37	Finalized settlement agreement	ADR
Kristen Jackson	4/11/2022	0.30	\$ 520.41	\$ 156.12	Participated in team call	Case development
Kristen Jackson	4/29/2022	1.60	\$ 520.41	\$ 832.66	Participated in team call	Case development
Kristen Jackson	5/13/2022	2.10	\$ 520.41	\$1,092.86	Prepared for settlement discussion	ADR
Kristen Jackson	5/15/2022	1.40	\$ 520.41	\$ 728.57	Edited settlement agreement	ADR
Kristen Jackson	5/18/2022	0.70	\$ 520.41	\$ 364.29	Participated in team call	Case development
Kristen Jackson	5/20/2022	2.30	\$ 520.41	\$1,196.94	Edited settlement agreement	ADR
Kristen Jackson	5/20/2022	0.70	\$ 520.41	\$ 364.29	Participated in team call and discussion with W. Wylegala	Case development
Kristen Jackson	5/23/2022	0.90	\$ 520.41	\$ 468.37	Edited email alert for class members	Class counsel duties
Kristen Jackson	5/25/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call and discussion with W. Wylegala	Case development
Kristen Jackson	5/27/2022	0.20	\$ 520.41	\$ 104.08	Participated in call with R. Scholtz regarding settlement	ADR
Kristen Jackson	5/27/2022	1.20	\$ 520.41	\$ 624.49	Reviewed and edited settlement agenda and talking points	ADR
Kristen Jackson	5/31/2022	0.90	\$ 520.41	\$ 468.37	Participated in team call	Case development
Kristen Jackson	5/31/2022	0.30	\$ 520.41	\$ 156.12	Finalized email alert for class members	Class counsel duties
Kristen Jackson	5/31/2022	0.80	\$ 520.41	\$ 416.33	Participated in team call	Case development
Kristen Jackson	6/3/2022	0.10	\$ 520.41	\$ 52.04	Sent email alert for class members	Class counsel duties
Kristen Jackson	6/6/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	6/6/2022	0.30	\$ 520.41	\$ 156.12	Reviewed docket filings on TRO retraction timing	ADR
Kristen Jackson	6/7/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	6/10/2022	0.80	\$ 520.41	\$ 416.33	Participated in call with R. Scholtz	Case development
Kristen Jackson	6/17/2022	1.20	\$ 520.41	\$ 624.49	Edited settlement talking points	ADR
Kristen Jackson	6/18/2022	0.30	\$ 520.41	\$ 156.12	Reviewed settlement talking points	ADR
Kristen Jackson	6/19/2022	0.50	\$ 520.41	\$ 260.21	Participated in call with R. Scholtz regarding settlement	ADR
Kristen Jackson	6/19/2022	0.70	\$ 520.41	\$ 364.29	Participated in team call	Case development
Kristen Jackson	6/25/2022	0.40	\$ 520.41	\$ 208.16	Participated in team call	Case development
Kristen Jackson	6/27/2022	0.70	\$ 520.41	\$ 364.29	Participated in call with M. Tanagho Ross	Case development
Kristen Jackson	7/7/2022	0.70	\$ 520.41	\$ 364.29	Participated in call with K. DeJong	Case development
Kristen Jackson	7/7/2022	0.90	\$ 520.41	\$ 468.37	Annotated draft settlement agreement and agenda	ADR
Kristen Jackson	7/7/2022	0.80	\$ 520.41	\$ 416.33	Participated in call with R. Scholtz	Case development
Kristen Jackson	7/7/2022	1.90	\$ 520.41	\$ 988.78	Edited talking points document	ADR
Kristen Jackson	7/8/2022	0.30	\$ 520.41	\$ 156.12	Assembled materials for mediation	ADR
Kristen Jackson	7/9/2022	0.70	\$ 520.41	\$ 364.29	Participated in team call	Case development
Kristen Jackson	7/9/2022	3.00	\$ 520.41	\$1,561.23	Participated in mediation	ADR
Kristen Jackson	7/9/2022	0.30	\$ 520.41	\$ 156.12	Participated in team call	Case development
Kristen Jackson	7/10/2022	0.90	\$ 520.41	\$ 468.37	Edited draft settlement document	ADR
Kristen Jackson	7/11/2022	0.20	\$ 520.41	\$ 104.08	Participated in call with R. Scholtz	Case development
Kristen Jackson	7/11/2022	0.10	\$ 520.41	\$ 52.04	Participated in call with K. DeJong	Case development
Kristen Jackson	7/11/2022	0.30	\$ 520.41	\$ 156.12	Revised mediation agenda	ADR
Kristen Jackson	7/11/2022	0.70	\$ 520.41	\$ 364.29	Participated in team call	Case development
Kristen Jackson	7/11/2022	3.10	\$ 520.41	\$1,613.27	Participated in mediation	ADR
Kristen Jackson	7/11/2022	0.40	\$ 520.41	\$ 208.16	Participated in team call	Case development
Kristen Jackson	7/11/2022	0.70	\$ 520.41	\$ 364.29	Revised draft settlement agreement	ADR
Kristen Jackson	7/11/2022	0.10	\$ 520.41	\$ 52.04	Participated in call with R. Scholtz	Case development
Kristen Jackson	7/11/2022	0.90	\$ 520.41	\$ 468.37	Participated in call with R. Scholtz	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	7/11/2022	1.00	\$ 520.41	\$ 520.41	Edited draft settlement document	ADR
Kristen Jackson	7/12/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	7/12/2022	0.20	\$ 520.41	\$ 104.08	Finalized draft settlement agreement	ADR
Kristen Jackson	7/12/2022	0.30	\$ 520.41	\$ 156.12	Updated mediation documents	ADR
Kristen Jackson	7/12/2022	0.10	\$ 520.41	\$ 52.04	Annotated draft settlement agreement	ADR
Kristen Jackson	7/12/2022	0.40	\$ 520.41	\$ 208.16	Edited mediation talking points	ADR
Kristen Jackson	7/14/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	7/14/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	7/15/2022	0.30	\$ 520.41	\$ 156.12	Participated in call with K. DeJong	Case development
Kristen Jackson	7/15/2022	0.80	\$ 520.41	\$ 416.33	Reviewed and edited draft settlement agreement	ADR
Kristen Jackson	7/15/2022	0.30	\$ 520.41	\$ 156.12	Reviewed and edited draft settlement agreement	ADR
Kristen Jackson	7/15/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	7/15/2022	2.30	\$ 520.41	\$1,196.94	Edited draft settlement agreement	ADR
Kristen Jackson	7/15/2022	0.60	\$ 520.41	\$ 312.25	Participated in call with R. Scholtz	Case development
Kristen Jackson	7/18/2022	1.20	\$ 520.41	\$ 624.49	Edited draft settlement agreement	ADR
Kristen Jackson	7/18/2022	0.20	\$ 520.41	\$ 104.08	Reviewed draft settlement agreement	ADR
Kristen Jackson	7/25/2022	1.20	\$ 520.41	\$ 624.49	Participated in call with R. Scholtz	Case development
Kristen Jackson	7/25/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	7/25/2022	0.60	\$ 520.41	\$ 312.25	Edited draft settlement agreement	ADR
Kristen Jackson	7/26/2022	0.40	\$ 520.41	\$ 208.16	Edited mediation agenda	ADR
Kristen Jackson	7/29/2022	0.10	\$ 520.41	\$ 52.04	Participated in call with M. Mendez	Case development
Kristen Jackson	7/29/2022	0.10	\$ 520.41	\$ 52.04	Reviewed draft settlement agreement	ADR
Kristen Jackson	7/29/2022	0.30	\$ 520.41	\$ 156.12	Participated in call with M. Tanagho Ross	Case development
Kristen Jackson	7/29/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	7/30/2022	1.60	\$ 520.41	\$ 832.66	Edited talking points document	ADR
Kristen Jackson	7/30/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	7/31/2022	0.50	\$ 520.41	\$ 260.21	Participated in team call	ADR
Kristen Jackson	7/31/2022	3.00	\$ 520.41	\$1,561.23	Participated in mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	8/5/2022	0.30	\$ 520.41	\$ 156.12	Edited draft settlement agreement	ADR
Kristen Jackson	8/5/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	8/8/2022	0.40	\$ 520.41	\$ 208.16	Reviewed and edited talking points document	ADR
Kristen Jackson	8/11/2022	0.50	\$ 520.41	\$ 260.21	Participated in team call	ADR
Kristen Jackson	8/11/2022	3.00	\$ 520.41	\$1,561.23	Participated in mediation	ADR
Kristen Jackson	8/12/2022	0.30	\$ 520.41	\$ 156.12	Participated in team call	ADR
Kristen Jackson	8/15/2022	0.20	\$ 520.41	\$ 104.08	Updated team schedule chart	ADR
Kristen Jackson	8/15/2022	3.20	\$ 520.41	\$1,665.31	Updated talking points document	ADR
Kristen Jackson	8/15/2022	0.90	\$ 520.41	\$ 468.37	Edited draft settlement agreement	ADR
Kristen Jackson	8/15/2022	0.20	\$ 520.41	\$ 104.08	Edited mediation agenda	ADR
Kristen Jackson	8/15/2022	0.20	\$ 520.41	\$ 104.08	Updated and circulated team schedule chart	ADR
Kristen Jackson	8/16/2022	0.50	\$ 520.41	\$ 260.21	Edited talking points document	ADR
Kristen Jackson	8/16/2022	0.10	\$ 520.41	\$ 52.04	Edited talking points document	ADR
Kristen Jackson	8/18/2022	0.60	\$ 520.41	\$ 312.25	Participated in call with R. Scholtz	Case development
Kristen Jackson	8/18/2022	1.10	\$ 520.41	\$ 572.45	Edited draft settlement agreement	ADR
Kristen Jackson	8/21/2022	0.70	\$ 520.41	\$ 364.29	Participated in team call	Case development
Kristen Jackson	8/22/2022	0.10	\$ 520.41	\$ 52.04	Edited team schedule and mediation agenda	ADR
Kristen Jackson	8/22/2022	1.10	\$ 520.41	\$ 572.45	Participated in team call	Case development
Kristen Jackson	8/23/2022	2.00	\$ 520.41	\$1,040.82	Annotated draft settlement agreement	ADR
Mary Tanagho Ross	8/23/2022	0.70	\$ 240.89	\$ 168.62	Participated in call with KMJ	Case development
Mary Tanagho Ross	8/23/2022	0.60	\$ 240.89	\$ 144.53	Reviewed talking points document	ADR
Mary Tanagho Ross	8/24/2022	1.50	\$ 240.89	\$ 361.34	Reviewed mediation materials	ADR
Mary Tanagho Ross	8/24/2022	0.70	\$ 240.89	\$ 168.62	Participated in Team Call	Case development
Mary Tanagho Ross	8/24/2022	3.00	\$ 240.89	\$ 722.67	Participated in mediation	ADR
Mary Tanagho Ross	8/25/2022	0.20	\$ 240.89	\$ 48.18	Participated in Team Call	Case development
Mary Tanagho Ross	8/25/2022	1.00	\$ 240.89	\$ 240.89	Participated in Team Call	Case development
Mary Tanagho Ross	8/25/2022	1.00	\$ 240.89	\$ 240.89	Participated in Team Call	Case development
Mary Tanagho Ross	8/25/2022	1.00	\$ 240.89	\$ 240.89	Participated in team call	Case development
Mary Tanagho Ross	8/25/2022	1.00	\$ 240.89	\$ 240.89	Participated in Team Call	Case development
Mary Tanagho Ross	8/27/2022	1.00	\$ 240.89	\$ 240.89	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	8/29/2022	0.80	\$ 240.89	\$ 192.71	Edited terms in draft settlement agreement	ADR
Mary Tanagho Ross	8/29/2022	0.60	\$ 240.89	\$ 144.53	Participated in call with K. DeJong	Case development
Mary Tanagho Ross	8/29/2022	1.00	\$ 240.89	\$ 240.89	Participated in Team Call	Case development
Mary Tanagho Ross	9/1/2022	1.00	\$ 240.89	\$ 240.89	Participated in Team Call	Case development
Mary Tanagho Ross	9/1/2022	0.30	\$ 240.89	\$ 72.27	Participated in Call with K. Jackson	Case development
Mary Tanagho Ross	9/1/2022	1.00	\$ 240.89	\$ 240.89	Participated in Team Call	Case development
Mary Tanagho Ross	9/1/2022	1.00	\$ 240.89	\$ 240.89	Participated in Team Call	Case development
Mary Tanagho Ross	9/2/2022	3.00	\$ 240.89	\$ 722.67	Participated in Mediation	ADR
Mary Tanagho Ross	9/7/2022	2.00	\$ 240.89	\$ 481.78	Edited Talking Points in Prep for Mediation	ADR
Mary Tanagho Ross	9/8/2022	3.00	\$ 240.89	\$ 722.67	Participated in Mediation	ADR
Mary Tanagho Ross	9/8/2022	0.50	\$ 240.89	\$ 120.45	Participated in team call	ADR
Mary Tanagho Ross	9/12/2022	2.00	\$ 240.89	\$ 481.78	Edited Settlement talking points document	ADR
Mary Tanagho Ross	9/12/2022	0.50	\$ 240.89	\$ 120.45	Organized time records	ADR
Mary Tanagho Ross	9/16/2022	0.50	\$ 240.89	\$ 120.45	Organized time records	ADR
Mary Tanagho Ross	9/22/2022	1.00	\$ 240.89	\$ 240.89	Worked on settlement terms	ADR
Mary Tanagho Ross	9/22/2022	0.80	\$ 240.89	\$ 192.71	edited terms in settlement agreement	ADR
Mary Tanagho Ross	9/26/2022	0.60	\$ 240.89	\$ 144.53	participated in call with W. Wylegala	ADR
Mary Tanagho Ross	9/26/2022	0.50	\$ 240.89	\$ 120.45	participated in call with K. Jackson	ADR
Mary Tanagho Ross	9/26/2022	1.00	\$ 240.89	\$ 240.89	participated in team call	Case development
Kristen Jackson	10/6/2022	0.20	\$ 520.41	\$ 104.08	Participated in team call	Case development
Kristen Jackson	10/17/2022	0.30	\$ 520.41	\$ 156.12	Spoke with K. DeJong	Case development
Kristen Jackson	10/17/2022	0.10	\$ 520.41	\$ 52.04	Updated mediation agenda	ADR
Kristen Jackson	10/18/2022	0.10	\$ 520.41	\$ 52.04	Updated team schedule chart	ADR
Kristen Jackson	10/18/2022	0.10	\$ 520.41	\$ 52.04	Reviewed mediation talking points document	ADR
Kristen Jackson	10/18/2022	0.30	\$ 520.41	\$ 156.12	Spoke with M. Tanagho Ross regarding mediation	ADR
Kristen Jackson	10/18/2022	2.20	\$ 520.41	\$1,144.90	Reviewed materials in preparation for mediation session	ADR
Kristen Jackson	10/18/2022	1.00	\$ 520.41	\$ 520.41	Participated in team meeting regarding mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	10/19/2022	1.50	\$ 520.41	\$ 780.62	Participated in mediation	ADR
Kristen Jackson	10/19/2022	0.50	\$ 520.41	\$ 260.21	Participated in team meeting regarding mediation	ADR
Kristen Jackson	10/19/2022	1.50	\$ 520.41	\$ 780.62	Edited settlement agreement draft	ADR
Kristen Jackson	10/19/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	10/20/2022	1.00	\$ 520.41	\$ 520.41	Drafted questions for Defendants	ADR
Kristen Jackson	10/20/2022	0.20	\$ 520.41	\$ 104.08	Edited questions for Defendants	ADR
Kristen Jackson	10/20/2022	1.40	\$ 520.41	\$ 728.57	Edited draft settlement agreement draft	ADR
Kristen Jackson	10/20/2022	0.20	\$ 520.41	\$ 104.08	Updated mediation agenda	ADR
Kristen Jackson	10/20/2022	0.10	\$ 520.41	\$ 52.04	Updated team schedule chart	ADR
Kristen Jackson	10/21/2022	0.60	\$ 520.41	\$ 312.25	Reviewed materials in preparation for mediation session	ADR
Kristen Jackson	10/21/2022	1.00	\$ 520.41	\$ 520.41	Participated in team call	Case development
Kristen Jackson	10/21/2022	0.50	\$ 520.41	\$ 260.21	Participated in team meeting regarding mediation	ADR
Kristen Jackson	10/21/2022	0.50	\$ 520.41	\$ 260.21	Prepared for mediation session	ADR
Kristen Jackson	10/21/2022	2.60	\$ 520.41	\$1,353.07	Participated in mediation	ADR
Kristen Jackson	10/21/2022	0.30	\$ 520.41	\$ 156.12	Edited draft settlement agreement	ADR
Kristen Jackson	10/21/2022	3.10	\$ 520.41	\$1,613.27	Edited draft settlement agreement	ADR
Kristen Jackson	10/22/2022	1.20	\$ 520.41	\$ 624.49	Edited draft settlement agreement	ADR
Kristen Jackson	10/24/2022	1.20	\$ 520.41	\$ 624.49	Participated in team call	Case development
Kristen Jackson	10/24/2022	0.80	\$ 520.41	\$ 416.33	Edited draft settlement agreement	ADR
Mary Tanagho Ross	10/24/2022	0.20	\$ 240.89	\$ 48.18	Participated in team call	Case development
Mary Tanagho Ross	10/24/2022	0.60	\$ 240.89	\$ 144.53	Reviewed mediation talking points document	ADR
Mary Tanagho Ross	10/24/2022	0.30	\$ 240.89	\$ 72.27	Spoke with K. Jackson regarding mediation	ADR
Mary Tanagho Ross	10/24/2022	1.50	\$ 240.89	\$ 361.34	Prepared for mediation session	ADR
Mary Tanagho Ross	10/25/2022	1.00	\$ 240.89	\$ 240.89	Participated in pre mediation call with counsel team	ADR
Mary Tanagho Ross	10/25/2022	1.50	\$ 240.89	\$ 361.34	Participated in Mediation	ADR
Mary Tanagho Ross	10/25/2022	1.00	\$ 240.89	\$ 240.89	Participated in team call	Case development



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	10/25/2022	0.60	\$ 240.89	\$ 144.53	Reviewed questions to send to Defendants	ADR
Mary Tanagho Ross	10/26/2022	1.50	\$ 240.89	\$ 361.34	Reviewed Agenda and talking points to prepare for Mediation	ADR
Mary Tanagho Ross	10/27/2022	2.60	\$ 240.89	\$ 626.31	Participated in Mediation	ADR
Mary Tanagho Ross	10/31/2022	1.10	\$ 240.89	\$ 264.98	Participated in Team Call	Case development
Kristen Jackson	10/31/2022	0.20	\$ 520.41	\$ 104.08	Organized time records	ADR
Kristen Jackson	11/1/2022	0.40	\$ 520.41	\$ 208.16	Edited draft settlement agreement	ADR
Kristen Jackson	11/1/2022	0.10	\$ 520.41	\$ 52.04	Edited draft settlement agreement	ADR
Kristen Jackson	11/14/2022	0.50	\$ 520.41	\$ 260.21	Spoke with M. Tanagho Ross	Case development
Kristen Jackson	11/15/2022	0.20	\$ 520.41	\$ 104.08	Reviewed draft settlement agreement	ADR
Kristen Jackson	11/15/2022	0.50	\$ 520.41	\$ 260.21	Participated in team call	Case development
Kristen Jackson	11/18/2022	0.10	\$ 520.41	\$ 52.04	Edited team schedule	ADR
Kristen Jackson	11/18/2022	0.30	\$ 520.41	\$ 156.12	Spoke with M. Tanagho Ross	Case development
Mary Tanagho Ross	11/18/2022	1.00	\$ 240.89	\$ 240.89	Participated in Team Call	Case development
Mary Tanagho Ross	11/28/2022	0.50	\$ 240.89	\$ 120.45	Spoke with K. Jackson	Case development
Mary Tanagho Ross	11/28/2022	0.30	\$ 240.89	\$ 72.27	Spoke with K. Jackson	Case development
Mary Tanagho Ross	11/30/2022	1.00	\$ 240.89	\$ 240.89	Prepared for mediation session	ADR
Kristen Jackson	12/5/2022	0.50	\$ 520.41	\$ 260.21	Participated in team call	Case development
Kristen Jackson	12/7/2022	0.40	\$ 520.41	\$ 208.16	Participated in team call	Case development
Kristen Jackson	12/9/2022	0.40	\$ 520.41	\$ 208.16	Reviewed class member's Ninth Circuit materials	Class counsel duties
Kristen Jackson	12/9/2022	0.10	\$ 520.41	\$ 52.04	Updated team schedule	ADR
Kristen Jackson	12/12/2022	0.70	\$ 520.41	\$ 364.29	Drafted mediation agenda	ADR
Kristen Jackson	12/12/2022	0.40	\$ 520.41	\$ 208.16	Participated in team call	Case development
Kristen Jackson	12/12/2022	0.50	\$ 520.41	\$ 260.21	Participated in team call	Case development
Kristen Jackson	12/13/2022	0.30	\$ 520.41	\$ 156.12	Participated in team call	Case development
Kristen Jackson	12/19/2022	0.20	\$ 520.41	\$ 104.08	Spoke with class member's attorney	Class counsel duties
Mary Tanagho Ross	12/19/2022	0.50	\$ 240.89	\$ 120.45	Participated in team call	Case development
Mary Tanagho Ross	1/7/2023	0.40	\$ 250.01	\$ 100.00	Participated in team call	Case development
Mary Tanagho Ross	1/7/2023	0.40	\$ 250.01	\$ 100.00	Participated in team call	Case development



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	1/8/2023	0.60	\$ 250.01	\$ 150.01	Communicated with class member atty regarding class member case	Case development
Mary Tanagho Ross	1/9/2023	1.00	\$ 250.01	\$ 250.01	Drafted email to Defendants regarding class member	Class counsel duties
Kristen Jackson	1/9/2023	0.10	\$ 603.64	\$ 60.36	Organized time records	ADR
Kristen Jackson	1/9/2023	0.50	\$ 603.64	\$ 301.82	Reviewed class member's EOIR materials	Class counsel duties
Kristen Jackson	1/11/2023	0.70	\$ 603.64	\$ 422.55	Participated in team call	Case development
Kristen Jackson	1/11/2023	0.20	\$ 603.64	\$ 120.73	Spoke with class member's counsel	Class counsel duties
Kristen Jackson	1/13/2023	1.50	\$ 603.64	\$ 905.46	Drafted declaration in support of class member's pending EOIR motions	Class counsel duties
Kristen Jackson	1/17/2023	0.80	\$ 603.64	\$ 482.91	Participated in team call	Case development
Kristen Jackson	1/23/2023	1.50	\$ 603.64	\$ 905.46	Spoke with R. Scholtz regarding draft settlement agreement	ADR
Kristen Jackson	1/23/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	1/25/2023	0.90	\$ 603.64	\$ 543.28	Spoke with R. Scholtz regarding draft settlement agreement	ADR
Kristen Jackson	1/27/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	1/30/2023	0.40	\$ 603.64	\$ 241.46	Edited draft settlement agreement	ADR
Kristen Jackson	1/30/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	2/2/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	2/3/2023	0.40	\$ 603.64	\$ 241.46	Spoke with Mendez Rojas counsel	ADR
Kristen Jackson	2/6/2023	0.40	\$ 603.64	\$ 241.46	Edited draft settlement agreement	ADR
Kristen Jackson	2/6/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	2/11/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	2/12/2023	0.20	\$ 603.64	\$ 120.73	Updated and uploaded team schedule and proposed agenda for mediation	ADR
Kristen Jackson	2/13/2023	0.50	\$ 603.64	\$ 301.82	Participated in call with R. Scholtz regarding mediation	ADR
Kristen Jackson	2/13/2023	1.30	\$ 603.64	\$ 784.73	Participated in team call regarding mediation	ADR
Kristen Jackson	2/16/2023	0.20	\$ 603.64	\$ 120.73	Updated and uploaded agenda for mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	2/17/2023	0.50	\$ 603.64	\$ 301.82	Prepared for mediation session	ADR
Kristen Jackson	2/17/2023	0.50	\$ 603.64	\$ 301.82	Participated in team call in advance of mediation	ADR
Kristen Jackson	2/23/2023	1.10	\$ 603.64	\$ 664.00	Participated in mediation	ADR
Kristen Jackson	2/24/2023	0.40	\$ 603.64	\$ 241.46	Participated in mediation debrief	ADR
Kristen Jackson	2/24/2023	0.40	\$ 603.64	\$ 241.46	Spoke with K. DeJong regarding discussion with Judge Schultz	ADR
Kristen Jackson	2/27/2023	0.60	\$ 603.64	\$ 362.18	Participated in team call	Case development
Kristen Jackson	2/27/2023	0.40	\$ 603.64	\$ 241.46	Participated in court call	Attending court hearings
Kristen Jackson	2/27/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	2/28/2023	0.20	\$ 603.64	\$ 120.73	Spoke with K. DeJong regarding mediation scheduling	ADR
Kristen Jackson	3/1/2023	1.10	\$ 603.64	\$ 664.00	Edited draft settlement agreement	ADR
Kristen Jackson	3/1/2023	0.20	\$ 603.64	\$ 120.73	Reviewed and commented on research document	ADR
Kristen Jackson	3/2/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	3/2/2023	0.70	\$ 603.64	\$ 422.55	Edited draft settlement agreement and research documents	ADR
Kristen Jackson	3/2/2023	0.30	\$ 603.64	\$ 181.09	Edited draft settlement agreement and research documents and circulated to the team	ADR
Kristen Jackson	3/2/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	3/5/2023	0.50	\$ 603.64	\$ 301.82	Reviewed draft settlement agreement and proposed edits	ADR
Kristen Jackson	3/6/2023	1.30	\$ 603.64	\$ 784.73	Edited talking points document	ADR
Kristen Jackson	3/6/2023	0.80	\$ 603.64	\$ 482.91	Spoke with R. Scholtz regarding mediation	ADR
Kristen Jackson	3/10/2023	3.40	\$ 603.64	\$2,052.38	Participated in mediation	ADR
Kristen Jackson	3/13/2023	1.20	\$ 603.64	\$ 724.37	Participated in team call	ADR
Kristen Jackson	3/14/2023	0.20	\$ 603.64	\$ 120.73	Edited and circulated schedule document	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	3/14/2023	0.90	\$ 603.64	\$ 543.28	Drafted declaration in support of class member's motion	Class counsel duties
Kristen Jackson	3/19/2023	0.20	\$ 603.64	\$ 120.73	Spoke with K. DeJong regarding scheduling	ADR
Kristen Jackson	3/20/2023	3.80	\$ 603.64	\$2,293.83	Edited draft settlement agreement	ADR
Mary Tanagho Ross	3/20/2023	1.00	\$ 250.01	\$ 250.01	Organized time records	ADR
Mary Tanagho Ross	3/20/2023	0.70	\$ 250.01	\$ 175.01	Participated in Team Call	Case development
Mary Tanagho Ross	3/20/2023	0.50	\$ 250.01	\$ 125.01	Updated time records	ADR
Mary Tanagho Ross	3/20/2023	0.50	\$ 250.01	\$ 125.01	corresponded with Co counsel re time records	ADR
Mary Tanagho Ross	3/24/2023	0.80	\$ 250.01	\$ 200.01	Participated in team call	Case development
Mary Tanagho Ross	3/25/2023	1.00	\$ 250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	3/26/2023	1.00	\$ 250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	3/27/2023	0.80	\$ 250.01	\$ 200.01	Drafted email to Defendants regarding class member	Case development
Mary Tanagho Ross	3/27/2023	1.00	\$ 250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	3/28/2023	1.00	\$ 250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	3/29/2023	1.00	\$ 250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	12/5/2023	0.30	\$ 250.01	\$ 75.00	corresponded with co-counsel re class member case	Class counsel duties
Mary Tanagho Ross	12/9/2023	0.80	\$ 250.01	\$ 200.01	Spoke with atty re class member case	Class counsel duties
Mary Tanagho Ross	12/12/2023	1.00	\$ 250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	12/16/2023	0.70	\$ 250.01	\$ 175.01	Corresponded with attorney re class member case	Class counsel duties
Kristen Jackson	3/29/2023	3.80	\$ 603.64	\$2,293.83	Edited draft settlement agreement	ADR
Mary Tanagho Ross	4/3/2023	0.40	\$ 250.01	\$ 100.00	Reviewed emails regarding settlement	ADR
Kristen Jackson	4/3/2023	0.20	\$ 603.64	\$ 120.73	Emailed regarding draft settlement agreement	ADR
Kristen Jackson	4/3/2023	0.90	\$ 603.64	\$ 543.28	Edited draft settlement agreement	ADR
Kristen Jackson	4/3/2023	1.00	\$ 603.64	\$ 603.64	Participated in team meeting	Case development
Kristen Jackson	4/3/2023	0.10	\$ 603.64	\$ 60.36	Prepared for team meeting	Case development
Kristen Jackson	4/4/2023	1.90	\$ 603.64	\$1,146.92	Edited draft settlement agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	4/4/2023	0.10	\$ 603.64	\$ 60.36	Prepared for team call	Case development
Kristen Jackson	4/4/2023	0.70	\$ 603.64	\$ 422.55	Participated in team meeting	Case development
Kristen Jackson	4/5/2023	0.10	\$ 603.64	\$ 60.36	Emailed co-counsel regarding team call	Case development
Kristen Jackson	4/5/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding draft settlement agreement	ADR
Kristen Jackson	4/5/2023	0.60	\$ 603.64	\$ 362.18	Edited and circulated draft settlement agreement	ADR
Kristen Jackson	4/6/2023	0.70	\$ 603.64	\$ 422.55	Edited schedule and agenda documents and uploaded to Teams	Case development
Mary Tanagho Ross	4/7/2023	0.70	\$ 250.01	\$ 175.01	Participated in call with with KMJ re settlement	ADR
Kristen Jackson	4/7/2023	0.70	\$ 603.64	\$ 422.55	Participated in call with M. Tanagho Ross regarding settlement	ADR
Mary Tanagho Ross	4/10/2023	1.00	\$ 250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	4/11/2023	0.50	\$ 250.01	\$ 125.01	Communicated with Class Member's attorney	Class counsel duties
Mary Tanagho Ross	4/11/2023	2.50	\$ 250.01	\$ 625.03	Prepared for mediation	ADR
Mary Tanagho Ross	4/12/2023	1.60	\$ 250.01	\$ 400.02	Worked on mediation statement	ADR
Kristen Jackson	4/13/2023	0.20	\$ 603.64	\$ 120.73	Emailed co-counsel regarding mediation preparation.	ADR
Mary Tanagho Ross	4/13/2023	1.50	\$ 250.01	\$ 375.02	Prepared for mediation	ADR
Mary Tanagho Ross	4/14/2023	2.00	\$ 250.01	\$ 500.02	Prepared for mediation by reviewing documents	ADR
Kristen Jackson	4/16/2023	1.20	\$ 603.64	\$ 724.37	Edited draft mediation statement	ADR
Kristen Jackson	4/16/2023	2.50	\$ 603.64	\$1,509.10	Edited talking points document.	ADR
Mary Tanagho Ross	4/17/2023	1.80	\$ 250.01	\$ 450.02	Edited mediation statement	ADR
Kristen Jackson	4/17/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	4/18/2023	0.70	\$ 603.64	\$ 422.55	Edited mediation statement	ADR
Kristen Jackson	4/19/2023	0.50	\$ 603.64	\$ 301.82	Participated in call regarding mediation with M. Tanagho Ross and K. DeJong.	ADR
Mary Tanagho Ross	4/21/2023	1.30	\$ 250.01	\$ 325.01	Reviewed and edited mediation statement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	4/21/2023	0.40	\$ 250.01	\$ 100.00	Participated in call with Co counsel	Case development
Mary Tanagho Ross	4/24/2023	2.50	\$ 250.01	\$ 625.03	Updated mediation documents	ADR
Mary Tanagho Ross	4/24/2023	1.00	\$ 250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	4/25/2023	3.50	\$ 250.01	\$ 875.04	Prepared for mediation	ADR
Mary Tanagho Ross	4/25/2023	1.00	\$ 250.01	\$ 250.01	Participated in preparation call for mediation	ADR
Mary Tanagho Ross	4/26/2023	4.50	\$ 250.01	\$1,125.05	Participated in settlement/mediation conference	ADR
Kristen Jackson	5/1/2023	0.50	\$ 603.64	\$ 301.82	Reviewed all email activity during absence	Case development
Kristen Jackson	5/1/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	5/2/2023	0.50	\$ 603.64	\$ 301.82	Reviewed mediation notes	ADR
Kristen Jackson	5/2/2023	1.80	\$ 603.64	\$1,086.55	Reviewed and edited draft settlement agreement	ADR
Kristen Jackson	5/2/2023	0.50	\$ 603.64	\$ 301.82	Participated in call with R. Scholtz regarding mediation	ADR
Mary Tanagho Ross	5/2/2023	0.80	\$ 250.01	\$ 200.01	Updated notes on settlement conference	ADR
Mary Tanagho Ross	5/2/2023	2.50	\$ 250.01	\$ 625.03	Draft portions of settlement agreement	ADR
Kristen Jackson	5/3/2023	1.00	\$ 603.64	\$ 603.64	Participated in call with R. Scholtz regarding mediation	ADR
Kristen Jackson	5/4/2023	0.40	\$ 603.64	\$ 241.46	Participated in call with R. Scholtz regarding settlement agreement	ADR
Kristen Jackson	5/4/2023	1.90	\$ 603.64	\$1,146.92	Edited draft settlement agreement	ADR
Kristen Jackson	5/4/2023	0.70	\$ 603.64	\$ 422.55	Participated in call with M. Tanagho Ross regarding settlement	ADR
Mary Tanagho Ross	5/4/2023	0.70	\$ 250.01	\$ 175.01	Participated in call with KMJ re settlement conference	ADR
Mary Tanagho Ross	5/4/2023	1.50	\$ 250.01	\$ 375.02	Edited portions of settlement agreement	ADR
Kristen Jackson	5/5/2023	0.50	\$ 603.64	\$ 301.82	Edited draft settlement agreement	ADR
Kristen Jackson	5/5/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	5/7/2023	0.20	\$ 603.64	\$ 120.73	Emailed R. Scholtz regarding draft settlement agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	5/7/2023	1.50	\$ 603.64	\$ 905.46	Edited draft settlement agreement	ADR
Kristen Jackson	5/8/2023	0.60	\$ 603.64	\$ 362.18	Spoke with R. Scholtz regarding draft settlement agreement	ADR
Mary Tanagho Ross	5/8/2023	1.20	\$ 250.01	\$ 300.01	Reviewed settlement agreement edits post mediation	ADR
Kristen Jackson	5/8/2023	1.10	\$ 603.64	\$ 664.00	Reviewed compliance reporting materials	ADR
Kristen Jackson	5/8/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with co-counsel regarding draft settlement agreement	ADR
Kristen Jackson	5/8/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	5/8/2023	0.90	\$ 603.64	\$ 543.28	Edited draft settlement agreement	ADR
Kristen Jackson	5/9/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Mary Tanagho Ross	5/9/2023	1.00	\$ 250.01	\$ 250.01	Edited settlement agreement	ADR
Mary Tanagho Ross	5/9/2023	0.70	\$ 250.01	\$ 175.01	Communications with attorney for class member	Class counsel duties
Mary Tanagho Ross	5/10/2023	0.70	\$ 250.01	\$ 175.01	Drafted Settlement exhibit Compliance Report	ADR
Kristen Jackson	5/10/2023	1.70	\$ 603.64	\$1,026.19	Edited draft settlement agreement	ADR
Kristen Jackson	5/10/2023	0.70	\$ 603.64	\$ 422.55	Spoke with R. Scholtz regarding draft settlement agreement	ADR
Mary Tanagho Ross	5/11/2023	1.40	\$ 250.01	\$ 350.01	Reviewed and edited settlement draft exhibit	ADR
Kristen Jackson	5/11/2023	0.20	\$ 603.64	\$ 120.73	Emailed co-counsel regarding draft settlement agreement and report	ADR
Kristen Jackson	5/11/2023	2.20	\$ 603.64	\$1,328.01	Reviewed and edited draft compliance report	ADR
Kristen Jackson	5/11/2023	0.70	\$ 603.64	\$ 422.55	Edited draft settlement agreement	ADR
Kristen Jackson	5/11/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	5/11/2023	0.20	\$ 603.64	\$ 120.73	Reviewed protective order in light of settlement agreement draft	ADR
Kristen Jackson	5/12/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with co-counsel regarding draft settlement agreement	ADR
Kristen Jackson	5/12/2023	0.30	\$ 603.64	\$ 181.09	Edited draft settlement agreement	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	5/12/2023	0.20	\$ 603.64	\$ 120.73	Edited draft notice of compliance report	ADR
Kristen Jackson	5/15/2023	0.30	\$ 603.64	\$ 181.09	Emailed co-counsel regarding next steps	Case development
Kristen Jackson	5/15/2023	0.20	\$ 603.64	\$ 120.73	Updated schedule document	ADR
Kristen Jackson	5/15/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Mary Tanagho Ross	5/17/2023	0.80	\$ 250.01	\$ 200.01	Communicated with class member's atty	Case development
Kristen Jackson	5/19/2023	0.60	\$ 603.64	\$ 362.18	Edited draft mediation statement	ADR
Kristen Jackson	5/19/2023	0.30	\$ 603.64	\$ 181.09	Reviewed OPLA FOIA results reflecting JOP guidance.	Class counsel duties
Kristen Jackson	5/19/2023	0.20	\$ 603.64	\$ 120.73	Reviewed approval and notice documents	ADR
Kristen Jackson	5/19/2023	0.20	\$ 603.64	\$ 120.73	Prepared for team call	Case development
Kristen Jackson	5/19/2023	0.90	\$ 603.64	\$ 543.28	Participated in team call	Case development
Mary Tanagho Ross	5/19/2023	0.90	\$ 250.01	\$ 225.01	Compiled and circulated sample notices for settlement exhibits	ADR
Kristen Jackson	5/22/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with K. Eidmann regarding mediation	ADR
Kristen Jackson	5/22/2023	1.40	\$ 603.64	\$ 845.10	Reviewed and edited email regarding OPLA issues	Class counsel duties
Kristen Jackson	5/22/2023	1.90	\$ 603.64	\$1,146.92	Drafted notice of noncompliance	ADR
Mary Tanagho Ross	5/22/2023	0.70	\$ 250.01	\$ 175.01	Circulated sample notices	ADR
Kristen Jackson	5/22/2023	0.10	\$ 603.64	\$ 60.36	Drafted notice of noncompliance	Case development
Kristen Jackson	5/22/2023	0.20	\$ 603.64	\$ 120.73	Prepared for team call	Case development
Kristen Jackson	5/22/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Mary Tanagho Ross	5/23/2023	0.80	\$ 250.01	\$ 200.01	Review/edit correspondence to Defendants	Case development
Kristen Jackson	5/23/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding OPLA email	Class counsel duties
Kristen Jackson	5/24/2023	0.10	\$ 603.64	\$ 60.36	Emailed K. DeJong regarding OPLA email	Class counsel duties
Kristen Jackson	5/24/2023	0.10	\$ 603.64	\$ 60.36	Emailed R. Scholtz regarding draft notice of noncompliance	ADR
Kristen Jackson	5/25/2023	0.70	\$ 603.64	\$ 422.55	Edited notice of noncompliance	ADR
Kristen Jackson	5/27/2023	0.30	\$ 603.64	\$ 181.09	Drafted response regarding OPLA email	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	5/27/2023	0.20	\$ 603.64	\$ 120.73	Emailed co-counsel regarding notice of noncompliance and OPLA	Class counsel duties
Kristen Jackson	5/28/2023	0.50	\$ 603.64	\$ 301.82	Booked and sought reimbursement for flight	ADR
Mary Tanagho Ross	5/30/2023	0.80	\$ 250.01	\$ 200.01	Review emails to Defendants	Case development
Mary Tanagho Ross	5/30/2023	0.60	\$ 250.01	\$ 150.01	Review correspondence to Defendants	Case development
Kristen Jackson	5/31/2023	0.70	\$ 603.64	\$ 422.55	Edited draft settlement agreement	ADR
Kristen Jackson	5/31/2023	0.20	\$ 603.64	\$ 120.73	Emailed regarding I-589 filing instructions	Class counsel duties
Kristen Jackson	5/31/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding OPLA email and USCIS website	Class counsel duties
Mary Tanagho Ross	5/31/2023	0.80	\$ 250.01	\$ 200.01	Reviewed notice for post-settlement	ADR
Kristen Jackson	6/1/2023	1.10	\$ 603.64	\$ 664.00	Reviewed USCIS website for I-589 filing instructions	Class counsel duties
Kristen Jackson	6/1/2023	0.30	\$ 603.64	\$ 181.09	Emailed co-counsel regarding notice of noncompliance	Class counsel duties
Mary Tanagho Ross	6/1/2023	0.60	\$ 250.01	\$ 150.01	Emailed regarding incorrect information for I-589 filings	Class counsel duties
Mary Tanagho Ross	6/1/2023	0.70	\$ 250.01	\$ 175.01	Edited correspondence to defendants	Case development
Kristen Jackson	6/1/2023	0.10	\$ 603.64	\$ 60.36	Emailed R. Scholtz regarding incorrect receipt	Class counsel duties
Kristen Jackson	6/1/2023	0.10	\$ 603.64	\$ 60.36	Emailed K. DeJong regarding OPLA email	Class counsel duties
Kristen Jackson	6/2/2023	0.40	\$ 603.64	\$ 241.46	Spoke with R. Scholtz regarding USCIS issues	Class counsel duties
Kristen Jackson	6/2/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	6/4/2023	0.30	\$ 603.64	\$ 181.09	Edited email regarding USCIS web page	Class counsel duties
Kristen Jackson	6/4/2023	0.80	\$ 603.64	\$ 482.91	Reviewed FOIA results and drafted responses regarding individual cases.	Class counsel duties
Kristen Jackson	6/5/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	6/5/2023	1.10	\$ 603.64	\$ 664.00	Edited two emails, notice, and brainstorm document.	Case development
Kristen Jackson	6/5/2023	1.00	\$ 603.64	\$ 603.64	Edited email regarding USCIS web page	Class counsel duties
Kristen Jackson	6/6/2023	1.00	\$ 603.64	\$ 603.64	Edited notice of noncompliance.	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	6/6/2023	0.10	\$ 603.64	\$ 60.36	Emailed R. Scholtz regarding attorney and notice	Case development
Kristen Jackson	6/7/2023	1.70	\$ 603.64	\$1,026.19	Drafted, edited, and circulated notice of noncompliance.	ADR
Kristen Jackson	6/7/2023	0.20	\$ 603.64	\$ 120.73	Finalized USCIS website email.	Class counsel duties
Kristen Jackson	6/9/2023	0.70	\$ 603.64	\$ 422.55	Prepared for team call by reviewing documents and corresponding about outstanding issues.	Case development
Kristen Jackson	6/9/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	6/12/2023	0.30	\$ 603.64	\$ 181.09	Prepared for team call.	Case development
Kristen Jackson	6/12/2023	0.70	\$ 603.64	\$ 422.55	Participated in team call	Case development
Kristen Jackson	6/13/2023	0.30	\$ 603.64	\$ 181.09	Discussed scheduling with R. Scholtz	Case development
Kristen Jackson	6/13/2023	0.50	\$ 603.64	\$ 301.82	Reviewed draft settlement agreement.	ADR
Kristen Jackson	6/13/2023	0.50	\$ 603.64	\$ 301.82	Reviewed and responded to emails about scheduling.	Case development
Mary Tanagho Ross	6/13/2023	0.70	\$ 250.01	\$ 175.01	Responded to emails with co-counsel	Case development
Mary Tanagho Ross	6/13/2023	2.00	\$ 250.01	\$ 500.02	Review edits from Def. to settlement documents	ADR
Kristen Jackson	6/14/2023	0.20	\$ 603.64	\$ 120.73	Edited case processing email.	Case development
Kristen Jackson	6/14/2023	0.40	\$ 603.64	\$ 241.46	Corresponded regarding mediation and status report.	ADR
Kristen Jackson	6/14/2023	0.20	\$ 603.64	\$ 120.73	Participated in call with R. Scholtz regarding filing and mediation.	ADR
Kristen Jackson	6/15/2023	0.60	\$ 603.64	\$ 362.18	Revised draft mediation statement.	ADR
Kristen Jackson	6/15/2023	0.60	\$ 603.64	\$ 362.18	Reviewed and revised notice of compliance report.	ADR
Kristen Jackson	6/15/2023	5.10	\$ 603.64	\$3,078.56	Reviewed and revised draft settlement agreement.	ADR
Kristen Jackson	6/15/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with co-counsel regarding draft settlement agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Mary Tanagho Ross	6/15/2023	1.00	\$ 250.01	\$ 250.01	Edited letter to def.	Case development
Mary Tanagho Ross	6/15/2023	1.50	\$ 250.01	\$ 375.02	Reviewed correspondence to Def.	Case development
Kristen Jackson	6/16/2023	1.80	\$ 603.64	\$1,086.55	Participated in team call	Case development
Kristen Jackson	6/16/2023	0.30	\$ 603.64	\$ 181.09	Corresponded regarding mediation.	ADR
Kristen Jackson	6/16/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding mediation	ADR
Mary Tanagho Ross	6/16/2023	1.30	\$ 250.01	\$ 325.01	Call with Co counsel	Case development
Mary Tanagho Ross	6/16/2023	3.00	\$ 250.01	\$ 750.03	Reviewed settlement agreement	ADR
Kristen Jackson	6/17/2023	0.30	\$ 603.64	\$ 181.09	Reviewed materials regarding termination dates.	ADR
Kristen Jackson	6/17/2023	0.80	\$ 603.64	\$ 482.91	Drafted and circulated OPLA guidance email.	Class counsel duties
Kristen Jackson	6/17/2023	1.20	\$ 603.64	\$ 724.37	Reviewed and edited draft settlement notice and returned it to R. Scholtz.	ADR
Kristen Jackson	6/17/2023	0.50	\$ 603.64	\$ 301.82	Edited and circulated draft notice of noncompliance.	ADR
Kristen Jackson	6/18/2023	3.90	\$ 603.64	\$2,354.20	Edited draft mediation statement	ADR
Kristen Jackson	6/18/2023	0.30	\$ 603.64	\$ 181.09	Corresponded with co-counsel regarding draft mediation statement	ADR
Kristen Jackson	6/19/2023	0.10	\$ 603.64	\$ 60.36	Emailed with M. Tanagho Ross regarding mediation statement.	ADR
Kristen Jackson	6/19/2023	0.40	\$ 603.64	\$ 241.46	Drafted mediation agenda.	ADR
Kristen Jackson	6/19/2023	0.60	\$ 603.64	\$ 362.18	Drafted questions for mediation.	ADR
Kristen Jackson	6/19/2023	0.10	\$ 603.64	\$ 60.36	Edited OPLA email	Case development
Kristen Jackson	6/19/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	6/19/2023	1.30	\$ 603.64	\$ 784.73	Edited draft mediation statement	ADR
Mary Tanagho Ross	6/19/2023	0.10	\$ 250.01	\$ 25.00	Emailed with KMJ regarding mediation statement	ADR
Mary Tanagho Ross	6/19/2023	0.50	\$ 250.01	\$ 125.01	Reviewed and drafted questions for defendants	ADR
Kristen Jackson	6/20/2023	0.50	\$ 603.64	\$ 301.82	Revised draft agenda	Case development
Kristen Jackson	6/20/2023	0.20	\$ 603.64	\$ 120.73	Reviewed ATD materials.	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	6/20/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding mediation questions.	ADR
Kristen Jackson	6/20/2023	0.70	\$ 603.64	\$ 422.55	Edited draft questions	ADR
Mary Tanagho Ross	6/20/2023	1.70	\$ 250.01	\$ 425.02	Edited mediation statement	ADR
Kristen Jackson	6/20/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule.	Case development
Kristen Jackson	6/20/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	6/20/2023	2.20	\$ 603.64	\$1,328.01	Edited draft mediation statement	ADR
Kristen Jackson	6/20/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding mediation schedule and draft.	ADR
Mary Tanagho Ross	6/21/2023	0.20	\$ 250.01	\$ 50.00	Updated schedule document	Case development
Mary Tanagho Ross	6/21/2023	2.00	\$ 250.01	\$ 500.02	Reviewed settlement documents (Draft agenda, mediation statement and settlement draft)	ADR
Kristen Jackson	6/22/2023	0.20	\$ 603.64	\$ 120.73	Edited email regarding USCIS memo	Class counsel duties
Kristen Jackson	6/22/2023	0.20	\$ 603.64	\$ 120.73	Reviewed USCIS website filing tool	Class counsel duties
Kristen Jackson	6/22/2023	0.20	\$ 603.64	\$ 120.73	Emailed regarding mediation scheduling.	ADR
Kristen Jackson	6/22/2023	0.20	\$ 603.64	\$ 120.73	Emailed regarding USCIS and OPLA emails.	Class counsel duties
Mary Tanagho Ross	6/22/2023	0.40	\$ 250.01	\$ 100.00	Reviewed correspondence from Defendants re I-589 filings	Class counsel duties
Kristen Jackson	6/23/2023	0.30	\$ 603.64	\$ 181.09	Edited and circulated emails to opposing counsel	Case development
Kristen Jackson	6/23/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	6/23/2023	0.20	\$ 603.64	\$ 120.73	Prepared for team call	Case development
Mary Tanagho Ross	6/23/2023	0.20	\$ 250.01	\$ 50.00	Reviewed correspondence to Defendants	Case development
Kristen Jackson	6/24/2023	0.20	\$ 603.64	\$ 120.73	Downloaded and read United States v. Texas.	Case development
Kristen Jackson	6/24/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding mediation schedule.	ADR
Kristen Jackson	6/24/2023	2.10	\$ 603.64	\$1,267.64	Reviewed and edited comments on USCIS website and I-589 instructions.	Class counsel duties
Kristen Jackson	6/24/2023	0.60	\$ 603.64	\$ 362.18	Edited class notice	Case development
Kristen Jackson	6/25/2023	1.60	\$ 603.64	\$ 965.82	Updated talking points document.	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	6/25/2023	0.80	\$ 603.64	\$ 482.91	Reviewed US v. TX majority and concurring opinions.	Case development
Mary Tanagho Ross	6/26/2023	3.00	\$ 250.01	\$ 750.03	Edited talking points doc for Mediation	ADR
Mary Tanagho Ross	6/26/2023	0.50	\$ 250.01	\$ 125.01	Reviewed and drafted questions for defendants	ADR
Kristen Jackson	6/26/2023	0.10	\$ 603.64	\$ 60.36	Emailed co-counsel regarding mediation	ADR
Kristen Jackson	6/26/2023	1.00	\$ 603.64	\$ 603.64	Edited talking points document.	ADR
Kristen Jackson	6/26/2023	0.40	\$ 603.64	\$ 241.46	Prepared for team call	Case development
Kristen Jackson	6/26/2023	1.20	\$ 603.64	\$ 724.37	Participated in team call	Case development
Kristen Jackson	6/27/2023	0.50	\$ 603.64	\$ 301.82	Prepared for mediation session	ADR
Kristen Jackson	6/27/2023	1.00	\$ 603.64	\$ 603.64	Reviewed and edited talking points document	ADR
Kristen Jackson	6/27/2023	0.30	\$ 603.64	\$ 181.09	Corresponded regarding mediation	ADR
Mary Tanagho Ross	6/27/2023	2.30	\$ 250.01	\$ 575.02	Prepare for mediation	ADR
Mary Tanagho Ross	6/27/2023	1.20	\$ 250.01	\$ 300.01	Reviewed comments on talking points doc for mediation	ADR
Mary Tanagho Ross	6/28/2023	0.70	\$ 250.01	\$ 175.01	Edited notes taken from mediation and circulated to team	ADR
Mary Tanagho Ross	6/28/2023	0.70	\$ 250.01	\$ 175.01	Participated in pre mediation meeting	ADR
Mary Tanagho Ross	6/28/2023	3.00	\$ 250.01	\$ 750.03	Participated in mediation	ADR
Kristen Jackson	6/29/2023	1.50	\$ 603.64	\$ 905.46	Spoke with R. Scholtz regarding I-589 instruction and filing issues	Class counsel duties
Kristen Jackson	6/29/2023	0.50	\$ 603.64	\$ 301.82	Reviewed and edited instruction comments	Class counsel duties
Kristen Jackson	6/29/2023	0.20	\$ 603.64	\$ 120.73	Drafted email regarding mediation follow up	ADR
Kristen Jackson	6/29/2023	0.30	\$ 603.64	\$ 181.09	Drafted follow up filing questions	ADR
Mary Tanagho Ross	6/29/2023	0.80	\$ 250.01	\$ 200.01	Corresponded with KDJ and CA re fees updates	ADR
Mary Tanagho Ross	6/29/2023	0.90	\$ 250.01	\$ 225.01	Reviewed and edited proposed class notice	Case development
Kristen Jackson	6/30/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding instructions and mediation schedule.	ADR
Kristen Jackson	6/30/2023	0.60	\$ 603.64	\$ 362.18	Edited instructions and web page comments	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	6/30/2023	1.20	\$ 603.64	\$ 724.37	Edited draft settlement agreement	ADR
Mary Tanagho Ross	6/30/2023	0.70	\$ 250.01	\$ 175.01	Reviewed and edited comment to I 589 instructions	Class counsel duties
Mary Tanagho Ross	6/30/2023	0.20	\$ 250.01	\$ 50.00	Updated case scheduling document	ADR
Kristen Jackson	7/1/2023	1.00	\$ 603.64	\$ 603.64	Edited draft settlement agreement	ADR
Mary Tanagho Ross	7/1/2023	0.70	\$ 250.01	\$ 175.01	Reviewed edits to agreement	ADR
Mary Tanagho Ross	7/1/2023	0.80	\$ 250.01	\$ 200.01	Corresponded regarding Settlement	ADR
Kristen Jackson	7/2/2023	0.20	\$ 603.64	\$ 120.73	Updated comprehensive talking points document	ADR
Kristen Jackson	7/2/2023	2.70	\$ 603.64	\$1,629.83	Drafted instructions cover letter	Case development
Kristen Jackson	7/2/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding X.	Class counsel duties
Kristen Jackson	7/3/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule.	Case development
Kristen Jackson	7/3/2023	0.10	\$ 603.64	\$ 60.36	Updated questions document	ADR
Kristen Jackson	7/3/2023	0.20	\$ 603.64	\$ 120.73	Emailed K. DeJong regarding mediation schedule	ADR
Kristen Jackson	7/3/2023	0.70	\$ 603.64	\$ 422.55	Participated in team call	Case development
Kristen Jackson	7/3/2023	0.10	\$ 603.64	\$ 60.36	Reviewed instructions document	Case development
Mary Tanagho Ross	7/3/2023	1.50	\$ 250.01	\$ 375.02	Reviewed settlement agreement	ADR
Mary Tanagho Ross	7/3/2023	1.50	\$ 250.01	\$ 375.02	Updated document post-mediation	ADR
Kristen Jackson	7/5/2023	0.10	\$ 603.64	\$ 60.36	Emailed with R. Scholtz regarding instructions	Case development
Kristen Jackson	7/5/2023	0.30	\$ 603.64	\$ 181.09	Corresponded regarding mediation schedule	ADR
Kristen Jackson	7/5/2023	0.60	\$ 603.64	\$ 362.18	Edited and circulated instructions cover letter	Case development
Mary Tanagho Ross	7/5/2023	0.80	\$ 250.01	\$ 200.01	Reviewed and edited comments to I-589 instructions	Case development
Mary Tanagho Ross	7/5/2023	0.20	\$ 250.01	\$ 50.00	Corresponded re mediation	ADR
Kristen Jackson	7/6/2023	0.30	\$ 603.64	\$ 181.09	Emailed regarding mediation schedule.	ADR
Kristen Jackson	7/6/2023	0.10	\$ 603.64	\$ 60.36	Edited draft settlement agreement	ADR
Kristen Jackson	7/6/2023	0.10	\$ 603.64	\$ 60.36	Edited instructions and cover letter	Case development
Kristen Jackson	7/6/2023	0.10	\$ 603.64	\$ 60.36	Emailed with R. Scholtz regarding filing locations	Case development



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	7/7/2023	0.50	\$ 603.64	\$ 301.82	Emailed regarding draft settlement agreement	ADR
Kristen Jackson	7/7/2023	1.20	\$ 603.64	\$ 724.37	Participated in team call	Case development
Kristen Jackson	7/7/2023	1.70	\$ 603.64	\$1,026.19	Edited draft settlement agreement	ADR
Kristen Jackson	7/7/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding instructions	Case development
Kristen Jackson	7/7/2023	0.50	\$ 603.64	\$ 301.82	Researched prior denial issues	Case development
Kristen Jackson	7/9/2023	1.70	\$ 603.64	\$1,026.19	Reviewed and edited instruction comments and cover letter.	Case development
Kristen Jackson	7/10/2023	0.20	\$ 603.64	\$ 120.73	Emailed regarding draft settlement agreement	ADR
Kristen Jackson	7/10/2023	0.30	\$ 603.64	\$ 181.09	Edited instructions and cover letter	Case development
Kristen Jackson	7/10/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	7/10/2023	0.50	\$ 603.64	\$ 301.82	Edited draft settlement agreement	ADR
Kristen Jackson	7/13/2023	0.30	\$ 603.64	\$ 181.09	Corresponded regarding mediation schedule and questions	ADR
Kristen Jackson	7/14/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	7/14/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding meeting.	Case development
Kristen Jackson	7/14/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule.	Case development
Kristen Jackson	7/14/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding I-589 instructions	Case development
Kristen Jackson	7/14/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding waiver	Case development
Kristen Jackson	7/16/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding draft settlement agreement	ADR
Kristen Jackson	7/16/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding instructions letter	Case development
Kristen Jackson	7/16/2023	0.30	\$ 603.64	\$ 181.09	Edited draft settlement agreement	ADR
Kristen Jackson	7/17/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding meeting	Case development
Kristen Jackson	7/17/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding draft settlement agreement	ADR
Kristen Jackson	7/18/2023	0.50	\$ 603.64	\$ 301.82	Reviewed class member materials and emailed regarding draft.	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	7/18/2023	0.50	\$ 603.64	\$ 301.82	Edited draft settlement agreement in light of new proposal and circulated to team.	ADR
Kristen Jackson	7/20/2023	0.40	\$ 603.64	\$ 241.46	Edited instruction commentary	Case development
Kristen Jackson	7/20/2023	0.20	\$ 603.64	\$ 120.73	Reviewed draft settlement agreement.	ADR
Kristen Jackson	7/20/2023	0.10	\$ 603.64	\$ 60.36	Emailed co-counsel regarding meeting.	Case development
Kristen Jackson	7/20/2023	0.10	\$ 603.64	\$ 60.36	Emailed co-counsel regarding instructions commentary.	Case development
Kristen Jackson	7/21/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding meeting	Case development
Kristen Jackson	7/21/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	7/21/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding instruction submission	Case development
Kristen Jackson	7/21/2023	0.30	\$ 603.64	\$ 181.09	Reviewed briefing in class member's case	Class counsel duties
Kristen Jackson	7/21/2023	1.10	\$ 603.64	\$ 664.00	Edited draft settlement agreement	ADR
Kristen Jackson	7/21/2023	0.30	\$ 603.64	\$ 181.09	Prepared for team meeting	Case development
Kristen Jackson	7/21/2023	0.40	\$ 603.64	\$ 241.46	Finalized and submitted I-589 instruction commentary	Case development
Kristen Jackson	7/24/2023	0.20	\$ 603.64	\$ 120.73	Drafted cover email and sent to co-counsel regarding comments.	Case development
Kristen Jackson	7/24/2023	0.90	\$ 603.64	\$ 543.28	Participated in team call	Case development
Kristen Jackson	7/24/2023	0.50	\$ 603.64	\$ 301.82	Edited draft settlement agreement	ADR
Kristen Jackson	7/24/2023	0.10	\$ 603.64	\$ 60.36	Finalized and sent email to opposing counsel regarding I-589 instructions.	Case development
Kristen Jackson	7/24/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with co-counsel regarding draft settlement agreement	ADR
Kristen Jackson	7/24/2023	0.60	\$ 603.64	\$ 362.18	Corresponded with counsel for class members regarding filing problems..	Class counsel duties
Kristen Jackson	7/25/2023	0.30	\$ 603.64	\$ 181.09	Corresponded with class members' counsel	Class counsel duties
Kristen Jackson	7/25/2023	0.40	\$ 603.64	\$ 241.46	Reviewed and edited class communication	Case development
Kristen Jackson	7/27/2023	0.30	\$ 603.64	\$ 181.09	Emailed co-counsel regarding class communications	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	7/27/2023	0.20	\$ 603.64	\$ 120.73	Drafted and shared cover email for documents.	Case development
Kristen Jackson	7/30/2023	0.40	\$ 603.64	\$ 241.46	Edited and circulated draft settlement agreement	ADR
Kristen Jackson	7/30/2023	0.20	\$ 603.64	\$ 120.73	Emailed tracking information for class member's I-589 to opposing counsel	Class counsel duties
Kristen Jackson	8/1/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding draft settlement agreement	ADR
Kristen Jackson	8/1/2023	0.20	\$ 603.64	\$ 120.73	Reviewed responses to notice questions	ADR
Kristen Jackson	8/3/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with co-counsel regarding meetings.	Case development
Kristen Jackson	8/6/2023	0.50	\$ 603.64	\$ 301.82	Revised and circulated draft settlement agreement	ADR
Kristen Jackson	8/7/2023	0.90	\$ 603.64	\$ 543.28	Participated in team call	Case development
Kristen Jackson	8/7/2023	0.10	\$ 603.64	\$ 60.36	Emailed K. DeJong regarding mediation schedule	ADR
Kristen Jackson	8/7/2023	0.30	\$ 603.64	\$ 181.09	Reviewed new AAPM confidentiality provisions	ADR
Kristen Jackson	8/7/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with counsel for UC regarding filing problems..	Class counsel duties
Kristen Jackson	8/7/2023	0.50	\$ 603.64	\$ 301.82	Edited draft mediation statement	ADR
Kristen Jackson	8/9/2023	0.30	\$ 603.64	\$ 181.09	Emailed regarding scheduling	Case development
Kristen Jackson	8/9/2023	0.10	\$ 603.64	\$ 60.36	Emailed R. Scholtz regarding class notice	ADR
Kristen Jackson	8/10/2023	0.10	\$ 603.64	\$ 60.36	Emailed team regarding meeting	Case development
Kristen Jackson	8/12/2023	0.70	\$ 603.64	\$ 422.55	Reviewed new AAPM UC provisions	ADR
Kristen Jackson	8/14/2023	0.70	\$ 603.64	\$ 422.55	Participated in team call	Case development
Kristen Jackson	8/14/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with co-counsel regarding outstanding questions	ADR
Kristen Jackson	8/15/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding filing location problems	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	8/16/2023	0.20	\$ 603.64	\$ 120.73	Edited proposed revisions to rejection notice	ADR
Kristen Jackson	8/17/2023	0.20	\$ 603.64	\$ 120.73	Emailed co-counsel regarding instructions	Case development
Kristen Jackson	8/18/2023	0.40	\$ 603.64	\$ 241.46	Participated in team call	Case development
Kristen Jackson	8/18/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding class member's case	Class counsel duties
Kristen Jackson	8/18/2023	0.20	\$ 603.64	\$ 120.73	Reviewed proposed edits to instructions	ADR
Kristen Jackson	8/24/2023	0.30	\$ 603.64	\$ 181.09	Corresponded with co-counsel regarding class member and settlement agreement draft.	ADR
Kristen Jackson	8/25/2023	1.40	\$ 603.64	\$ 845.10	Reviewed and circulated draft settlement agreement and notice of compliance report.	ADR
Kristen Jackson	8/25/2023	0.30	\$ 603.64	\$ 181.09	Reviewed and edited schedule, agenda, and mediation statement.	ADR
Kristen Jackson	8/25/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call.	Case development
Kristen Jackson	8/25/2023	2.30	\$ 603.64	\$1,388.37	Reviewed and edited draft mediation statement	ADR
Kristen Jackson	8/25/2023	0.20	\$ 603.64	\$ 120.73	Contacted M. Tanagho Ross regarding updating contact information.	Case development
Kristen Jackson	8/25/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with team regarding M. Tanagho Ross contact change.	Case development
Kristen Jackson	8/26/2023	0.10	\$ 603.64	\$ 60.36	Emailed co-counsel regarding class member issue.	Class counsel duties
Kristen Jackson	8/26/2023	0.30	\$ 603.64	\$ 181.09	Reviewed and edited draft mediation statement.	ADR
Kristen Jackson	8/26/2023	0.40	\$ 603.64	\$ 241.46	Reviewed and commented on draft notice of compliance reporting.	ADR
Kristen Jackson	8/26/2023	1.10	\$ 603.64	\$ 664.00	Spoke with R. Scholtz regarding draft documents.	ADR
Kristen Jackson	8/26/2023	0.90	\$ 603.64	\$ 543.28	Drafted and circulated draft questions in advance of mediation.	ADR
Kristen Jackson	8/26/2023	1.10	\$ 603.64	\$ 664.00	Reviewed and edited draft settlement agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	8/27/2023	1.40	\$ 603.64	\$ 845.10	Edited draft mediation statement	ADR
Kristen Jackson	8/28/2023	2.30	\$ 603.64	\$1,388.37	Drafted questions for mediation	ADR
Kristen Jackson	8/28/2023	0.50	\$ 603.64	\$ 301.82	Edited draft settlement agreement	ADR
Kristen Jackson	8/28/2023	1.80	\$ 603.64	\$1,086.55	Spoke with R. Scholtz regarding draft documents.	ADR
Kristen Jackson	8/28/2023	0.10	\$ 603.64	\$ 60.36	Emailed regarding mediation materials	ADR
Kristen Jackson	8/28/2023	0.10	\$ 603.64	\$ 60.36	Edited draft mediation agenda	ADR
Kristen Jackson	8/28/2023	0.40	\$ 603.64	\$ 241.46	Edited draft mediation statement.	ADR
Kristen Jackson	8/28/2023	0.70	\$ 603.64	\$ 422.55	Prepared for team call.	Case development
Kristen Jackson	8/28/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	8/28/2023	0.30	\$ 603.64	\$ 181.09	Reviewed and commented on mediation agenda	ADR
Kristen Jackson	8/28/2023	0.40	\$ 603.64	\$ 241.46	Reviewed and commented on draft mediation questions.	ADR
Kristen Jackson	8/29/2023	0.20	\$ 603.64	\$ 120.73	Updated class representative information on spreadsheet.	Case development
Kristen Jackson	8/29/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with team regarding talking points document.	ADR
Kristen Jackson	8/29/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with M. Mendez regarding mediation strategy	ADR
Kristen Jackson	8/29/2023	0.20	\$ 603.64	\$ 120.73	Reviewed and edited draft mediation questions	ADR
Kristen Jackson	8/29/2023	1.00	\$ 603.64	\$ 603.64	Edited and circulated mediation statement.	ADR
Kristen Jackson	8/29/2023	0.20	\$ 603.64	\$ 120.73	Investigated confidentiality issues.	ADR
Kristen Jackson	8/29/2023	0.80	\$ 603.64	\$ 482.91	Drafted talking points for mediation.	ADR
Kristen Jackson	8/30/2023	0.40	\$ 603.64	\$ 241.46	Finalized pre-mediation questions	ADR
Kristen Jackson	8/30/2023	0.20	\$ 603.64	\$ 120.73	Spoke with K. DeJong regarding mediation statement.	ADR
Kristen Jackson	8/30/2023	0.70	\$ 603.64	\$ 422.55	Spoke with M. Mendez regarding mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	8/30/2023	0.20	\$ 603.64	\$ 120.73	Reviewed and commented on mediation statement	ADR
Kristen Jackson	8/30/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with team regarding pre-mediation questions	ADR
Kristen Jackson	8/30/2023	0.90	\$ 603.64	\$ 543.28	Drafted talking points for mediation.	ADR
Kristen Jackson	8/31/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with M. Tanagho Ross regarding co-counsel matters	Case development
Kristen Jackson	8/31/2023	0.30	\$ 603.64	\$ 181.09	Reviewed USCIS filing answers and corresponded with team.	Case development
Kristen Jackson	8/31/2023	0.20	\$ 603.64	\$ 120.73	Drafted talking points for mediation.	ADR
Kristen Jackson	8/31/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with team regarding mediation prep meeting.	ADR
Kristen Jackson	9/1/2023	1.20	\$ 603.64	\$ 724.37	Participated in team call	Case development
Kristen Jackson	9/1/2023	0.10	\$ 603.64	\$ 60.36	Drafted talking points for mediation.	ADR
Kristen Jackson	9/1/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with M. Mendez regarding mediation strategy	ADR
Kristen Jackson	9/1/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule.	Case development
Kristen Jackson	9/1/2023	0.30	\$ 603.64	\$ 181.09	Corresponded with R. Scholtz regarding confidentiality.	ADR
Kristen Jackson	9/1/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with M. Tanagho Ross regarding logistics	Case development
Kristen Jackson	9/2/2023	0.30	\$ 603.64	\$ 181.09	Reviewed correspondence regarding talking points and AAPM.	ADR
Kristen Jackson	9/2/2023	2.10	\$ 603.64	\$1,267.64	Edited talking points document	ADR
Kristen Jackson	9/2/2023	0.30	\$ 603.64	\$ 181.09	Corresponded regarding talking points document	ADR
Kristen Jackson	9/3/2023	2.30	\$ 603.64	\$1,388.37	Drafted talking points for mediation.	ADR
Kristen Jackson	9/3/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding talking points document	ADR
Kristen Jackson	9/3/2023	0.20	\$ 603.64	\$ 120.73	Reviewed talking points document.	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	9/3/2023	1.30	\$ 603.64	\$ 784.73	Reviewed and edited M. Mendez's talking points draft.	ADR
Kristen Jackson	9/3/2023	0.20	\$ 603.64	\$ 120.73	Inserted draft talking points into main document	ADR
Kristen Jackson	9/4/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding mediation prep	ADR
Kristen Jackson	9/5/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding mediation preparation	ADR
Kristen Jackson	9/5/2023	0.40	\$ 603.64	\$ 241.46	Printed and assembled items for mediation	ADR
Kristen Jackson	9/5/2023	0.40	\$ 603.64	\$ 241.46	Reviewed comments on talking points document	ADR
Kristen Jackson	9/5/2023	0.50	\$ 603.64	\$ 301.82	Spoke with M. Mendez regarding mediation	ADR
Kristen Jackson	9/5/2023	1.20	\$ 603.64	\$ 724.37	Participated in team call regarding mediation	ADR
Kristen Jackson	9/5/2023	1.70	\$ 603.64	\$1,026.19	Edited talking points	ADR
Kristen Jackson	9/5/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with M. Mendez regarding talking points	ADR
Kristen Jackson	9/6/2023	1.00	\$ 603.64	\$ 603.64	Brainstormed regarding termination mechanism.	ADR
Kristen Jackson	9/6/2023	0.80	\$ 603.64	\$ 482.91	Participated in team meeting regarding mediation	ADR
Kristen Jackson	9/6/2023	2.90	\$ 603.64	\$1,750.56	Participated in mediation.	ADR
Kristen Jackson	9/6/2023	0.40	\$ 603.64	\$ 241.46	Participated in mediation debrief	ADR
Kristen Jackson	9/6/2023	0.50	\$ 603.64	\$ 301.82	Printed and reviewed talking points	ADR
Kristen Jackson	9/6/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding talking points	ADR
Kristen Jackson	9/6/2023	0.30	\$ 603.64	\$ 181.09	Spoke with M. Mendez regarding mediation	ADR
Kristen Jackson	9/6/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding confidentiality.	ADR
Kristen Jackson	9/7/2023	1.00	\$ 603.64	\$ 603.64	Brainstormed regarding termination mechanism.	ADR
Kristen Jackson	9/7/2023	0.10	\$ 603.64	\$ 60.36	Emailed team regarding class member	Class counsel duties
Kristen Jackson	9/7/2023	0.10	\$ 603.64	\$ 60.36	Emailed team regarding agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	9/7/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with M. Tanagho Ross regarding schedule	Case development
Kristen Jackson	9/7/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule	Case development
Kristen Jackson	9/7/2023	1.90	\$ 603.64	\$1,146.92	Reviewed proposed EOIR admin closure/termination regulation in light of draft settlement.	ADR
Kristen Jackson	9/7/2023	2.00	\$ 603.64	\$1,207.28	Edited draft settlement agreement	ADR
Kristen Jackson	9/8/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call.	Case development
Kristen Jackson	9/8/2023	1.70	\$ 603.64	\$1,026.19	Edited draft settlement agreement	ADR
Kristen Jackson	9/8/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with M. Tanagho Ross regarding mediation plan.	ADR
Kristen Jackson	9/8/2023	0.20	\$ 603.64	\$ 120.73	Prepared for team call	Case development
Kristen Jackson	9/9/2023	0.50	\$ 603.64	\$ 301.82	Edited draft notice of compliance report	ADR
Kristen Jackson	9/9/2023	0.10	\$ 603.64	\$ 60.36	Emailed R. Scholtz regarding draft notice of compliance report	ADR
Kristen Jackson	9/9/2023	0.30	\$ 603.64	\$ 181.09	Reviewed draft class notice and template for possible reformatting	ADR
Kristen Jackson	9/11/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with team regarding class member.	Class counsel duties
Kristen Jackson	9/11/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule.	Case development
Kristen Jackson	9/12/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	9/12/2023	1.20	\$ 603.64	\$ 724.37	Edited draft settlement agreement	ADR
Kristen Jackson	9/12/2023	0.10	\$ 603.64	\$ 60.36	Edited draft notice of compliance report	ADR
Kristen Jackson	9/13/2023	0.20	\$ 603.64	\$ 120.73	Edited draft settlement agreement.	ADR
Kristen Jackson	9/14/2023	0.20	\$ 603.64	\$ 120.73	Reviewed and commented on counsel motion	Case development
Kristen Jackson	9/14/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with R. Scholtz regarding EOIR regulation.	Case development
Kristen Jackson	9/15/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call.	Case development
Kristen Jackson	9/15/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with M. Mendez regarding meeting	Case development



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	9/16/2023	0.30	\$ 603.64	\$ 181.09	Reviewed and commented on EOIR regulations	Case development
Kristen Jackson	9/18/2023	0.10	\$ 603.64	\$ 60.36	Prepared for team call	Case development
Kristen Jackson	9/18/2023	0.80	\$ 603.64	\$ 482.91	Participated in team call	Case development
Kristen Jackson	9/18/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding mediation.	ADR
Kristen Jackson	9/19/2023	0.30	\$ 603.64	\$ 181.09	Corresponded regarding PI violation.	Class counsel duties
Kristen Jackson	9/19/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding status conference.	Case development
Kristen Jackson	9/21/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding mediation.	ADR
Kristen Jackson	9/22/2023	0.30	\$ 603.64	\$ 181.09	Corresponded with counsel for prospective class member.	Class counsel duties
Kristen Jackson	9/25/2023	0.60	\$ 603.64	\$ 362.18	Participated in team call	Case development
Kristen Jackson	9/25/2023	0.30	\$ 603.64	\$ 181.09	Corresponded regarding mediation	ADR
Kristen Jackson	9/26/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding status conference.	Case development
Kristen Jackson	9/27/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding status conference.	Case development
Kristen Jackson	9/28/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding status conference	Case development
Kristen Jackson	10/2/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule.	Case development
Kristen Jackson	10/2/2023	0.10	\$ 603.64	\$ 60.36	Emailed team regarding team meeting.	Case development
Kristen Jackson	10/2/2023	0.10	\$ 603.64	\$ 60.36	Emailed team regarding mediation	ADR
Kristen Jackson	10/6/2023	1.10	\$ 603.64	\$ 664.00	Participated in team call	Case development
Kristen Jackson	10/12/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule document	Case development
Kristen Jackson	10/12/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with R. Scholtz regarding mediation.	ADR
Kristen Jackson	10/12/2023	0.80	\$ 603.64	\$ 482.91	Spoke with R. Scholtz regarding mediation	ADR
Kristen Jackson	10/12/2023	0.10	\$ 603.64	\$ 60.36	Updated draft proposed language on regulations.	ADR
Kristen Jackson	10/13/2023	0.60	\$ 603.64	\$ 362.18	Corresponded regarding mediation	ADR
Kristen Jackson	10/13/2023	1.40	\$ 603.64	\$ 845.10	Reviewed, edited, and circulated draft notice of noncompliance.	ADR
Kristen Jackson	10/13/2023	1.20	\$ 603.64	\$ 724.37	Spoke with R. Scholtz regarding draft settlement agreement.	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	10/13/2023	0.40	\$ 603.64	\$ 241.46	Reviewed draft settlement agreement	ADR
Kristen Jackson	10/13/2023	0.20	\$ 603.64	\$ 120.73	Revised mediation agenda	ADR
Kristen Jackson	10/13/2023	0.40	\$ 603.64	\$ 241.46	Reviewed, edited, and circulated draft notice of compliance report.	ADR
Kristen Jackson	10/13/2023	0.20	\$ 603.64	\$ 120.73	Edited draft settlement agreement.	ADR
Kristen Jackson	10/13/2023	0.10	\$ 603.64	\$ 60.36	Emailed opposing counsel regarding documents and schedule.	ADR
Kristen Jackson	10/13/2023	0.60	\$ 603.64	\$ 362.18	Edited proposed language for draft settlement agreement.	ADR
Kristen Jackson	10/13/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	10/13/2023	0.20	\$ 603.64	\$ 120.73	Prepared for team call.	Case development
Kristen Jackson	10/13/2023	0.50	\$ 603.64	\$ 301.82	Reviewed I-589 filing announcement and edited follow up questions to USCIS.	Case development
Kristen Jackson	10/14/2023	1.10	\$ 603.64	\$ 664.00	Spoke with R. Scholtz regarding talking points	ADR
Kristen Jackson	10/14/2023	0.10	\$ 603.64	\$ 60.36	Emailed team regarding talking points	ADR
Kristen Jackson	10/14/2023	3.00	\$ 603.64	\$1,810.92	Drafted talking points.	ADR
Kristen Jackson	10/14/2023	0.10	\$ 603.64	\$ 60.36	Reviewed I-589 AVC instructions.	Case development
Kristen Jackson	10/14/2023	0.50	\$ 603.64	\$ 301.82	Edited and circulated two draft notices.	ADR
Kristen Jackson	10/14/2023	0.30	\$ 603.64	\$ 181.09	Edited and circulated draft notice of compliance report.	ADR
Kristen Jackson	10/14/2023	0.70	\$ 603.64	\$ 422.55	Edited draft settlement agreement.	ADR
Kristen Jackson	10/15/2023	0.50	\$ 603.64	\$ 301.82	Emailed team regarding mediation.	ADR
Kristen Jackson	10/15/2023	0.50	\$ 603.64	\$ 301.82	Prepared all materials for mediation.	ADR
Kristen Jackson	10/15/2023	2.10	\$ 603.64	\$1,267.64	Reviewed and edited talking points document	ADR
Kristen Jackson	10/16/2023	1.10	\$ 603.64	\$ 664.00	Prepared for mediation session	ADR
Kristen Jackson	10/16/2023	1.50	\$ 603.64	\$ 905.46	Participated in team meeting regarding mediation	ADR
Kristen Jackson	10/16/2023	0.30	\$ 603.64	\$ 181.09	Reviewed and edited draft settlement agreement.	ADR
Kristen Jackson	10/16/2023	0.80	\$ 603.64	\$ 482.91	Reviewed Ms. L settlement agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	10/16/2023	0.80	\$ 603.64	\$ 482.91	Participated in mediation debrief	ADR
Kristen Jackson	10/16/2023	3.30	\$ 603.64	\$1,992.01	Participated in mediation	ADR
Kristen Jackson	10/17/2023	0.80	\$ 603.64	\$ 482.91	Participated in mediation	ADR
Kristen Jackson	10/17/2023	0.30	\$ 603.64	\$ 181.09	Prepared for mediation	ADR
Kristen Jackson	10/17/2023	0.40	\$ 603.64	\$ 241.46	Reviewed and edited proposed language	ADR
Kristen Jackson	10/17/2023	0.30	\$ 603.64	\$ 181.09	Participated in team meeting debrief re mediation.	ADR
Kristen Jackson	10/17/2023	1.00	\$ 603.64	\$ 603.64	Participated in team meeting regarding mediation	ADR
Kristen Jackson	10/18/2023	1.30	\$ 603.64	\$ 784.73	Edited draft settlement agreement	ADR
Kristen Jackson	10/19/2023	0.50	\$ 603.64	\$ 301.82	Updated M. Tanagho Ross on mediation	ADR
Kristen Jackson	10/19/2023	0.70	\$ 603.64	\$ 422.55	Edited filing questions	Case development
Kristen Jackson	10/19/2023	0.40	\$ 603.64	\$ 241.46	Spoke with R. Scholtz regarding draft settlement agreement.	ADR
Kristen Jackson	10/19/2023	1.10	\$ 603.64	\$ 664.00	Edited draft settlement agreement and notices	ADR
Kristen Jackson	10/20/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with team regarding draft	ADR
Kristen Jackson	10/23/2023	0.50	\$ 603.64	\$ 301.82	Corresponded with counsel of prospective class member	Class counsel duties
Kristen Jackson	10/23/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding settlement orders	ADR
Kristen Jackson	10/23/2023	0.20	\$ 603.64	\$ 120.73	Reviewed and edited draft compliance report	ADR
Kristen Jackson	10/24/2023	1.40	\$ 603.64	\$ 845.10	Edited and circulated draft settlement agreement and notices	ADR
Kristen Jackson	10/24/2023	1.20	\$ 603.64	\$ 724.37	Participated in team call	Case development
Kristen Jackson	10/24/2023	0.10	\$ 603.64	\$ 60.36	Edited and circulated draft compliance report	ADR
Kristen Jackson	10/25/2023	0.20	\$ 603.64	\$ 120.73	Edited and circulated filing questions	Case development
Kristen Jackson	10/25/2023	0.20	\$ 603.64	\$ 120.73	Edited draft notice of noncompliance	ADR
Kristen Jackson	10/25/2023	0.80	\$ 603.64	\$ 482.91	Edited and circulated draft settlement agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	10/25/2023	0.20	\$ 603.64	\$ 120.73	Corresponded with attorney for prospective class member	Class counsel duties
Kristen Jackson	10/25/2023	0.20	\$ 603.64	\$ 120.73	Edited draft compliance report.	ADR
Kristen Jackson	10/25/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with team regarding court call.	Case development
Kristen Jackson	10/27/2023	0.20	\$ 603.64	\$ 120.73	Finalized and circulated filing questions and drafts	Case development
Kristen Jackson	10/27/2023	0.80	\$ 603.64	\$ 482.91	Participated in team call	Case development
Kristen Jackson	10/30/2023	0.30	\$ 603.64	\$ 181.09	Participated in team call	Case development
Kristen Jackson	10/30/2023	0.10	\$ 603.64	\$ 60.36	Updated team schedule	Case development
Kristen Jackson	10/31/2023	0.10	\$ 603.64	\$ 60.36	Participated in status conference	Case development
Kristen Jackson	10/31/2023	0.40	\$ 603.64	\$ 241.46	Prepared for and debriefed from status conference	Case development
Kristen Jackson	10/31/2023	0.10	\$ 603.64	\$ 60.36	Emailed team regarding settlement assignment.	ADR
Kristen Jackson	11/2/2023	0.10	\$ 603.64	\$ 60.36	Emailed co-counsel regarding meetings.	Case development
Kristen Jackson	11/5/2023	0.50	\$ 603.64	\$ 301.82	Reviewed and edited draft class notice.	ADR
Kristen Jackson	11/6/2023	0.80	\$ 603.64	\$ 482.91	Participated in team call	Case development
Kristen Jackson	11/6/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding named plaintiff and notice.	ADR
Kristen Jackson	11/9/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding mediation statement	ADR
Kristen Jackson	11/10/2023	0.10	\$ 603.64	\$ 60.36	Discussed statement schedule with R. Scholtz	ADR
Kristen Jackson	11/10/2023	0.20	\$ 603.64	\$ 120.73	Reviewed injunction violation email	Class counsel duties
Kristen Jackson	11/10/2023	0.40	\$ 603.64	\$ 241.46	Reviewed draft mediation statement	ADR
Kristen Jackson	11/10/2023	1.20	\$ 603.64	\$ 724.37	Participated in team call	Case development
Kristen Jackson	11/10/2023	0.10	\$ 603.64	\$ 60.36	Drafted and edited mediation statement	ADR
Kristen Jackson	11/11/2023	3.60	\$ 603.64	\$2,173.10	Edited draft mediation statement	ADR
Kristen Jackson	11/12/2023	0.10	\$ 603.64	\$ 60.36	Emailed team regarding mediation statement.	ADR
Kristen Jackson	11/12/2023	1.30	\$ 603.64	\$ 784.73	Reviewed and edited draft mediation statement	ADR
Kristen Jackson	11/13/2023	1.20	\$ 603.64	\$ 724.37	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	11/13/2023	1.60	\$ 603.64	\$ 965.82	Edited draft mediation statement	ADR
Kristen Jackson	11/13/2023	0.10	\$ 603.64	\$ 60.36	Reviewed draft mediation statement	ADR
Kristen Jackson	11/15/2023	1.20	\$ 603.64	\$ 724.37	Edited draft settlement agreement	ADR
Kristen Jackson	11/17/2023	0.10	\$ 603.64	\$ 60.36	Corresponded regarding team call schedule	Case development
Kristen Jackson	11/17/2023	0.20	\$ 603.64	\$ 120.73	Updated team schedule	Case development
Kristen Jackson	11/17/2023	0.40	\$ 603.64	\$ 241.46	Reviewed and edited mediation statement.	ADR
Kristen Jackson	11/19/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with team re preliminary approval and named plaintiff	ADR
Kristen Jackson	11/21/2023	0.10	\$ 603.64	\$ 60.36	Corresponded with team regarding call schedule	Case development
Kristen Jackson	12/4/2023	0.20	\$ 603.64	\$ 120.73	Reviewed notice re MALC.	Case development
Kristen Jackson	12/4/2023	0.70	\$ 603.64	\$ 422.55	Participated in team call	Case development
Kristen Jackson	12/8/2023	0.10	\$ 603.64	\$ 60.36	Reviewed current drafts of settlement documents	ADR
Kristen Jackson	12/8/2023	0.30	\$ 603.64	\$ 181.09	Edited class communication	Case development
Kristen Jackson	12/8/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	12/10/2023	0.80	\$ 603.64	\$ 482.91	Edited and circulated three draft documents.	ADR
Kristen Jackson	12/11/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	12/12/2023	0.30	\$ 603.64	\$ 181.09	Corresponded regarding class member and mediation.	ADR
Kristen Jackson	12/22/2023	1.00	\$ 603.64	\$ 603.64	Participated in team call	Case development
Kristen Jackson	12/27/2023	0.10	\$ 603.64	\$ 60.36	Corresponded re injunction violations.	Class counsel duties
Kristen Jackson	12/27/2023	0.40	\$ 603.64	\$ 241.46	Spoke with R. Scholtz re updates	ADR
Kristen Jackson	12/29/2023	0.20	\$ 603.64	\$ 120.73	Corresponded regarding mediation.	ADR
Kristen Jackson	1/8/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call.	Case development
Kristen Jackson	1/9/2024	1.20	\$ 616.36	\$ 739.63	Edited draft settlement agreement and exhibits.	ADR
Kristen Jackson	1/10/2024	0.50	\$ 616.36	\$ 308.18	Edited draft settlement agreement.	ADR
Kristen Jackson	1/11/2024	0.40	\$ 616.36	\$ 246.54	Corresponded regarding draft mediation statement.	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	1/19/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	1/22/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	1/25/2024	1.70	\$ 616.36	\$1,047.81	Drafted portion of mediation statement	ADR
Kristen Jackson	1/26/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call.	Case development
Kristen Jackson	1/26/2024	0.40	\$ 616.36	\$ 246.54	Reviewed draft mediation statement.	ADR
Kristen Jackson	1/29/2024	0.40	\$ 616.36	\$ 246.54	Booked hotel and flights.	Case development
Kristen Jackson	1/29/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	1/29/2024	0.20	\$ 616.36	\$ 123.27	Reviewed draft mediation statement.	ADR
Kristen Jackson	2/2/2024	0.20	\$ 616.36	\$ 123.27	Reviewed injunction violation materials	Case development
Kristen Jackson	2/4/2024	0.90	\$ 616.36	\$ 554.72	Reviewed and edited draft settlement agreement.	ADR
Kristen Jackson	2/4/2024	0.10	\$ 616.36	\$ 61.64	Corresponded regarding draft settlement agreement.	ADR
Kristen Jackson	2/5/2024	0.60	\$ 616.36	\$ 369.82	Participated in team call	Case development
Kristen Jackson	2/5/2024	0.20	\$ 616.36	\$ 123.27	Corresponded regarding draft settlement agreement.	ADR
Kristen Jackson	2/9/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	2/11/2024	0.10	\$ 616.36	\$ 61.64	Corresponded regarding draft mediation statement.	ADR
Kristen Jackson	2/11/2024	0.50	\$ 616.36	\$ 308.18	Reviewed and edited mediation statement	ADR
Kristen Jackson	2/12/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	2/15/2024	1.00	\$ 616.36	\$ 616.36	Prepared for team call regarding mediation.	ADR
Kristen Jackson	2/16/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	2/19/2024	0.20	\$ 616.36	\$ 123.27	Corresponded regarding filing issues.	Case development
Kristen Jackson	2/23/2024	1.10	\$ 616.36	\$ 678.00	Participated in team call	Case development
Kristen Jackson	2/27/2024	1.00	\$ 616.36	\$ 616.36	Revised talking points document.	ADR
Kristen Jackson	2/28/2024	1.50	\$ 616.36	\$ 924.54	Drafted talking points for mediation	ADR
Kristen Jackson	2/29/2024	0.50	\$ 616.36	\$ 308.18	Edited talking points.	ADR
Kristen Jackson	3/1/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	3/3/2024	1.90	\$ 616.36	\$1,171.08	Prepared for mediation session	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	3/3/2024	3.30	\$ 616.36	\$2,033.99	Prepared for mediation with co-counsel	ADR
Kristen Jackson	3/4/2024	7.00	\$ 616.36	\$4,314.52	Participated in mediation	ADR
Kristen Jackson	3/4/2024	1.00	\$ 616.36	\$ 616.36	Edited mediation documents	ADR
Kristen Jackson	3/4/2024	1.00	\$ 616.36	\$ 616.36	Prepared for mediation	ADR
Kristen Jackson	3/5/2024	0.50	\$ 616.36	\$ 308.18	Prepared for mediation session	ADR
Kristen Jackson	3/5/2024	12.50	\$ 616.36	\$7,704.50	Participated in mediation.	ADR
Kristen Jackson	3/6/2024	0.20	\$ 616.36	\$ 123.27	Circulated settlement materials	ADR
Kristen Jackson	3/8/2024	0.60	\$ 616.36	\$ 369.82	Participated in team call	Case development
Kristen Jackson	3/11/2024	0.50	\$ 616.36	\$ 308.18	Participated in team call	Case development
Kristen Jackson	3/15/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	3/18/2024	0.80	\$ 616.36	\$ 493.09	Participated in team call	Case development
Kristen Jackson	3/24/2024	0.20	\$ 616.36	\$ 123.27	Reviewed class member email	Case development
Kristen Jackson	3/24/2024	0.40	\$ 616.36	\$ 246.54	Reviewed and edited class notice	ADR
Kristen Jackson	3/24/2024	0.30	\$ 616.36	\$ 184.91	Edited notice of noncompliance	ADR
Kristen Jackson	3/25/2024	0.30	\$ 616.36	\$ 184.91	Edited notice of noncompliance	ADR
Kristen Jackson	3/25/2024	0.80	\$ 616.36	\$ 493.09	Participated in team call	Case development
Kristen Jackson	4/5/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	4/12/2024	0.30	\$ 616.36	\$ 184.91	Edited and circulated notice of noncompliance	ADR
Kristen Jackson	4/12/2024	0.80	\$ 616.36	\$ 493.09	Participated in team call	Case development
Kristen Jackson	4/19/2024	0.40	\$ 616.36	\$ 246.54	Participated in team call	Case development
Kristen Jackson	4/22/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	4/26/2024	1.10	\$ 616.36	\$ 678.00	Participated in team call	Case development
Kristen Jackson	4/28/2024	0.40	\$ 616.36	\$ 246.54	Edited draft orders	ADR
Kristen Jackson	5/10/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	5/20/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	5/20/2024	0.40	\$ 616.36	\$ 246.54	Reviewed agreement and exhibits	ADR
Kristen Jackson	5/24/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	5/26/2024	0.30	\$ 616.36	\$ 184.91	Reviewed and edited final class notice	ADR
Kristen Jackson	5/26/2024	0.10	\$ 616.36	\$ 61.64	Emailed team regarding final class notice	ADR



Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	6/3/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	6/7/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	6/14/2024	1.10	\$ 616.36	\$ 678.00	Participated in team call	Case development
Kristen Jackson	6/17/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	6/21/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	6/24/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	6/27/2024	0.40	\$ 616.36	\$ 246.54	Reviewed draft motion for preliminary approval	ADR
Kristen Jackson	6/28/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	7/6/2024	0.10	\$ 616.36	\$ 61.64	Emailed translator regarding notice translation	Case development
Kristen Jackson	7/6/2024	0.20	\$ 616.36	\$ 123.27	Reviewed and commented on press document	Case development
Kristen Jackson	7/8/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	7/10/2024	0.50	\$ 616.36	\$ 308.18	Edited materials for the field	Case development
Kristen Jackson	7/12/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	7/15/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	7/18/2024	0.10	\$ 616.36	\$ 61.64	Corresponded with translator regarding class notice.	ADR
Kristen Jackson	7/19/2024	0.50	\$ 616.36	\$ 308.18	Participated in team call	Case development
Kristen Jackson	7/26/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	7/29/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	8/2/2024	1.30	\$ 616.36	\$ 801.27	Participated in team call	Case development
Kristen Jackson	8/9/2024	0.30	\$ 616.36	\$ 184.91	Participated in team call	Case development
Kristen Jackson	8/11/2024	0.70	\$ 616.36	\$ 431.45	Edited web page for class notice	ADR
Kristen Jackson	8/12/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	8/16/2024	0.50	\$ 616.36	\$ 308.18	Participated in team call	Case development
Kristen Jackson	8/19/2024	0.50	\$ 616.36	\$ 308.18	Participated in team call	Case development
Kristen Jackson	8/23/2024	0.50	\$ 616.36	\$ 308.18	Participated in team call	Case development
Kristen Jackson	8/25/2024	0.50	\$ 616.36	\$ 308.18	Edited class notice materials	ADR

Name	Date	Hours Worked	Hourly Rate	Amount billed	Description	Litigation Phase
Kristen Jackson	8/25/2024	0.40	\$ 616.36	\$ 246.54	Edited Spanish language class notice	ADR
Kristen Jackson	8/26/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	9/9/2024	2.50	\$ 616.36	\$1,540.90	Prepared for settlement webinar.	Case development
Kristen Jackson	9/9/2024	1.00	\$ 616.36	\$ 616.36	Presented on settlement webinar.	Case development
Kristen Jackson	9/22/2024	0.30	\$ 616.36	\$ 184.91	Edited webinar materials	Case development
Kristen Jackson	9/23/2024	0.70	\$ 616.36	\$ 431.45	Participated in team call	Case development
Kristen Jackson	9/27/2024	0.50	\$ 616.36	\$ 308.18	Participated in team call	Case development
Kristen Jackson	9/30/2024	1.40	\$ 616.36	\$ 862.90	Prepared for and presented in webinar about the proposed settlement.	Case development
Kristen Jackson	10/7/2024	0.90	\$ 616.36	\$ 554.72	Participated in team call	Case development
Kristen Jackson	10/11/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	10/18/2024	0.80	\$ 616.36	\$ 493.09	Participated in team call	Case development
Kristen Jackson	10/23/2024	0.30	\$ 616.36	\$ 184.91	Reviewed and commented on email regarding PI violation	Class Counsel Duties
Kristen Jackson	10/25/2024	1.10	\$ 616.36	\$ 678.00	Participated in team call	Case development
Kristen Jackson	11/8/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	11/15/2024	1.10	\$ 616.36	\$ 678.00	Participated in team call	Case development
Kristen Jackson	12/2/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
Kristen Jackson	12/9/2024	1.00	\$ 616.36	\$ 616.36	Participated in team call	Case development
<b>TOTALS</b>		<b>1350.30</b>		<b>\$619,119.36</b>		

# Exhibit B

**Costs and expenses incurred by class counsel relating to *J.O.P. v D.H.S.* : Public Counsel**

<b>Name</b>	<b>Amount incurred</b>	<b>Date incurred</b>	<b>Paid to</b>	<b>Purpose</b>
Kristen Jackson	\$696.20	3/2/2024	Delta	Plane ticket for trip to Greenbelt (LAX to DCA) for March 2024 mediation
Kristen Jackson	\$634.43	3/2/2024	Crowne Plaza Hotel, Greenbelt	hotel stay for mediation, 3/2 - 3/5
Kristen Jackson	\$32.30	3/2/2024	Mileage	Transportation related to March 2024 mediation
Kristen Jackson	\$72.00	3/6/2024	Taxi Latino	Transportation related to March 2024 mediation
Kristen Jackson	\$85.96	3/6/2024	Yellow Cab	Transportation related to March 2024 mediation
Kristen Jackson	\$862.80	8/29/2024	Alexia Veytia-Rubio	Spanish translation of class notice

**TOTAL            \$2,383.69**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**J.O.P.**, et al.,

Plaintiffs,

v.

**U.S. DEPARTMENT OF  
HOMELAND SECURITY**, et al.,

Defendants.

Civil Action No. 8:19-CV-01944-SAG

**DECLARATION OF MARY TANAGHO ROSS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES**

I, Mary Tanagho Ross, declare:

1. I am an attorney duly licensed to practice law before the courts of the State of California have appeared in this Court *pro hac vice*. I make this declaration in support of Plaintiffs' motion as prevailing party for recovery of attorneys' fees. I have personal knowledge of the facts in this declaration and can testify to them as needed.

2. I am a Directing Attorney at Bet Tzedek Legal Services ("Bet Tzedek") in Los Angeles, California. I have been co-counsel to the named plaintiffs in the above-captioned lawsuit from its inception in July 2019. I make this declaration in support of Plaintiffs' motion as prevailing party for recovery of attorneys' fees.

**About Bet Tzedek**

3. Bet Tzedek – Hebrew for the "House of Justice" – was established in 1974 and is a non profit legal services program that provides free legal services to low-income residents of Southern California. Bet Tzedek represents clients on a non-sectarian basis in numerous areas of

anti-poverty law, including, but not limited to, employment, immigration, housing, government benefits, real estate fraud, and caregiving for seniors and the developmentally disabled. Bet Tzedek depends upon public and charitable funding sources to support its services. Bet Tzedek also serves as class counsel and amicus counsel in select class action and impact litigation.

4. Bet Tzedek provides direct representation to unaccompanied children seeking asylum before U.S. Citizenship and Immigration Services (“USCIS”) and to children seeking Special Immigrant Juvenile Status (“SIJS”). Bet Tzedek also supervises immigration cases of unaccompanied children placed with pro bono counsel. As a national leader in providing legal services to immigrant children seeking relief, we train pro bono volunteers in representing immigrant children and youth. Further, we advise legislators on changes to improve immigration policies on the state and federal level.

#### **My Professional Background**

5. I graduated from UCLA School of Law in 2011, and following graduation, I served as a law clerk to the Honorable Valerie P. Cooke of the United States District Court for the District of Nevada. In 2012, I joined Hadsell Stormer & Renick, LLP, where I litigated civil rights and international human rights cases in both individual and class action litigation for six years. I gained expertise in federal litigation as well as class action litigation. While at Hadsell Stormer, I served as class counsel in *Dukes v. Wal-Mart Stores, Inc.*, 964 F. Supp. 2d 1115 (N.D. Cal. 2013), a groundbreaking civil rights case, on behalf of women alleging gender discrimination. I also represented Cambodian victims of human trafficking in *Ratha v. Phatthana Seafood Co.*, 2016 U.S. Dist. LEXIS 200786 (C.D. Cal. 2016), raising claims of human trafficking, peonage, and forced labor. This litigation resulted in Congress amending the Trafficking Victims Protection Reauthorization Act (TVPRA) in 2023 to clarify that there is liability for individuals who attempt or conspire to benefit from human trafficking.

6. Over the past 5 years, I also held adjunct positions at the University of California Irvine School of Law and Loyola Law School in their respective Ninth Circuit Appellate Clinics. While working at Loyola Law School, I oversaw students in their representation of an individual appealing a denial of immigration relief to the U.S. Court of Appeals for the Ninth Circuit.

7. I also served as a fellow to the Sudreau Global Justice Institute and supervised law students on a trip to Uganda in 2023 to provide access to justice to Ugandan youth facing misdemeanor and felony charges. Working with local Ugandan advocates and law students, we assisted youth in participating in mediation sessions with the prosecutor's office and conducted know your rights sessions at the jails. I was invited to this role largely because of my experience, training, and expertise in representing vulnerable youth.

8. In 2018, I joined the Immigrants' Rights Project (IRP) at Public Counsel, a Los Angeles based nonprofit public interest law firm where I worked until 2023. I began as a Staff Attorney in 2019 and became a Senior Staff Attorney in 2020. I specialized in federal court litigation on behalf of unaccompanied immigrant children and gained expertise in federal litigation challenging policies which impacted unaccompanied immigrant children and children seeking Special Immigrant Juvenile Status (SIJS). I specialized in impact litigation both through class action litigation and individual cases representing immigration children and youth. I served as lead counsel in *J.L. v. Cuccinelli*, Case 5:18-cv-04914-NC (N.D. Cal. Feb. 14, 2020), a class action lawsuit successfully challenging USCIS's unlawful policy barring a class of petitioners in California, aged 18-20, from being granted SIJS despite California state courts having issued the required predicate findings for SIJS. I played an instrumental role in the settlement of the case.

9. Further, I litigated federal habeas cases on behalf of immigrant youth facing unlawful detention. I also provided guidance and consultation to immigration practitioners on these types of cases.



10. While at Public Counsel, I served as Acting Directing Attorney of IRP from June 2022 to September 2022, and Acting Supervising Senior Staff Attorney for the children's removal defense team from January 2022 to June 2022. During my time at Public Counsel, I joined the co-counsel team for this litigation. I served as one of the contacts for named Plaintiff E.D.G. In this capacity, I communicated with him by phone throughout the litigation to inform him of case developments. In August 2023, I began in my current role at Bet Tzedek and continued in my role as class counsel in the instant litigation.

#### **Time Incurred by Bet Tzedek Legal Services**

11. Bet Tzedek Legal Services is a non-profit legal services program that provides free legal services to low-income residents of Southern California and represents unaccompanied immigration children in seeking relief such as asylum and Special Immigrant Juvenile Status. It depends upon the recovery of attorneys' fees from opposing parties and public and charitable funding sources to support its services. Any fees recovered for legal services provided by Bet Tzedek directly support its programs; they are not distributed to any Bet Tzedek staff member or volunteer.

12. Each of the named Plaintiffs agreed in their respective retainers to assign any fee award to the legal team for distribution consistent with the terms of a co-counsel agreement.

13. At Bet Tzedek Legal Services, I was the primary advocate on this matter, but other attorneys also provided support on the case. I calculated the amount of time expended by Bet Tzedek staff by generating a report from our time-keeping database which includes contemporaneous daily time records. I reviewed each entry and excluded any time I considered excessive, duplicative, or unnecessary to prosecute this matter, or otherwise unreasonable.

14. Attached to this declaration is a table setting forth itemized entries describing tasks

I performed in this matter, the date of the task, and the time spent on each task. My colleagues assisted with the attorney fee motion preparation and research. Throughout the litigation, I played an active role and was involved in each stage of the litigation.

### **Fee Rates for Class Counsel**

15. Counsel for the Plaintiffs seek recovery for the work of Ms. Jackson, Ms. Mendez, and Ms. Wylegala at enhanced rates given their level of expertise. Their hourly rates are based on the high end of the range of rates for lawyers with comparable years in practice as specified in the Guidelines Regarding Hourly Rates in Appendix B to this Court's Local Rules. Two of these practitioners were admitted to practice in 2003, and one in 2008. Under those Guidelines, "One factor that would support an adjustment to the applicable range is an increase in the cost of legal services since the adoption of the Guidelines." L.R., Appx. B at 127 (fn). The Guidelines were adopted in July 2014, so Plaintiffs have adjusted the hourly rates drawn from the Guidelines using the annual average Consumer Price Index – All Urban Residents (CPI-U) for Maryland. Specifically, the rates are calculated by multiplying the Guidelines rate by the average annual CPI-U factor for the year in which the work was performed, and dividing the product by 240.797, the CPI-U factor for July 2014, when the Guidelines were promulgated. The adjusted rates range from \$373 per hour in 2019 to \$551 per hour in 2024 for Ms. Mendez, and from \$453 per hour for 2019 to \$616.36 per hour in 2024 for Ms. Jackson and Ms. Wylegala.

16. For the remaining members of the legal team, Plaintiffs seek recovery at the maximum rate specified in the EAJA, adjusted according to the annual average CPI-U for Maryland, the market in which the court is located. Plaintiffs computed attorney fees for each year of this litigation by multiplying the \$125 hourly EAJA rate by the average annual consumer price index (CPI-U) for the Baltimore-Columbia-Towson, Maryland area, divided by 153, the CPI-U value

for March 1996, when the EAJA rate was adopted. These rates range from \$209.88 to \$255.27 for the period 2019 to 2024. Mendez Decl., Ex. A, Jackson Decl., Ex. A, Wylegala Decl., Ex. A.

17. For work by paralegals on this matter, Plaintiffs seek recovery at \$115 per hour, which is approximately half of the average of the attorney rates for each year of this litigation.

#### **Review of Class Counsel's Time**

18. Guidelines in the Local Rules require that fee records are organized by litigation phase. In addition to the litigation phases specified in the guidelines, Plaintiffs added an additional category, "Class counsel duties," to account for class counsel's time in reviewing and responding to inquiries from class members and putative class members, advocating on their behalf with Defendants' counsel, and providing guidance to counsel representing class members and putative class members. Plaintiffs do not seek recovery for all hours actually worked, and have eliminated certain time entries consistent with the guidance in the Local Rules, Appendix B, as described below. In some instances where the guidance does not directly address circumstances of the case, Plaintiffs exercised judgment as described below.

- a. Co-counsel team calls. Our co-counsel team held team calls generally once or twice per week throughout the litigation in order to respond promptly to developments in the case, to develop case strategy with the benefit of all members' analysis, and to ensure adequate representation for the class. Although we believe the participation of each member of our co-counsel team was instrumental to the effectiveness and efficiency of these calls, in view of the Local Rules' guidance regarding billing for only one attorney per office for intraoffice conferences, we seek fees for only one attorney per nonprofit organization participating in such calls from each organization. The product of that collaboration on these weekly calls was superior, given the team's unique and

varied experience working with unaccompanied children, to what would have resulted from an attorney working alone, and ultimately resulted in overall increased efficiency in conducting the litigation by reducing the need for email correspondence while keeping the team informed as to case strategy.

- b. Attending Court Hearings. Consistent with the Local Rules, Plaintiffs seek to recover fees only for attorneys who spoke on the record at hearings and court telephonic conferences, and not for others in attendance.
- c. Mediation Sessions. Plaintiffs divided case issues by subject matter, allocating responsibility for several topics to each team member. Each member of the Class counsel team worked independently to prepare for and attend these sessions and requests fees for this time.
- d. November 2019 Motion to Enforce. Because the Court denied Plaintiffs' motion to enforce (ECF No.75), we are not seeking to recover fees for time spent on this motion. Certain time records in April and May 2020 pertained to a second motion to enforce, but based on the Court's reasoning in its decision denying the November 2019 motion to enforce, class counsel instead filed a motion to amend the preliminary injunction, ECF No.117, which adapted the arguments and evidence prepared for the planned motion to enforce but sought different relief. Accordingly, Plaintiffs have requested fee recovery for the time that was recorded contemporaneously as work on a second motion to enforce and its supporting exhibits, but have excluded time that pertained to formatting and finalizing the motion in the form of a motion to enforce.
- e. Assembling Fee Records. In compliance with the Local Rules, beginning in May 2022, Plaintiffs began providing Defendants with quarterly fee statements.

- f. Other court filings. For all other court filings (but not for work on the settlement and mediation statements), Plaintiffs seek to recover time spent by only one individual per nonprofit organization, even though this is not required by the Local Rules. Because Goodwin Procter was primarily responsible for initial drafting of court filings, they seek to recover time for all attorneys who drafted court filings.
- g. Plaintiffs do not seek fees for filings related to substitution or withdrawal of counsel, or for monthly status reports filed in the recently dismissed appeal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed December 18, 2024, in Los Angeles, California.

/s/ Mary Tanagho Ross  
Mary Tanagho Ross, Counsel for Plaintiffs  
Bet Tzedek Legal Services  
3250 Wilshire Blvd,  
Los Angeles, CA 90010  
(323) 939-0506  
mross@bettzedek.org

# Exhibit A

National Immigration Project Time Records, <i>J.O.P. v. DHS</i> , 2019 through December 15, 2024						
Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Mary Tanagho Ross	9/1/2023	0.20	\$250.01	\$ 50.00	Corresponded with KMJ re logistics	Case development
Mary Tanagho Ross	9/5/2023	2.00	\$250.01	\$ 500.02	Reviewed documents in preparation for mediation session	ADR
Mary Tanagho Ross	9/6/2023	4.50	\$250.01	\$ 1,125.05	Participated in mediation session and prep and post-mediation calls	ADR
Mary Tanagho Ross	9/7/2023	0.40	\$250.01	\$ 100.00	Corresponded with KMJ re mediation	Case development
Mary Tanagho Ross	9/8/2023	0.30	\$250.01	\$ 75.00	Updated scheduling calendar	Case development
Mary Tanagho Ross	9/8/2023	0.20	\$250.01	\$ 50.00	Corresponded with KMJ re scheduling	Case development
Mary Tanagho Ross	9/11/2023	0.90	\$250.01	\$ 225.01	Reviewed and added comments to settlement agreement	ADR
Mary Tanagho Ross	9/12/2023	1.00	\$250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	9/19/2023	0.50	\$250.01	\$ 125.01	Reviewed violation of PI, corresponded with co-counsel	Class counsel duties
Mary Tanagho Ross	9/20/2023	0.50	\$250.01	\$ 125.01	Review PI violation	Class counsel duties
Mary Tanagho Ross	9/21/2023	0.30	\$250.01	\$ 75.00	Corresponded re status conference request	Case development
Mary Tanagho Ross	9/26/2023	0.40	\$250.01	\$ 100.00	Reviewed and responded to correspondence from court clerk re hearing	Case development
Mary Tanagho Ross	9/27/2023	0.20	\$250.01	\$ 50.00	Reviewed correspondence from defendants and responded to co-counsel	Case development
Mary Tanagho Ross	9/27/2023	0.20	\$250.01	\$ 50.00	Corresponded with class counsel re scheduling hearing	Case development
Mary Tanagho Ross	9/28/2023	0.20	\$250.01	\$ 50.00	Reviewed scheduling order from court	Case development
Mary Tanagho Ross	9/29/2023	0.20	\$250.01	\$ 50.00	Corresponded with team re hearing	Case development
Mary Tanagho Ross	10/3/2023	0.20	\$250.01	\$ 50.00	Updated team schedule	Case development
Mary Tanagho Ross	10/6/2023	1.20	\$250.01	\$ 300.01	Prepared for and participated in TC	Case development
Mary Tanagho Ross	10/11/2023	0.40	\$250.01	\$ 100.00	Corresponded with team re mediation	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Mary Tanagho Ross	10/12/2023	0.60	\$250.01	\$ 150.01	Reviewed mediation related emails	ADR
Mary Tanagho Ross	10/13/2023	0.80	\$250.01	\$ 200.01	Review draft documents for settlement	ADR
Mary Tanagho Ross	10/13/2023	1.00	\$250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	10/14/2023	0.80	\$250.01	\$ 200.01	reviewed and commented on mediation documents	ADR
Mary Tanagho Ross	10/16/2023	0.20	\$250.01	\$ 50.00	Corresponded with KMJ re scheduling	Case development
Mary Tanagho Ross	10/18/2023	0.40	\$250.01	\$ 100.00	Review and respond re PI violation correspondence	Class counsel duties
Mary Tanagho Ross	10/19/2023	0.50	\$250.01	\$ 125.01	Call with KMJ re mediation	ADR
Mary Tanagho Ross	10/23/2023	0.80	\$250.01	\$ 200.01	Reviewed settlement agreement & settlement docs	ADR
Mary Tanagho Ross	10/24/2023	0.80	\$250.01	\$ 200.01	Reviewed filing questions for sending to the government	Class counsel duties
Mary Tanagho Ross	10/27/2023	1.00	\$250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	10/27/2023	1.00	\$250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	10/31/2023	0.20	\$250.01	\$ 50.00	Review order re new magistrate judge	Case development
Mary Tanagho Ross	10/31/2023	1.50	\$250.01	\$ 375.02	Participated in pre call and status conference hearing	Case development
Mary Tanagho Ross	11/8/2023	0.40	\$250.01	\$ 100.00	Review team correspondence and scheduling order	Case development
Mary Tanagho Ross	11/8/2023	1.20	\$250.01	\$ 300.01	Review class notice and sample notices for reference	Case development
Mary Tanagho Ross	11/8/2023	0.20	\$250.01	\$ 50.00	Update scheduling calendar	Case development
Mary Tanagho Ross	11/10/2023	0.50	\$250.01	\$ 125.01	Correspondence with WW re edits to settlement draft	ADR
Mary Tanagho Ross	11/10/2023	1.00	\$250.01	\$ 250.01	Participated in team call	Case development
Mary Tanagho Ross	11/11/2023	0.80	\$250.01	\$ 200.01	Edited mediation statement to judge	ADR
Mary Tanagho Ross	11/13/2023	1.00	\$250.01	\$ 250.01	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Mary Tanagho Ross	11/14/2023	1.30	\$250.01	\$ 325.01	Edit settlement statement	ADR
Mary Tanagho Ross	11/22/2023	0.30	\$250.01	\$ 75.00	responded to team correspondence re scheduling	Case development
Mary Tanagho Ross	12/1/2023	0.40	\$250.01	\$ 100.00	Reviewed PI draft and checked attachments	Class counsel duties
Mary Tanagho Ross	12/1/2023	0.20	\$250.01	\$ 50.00	Corresponded with team re next steps and call	Case development
Mary Tanagho Ross	12/4/2023	0.40	\$250.01	\$ 100.00	Reviewed draft notice to court	Case development
Mary Tanagho Ross	12/4/2023	0.70	\$250.01	\$ 175.01	Participated in team call	Case development
Mary Tanagho Ross	12/5/2023	0.50	\$250.01	\$ 125.01	Review and edit email to the field re class case status etc	Class counsel duties
Mary Tanagho Ross	12/5/2023	0.30	\$250.01	\$ 75.00	Correspond re notice re client death	Case development
Mary Tanagho Ross	12/8/2023	0.50	\$250.01	\$ 125.01	reviewed draft of settlement agreement	ADR
Mary Tanagho Ross	12/8/2023	1.00	\$250.01	\$ 250.01	participated in team call	Case development
Mary Tanagho Ross	12/11/2023	0.20	\$250.01	\$ 50.00	Correspond with team re settlement documents	ADR
Mary Tanagho Ross	12/12/2023	0.60	\$250.01	\$ 150.01	Review PI violation and correspond with team	Class counsel duties
Mary Tanagho Ross	12/15/2023	0.80	\$250.01	\$ 200.01	Updated settlement document	ADR
Mary Tanagho Ross	1/9/2024	0.60	\$255.27	\$ 153.16	Review email from OC and respond to OC	Case development
Mary Tanagho Ross	1/16/2024	0.80	\$255.27	\$ 204.22	Reviewed and edited mediation statement	ADR
Mary Tanagho Ross	1/17/2024	0.40	\$255.27	\$ 102.11	Reviewed correspondence re Class Member issue	Class counsel duties
Mary Tanagho Ross	1/18/2024	0.50	\$255.27	\$ 127.64	Reviewed edits to agreement	Case development
Mary Tanagho Ross	1/18/2024	0.30	\$255.27	\$ 76.58	Reviewed team correspondence about plaintiff issue and responded	Class counsel duties
Mary Tanagho Ross	1/18/2024	0.30	\$255.27	\$ 76.58	Review email re settlement from RS	ADR
Mary Tanagho Ross	1/19/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	1/26/2024	0.90	\$255.27	\$ 229.74	Reviewed and edited statement to named plaintiffs	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Mary Tanagho Ross	1/26/2024	0.80	\$255.27	\$ 204.22	Edit mediation statement	ADR
Mary Tanagho Ross	1/26/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	2/2/2024	0.30	\$255.27	\$ 76.58	Reviewed email re class member and responded to WW	Class counsel duties
Mary Tanagho Ross	2/2/2024	0.50	\$255.27	\$ 127.64	Edited mediation statement to judge	ADR
Mary Tanagho Ross	2/5/2024	0.40	\$255.27	\$ 102.11	Reviewed call notes and replied to team	Case development
Mary Tanagho Ross	2/5/2024	0.30	\$255.27	\$ 76.58	Review call notes from team call	Case development
Mary Tanagho Ross	2/5/2024	0.40	\$255.27	\$ 102.11	Reviewed co counsel correspondence and replied	Case development
Mary Tanagho Ross	2/9/2024	1.40	\$255.27	\$ 357.38	Review and edit mediation statement	ADR
Mary Tanagho Ross	2/9/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	2/12/2024	0.30	\$255.27	\$ 76.58	Emailed named plaintiff's counsel	Class counsel duties
Mary Tanagho Ross	2/12/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	2/14/2024	0.30	\$255.27	\$ 76.58	Review email re named plaintiff requests	Class counsel duties
Mary Tanagho Ross	2/14/2024	0.40	\$255.27	\$ 102.11	Correspondence with named plaintiff counsel	Class counsel duties
Mary Tanagho Ross	2/15/2024	0.50	\$255.27	\$ 127.64	Reviewed notes from call with magistrate and responded to team	ADR
Mary Tanagho Ross	2/16/2024	0.30	\$255.27	\$ 76.58	Correspondence with named plaintiff counsel	Class counsel duties
Mary Tanagho Ross	2/16/2024	0.40	\$255.27	\$ 102.11	Correspondence w team re mediation statement	ADR
Mary Tanagho Ross	2/22/2024	0.30	\$255.27	\$ 76.58	Emailed team re plaintiff call	Class counsel duties
Mary Tanagho Ross	2/22/2024	1.00	\$255.27	\$ 255.27	Call w named plaintiff (EDG) re settlement	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Mary Tanagho Ross	2/22/2024	0.40	\$255.27	\$ 102.11	Correspondence re PI violation	Class counsel duties
Mary Tanagho Ross	2/23/2024	0.30	\$255.27	\$ 76.58	Review government correspondence re lockbox inquiry	Case development
Mary Tanagho Ross	2/23/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	2/26/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	2/26/2024	0.20	\$255.27	\$ 51.05	Email to named plaintiff's counsel	Case development
Mary Tanagho Ross	2/28/2024	0.40	\$255.27	\$ 102.11	Review and respond to correspondence to gov	Case development
Mary Tanagho Ross	2/29/2024	0.30	\$255.27	\$ 76.58	Email team re mediation	ADR
Mary Tanagho Ross	3/1/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	3/7/2024	1.00	\$255.27	\$ 255.27	Review settlement documents from mediation	ADR
Mary Tanagho Ross	3/8/2024	0.80	\$255.27	\$ 204.22	Participated in team call	Case development
Mary Tanagho Ross	3/15/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	3/18/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	3/22/2024	0.60	\$255.27	\$ 153.16	Meet with Emily and email re assignment for case	Case development
Mary Tanagho Ross	3/25/2024	0.70	\$255.27	\$ 178.69	Review, edit class notice	ADR
Mary Tanagho Ross	3/25/2024	1.00	\$255.27	\$ 255.27	Prep for and participated in team call	Case development
Mary Tanagho Ross	4/8/2024	0.80	\$255.27	\$ 204.22	Reviewed draft notice of noncompliance	Case development
Mary Tanagho Ross	4/12/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	4/19/2024	0.40	\$255.27	\$ 102.11	Participated in team call	Case development
Mary Tanagho Ross	4/24/2024	0.40	\$255.27	\$ 102.11	Review team correspondence re settlement approval	Case development
Mary Tanagho Ross	4/26/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	5/3/2024	0.50	\$255.27	\$ 127.64	Participated in team call	Case development
Mary Tanagho Ross	5/6/2024	0.70	\$255.27	\$ 178.69	Review settlement documents	Case development
Mary Tanagho Ross	5/6/2024	0.20	\$255.27	\$ 51.05	Emailed team re translation of class notice	Case development
Mary Tanagho Ross	5/10/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Mary Tanagho Ross	5/15/2024	0.50	\$255.27	\$ 127.64	Call with RS	Case development
Mary Tanagho Ross	5/20/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	5/28/2024	0.70	\$255.27	\$ 178.69	Reviewed class notice	Case development
Mary Tanagho Ross	5/31/2024	0.30	\$255.27	\$ 76.58	Reviewed update from KDJ and responded	Case development
Mary Tanagho Ross	6/3/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	6/4/2024	0.30	\$255.27	\$ 76.58	Emailed re case assignment	Case development
Mary Tanagho Ross	6/7/2024	0.30	\$255.27	\$ 76.58	Emailed RS re settlement	ADR
Mary Tanagho Ross	6/24/2024	0.90	\$255.27	\$ 229.74	Participated in team call	Case development
Mary Tanagho Ross	6/26/2024	0.80	\$255.27	\$ 204.22	Reviewed and edited motion for prelim approval of settlement	Case development
Mary Tanagho Ross	6/27/2024	0.70	\$255.27	\$ 178.69	Emailed RS re preliminary order & objections	Case development
Mary Tanagho Ross	6/28/2024	0.20	\$255.27	\$ 51.05	Reviewed email re next steps	Case development
Mary Tanagho Ross	6/28/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	7/2/2024	0.50	\$255.27	\$ 127.64	Reviewed media points	Case development
Mary Tanagho Ross	7/2/2024	0.60	\$255.27	\$ 153.16	Reviewed notice to the field	Case development
Mary Tanagho Ross	7/8/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	7/15/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	7/19/2024	0.40	\$255.27	\$ 102.11	Reviewed practice alert	Case development
Mary Tanagho Ross	7/23/2024	0.80	\$255.27	\$ 204.22	Reviewed draft motion for prelim. approval and corresponded with team	Motions practice
Mary Tanagho Ross	7/26/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	8/13/2024	0.40	\$255.27	\$ 102.11	Respond re webinar availability	Case development
Mary Tanagho Ross	8/14/2024	0.80	\$255.27	\$ 204.22	Reviewed proposed deductions to team's time and emailed CA	Case development
Mary Tanagho Ross	8/19/2024	0.50	\$255.27	\$ 127.64	Participated in team call	Case development
Mary Tanagho Ross	8/23/2024	0.40	\$255.27	\$ 102.11	Reviewed court's order on prelim. approval	Case development
Mary Tanagho Ross	8/23/2024	0.80	\$255.27	\$ 204.22	Reviewed documents related to providing notice to the class	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Mary Tanagho Ross	8/26/2024	0.70	\$255.27	\$ 178.69	Prep for Acacia Webinar	Case development
Mary Tanagho Ross	8/26/2024	0.80	\$255.27	\$ 204.22	Participated in team call	Case development
Mary Tanagho Ross	9/3/2024	0.70	\$255.27	\$ 178.69	Reviewed class notices from Def.	Case development
Mary Tanagho Ross	9/4/2024	1.00	\$255.27	\$ 255.27	Participated in webinar prep call	Case development
Mary Tanagho Ross	9/4/2024	0.70	\$255.27	\$ 178.69	Call with team re finalizing notices	Case development
Mary Tanagho Ross	9/5/2024	0.40	\$255.27	\$ 102.11	Reviewed class member question	Case development
Mary Tanagho Ross	9/5/2024	1.00	\$255.27	\$ 255.27	Prepared for Post Settlement Webinar	Case development
Mary Tanagho Ross	9/6/2024	0.70	\$255.27	\$ 178.69	Participated in team call	Case development
Mary Tanagho Ross	9/6/2024	1.20	\$255.27	\$ 306.32	Prepared for webinar on settlement	Case development
Mary Tanagho Ross	9/8/2024	2.00	\$255.27	\$ 510.54	Reviewed outline and prepared for settlement webinar	Case development
Mary Tanagho Ross	9/9/2024	0.70	\$255.27	\$ 178.69	Reviewed inquiry from counsel for CM and responded	Case development
Mary Tanagho Ross	9/9/2024	1.50	\$255.27	\$ 382.91	Prepared for, presented on settlement webinar	Case development
Mary Tanagho Ross	9/16/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	9/23/2024	0.70	\$255.27	\$ 178.69	Participated in team call	Case development
Mary Tanagho Ross	9/26/2024	1.00	\$255.27	\$ 255.27	Reviewed outline, prepared for webinar	Case development
Mary Tanagho Ross	9/30/2024	1.50	\$255.27	\$ 382.91	Prep and participate in Webinar on settlement	Case development
Mary Tanagho Ross	10/7/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	10/9/2024	0.40	\$255.27	\$ 102.11	Review case update for fee motion	Case development
Mary Tanagho Ross	10/23/2024	0.70	\$255.27	\$ 178.69	Reviewed PI violation issue and edited response to	Case development
Mary Tanagho Ross	10/25/2024	0.60	\$255.27	\$ 153.16	Participated in team call	Case development
Mary Tanagho Ross	11/1/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	11/15/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	11/18/2024	1.00	\$255.27	\$ 255.27	Participated in call	Case development
Mary Tanagho Ross	11/18/2024	1.60	\$255.27	\$ 408.43	Participated in team calls	Case development
Mary Tanagho Ross	11/22/2024	0.50	\$255.27	\$ 127.64	Coordinated translation of Notice of Non	ADR
Mary Tanagho Ross	11/25/2024	0.40	\$255.27	\$ 102.11	Emails re translating Notice of Non Compliance	ADR

<b>Name</b>	<b>Date</b>	<b>Hours Worked</b>	<b>Hourly Rate</b>	<b>Amount Billed</b>	<b>Description</b>	<b>Litigation Phase</b>
Mary Tanagho Ross	12/2/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	12/9/2024	1.00	\$255.27	\$ 255.27	Participated in team call	Case development
Mary Tanagho Ross	12/12/2024	1.50	\$255.27	\$ 382.91	Reviewed and finalized docs to send to defendants for fee settlement negotiation	ADR
<b>TOTALS</b>		<b>111</b>		<b>\$28,147.19</b>		



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION**

**J.O.P., et al.,**

Plaintiffs,

v.

**U.S. DEPARTMENT OF HOMELAND  
SECURITY, et al.,**

Defendants.

Civil Action No. 8:19-CV-01944-SAG

**DECLARATION OF MICHELLE N. MÉNDEZ IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES**

I, Michelle N. Méndez, hereby declare as follows:

1. I am an attorney licensed to practice before the courts of the State of Maryland and I am a member in good standing of this court. I have personal knowledge of the facts in this declaration, and if called upon to testify, I could and would testify competently to the facts herein.

2. I serve as the Director of Legal Resources and Training at the National Immigration Project. In cooperation with attorneys from Kids in Need of Defense (KIND), Public Counsel, Bet Tzedek Legal Services, and Goodwin Procter, LLP, my colleague Rebecca Scholtz and I represent the Plaintiffs and certified class in this case. Ms. Scholtz and I have served as co-counsel to the named plaintiffs in this litigation from its inception in 2019, initially while employed at Catholic Legal Immigration Network, Inc. (CLINIC) and, since January 2022, while employed at the National Immigration Project. On March 8, 2023, the Court granted the Motion for Substitution of Class Counsel filed on January 26, 2022, thereby appointing the National

Immigration Project as counsel to the Plaintiff Class. ECF No. 179. I make this declaration in support of Plaintiffs' motion as prevailing party for recovery of attorneys' fees and expenses.

**A. About the National Immigration Project**

3. Founded in 1971, the National Immigration Project is a national membership organization of attorneys, advocates, and community members that promotes justice for immigrants and government accountability through litigation, advocacy, training and legal resources, and community education.

4. Over the past several years, National Immigration Project attorneys have filed more than 35 lawsuits in coordination with partners that have upheld protections for noncitizens. The National Immigration Project represents all litigation clients at no charge and relies on the recovery of attorneys' fees. In fact, our funding stems primarily from the recovery of attorneys' fees from opposing parties, public funding, charitable contributions, and training revenue. Any fees recovered for legal services provided by the National Immigration Project directly support our work; the fees are not distributed to any National Immigration Project staff member or volunteer.

5. We provide training and technical assistance to private and non-profit immigration attorney members, including attorney members who represent asylum-seeking unaccompanied children. The National Immigration Project authors numerous resources, including practice advisories, a quarterly Index of Unpublished Administrative Appeals Office (AAO) Decisions on Special Immigrant Juvenile Status, immigration law treatises published by Thomson Reuters West, and "Trial Skills for Immigration Court: A Practical Guide to Effective Strategies and Tactics" published by American Immigration Lawyers Association (AILA).

## **B. My Professional Background and Qualifications**

6. I graduated from the University of Maryland Francis King Carey School of Law in 2008 and was sworn in to the Maryland bar in December 2008. I began my legal career as an Equal Justice Works Fellow sponsored by DLA Piper. I worked at Catholic Charities of the Archdiocese of Washington until December 2014, where I represented noncitizens, including unaccompanied children, before various Maryland (state) circuit courts, U.S. Citizenship and Immigration Services (USCIS), immigration courts, the Board of Immigration Appeals (BIA), and the U.S. Court of Appeals for the Fourth Circuit. I also engaged in administrative advocacy, particularly on behalf of asylum seekers, including unaccompanied children, and detained individuals.

7. From January 2015 until December 2021, I worked at CLINIC first as a senior attorney and then as the Director of the Defending Vulnerable Populations Program. There, I led trainings, created legal resources, provided technical assistance, engaged in federal and local advocacy, and pursued federal litigation before the U.S. District Court for the District of Maryland, the U.S. District Court for the District of Columbia, the U.S. Court of Appeals for the Fourth Circuit, and the U.S. Court of Appeals for the Fifth Circuit. When CLINIC appeared as an organizational plaintiff challenging proposed immigration policies, I submitted the declarations outlining how the proposed change would affect the organization. *See e.g., Catholic Leg. Immig. Network, Inc. v. Exec. Off. for Immig. Rev.*, 513 F. Supp. 3d 154 (D.D.C. 2021) (APA, Regulatory Flexibility Act, and Due Process and Equal Protection Clause challenges to a final rule raising filing fees for immigration court and Board of Immigration Appeals filings); *Catholic Leg. Immig. Network, Inc. v. Exec. Off. for Immig. Rev.*, No. CV 21-00094 (RJL), 2021 WL 3609986 (D.D.C. Apr. 4, 2021) (APA challenge to a final rule enacting numerous changes to

the immigration court system). I also represented a small number of cases, including those of unaccompanied children, before the Baltimore Immigration Court, the BIA, and USCIS.

8. During my tenure at Catholic Charities of the Archdiocese of Washington and CLINIC, I also taught at the Catholic University Columbus School of Law, Yale Law School, and the University of Baltimore School of Law. Additionally, since 2017, I have directed the National Institute for Trial Advocacy (NITA) public immigration programs.

9. I have successfully represented vulnerable noncitizens in a variety of federal litigation matters including *Duncan v. Kavanagh*, No. 1:19-cv-01465 (D. Md. filed May 20, 2019); *CLINIC v. USCIS*, No. 8:19-cv-01074 (D. Md. filed Apr. 10, 2019); *S.A.P. v. Barr*, No. 1:19-cv-03549 (D.D.C. filed Nov. 22, 2019); *Duncan v. Barr*, 919 F.3d 209 (4th Cir. 2019); and *Perez-Vasquez v. Garland*, No. 21-60524 (5th Cir. July 22, 2022).

10. Over the years I have received the following recognition for my immigrant rights work: Rotary International Paul Harris Award for commitment to helping others through volunteerism & service (2014); The Daily Record's "Very Important Professional in Maryland" (2014); American Immigration Lawyers Association's Joseph Minsky Young Lawyer Award (2015); The Baltimore Sun's "Women to Watch in 2017"; The University of Maryland Francis King Carey School of Law Rising Star Award (2018); The National Law Journal 2018 Immigration Trailblazer recognizing 22 attorneys in the United States; the NITA 2019 Robert E. Oliphant Award for Outstanding Service; and the Washingtonian Magazine's Top Immigration Lawyers List (2020, 2022).

### **C. My Expertise in Unaccompanied Children's Asylum Law and Practice**

11. Since my time at Catholic Charities of the Archdiocese of Washington, I have developed expertise in unaccompanied children's asylum law and practice. In 2010, the Department of

Justice's Executive Office for Immigration Review (EOIR) began the Legal Orientation Program for Custodians of Unaccompanied Children (LOPC). The William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA) requires that the Department of Health and Human Services (DHHS) and EOIR cooperate to ensure that custodians receive legal orientation presentations. Through this program, select nonprofits nationwide provide legal orientation presentations to the adult caregivers (custodians) of unaccompanied children in EOIR removal proceedings. EOIR selected Catholic Charities of the Archdiocese of Washington to offer orientations in-person in Washington, DC, Montgomery County, MD, Prince George's County, MD, Baltimore, MD, and Arlington, VA as well as telephonically for custodians who could not attend a program in person.

12. I managed the LOPC program at Catholic Charities of the Archdiocese of Washington from 2010, before USCIS issued the Kim Memo, to January 2015, after USCIS issued the Kim Memo. In this role, I received training from EOIR on conducting LOPCs, the TVPRA and its implementation by the Department of Homeland Security (DHS) and DHHS, government policies and practices relating to the rights of unaccompanied children, and child-centered and trauma-informed practices.

13. As the LOPC manager at Catholic Charities of the Archdiocese of Washington, I undertook the following responsibilities:

- a. Liaised with EOIR's Office of Legal Access Programs (OLAP) (which oversaw the LOPC), Immigration Court staff, and DHHS;
- b. Developed the curriculum for the LOPCs that aligned with EOIR requirements and expectations;
- c. Hired, trained, and supervised Catholic Charities of the Archdiocese of

Washington LOPC program staff;

- d. Presented legal orientation programs to custodians of unaccompanied children in Spanish weekly at locations including the Immigration Court in Baltimore, MD and at the Immigration Court in Arlington, VA; and
- e. Consulted with hundreds of unaccompanied children and their custodians on forms of immigration relief available to them.

14. Each legal orientation program lasted approximately an hour and covered the immigration court process for unaccompanied children, the common forms of immigration relief available to unaccompanied children, and the custodian's responsibilities, which included enrolling the children in school and encouraging them to seek therapy and counseling to address the children's past trauma. Our LOPCs actively sought to dispel cultural taboos regarding therapy and counseling so that custodians were more willing to seek these services for the children.

15. In addition to my LOPC duties, I represented over 100 unaccompanied children in pursuing asylum, special immigration juvenile status, U visas, Violence Against Women Act (VAWA) relief, prosecutorial discretion from DHS, and various immigration court motions such as motions to dismiss and motions to reopen removal proceedings. We learned about most of these cases through our LOPC contract.

16. I also recruited pro bono counsel to represent unaccompanied children and mentored pro bono counsel throughout their representation of unaccompanied children, including in claims for asylum. Recruitment of pro bono counsel was crucial because unaccompanied children do not have a right to government appointed counsel and also lack the ability to pay private counsel, which means that they would generally be unrepresented in removal proceedings. Indeed, as of

October 10, 2024, only 58% of unaccompanied children benefitted from representation in immigration court. *See* EOIR Adjudication Statistics, Current Representation Rates, <https://www.justice.gov/eoir/media/1344931/dl?inline>.

17. I educated immigration law practitioners on unaccompanied children’s asylum law and practice, including trauma-informed, child-centered, and culturally competent practices. Trauma-informed, child-centered, and culturally competent practices was an essential aspect of these training because all unaccompanied children are survivors of trauma with cultural backgrounds different from U.S. culture. If immigration law practitioners want to obtain the facts necessary to support the asylum claim, they must build trust with the unaccompanied child client. To build this trust immigration law practitioners must understand how to recognize trauma responses, how to communicate effectively with the client, how to center representation on the client’s needs and desires, and how to understand cultural differences.

18. Given the important differences between general asylum law and practice, and unaccompanied children’s asylum law and practice—in particular that an unaccompanied child can seek asylum before USCIS while in removal proceedings in immigration court—the pro bono attorneys and immigration law practitioners I supported required guidance on the unique procedural postures of unaccompanied children’s cases. Navigating removal proceedings while the asylum application is pending is an inherent, but complicated aspect of unaccompanied children’s cases. Our LOPC team constantly revised the trainings that we provided pro bono attorneys and immigration law practitioners to account for strategies on seeking immigration court postponements to allow USCIS to adjudicate the asylum application. For cases that we agreed to represent or place with pro bono counsel, this included reaching out to DHS on cases



that were scheduled for individual hearings and, after USCIS issued the Kim Memo, attending hearings as a friend to the court to inform immigration judges about the Kim Memo.

19. During the 2014 Maryland legislative session, I spearheaded advocacy for a legislative fix to Maryland law to protect children who were eligible for Special Immigrant Juvenile Status, a federal immigration benefit for those who have survived child abuse, neglect, or abandonment. A petition seeking classification as a Special Immigrant Juvenile must be filed with USCIS before the child's 21st birthday and must include a predicate order issued by a state juvenile court. Significantly, under immigration law, a child is defined as an unmarried person under 21 years of age, while Maryland law defined a child as under 18 years of age. Therefore, Maryland courts could not issue the required predicate order to anyone over age 18, vitiating their access to protection through Special Immigrant Juvenile Status.

20. Through the LOPC program I encountered many unaccompanied children who were eligible for Special Immigrant Juvenile Status, but were nearing the age of 18. For those nearing the age of 18, my colleagues and I spent countless hours after normal working hours preparing the filing for the Maryland Circuit Court in a race against the clock. This race against the clock was especially difficult as a child-centered approach and trauma-informed practices require time, and all of my clients survived and exhibited trauma in different ways. One client was resolute in learning English in order to testify in Maryland Circuit Court without an interpreter, only to break down sobbing on the stand as they recalled their father's rejection and abandonment. Other clients were reticent to speak in any language and were stoic in their description of their history of abuse, neglect or abandonment.

21. Drawing on my experience working with unaccompanied children eligible for Special Immigrant Juvenile Status, I worked with others to align the Maryland definition of child with

the federal definition so that more Maryland children could receive the protection they needed. *See* Md. Code Fam. Law §§ 1-201(a); 1-201(b)(10). To achieve this, I found House of Delegate and Senate sponsors for the bill. I testified on behalf of the bill before the Maryland House of Delegates Judiciary Committee and the Senate Judicial Proceedings Committee, and recruited other stakeholders to testify, including a witness from the Homeless Persons Representation Project Inc., the Marine Corps Sergeant brother of two unaccompanied children, and unaccompanied children. My testimony focused largely on why unaccompanied children needed access to this protection given the trauma that they survived.

22. From January 1, 2015 until August 31, 2017, EOIR partnered with the Corporation for National and Community Service (CNCS), which operates the AmeriCorps national service program, to establish the Justice Americorps Legal Services for Unaccompanied Children program. Through the Justice Americorps Legal Services for Unaccompanied Children program, recent law school graduates embarked on fellowships through which they represented unaccompanied children only. This national effort recognized the unique needs of unaccompanied children and the specific law, policies, and practices that applied to their cases.

23. I consulted with EOIR's OLAP program on the Justice Americorps Legal Services for Unaccompanied Children program and trained the selected fellows. I presented at the Justice Americorps training on December 11, 2014 on "Practice, Procedure, and Advocacy Skills" and participated in model hearings with an immigration judge, and I presented on "Immigration Law Overview" at the November 30, 2015 training. Notably, the December 11, 2014 training included panels on "Working with Children and Victims of Trauma" and "Cross-Cultural Lawyering" that discussed trauma-informed and culturally appropriate models of interacting with

unaccompanied children in recognition of the importance of these skills to unaccompanied children's asylum law and practice.

24. In addition to local trainings on children's immigration issues, I have presented at a number of trainings that have broadcasted nationwide discussing children's immigration issues, including the following:

- a. "In Children's Best Interests: Advancing a Fundamental Standard for the Treatment of Immigrant Children" Symposium, American Immigration Lawyers Association and American University Washington College of Law, February 14, 2020 (broadcast by C-SPAN).
- b. "Representing Children in Immigration Matters 2019: Effective Advocacy and Best Practices," Practising Law Institute, September 18, 2019 (viewed nationwide).
- c. "Central American Minors (CAM) Program: Updates, Requests For Review, Re-Parole," U.S. Catholic Conference of Bishops and Justice for Our Neighbors, October 4, 2017 (viewed nationwide).
- d. "What Will Advocacy For Unaccompanied Immigrant Children Look Like Under A New Administration?," American Bar Association Working Group on Unaccompanied Minor Immigrants, December 15, 2016 (viewed nationwide).
- e. "OPERATION: Preparation, Precision, and Bedside Manner in Unaccompanied Minors' Cases," American Immigration Lawyers Association Washington, DC Chapter Fall 2014 Conference, October 22, 2014 (viewed nationwide).
- f. "Advocating to Protect Unaccompanied Children in Your Community," Catholic Legal Immigration Network, Inc, September 26, 2014 (viewed nationwide).

25. In recognition of both my and Ms. Scholtz's expertise in unaccompanied children's asylum law and practice, the Vera Institute for Justice, which at that time was EOIR's prime contractor for the LOPC, asked us to train the LOPC staff. On May 5, 2021, Ms. Scholtz and I presented a 90-minute webinar on an "Overview of Asylum for Unaccompanied Children" to LOPC staff. On May 23, 2022, Ms. Scholtz and I presented a 90-minute webinar on Special Immigrant Juvenile Status, one of the most common forms of relief for unaccompanied children, to LOPC staff.

26. I have authored a number of resources dealing with children's immigration issues, including the following:

- a. *Practice Advisory: Strategies for Working with Children Affected by the Migrant Protection Protocols*, (American Bar Association Children's Immigration Law Academy and Catholic Legal Immigration Network, Inc., 2020)
- b. *EOIR Revises Guidance on Immigration Court Cases Involving Juveniles*, (Catholic Legal Immigration Network, Inc., 2018)
- c. "Don't Turn Your Back On Us!"—*Representing Unaccompanied Children in Removal Proceedings*, in IMMIGRATION PRACTICE POINTERS: TIPS FOR HANDLING COMPLEX CASES 635 (AILA 2015).
- d. *Strategies for SIJS Cases in Light of Adjustment Backlog*, (Catholic Legal Immigration Network, Inc., 2016).

27. Additionally, I have been quoted in media and interviewed on matters dealing with immigrant children, which include the following:

- a. *Immigration court speeds review of cases involving children*, Baltimore Sun, August 20, 2014, <https://www.baltimoresun.com/2014/08/20/immigration-court-speeds-review-of-cases-involving-children-3/>.
- b. Nuri, Vallbona, *Judge tentatively rules against restrictive detention facilities for immigrant families*, National Catholic Reporter, May 4, 2015, <https://www.ncronline.org/blogs/immigration-and-church/judge-tentatively-rules-against-restrictive-detention-facilities>.
- c. Jennifer Collings, *Traveling with a coyote: Brothers journey 4,000 miles to reunite with undocumented parents in the U.S.*, National Public Radio's The World, July 30, 2016, <https://theworld.org/stories/2016/07/30/traveling-coyote-brothers-journey-4000-miles-reunite-undocumented-parents-us>.
- d. Michael J. O'Loughlin, *Church Advocate: New immigration proposals reflect 'mass hysteria' about undocumented people*, America: The Jesuit Review, February 21, 2017, <https://www.americamagazine.org/politics-society/2017/02/21/church-advocate-new-immigration-proposals-reflect-mass-hysteria-about>
- e. Interview with the Council on Foreign Relations on U.S. Immigration Policy, August 15, 2018, <https://www.cfr.org/conference-calls/us-immigration-policy-0>.
- f. Nicolas Wu, *The Trump Administration Is Closing the Door on Migrant Children*, The Atlantic, December 25, 2018, <https://www.theatlantic.com/politics/archive/2018/12/asylum-approvals-children-have-plummeted-under-trump/578614/>.

- g. Sarah Stillman, *How Families Separated at the Border Could Make the Government Pay*, *The New Yorker*, June 15, 2019, <https://www.newyorker.com/news/news-desk/how-families-separated-at-the-border-could-make-the-government-pay>.

28. In addition to direct representation of unaccompanied children, I have worked on amicus briefs involving immigrant children filed with EOIR and U.S. courts of appeals. I co-wrote, along with co-counsel Kristen Jackson, an amicus brief in response to EOIR Amicus Invitation No. 17-10-17 which led to the BIA issuing an unpublished decision holding that those under 18 years of age categorically qualify for the “extraordinary circumstances” exception to the one-year asylum filing deadline, and that the youth of a person between the ages of 18 and 21 remains a factor to consider in determining whether an applicant qualifies for the extraordinary circumstances exception. *See* A-D-, AXXX XXX 526 (BIA May 22, 2017) (unpublished) *available at* <https://www.scribd.com/document/351904250/A-D-AXXX-XXX-526-BIA-May-22-2017>. Ms. Scholtz and I also contributed to an amicus brief in *B.R. v. Garland*, 26 F.4th 827 (9th Cir. 2022), a case involving an unaccompanied child and suppression of alienage evidence and termination of removal proceedings. Ms. Scholtz and I also contributed to amicus efforts by Lowenstein Sandler LLP before a number of U.S. Courts of Appeals and the District Court for the Eastern District of Virginia advocating against the removal of youth with approved Special Immigrant Juvenile Status petitions who are unable to apply for legal permanent residency because of a visa backlog. As noted above, many unaccompanied children are eligible for Special Immigrant Juvenile Status.

**D. Ms. Scholtz’s Professional Background and Qualifications**

29. Ms. Scholtz is a Senior Staff Attorney at the National Immigration Project. Ms. Scholtz

is admitted to practice law in Minnesota and New York, and has been admitted *pro hac vice* in this matter. Ms. Scholtz received her J.D. from Yale Law School in 2011. At Yale Law School, Ms. Scholtz won the Charles G. Albom Prize for excellence in judicial and/or administrative appellate advocacy in connection with her work in the Worker and Immigrant Rights Advocacy Clinic. From 2011 to 2012, Ms. Scholtz completed a judicial clerkship with the Honorable Diana E. Murphy of the U.S. Court of Appeals for the Eighth Circuit. From 2012 to 2017, Ms. Scholtz worked at Mid-Minnesota Legal Aid (MMLA), first as an Arthur Liman Public Interest Fellow and then as a staff attorney; her work there focused on the representation of noncitizen children, many of them unaccompanied children. Ms. Scholtz co-founded and supervised a pro bono project at the Minnesota immigration court juvenile docket that provided free screenings and referrals for hundreds of pro se unaccompanied children. In 2016, the *Minnesota Lawyer* recognized her as an “Up and Coming Attorney.” Ms. Scholtz was employed at CLINIC from 2017 until December 2021 when she joined the National Immigration Project.

30. In addition to her full-time employment at MMLA, CLINIC, and the National Immigration Project, Ms. Scholtz has taught at two law schools. Ms. Scholtz was an adjunct professor at the University of Minnesota Law School’s Federal Immigration Litigation Clinic from 2015 to 2017. Since 2017, Ms. Scholtz has been a Faculty Fellow at St. Thomas School of Law. In both of these clinic roles, her work has included supervising students in the representation of asylum-seeking unaccompanied children.

31. Ms. Scholtz has represented vulnerable noncitizens in a variety of federal litigation matters. Ms. Scholtz was co-counsel in *Dilley Pro Bono Project v. ICE*, No. 1:17-cv-01055 (D.D.C. filed June 1, 2017), *S.A.P. v. Barr*, No. 1:19-cv-03549 (D.D.C. filed Nov. 22, 2019), and *I.J. et al. v. Harper et al.*, No. 2:24-cv-00327 (E.D. La.), and she currently serves as co-counsel



in *Immigrant Defenders Law Center et al v. Mayorkas et al*, 2:20-cv-09893-JGB-SHK (C.D. Cal.).

32. Ms. Scholtz has edited important and popular immigration law publications and, in this role, added content regarding the rights of unaccompanied children. She edited the eighth and ninth editions of AILA's "Asylum Primer" and the sixth and fifth editions of AILA's "Representing Clients in Immigration Court."

33. Over the last seven years, Ms. Scholtz has authored or contributed to a number of practice advisories and other publications that address issues related to unaccompanied children seeking asylum.

34. Ms. Scholtz is also a frequent speaker on topics involving noncitizen children, including those seeking asylum as unaccompanied children. For example, the ABA and KIND invited her to speak at two of their Unaccompanied Children's Service Provider Trainings.

35. In her previous role at CLINIC and her current role at the National Immigration Project, Ms. Scholtz has provided technical assistance to hundreds of immigration practitioners on issues related to unaccompanied children seeking asylum.

#### **E. Other National Immigration Project Colleagues' Professional Background and Qualifications**

36. In addition to Ms. Scholtz and me, other National Immigration Project personnel who have periodically worked on this case are attorneys Victoria Neilson, Amber Qureshi, and Yulie Landan, as well as paralegals for whose time we have not requested recovery. Their qualifications are as follows:

- a. Attorney Victoria Neilson worked on this matter while Ms. Scholtz and I were each out on parental leave in 2022 and early 2023. Ms. Neilson is a graduate of City University of New York School of Law and has taught as an adjunct

professor at CUNY School of Law and New York University School of Law. Before joining the National Immigration Project, Ms. Neilson worked at CLINIC, as the Legal Director of the Immigrant Justice Corps, as an attorney for the Refugee and Asylum Law Division of U.S. Citizenship and Immigration Services, and as Legal Director of Immigration Equality and the HIV Law Project. She is the long-time co-chair of the American Immigration Lawyers Association's National Asylum Committee and she regularly conducts trainings with NITA. Ms. Neilson has served as co-counsel on several federal litigation matters, including *S.A.P. v. Barr*, No. 1:19-cv-03549 (D.D.C. filed Nov. 22, 2019); *Immigrant Defenders Law Center et al v. Mayorkas et al*, 2:20-cv-09893-JGB-SHK (C.D. Cal.) (class action); *O.C.V., et al., v. Garland*, No. 23-9609 (10th Cir. 2023); and *CLINIC et al. v. USCIS et al.*, 8:20-cv-02042-TDC (D. Md.). Ms. Neilson has also received a number of awards for her work, including the CUNY School of Law Distinguished Alumna Award (May 2024) and the National LGBTQ Bar Association Inaugural Legal Services Justice Award (2021).

- b. Attorney Amber Qureshi worked on this matter while Ms. Scholtz and I were each on parental leave in 2022 and early 2023. Ms. Qureshi is a 2019 graduate of Yale Law School, where she was awarded the Yale Law Women Student Excellence Award. She joined National Immigration Project as a Yale Law Journal Justine Wise Polier Fellow and then transitioned to a Staff Attorney role. Ms. Qureshi has represented detained and incarcerated persons in federal civil rights cases and in habeas corpus petitions in the federal district courts of Maryland, Virginia, Colorado, California, Georgia, New Jersey, and the District

of Columbia. She served as lead counsel or co-counsel in several class action and complex federal civil rights lawsuits on behalf of immigrants, including *Coreas v. Bounds*, No. 8:20-cv-780 (D. Md. filed March 24, 2020) (class action); *Immigrant Defenders Law Center v. Mayorkas*, No. 2:20-cv-9893 (C.D. Cal. filed October 28, 2020) (class action); *Santos Garcia v. Wolf*, No. 1:20-cv-821 (E.D. Va. filed July 21, 2020); *Mansaray v. King-Wessels*, No. 8:21-cv-1044 (D. Md. filed April 29, 2021); *Doe v. Perry*, No. 1:21-cv-1364 (E.D. Va. filed December 6, 2021); *Molina Santana v. Hott*, No. 1:23-cv-1538 (E.D. Va. filed November 13, 2023); *Vargas v. USA*, No. 5:23-cv-380 (C.D. Cal. filed March 7, 2023); *Oldaker v. Giles*, No. 7:20-cv-224 (M.D. Ga. filed December 21, 2020); *J.R. v. U.S. Dept. of Homeland Security*, No. 2:21-cv-13117 (D.N.J. filed June 30, 2021); *Codner v. Choate*, No. 1:20-cv-1050 (D. Colo. filed Apr. 14, 2020); *National Immigration Project of the National Lawyers Guild v. Executive Office of Immigration Review*, No. 1:20-cv-852 (D.D.C. filed March 30, 2020).

- c. Attorney and fellow Yulie Landan assisted with the lay-friendly design of the class notices in this case. Ms. Landan graduated from Stanford Law School in 2022. There, she received the Judge Shelton E. Henderson Prize for Outstanding Performance in the Immigrants' Rights Clinic and represented a class of detained immigrants in California challenging their access to counsel in *Torres v. DHS*, Case No. 5:18-cv-02604 (C.D. Cal. filed Dec. 17, 2018). Ms. Landan then clerked for the Honorable R. Guy Cole, Jr. of the Court of Appeals for the Sixth Circuit. She is a Justice Catalyst Fellow at the National Immigration Project and has served as co-counsel on *Oldaker, et al. v. Giles, et al.*, 7:20-cv-0224 (M.D. Ga.),

*Argueta Anariba v. United States, et al.*, No. 1:24-cv-00767 (D.D.C.), and  
*Rodriguez Guerra v. Perry*, 1:23-cv-01151 (E.D. Va).

37. As reflected above, my attorney colleagues and I have extensive experience in federal litigation, immigration law, and matters relating to unaccompanied children.

**F. Contributions By Each Co-Counsel Entity**

38. While Ms. Scholtz and I were at CLINIC, our small Defending Vulnerable Populations staff and limited resources required us to recruit co-counsel if we wanted to engage in federal litigation. Similarly, our small staff at the National Immigration Project, which includes seven attorneys who engage in state and federal litigation, requires us to enlist co-counsel. We rely on non-profit partners and law firms to serve as co-counsel. Given their federal litigation expertise and larger staffing, which includes significant administrative support that non-profits tend to lack, partnerships with law firms in particular allow us to represent more cases of vulnerable noncitizens who likely would otherwise lack representation. However, even with law firm co-counsel, every case we undertake means that we have to decline other litigation opportunities because we lack the resources and time to handle many cases simultaneously. It would be extremely difficult, if not impossible, for the National Immigration Project to engage in state and federal litigation without co-counsel and this case is no exception.

39. Each co-counsel entity on this case was essential to every part of this case, including the ultimate settlement agreement. Public Counsel is perhaps the national leader on federal litigation protecting the rights of immigration children and youth. KIND represents and mentors pro bono attorneys on thousands of unaccompanied children's cases nationwide. Goodwin Procter LLP has extensive federal litigation experience and offices throughout the United States. Our

significant experience working with unaccompanied children, assisting legal representatives for unaccompanied children, and analyzing legal cases and policy memoranda relevant to unaccompanied children proved invaluable in this case. Each member of the co-counsel team brought their unique experience and expertise that allowed us to navigate legal issues that included those of first impression, analyze thoroughly the options presented by government counsel during settlement negotiations, and engage in thoughtful legal strategy that considered the needs of class members and potential class members. For example, I felt competent arguing at the temporary restraining order (TRO) hearing about the harm caused by depriving class members access to an asylum interview with a USCIS officer and the exemption from the one-year filing deadline because I had witnessed first-hand the value of these protections through my direct representation of unaccompanied children. Furthermore, during settlement negotiations the U.S. Supreme Court issued *Garland v. Aleman Gonzalez*, 142 S. Ct. 2057 (2022), requiring analysis and significant deliberation from our team. No co-counsel entity could have secured the settlement agreement in this case had they been sole counsel, especially having faced sophisticated government counsel and a large team of defendants.

40. Beyond the substance of the issues in this case, it would have been impossible for any co-counsel entity to litigate it alone given the demands on our time. Navigating complex and niche substantive and procedural immigration issues from the case development stage to the Joint Motion for Preliminary Approval of a settlement agreement phase, complying with the requirements of a class action, analyzing thoroughly the options presented by government counsel during settlement negotiations, and engaging in thoughtful legal strategy that considered the needs of the class members, required time. Considering the needs of the class members and potential class members required significant time because the class members' immigration cases

are in different postures and each posture requires specific analysis. For example, the considerations for a class member with an asylum application pending with USCIS and no removal proceedings in immigration court differ greatly from a potential class member who has yet to file the asylum application with USCIS and had an order of removal from the immigration judge. Had we not been able to divide the many responsibilities among our co-counsel team, we would have failed to uphold the rights of this vulnerable class and present quality work deserving of the court's time and aligned with our ethical obligations.

**G. Work Performed by Ms. Scholtz, Myself, and Other National Immigration Project Personnel in Connection with This Matter**

41. Ms. Scholtz and I along with our non-profit co-counsel knew that the only option for protecting unaccompanied children affected by the overnight policy change was this litigation. We also knew that immigration law practitioners would look to us to pursue this litigation given our commitment to and expertise in unaccompanied immigrant children's issues. Lastly, we knew that, given the substantive impact of the overnight policy change on unaccompanied children and the number of unaccompanied children affected, a law firm partner such as Goodwin Procter LLP would ensure that we had the resources necessary to fully pursue this matter. Together with co-counsel, we identified several clients whose rights would be impaired under the policy change, and following conversations with them and their immigration counsel, four chose to become plaintiffs. We interviewed and developed declarations for the Plaintiffs. One day after the policy change went into effect we filed the complaint. One day later, we moved for a TRO.

42. Since filing the complaint on July 1, 2019, Ms. Scholtz and I have engaged in legal research and writing, including drafting pleadings, motions, the fee petition and other court filings; oral argument in support of the TRO; review and analysis of government documents,

including those included in the Administrative Record; discussions with declarants and drafting declarations in support of court filings; virtual and in-person mediations; communications with opposing counsel, including communications to provide notice of violations of the preliminary injunction; communication with legal representatives for class members or potential class members regarding their rights under the preliminary injunction; and education of immigration law practitioners regarding the preliminary injunction. Indeed, this matter has consumed much of our professional lives during the past five years.

43. Responding to alleged violations of the preliminary injunction took a significant amount of time. Immigration practitioners representing class members frequently contacted Class Counsel to seek assistance in resolving suspected violations of the preliminary injunction, such as USCIS's rejection of their clients' asylum applications claiming lack of jurisdiction, or DHS's conduct in class members' immigration court proceedings that thwarted the preliminary injunction. Whenever we received notice of an alleged violation, we investigated by requesting and reviewing relevant documents and having multiple phone calls with the legal representative. We then assessed the alleged violation as a team and, if we assessed that a violation had seemingly occurred, sent opposing counsel a concise email with the facts and relevant evidence attached. After discussing the violation with opposing counsel, we then took the proposed resolution of the violation back to the legal representative. Sometimes the proposed resolution required multiple steps, which in turn required multiple conversations with the legal representative and opposing counsel, respectively. Some weeks we received multiple notices of alleged violations from legal representatives. When we recognized preliminary injunction violation trends, we sent opposing counsel formal email correspondence asking the Defendants to take certain actions to prevent future violations, yet the violations continued.



44. Our ongoing education of immigration law practitioners on issues raised in this case has included creating written resources, email blasts to relevant listservs, webinars, individual email responses, and one-on-one phone calls. During this case, we have found that intentional and continuous outreach to immigration law practitioners has been necessary, as we still encounter practitioners lacking basic information about issues raised in this case.

45. This varied and ongoing education has been necessary because most immigration practitioners are not sufficiently familiar with the asylum law and practice that applies to unaccompanied children. Only a small proportion of practitioners specialize in or focus solely on unaccompanied children's asylum law and practice. Private practitioners who represent unaccompanied children often accept these cases without realizing that there is a difference in asylum law and practice as it pertains to unaccompanied children and non-unaccompanied children. Other private attorneys accepted the cases from non-profits intending to receive mentoring from that referring non-profit, but the mentorship is not always available or consistent. Private and non-profit practitioners who were recently retained may not realize the importance of inquiring about past unaccompanied child determinations. Furthermore, private and non-profit attorneys alike have difficulty keeping up with legal and policy developments given the volume of litigation and policy change during the last two presidential administrations. Many practitioners lack the resources to join immigration membership organizations that would provide them with these updates and look to the expertise of organizations such as those on the co-counsel team.

46. As a nationwide class action, and due to its complex substantive and procedural immigration issues, this case required a higher percentage of our time than did other litigation partnerships. Since 2019, we have declined other litigation opportunities due to the demands of

this case and our non-litigation duties both at CLINIC and at the National Immigration Project. For example, CLINIC was represented by other counsel as an organizational plaintiff in two federal lawsuits challenging proposed immigration policies because we lacked the resources to serve as co-counsel. We had hoped for and worked to settle this matter sooner so that we could accept other litigation opportunities. Yet, when settlement proved elusive, we forewent other litigation opportunities to protect the rights of noncitizens and continued to focus the same amount of time and resources on this case not knowing if we would eventually secure attorneys' fees.

#### **H. National Immigration Project's Time and Expense Records**

47. Throughout this litigation, Ms. Scholtz and I have kept contemporaneous notes of the services and hours expended on this case, as have the other National Immigration Project timekeeping staff.

48. Appended hereto as Exhibit 1 is a chronological itemization of work by all National Immigration Project and CLINIC personnel from July 2019 through the present, describing the tasks that National Immigration Project and CLINIC personnel accomplished in this matter, the date of the task, the time spent on each task, and, in accordance with the Court's Rules and Guidelines, the litigation phase. The time billed reflects work that was essential to the case and was contemporaneously recorded with electronic time-tracking tools whose output has been edited for form, clarity, and consistency.

49. Our National Immigration Project staff do not prepare billing statements for our federal litigation clients in the ordinary course of our work and therefore do not have customary hourly rates. In requesting reimbursement for fees incurred in this matter, we have proposed rates consistent with the EAJA and with Appendix B to this Court's local rules. I became licensed to

practice in 2008 and Ms. Scholtz was licensed in 2012. Given my specialized skill in asylum law and practice relating to unaccompanied children that was essential to this litigation, I have requested reimbursement based on rate guidelines in the local rules for attorneys with eleven to sixteen years of practice. For Ms. Scholtz's work, we request reimbursement at the EAJA rate adjusted according to the consumer price index (CPI-U) for Maryland.

50. Attached to this declaration as Exhibit B is a table itemizing expenses that the National Immigration Project incurred in litigating and settling this matter. For each expense, the date, purpose, payee, and amount are set forth. We have retained receipts documenting each of these expenditures.

#### **I. Plaintiffs' Net Worth and Assignment of Fees**

51. I serve as the primary contact on the class counsel team to Plaintiff K.R.C. and recently began serving as the primary contact for Plaintiff E.D.G. Each has confirmed that his net worth did not exceed two million dollars at the time this lawsuit was filed, nor at any other time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed December 23, 2024, in Baltimore, Maryland.



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# Exhibit A

National Immigration Project Time Records, <i>J.O.P. v. DHS</i> , 2019 through December 15, 2024						
Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	6/19/2019	0.47	\$ 373.00	\$ 175.31	Telephone call (TC) with KIND	Case development
Michelle Mendez	6/21/2019	1.12	\$ 373.00	\$ 417.76	TC with KIND, CLINIC, Public Counsel	Case development
Michelle Mendez	6/22/2019	0.10	\$ 373.00	\$ 37.30	Email Jenny Cachaya regarding possible plaintiffs	Case development
Michelle Mendez	6/22/2019	1.00	\$ 373.00	\$ 373.00	TC co-counsel team	Case development
Rebecca Scholtz	6/24/2019	1.83	\$ 209.88	\$ 384.08	Read cases; email to team	Case development
Michelle Mendez	6/25/2019	0.58	\$ 373.00	\$ 216.34	TC co-counsel team	Case development
Michelle Mendez	6/26/2019	1.00	\$ 373.00	\$ 373.00	Calls to CLINIC Executive Director and immigration counsel of prospective plaintiff re case	Case development
Michelle Mendez	6/27/2019	0.30	\$ 373.00	\$ 111.90	Review co-counseling agreement	Case development
Michelle Mendez	6/27/2019	0.75	\$ 373.00	\$ 279.75	TC co-counsel team	Case development
Rebecca Scholtz	6/27/2019	0.20	\$ 209.88	\$ 41.98	Review co-counsel agreement	Case development
Rebecca Scholtz	6/27/2019	1.25	\$ 209.88	\$ 262.35	Review draft of TRO motion	Motions practice
Rebecca Scholtz	6/27/2019	1.10	\$ 209.88	\$ 230.87	Draft declaration re TRO	Motions practice
Michelle Mendez	6/27/2019	1.25	\$ 373.00	\$ 466.25	Meet with plaintiff	Motions practice
Michelle Mendez	6/27/2019	0.27	\$ 373.00	\$ 100.71	Review work product with plaintiff	Motions practice
Michelle Mendez	6/27/2019	1.10	\$ 373.00	\$ 410.30	Declaration drafting	Motions practice
Michelle Mendez	6/28/2019	2.15	\$ 373.00	\$ 801.95	Review draft motion	Motions practice
Michelle Mendez	6/28/2019	0.37	\$ 373.00	\$ 138.01	Review work product for plaintiff	Motions practice
Rebecca Scholtz	6/29/2019	1.02	\$ 209.88	\$ 214.08	Organize files, review declarations, emails to team	Case development
Rebecca Scholtz	6/29/2019	0.40	\$ 209.88	\$ 83.95	Review other motions/papers	Motions practice
Michelle Mendez	6/29/2019	0.55	\$ 373.00	\$ 205.15	Review complaint	Pleadings
Michelle Mendez	6/29/2019	0.38	\$ 373.00	\$ 141.74	Phone call and email re plaintiff	Motions practice
Michelle Mendez	6/29/2019	0.87	\$ 373.00	\$ 324.51	Review memo re motion to proceed by pseudonym	Motions practice
Michelle Mendez	6/30/2019	1.67	\$ 373.00	\$ 622.91	Review of draft TRO brief	Motions practice
Michelle Mendez	6/30/2019	0.35	\$ 373.00	\$ 130.55	Review of Pseudonym Motion	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	7/1/2019	0.42	\$ 373.00	\$ 156.66	Review of paragraph re Ombudsman Report for TRO brief	Motions practice
Michelle Mendez	7/8/2019	1.00	\$ 373.00	\$ 373.00	TC co-counsel team	Case development
Michelle Mendez	7/9/2019	0.75	\$ 373.00	\$ 279.75	TC with KIND	Case development
Michelle Mendez	7/9/2019	1.67	\$ 373.00	\$ 622.91	Review of notes/points on irreparable harm	Motions practice
Michelle Mendez	7/11/2019	0.75	\$ 373.00	\$ 279.75	TC with KIND, CLINIC, Public Counsel	Case development
Rebecca Scholtz	7/11/2019	0.25	\$ 209.88	\$ 52.47	Phone call prep	Case development
Rebecca Scholtz	7/11/2019	0.32	\$ 209.88	\$ 67.16	TC follow up	Case development
Rebecca Scholtz	7/11/2019	0.53	\$ 209.88	\$ 111.24	TC potential declarant	Motions practice
Rebecca Scholtz	7/11/2019	0.33	\$ 209.88	\$ 69.26	TC potential declarant	Motions practice
Rebecca Scholtz	7/11/2019	0.20	\$ 209.88	\$ 41.98	TC K. Jackson	Case development
Rebecca Scholtz	7/11/2019	0.50	\$ 209.88	\$ 104.94	Draft expert retainer	Case development
Rebecca Scholtz	7/11/2019	0.18	\$ 209.88	\$ 37.78	Finalize retainer	Case development
Rebecca Scholtz	7/11/2019	0.57	\$ 209.88	\$ 119.63	TC re TRO hearing prep and declarations	Motions practice
Rebecca Scholtz	7/11/2019	2.42	\$ 209.88	\$ 507.91	Draft declarations	Motions practice
Rebecca Scholtz	7/11/2019	0.87	\$ 209.88	\$ 182.60	Draft communication to expert (decl)	Motions practice
Rebecca Scholtz	7/12/2019	0.33	\$ 209.88	\$ 69.26	TC with potential declarant	Motions practice
Rebecca Scholtz	7/12/2019	0.32	\$ 209.88	\$ 67.16	Phone call with possible declarant	Motions practice
Rebecca Scholtz	7/12/2019	1.48	\$ 209.88	\$ 310.62	Draft declarations	Motions practice
Rebecca Scholtz	7/12/2019	0.13	\$ 209.88	\$ 27.28	Expert declaration bullet points	Motions practice
Rebecca Scholtz	7/12/2019	1.25	\$ 209.88	\$ 262.35	TC and prep for potential TRO declaration	Motions practice
Rebecca Scholtz	7/13/2019	3.12	\$ 209.88	\$ 654.83	Research in preparation for TRO hearing	Motions practice
Michelle Mendez	7/13/2019	1.72	\$ 373.00	\$ 641.56	Work on harm argument outline and prepare for moot	Motions practice
Rebecca Scholtz	7/14/2019	3.12	\$ 209.88	\$ 654.83	Research in preparation for TRO hearing	Motions practice
Rebecca Scholtz	7/14/2019	1.22	\$ 209.88	\$ 256.05	Assist with M. Mendez TRO hearing preparation (review outline)	Motions practice
Michelle Mendez	7/14/2019	1.00	\$ 373.00	\$ 373.00	Work on harm argument outline	Motions practice
Michelle Mendez	7/14/2019	1.08	\$ 373.00	\$ 402.84	Prepare for moot	Motions practice
Rebecca Scholtz	7/15/2019	1.75	\$ 209.88	\$ 367.29	Review declarations	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	7/15/2019	1.48	\$ 209.88	\$ 310.62	Assist with preparation for TRO argument	Motions practice
Rebecca Scholtz	7/15/2019	1.30	\$ 209.88	\$ 272.84	Review potential expert declaration	Motions practice
Rebecca Scholtz	7/15/2019	0.18	\$ 209.88	\$ 37.78	Finalize declaration	Motions practice
Rebecca Scholtz	7/15/2019	1.23	\$ 209.88	\$ 258.15	Review/edit expert declaration	Motions practice
Rebecca Scholtz	7/15/2019	1.43	\$ 209.88	\$ 300.13	Communications with declarants; declaration drafting	Motions practice
Rebecca Scholtz	7/15/2019	3.92	\$ 209.88	\$ 822.73	Declaration editing	Motions practice
Michelle Mendez	7/15/2019	1.30	\$ 373.00	\$ 484.90	Review of JZ declaration (dec)	Motions practice
Michelle Mendez	7/15/2019	1.05	\$ 373.00	\$ 391.65	Review of SS dec	Motions practice
Michelle Mendez	7/15/2019	1.63	\$ 373.00	\$ 607.99	TRO Hearing Moot	Motions practice
Michelle Mendez	7/15/2019	1.25	\$ 373.00	\$ 466.25	TRO Hearing Prep	Motions practice
Rebecca Scholtz	7/16/2019	1.17	\$ 209.88	\$ 245.56	Declaration editing	Motions practice
Michelle Mendez	7/16/2019	0.77	\$ 373.00	\$ 287.21	Review of JZ dec	Motions practice
Michelle Mendez	7/16/2019	0.38	\$ 373.00	\$ 141.74	Review of RN dec	Motions practice
Michelle Mendez	7/16/2019	0.32	\$ 373.00	\$ 119.36	Review of RC dec	Motions practice
Michelle Mendez	7/16/2019	2.20	\$ 373.00	\$ 820.60	TRO Hearing Prep	Motions practice
Michelle Mendez	7/17/2019	2.27	\$ 373.00	\$ 846.71	TRO Hearing Prep	Motions practice
Michelle Mendez	7/18/2019	1.82	\$ 373.00	\$ 678.86	TRO Hearing Prep	Motions practice
Michelle Mendez	7/18/2019	0.90	\$ 373.00	\$ 335.70	TC TRO Prep	Motions practice
Michelle Mendez	7/19/2019	1.00	\$ 373.00	\$ 373.00	TRO Hearing Prep	Motions practice
Michelle Mendez	7/19/2019	2.42	\$ 373.00	\$ 902.66	TRO Hearing	Attending court hearings
Michelle Mendez	7/21/2019	0.37	\$ 373.00	\$ 138.01	Review of Post-TRO Letter	Motions practice
Rebecca Scholtz	7/29/2019	0.97	\$ 209.88	\$ 203.58	Call with co-counsel team	Case development
Rebecca Scholtz	8/5/2019	0.50	\$ 209.88	\$ 104.94	Review court's memo opinion re TRO	Case development
Rebecca Scholtz	8/5/2019	0.42	\$ 209.88	\$ 88.15	TC co-counsel team	Case development
Rebecca Scholtz	8/6/2019	0.67	\$ 209.88	\$ 140.62	Call re amended complaint	Pleadings
Rebecca Scholtz	8/6/2019	0.50	\$ 209.88	\$ 104.94	Draft guidance for field re TRO	Class counsel duties
Rebecca Scholtz	8/6/2019	1.00	\$ 209.88	\$ 209.88	Draft guidance for field re TRO	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	8/7/2019	0.72	\$ 209.88	\$ 151.11	TC co-counsel, updated and sent guidance to team	Case development
Rebecca Scholtz	8/7/2019	2.08	\$ 209.88	\$ 436.55	Draft guidance for field re TRO	Class counsel duties
Rebecca Scholtz	8/9/2019	1.45	\$ 209.88	\$ 304.33	TC co-counsel team	Case development
Rebecca Scholtz	8/9/2019	0.50	\$ 209.88	\$ 104.94	TC attorney re potential plaintiff	Pleadings
Rebecca Scholtz	8/12/2019	0.87	\$ 209.88	\$ 182.60	TC co-counsel team (and prep)	Case development
Michelle Mendez	8/13/2019	0.18	\$ 373.00	\$ 67.14	Team conference call	Case development
Rebecca Scholtz	8/13/2019	0.13	\$ 209.88	\$ 27.28	Prepare for court conference	Case development
Rebecca Scholtz	8/13/2019	0.32	\$ 209.88	\$ 67.16	Draft update for field re TRO extension	Class counsel duties
Michelle Mendez	8/14/2019	0.38	\$ 373.00	\$ 141.74	TC co-counsel team	Case development
Rebecca Scholtz	8/14/2019	0.08	\$ 209.88	\$ 16.79	Review proposed judgment	Case development
Rebecca Scholtz	8/15/2019	0.45	\$ 209.88	\$ 94.45	Review draft email	Case development
Rebecca Scholtz	8/19/2019	0.35	\$ 209.88	\$ 73.46	TC co-counsel team	Case development
Rebecca Scholtz	8/20/2019	0.25	\$ 209.88	\$ 52.47	Analysis of gov't email	Case development
Rebecca Scholtz	8/20/2019	0.73	\$ 209.88	\$ 153.21	TC co-counsel team	Case development
Rebecca Scholtz	8/26/2019	0.72	\$ 209.88	\$ 151.11	TC co-counsel team	Case development
Rebecca Scholtz	8/26/2019	0.50	\$ 209.88	\$ 104.94	Call with USAO	Case development
Rebecca Scholtz	8/26/2019	0.70	\$ 209.88	\$ 146.92	Email to co-counsel team	Case development
Rebecca Scholtz	8/26/2019	0.28	\$ 209.88	\$ 58.77	Review mark up of govt draft proposed judgment	ADR
Rebecca Scholtz	8/28/2019	0.12	\$ 209.88	\$ 25.19	Review extension motion	Motions practice
Michelle Mendez	8/29/2019	0.42	\$ 373.00	\$ 156.66	TC co-counsel team	Case development
Rebecca Scholtz	8/30/2019	0.40	\$ 209.88	\$ 83.95	Review draft proposed judgment	ADR
Michelle Mendez	9/3/2019	0.75	\$ 373.00	\$ 279.75	TC co-counsel team	Case development
Michelle Mendez	9/4/2019	0.33	\$ 373.00	\$ 123.09	TC with R. Scholtz re Board of Immigration Appeals decision M-A-C-O-	Case development
Rebecca Scholtz	9/4/2019	0.10	\$ 209.88	\$ 20.99	Review proposed judgment	ADR
Rebecca Scholtz	9/5/2019	1.25	\$ 209.88	\$ 262.35	TC K. Jackson re proposed judgment	ADR
Rebecca Scholtz	9/8/2019	2.00	\$ 209.88	\$ 419.76	Review proposed judgment	ADR
Michelle Mendez	9/9/2019	0.27	\$ 373.00	\$ 100.71	TC with nonprofits	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	9/16/2019	0.42	\$ 209.88	\$ 88.15	TC co-counsel team	Case development
Michelle Mendez	9/26/2019	0.68	\$ 373.00	\$ 253.64	TC co-counsel team	Case development
Michelle Mendez	9/26/2019	0.22	\$ 373.00	\$ 82.06	TC with R. Scholtz	Case development
Rebecca Scholtz	9/26/2019	0.33	\$ 209.88	\$ 69.26	Review proposed order	ADR
Michelle Mendez	10/7/2019	0.88	\$ 373.00	\$ 328.24	TC co-counsel team	Case development
Rebecca Scholtz	10/9/2019	0.25	\$ 209.88	\$ 52.47	Review PI motion and TRO compliance issues	Motions practice
Rebecca Scholtz	10/9/2019	0.12	\$ 209.88	\$ 25.19	Review PI motion	Motions practice
Rebecca Scholtz	10/11/2019	0.33	\$ 209.88	\$ 69.26	TRO compliance issues	Class counsel duties
Michelle Mendez	10/14/2019	0.85	\$ 373.00	\$ 317.05	TC co-counsel team	Case development
Rebecca Scholtz	10/16/2019	0.13	\$ 209.88	\$ 27.28	Review email re TRO violation	Class counsel duties
Rebecca Scholtz	10/21/2019	0.68	\$ 209.88	\$ 142.72	TC co-counsel team & follow up	Case development
Rebecca Scholtz	10/21/2019	0.92	\$ 209.88	\$ 193.09	Review possible TRO violation data in prep for call	Class counsel duties
Rebecca Scholtz	10/23/2019	0.50	\$ 209.88	\$ 104.94	Work on amended complaint	Pleadings
Rebecca Scholtz	10/23/2019	1.78	\$ 209.88	\$ 373.59	Research and draft amended complaint	Pleadings
Rebecca Scholtz	10/23/2019	0.82	\$ 209.88	\$ 172.10	Track TRO violation data	Class counsel duties
Rebecca Scholtz	10/25/2019	0.83	\$ 209.88	\$ 174.20	TC co-counsel team	Case development
Rebecca Scholtz	10/28/2019	0.08	\$ 209.88	\$ 16.79	TC co-counsel team	Case development
Rebecca Scholtz	10/29/2019	0.70	\$ 209.88	\$ 146.92	Research for amended complaint	Pleadings
Rebecca Scholtz	10/30/2019	2.18	\$ 209.88	\$ 457.54	Research for amended complaint	Pleadings
Rebecca Scholtz	10/31/2019	2.25	\$ 209.88	\$ 472.23	Research for amended complaint	Pleadings
Rebecca Scholtz	11/1/2019	1.00	\$ 209.88	\$ 209.88	TC co-counsel team	Case development
Rebecca Scholtz	11/1/2019	0.35	\$ 209.88	\$ 73.46	Research for amended complaint	Pleadings
Rebecca Scholtz	11/1/2019	0.15	\$ 209.88	\$ 31.48	Track violation data	Class counsel duties
Rebecca Scholtz	11/1/2019	0.33	\$ 209.88	\$ 69.26	Potential TRO violations follow up	Class counsel duties
Rebecca Scholtz	11/1/2019	0.27	\$ 209.88	\$ 56.67	TC attorney with potential TRO violation	Class counsel duties
Rebecca Scholtz	11/1/2019	0.42	\$ 209.88	\$ 88.15	Communicate with attorney in field & email to team re TRO violation	Class counsel duties
Rebecca Scholtz	11/3/2019	1.07	\$ 209.88	\$ 224.57	Research for amended complaint	Pleadings
Rebecca Scholtz	11/3/2019	0.10	\$ 209.88	\$ 20.99	Track TRO violation data	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	11/4/2019	0.93	\$ 209.88	\$ 195.19	TC co-counsel team	Case development
Rebecca Scholtz	11/4/2019	0.32	\$ 209.88	\$ 67.16	TRO violations write-up to team	Class counsel duties
Michelle Mendez	11/6/2019	1.02	\$ 373.00	\$ 380.46	TC co-counsel team	Case development
Rebecca Scholtz	11/7/2019	4.03	\$ 209.88	\$ 845.82	Fact investigation for amended complaint	Pleadings
Michelle Mendez	11/8/2019	0.97	\$ 373.00	\$ 361.81	TC co-counsel team	Case development
Rebecca Scholtz	11/8/2019	0.45	\$ 209.88	\$ 94.45	TC K. DeJong	Case development
Rebecca Scholtz	11/8/2019	1.02	\$ 209.88	\$ 214.08	Fact investigation for amended complaint	Pleadings
Rebecca Scholtz	11/11/2019	0.43	\$ 209.88	\$ 90.25	Compliance issues	Class counsel duties
Rebecca Scholtz	11/13/2019	0.33	\$ 209.88	\$ 69.26	TC co-counsel team	Case development
Rebecca Scholtz	11/13/2019	0.47	\$ 209.88	\$ 98.64	TC AUSA Allen Loucks	Case development
Rebecca Scholtz	11/13/2019	0.40	\$ 209.88	\$ 83.95	TC co-counsel team, review of govt filing	Case development
Michelle Mendez	11/15/2019	0.95	\$ 373.00	\$ 354.35	TC co-counsel team	Case development
Michelle Mendez	11/23/2019	0.28	\$ 373.00	\$ 104.44	Call with plaintiff	Case development
Rebecca Scholtz	11/24/2019	1.07	\$ 209.88	\$ 224.57	Amended complaint	Pleadings
Rebecca Scholtz	11/24/2019	0.35	\$ 209.88	\$ 73.46	Research for amended complaint	Pleadings
Rebecca Scholtz	11/25/2019	0.98	\$ 209.88	\$ 205.68	TC co-counsel team	Case development
Rebecca Scholtz	11/25/2019	1.02	\$ 209.88	\$ 214.08	Research for amended complaint	Pleadings
Rebecca Scholtz	11/26/2019	0.63	\$ 209.88	\$ 132.22	Email re new plaintiffs	Pleadings
Rebecca Scholtz	11/26/2019	1.37	\$ 209.88	\$ 287.54	Research for amended complaint	Pleadings
Rebecca Scholtz	12/1/2019	2.07	\$ 209.88	\$ 434.45	Amended complaint	Pleadings
Rebecca Scholtz	12/2/2019	1.17	\$ 209.88	\$ 245.56	TC co-counsel team	Case development
Rebecca Scholtz	12/2/2019	0.22	\$ 209.88	\$ 46.17	TC K. Jackson	Case development
Rebecca Scholtz	12/3/2019	0.72	\$ 209.88	\$ 151.11	Plaintiff search	Pleadings
Rebecca Scholtz	12/3/2019	0.28	\$ 209.88	\$ 58.77	Draft email re amended complaint issue	Pleadings
Michelle Mendez	12/4/2019	0.95	\$ 373.00	\$ 354.35	TCs - K. Jackson, M. Mendez, and attorney providing expertise	Case development
Rebecca Scholtz	12/4/2019	0.17	\$ 209.88	\$ 35.68	Plaintiff outreach, email to co-counsel team re previous phone call	Pleadings
Rebecca Scholtz	12/5/2019	1.00	\$ 209.88	\$ 209.88	TC co-counsel team	Case development
Rebecca Scholtz	12/6/2019	1.20	\$ 209.88	\$ 251.86	TC co-counsel team, TC K. Jackson	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	12/6/2019	1.25	\$ 209.88	\$ 262.35	Amended complaint	Pleadings
Rebecca Scholtz	12/6/2019	0.62	\$ 209.88	\$ 130.13	TC attorney re potential new plaintiff	Pleadings
Rebecca Scholtz	12/6/2019	0.47	\$ 209.88	\$ 98.64	Email to co-counsel team re new plaintiff	Pleadings
Rebecca Scholtz	12/6/2019	0.08	\$ 209.88	\$ 16.79	Review deadline extension motion	Motions practice
Rebecca Scholtz	12/6/2019	0.82	\$ 209.88	\$ 172.10	TC attorney in field, follow up email	Class counsel duties
Rebecca Scholtz	12/9/2019	0.50	\$ 209.88	\$ 104.94	TC co-counsel team	Case development
Rebecca Scholtz	12/9/2019	0.88	\$ 209.88	\$ 184.69	Conflicts check and draft complaint allegations	Pleadings
Rebecca Scholtz	12/10/2019	0.30	\$ 209.88	\$ 62.96	Review retainer and next friend agreement	Case development
Rebecca Scholtz	12/10/2019	3.85	\$ 209.88	\$ 808.04	Amended complaint	Pleadings
Rebecca Scholtz	12/10/2019	0.48	\$ 209.88	\$ 100.74	TC attorneys re potential plaintiffs	Pleadings
Rebecca Scholtz	12/19/2019	3.17	\$ 209.88	\$ 665.32	Opposition to MTD/MSJ, amended complaint	Pleadings
Rebecca Scholtz	12/19/2019	1.22	\$ 209.88	\$ 256.05	Review drafts for filing tmrw	Pleadings
Rebecca Scholtz	12/20/2019	1.20	\$ 209.88	\$ 251.86	TC team	Case development
Rebecca Scholtz	12/20/2019	3.70	\$ 209.88	\$ 776.56	Amended complaint	Pleadings
Rebecca Scholtz	1/6/2020	0.67	\$ 211.99	\$ 142.03	TC co-counsel team	Case development
Rebecca Scholtz	1/8/2020	1.35	\$ 211.99	\$ 286.19	Review gov't MTD amended complaint	Motions practice
Rebecca Scholtz	1/8/2020	0.60	\$ 211.99	\$ 127.19	TC K. DeJong re extension mtn	Motions practice
Michelle Mendez	1/10/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel team	Case development
Rebecca Scholtz	1/14/2020	1.00	\$ 211.99	\$ 211.99	TC co-counsel team	Case development
Michelle Mendez	1/15/2020	0.43	\$ 377.00	\$ 162.11	Call with named plaintiff's immigration counsel	Case development
Rebecca Scholtz	1/15/2020	2.60	\$ 211.99	\$ 551.17	Opposition to second MTD	Motions practice
Rebecca Scholtz	1/15/2020	0.43	\$ 211.99	\$ 91.16	TC with previous declarant	Motions practice
Rebecca Scholtz	1/16/2020	0.33	\$ 211.99	\$ 69.96	TC K. Jackson re opposition to second MTD	Motions practice
Rebecca Scholtz	1/17/2020	0.32	\$ 211.99	\$ 67.84	TC K. Jackson	Case development
Rebecca Scholtz	1/17/2020	3.07	\$ 211.99	\$ 650.81	Opposition to second MTD	Motions practice
Rebecca Scholtz	1/18/2020	4.15	\$ 211.99	\$ 879.76	Opposition to second MTD	Motions practice
Rebecca Scholtz	1/19/2020	0.42	\$ 211.99	\$ 89.04	Opposition to second MTD	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	1/19/2020	0.50	\$ 211.99	\$ 106.00	Opposition to second MTD, call with K. Jackson	Motions practice
Rebecca Scholtz	1/21/2020	0.78	\$ 211.99	\$ 165.35	Review opposition to second MTD	Motions practice
Rebecca Scholtz	1/22/2020	0.42	\$ 211.99	\$ 89.04	TC co-counsel team	Case development
Rebecca Scholtz	1/24/2020	2.12	\$ 211.99	\$ 449.42	Review opposition and reply	Motions practice
Michelle Mendez	1/31/2020	0.32	\$ 377.00	\$ 120.64	Email to co-counsel re Legal Aid Society (LAS) case and review of decision	Case development
Michelle Mendez	2/3/2020	0.73	\$ 377.00	\$ 275.21	TC co-counsel team	Case development
Rebecca Scholtz	2/3/2020	0.50	\$ 211.99	\$ 106.00	Enforcement issue	Class counsel duties
Rebecca Scholtz	2/10/2020	0.50	\$ 211.99	\$ 106.00	TC co-counsel team	Case development
Rebecca Scholtz	2/10/2020	0.42	\$ 211.99	\$ 89.04	Review case law	Case development
Rebecca Scholtz	2/10/2020	0.50	\$ 211.99	\$ 106.00	Review gov't reply iso MTD FAC	Motions practice
Rebecca Scholtz	2/18/2020	0.33	\$ 211.99	\$ 69.96	TC co-counsel team	Case development
Michelle Mendez	2/20/2020	0.45	\$ 377.00	\$ 169.65	Emailed Miguel Mariscal re EDG and co-counsel team	Case development
Michelle Mendez	2/24/2020	0.12	\$ 377.00	\$ 45.24	Email to co-counsel sharing Miguel's communication re OPLA admin closure position	Case development
Rebecca Scholtz	2/28/2020	0.20	\$ 211.99	\$ 42.40	Review notice of supplemental authority	Motions practice
Michelle Mendez	3/6/2020	0.50	\$ 377.00	\$ 188.50	TC co-counsel team	Case development
Rebecca Scholtz	3/10/2020	0.22	\$ 211.99	\$ 46.64	Prepare for court conference	Case development
Michelle Mendez	3/16/2020	0.67	\$ 377.00	\$ 252.59	TC co-counsel team	Case development
Rebecca Scholtz	3/16/2020	1.02	\$ 211.99	\$ 216.23	Prepare for court conference	Case development
Michelle Mendez	3/18/2020	0.85	\$ 377.00	\$ 320.45	Review of brief ISO of class certification motion	Motions practice
Rebecca Scholtz	3/20/2020	0.73	\$ 211.99	\$ 154.75	Review plaintiff declaration	Motions practice
Michelle Mendez	3/23/2020	0.50	\$ 377.00	\$ 188.50	TC co-counsel team	Case development
Rebecca Scholtz	3/23/2020	0.28	\$ 211.99	\$ 59.36	Review co-counsel declaration	Motions practice
Rebecca Scholtz	3/23/2020	0.10	\$ 211.99	\$ 21.20	Review email re enforcement issues	Class counsel duties
Michelle Mendez	3/27/2020	0.77	\$ 377.00	\$ 290.29	Call with plaintiff	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	3/30/2020	0.18	\$ 377.00	\$ 67.86	TC co-counsel team	Case development
Michelle Mendez	4/8/2020	0.17	\$ 377.00	\$ 64.09	Email to Matthew Walter	Case development
Michelle Mendez	4/11/2020	0.58	\$ 377.00	\$ 218.66	Reviewing memo re violations	Class counsel duties
Michelle Mendez	4/13/2020	0.17	\$ 377.00	\$ 64.09	Emailed re confidentiality waiver option	Case development
Michelle Mendez	4/15/2020	0.48	\$ 377.00	\$ 180.96	Call with New Orleans attorney representing putative class member, email to co-counsel	Class counsel duties
Michelle Mendez	4/17/2020	0.97	\$ 377.00	\$ 365.69	TC co-counsel team	Case development
Michelle Mendez	4/17/2020	0.75	\$ 377.00	\$ 282.75	Researching asylum privacy reg in federal litigation	Case development
Michelle Mendez	4/22/2020	0.15	\$ 377.00	\$ 56.55	Email to co-counsel	Case development
Michelle Mendez	4/23/2020	0.35	\$ 377.00	\$ 131.95	Reviewing EID EARM Report from 5/20/2011	Case development
Michelle Mendez	4/23/2020	0.98	\$ 377.00	\$ 369.46	Reviewing updated memo re violations	Class counsel duties
Michelle Mendez	4/24/2020	0.33	\$ 377.00	\$ 124.41	Drafting LAS case description to send to gov't	Class counsel duties
Michelle Mendez	4/28/2020	0.20	\$ 377.00	\$ 75.40	Phone call with New Orleans attorney representing putative class member	Class counsel duties
Michelle Mendez	4/28/2020	0.95	\$ 377.00	\$ 358.15	Phone call with New Orleans attorneys representing putative class member, Email to K. Jackson with case description for class member	Class counsel duties
Michelle Mendez	5/7/2020	0.37	\$ 377.00	\$ 139.49	Review of and email to K. Jackson with feedback on memo re violations	Case development
Michelle Mendez	5/8/2020	0.67	\$ 377.00	\$ 252.59	Phone call with potential declarant	Motions practice
Michelle Mendez	5/8/2020	0.30	\$ 377.00	\$ 113.10	Email to LAS seeking a privacy waiver to co-counsel	Class counsel duties
Michelle Mendez	5/13/2020	0.05	\$ 377.00	\$ 18.85	Email to co-counsel re LAS case	Class counsel duties
Michelle Mendez	5/18/2020	1.47	\$ 377.00	\$ 554.19	Draft declaration	Motions practice
Michelle Mendez	5/28/2020	0.53	\$ 377.00	\$ 199.81	Draft declaration	Motions practice
Michelle Mendez	5/29/2020	0.47	\$ 377.00	\$ 177.19	Draft declaration	Motions practice
Michelle Mendez	6/5/2020	0.60	\$ 377.00	\$ 226.20	Email to K. Jackson re administrative record (AR)	Case development



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	6/5/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel team	Case development
Michelle Mendez	6/8/2020	0.27	\$ 377.00	\$ 101.79	Reading Garcia decision and email to co-counsel	Case development
Michelle Mendez	6/11/2020	0.40	\$ 377.00	\$ 150.80	Email to K. Jackson re class members	Case development
Michelle Mendez	6/13/2020	2.77	\$ 377.00	\$ 1,044.29	Review of Memo ISO Class Cert and review of CRS Report "UAC: An Overview" 10/9/2019	Motions practice
Michelle Mendez	6/13/2020	1.92	\$ 377.00	\$ 723.84	Reviewed class cert motion	Motions practice
Michelle Mendez	6/17/2020	2.50	\$ 377.00	\$ 942.50	Reviewed amended PI	Motions practice
Michelle Mendez	6/21/2020	1.00	\$ 377.00	\$ 377.00	Review gov't answer	Motions practice
Michelle Mendez	6/22/2020	2.18	\$ 377.00	\$ 821.86	Combine first amended complaint with gov't answer	Case development
Michelle Mendez	6/22/2020	2.85	\$ 377.00	\$ 1,074.45	Combined first amended complaint annotated with gov't answer	Case development
Michelle Mendez	6/22/2020	0.38	\$ 377.00	\$ 143.26	Email to co-counsel and review of unpublished BIA decision	Case development
Michelle Mendez	7/1/2020	0.75	\$ 377.00	\$ 282.75	Review of Derek Elder's Declaration and email to K. Jackson	Motions practice
Michelle Mendez	7/2/2020	1.02	\$ 377.00	\$ 384.54	Review of Memo ISO of motion to amend preliminary injunction (MAPI)	Motions practice
Michelle Mendez	7/3/2020	1.37	\$ 377.00	\$ 516.49	Review Ramirez v. USICE and ACHC v Barr filings	Case development
Michelle Mendez	7/6/2020	0.27	\$ 377.00	\$ 101.79	Email to co-counsel re Ramirez v. USICE	Case development
Michelle Mendez	7/7/2020	0.55	\$ 377.00	\$ 207.35	Call with immigration counsel for plaintiff	Case development
Michelle Mendez	7/8/2020	0.15	\$ 377.00	\$ 56.55	Call with plaintiff	Case development
Michelle Mendez	7/20/2020	0.73	\$ 377.00	\$ 275.21	TC co-counsel team	Case development
Michelle Mendez	7/23/2020	1.97	\$ 377.00	\$ 742.69	Review reply to class cert	Motions practice
Michelle Mendez	7/24/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel team	Case development
Michelle Mendez	7/24/2020	0.17	\$ 377.00	\$ 64.09	AR review	Case development
Michelle Mendez	7/25/2020	0.83	\$ 377.00	\$ 312.91	Research on 8 CFR 103.2(b)(16)(i)	Case development
Michelle Mendez	7/26/2020	0.40	\$ 377.00	\$ 150.80	Email to K. Jackson re 8 CFR 103.2(b)(16)(i)	Case development



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	7/27/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel team	Case development
Michelle Mendez	7/27/2020	0.80	\$ 377.00	\$ 301.60	Call with K. Jackson	Case development
Michelle Mendez	7/27/2020	0.55	\$ 377.00	\$ 207.35	Email to co-counsel & org. documents in AR	Case development
Michelle Mendez	7/28/2020	0.13	\$ 377.00	\$ 49.01	Review of protective order (PO)	Motions practice
Michelle Mendez	7/29/2020	4.00	\$ 377.00	\$ 1,508.00	AR review	Case development
Michelle Mendez	7/29/2020	2.03	\$ 377.00	\$ 765.31	AR review	Case development
Michelle Mendez	7/29/2020	1.43	\$ 377.00	\$ 539.11	Created timeline of administrative record and other important events	Case development
Michelle Mendez	7/29/2020	0.23	\$ 377.00	\$ 86.71	Review of MAPI Reply Content	Motions practice
Michelle Mendez	8/1/2020	0.38	\$ 377.00	\$ 143.26	Updated the AR timeline and emailed co-counsel	Case development
Michelle Mendez	8/1/2020	0.50	\$ 377.00	\$ 188.50	Research privilege waiver issue	Case development
Michelle Mendez	8/1/2020	2.82	\$ 377.00	\$ 1,063.14	Review of MAPI reply	Motions practice
Michelle Mendez	8/2/2020	0.13	\$ 377.00	\$ 49.01	Review of group edits to MAPI Reply	Motions practice
Michelle Mendez	8/3/2020	0.47	\$ 377.00	\$ 177.19	Review of letter to A. Loucks re AR	Case development
Michelle Mendez	8/3/2020	1.05	\$ 377.00	\$ 395.85	TC co-counsel team	Case development
Rebecca Scholtz	8/10/2020	0.73	\$ 211.99	\$ 154.75	TC co-counsel team	Case development
Michelle Mendez	8/11/2020	0.62	\$ 377.00	\$ 233.74	Call with K. Jackson re PO	Case development
Michelle Mendez	8/11/2020	0.77	\$ 377.00	\$ 290.29	Call with R. Scholtz re PO	Case development
Michelle Mendez	8/12/2020	0.10	\$ 377.00	\$ 37.70	Email to co-counsel re CAR	Case development
Rebecca Scholtz	8/12/2020	2.18	\$ 211.99	\$ 462.14	Review administrative record	Case development
Michelle Mendez	8/17/2020	0.80	\$ 377.00	\$ 301.60	TC co-counsel team	Case development
Michelle Mendez	8/18/2020	0.25	\$ 377.00	\$ 94.25	Review of gov't response to CAR email	Case development
Rebecca Scholtz	8/18/2020	1.82	\$ 211.99	\$ 385.82	Review A. Loucks response to CAR email; research	Case development
Michelle Mendez	8/24/2020	1.12	\$ 377.00	\$ 422.24	TC co-counsel team	Case development
Rebecca Scholtz	8/25/2020	0.73	\$ 211.99	\$ 154.75	Summary judgment outline	Motions practice
Rebecca Scholtz	8/25/2020	2.18	\$ 211.99	\$ 462.14	Research for summary judgment	Motions practice
Rebecca Scholtz	8/26/2020	1.75	\$ 211.99	\$ 370.98	Research for summary judgment	Motions practice
Rebecca Scholtz	8/26/2020	0.75	\$ 211.99	\$ 158.99	TC K. Jackson re summary judgment	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	8/26/2020	2.00	\$ 211.99	\$ 423.98	Summary judgment outline	Motions practice
Michelle Mendez	8/27/2020	1.00	\$ 377.00	\$ 377.00	Call with M. Tanagho Ross and R. Scholtz	Case development
Michelle Mendez	8/27/2020	0.43	\$ 377.00	\$ 162.11	Updated timeline of administrative record and other important events	Case development
Michelle Mendez	8/27/2020	1.00	\$ 377.00	\$ 377.00	Draft Count II SJ Research	Motions practice
Michelle Mendez	8/27/2020	1.25	\$ 377.00	\$ 471.25	Draft Count II	Motions practice
Rebecca Scholtz	8/27/2020	2.07	\$ 211.99	\$ 438.82	Summary judgment outline	Motions practice
Michelle Mendez	8/28/2020	1.08	\$ 377.00	\$ 407.16	Count II call	Motions practice
Michelle Mendez	8/30/2020	1.30	\$ 377.00	\$ 490.10	Review draft letter to A. Loucks re AR deficiencies	Case development
Michelle Mendez	8/30/2020	2.23	\$ 377.00	\$ 840.71	Count II SJ Research	Motions practice
Michelle Mendez	8/31/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel team	Case development
Rebecca Scholtz	8/31/2020	0.68	\$ 211.99	\$ 144.15	Review letter to A. Loucks re AR deficiencies	Case development
Rebecca Scholtz	9/1/2020	1.00	\$ 211.99	\$ 211.99	Research for summary judgment	Motions practice
Rebecca Scholtz	9/2/2020	0.87	\$ 211.99	\$ 184.43	Review letter to A. Loucks re AR deficiencies	Case development
Rebecca Scholtz	9/2/2020	0.58	\$ 211.99	\$ 122.95	Summary judgment analysis	Motions practice
Rebecca Scholtz	9/2/2020	0.15	\$ 211.99	\$ 31.80	JOP webpage updates	Class counsel duties
Rebecca Scholtz	9/2/2020	0.13	\$ 211.99	\$ 27.56	Email to A. Loucks re PI violations	Class counsel duties
Rebecca Scholtz	9/3/2020	0.17	\$ 211.99	\$ 36.04	Administrative record (AR) emails	Case development
Rebecca Scholtz	9/3/2020	1.42	\$ 211.99	\$ 301.03	Summary judgment analysis	Motions practice
Rebecca Scholtz	9/8/2020	0.83	\$ 211.99	\$ 175.95	TC co-counsel team	Case development
Rebecca Scholtz	9/8/2020	0.50	\$ 211.99	\$ 106.00	Review tracking sheet for potential new plaintiff	Pleadings
Rebecca Scholtz	9/8/2020	1.38	\$ 211.99	\$ 292.55	Research for summary judgment	Motions practice
Rebecca Scholtz	9/10/2020	2.30	\$ 211.99	\$ 487.58	Research for summary judgment	Motions practice
Rebecca Scholtz	9/10/2020	1.43	\$ 211.99	\$ 303.15	Summary judgment analysis	Motions practice
Michelle Mendez	9/11/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel	Case development
Rebecca Scholtz	9/11/2020	1.50	\$ 211.99	\$ 317.99	Summary judgment analysis	Motions practice
Rebecca Scholtz	9/11/2020	1.53	\$ 211.99	\$ 324.34	Outreach to field	Class counsel duties
Michelle Mendez	9/14/2020	1.05	\$ 377.00	\$ 395.85	Review of edits to jurisdictional letter	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	9/14/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel team	Case development
Rebecca Scholtz	9/14/2020	0.25	\$ 211.99	\$ 53.00	Tracking potential PI violations	Class counsel duties
Rebecca Scholtz	9/14/2020	0.38	\$ 211.99	\$ 80.56	Outreach to field	Class counsel duties
Michelle Mendez	9/15/2020	1.05	\$ 377.00	\$ 395.85	Jurisdictional letter	Case development
Rebecca Scholtz	9/16/2020	0.50	\$ 211.99	\$ 106.00	Emails re AR, putative class member issues	Case development
Rebecca Scholtz	9/16/2020	2.25	\$ 211.99	\$ 476.98	Draft outreach materials	Class counsel duties
Michelle Mendez	9/17/2020	0.68	\$ 377.00	\$ 256.36	Email to co-counsel re biometrics proposal rule	Case development
Michelle Mendez	9/17/2020	1.42	\$ 377.00	\$ 535.34	Call with attorney representing putative class member	Class counsel duties
Rebecca Scholtz	9/17/2020	1.50	\$ 211.99	\$ 317.99	Tracking issues encountered by putative class members	Class counsel duties
Michelle Mendez	9/21/2020	1.07	\$ 377.00	\$ 403.39	TC co-counsel team	Case development
Rebecca Scholtz	9/21/2020	0.50	\$ 211.99	\$ 106.00	CAR strategy (response to A. Loucks email)	Case development
Rebecca Scholtz	9/21/2020	0.80	\$ 211.99	\$ 169.59	TC M. Mendez and K. Jackson re amended complaint strategy	Pleadings
Rebecca Scholtz	9/21/2020	0.42	\$ 211.99	\$ 89.04	Tracking issues encountered by putative class members	Class counsel duties
Rebecca Scholtz	9/21/2020	0.57	\$ 211.99	\$ 120.83	Draft guidance for field	Class counsel duties
Rebecca Scholtz	9/22/2020	2.82	\$ 211.99	\$ 597.81	Amended complaint	Pleadings
Michelle Mendez	9/22/2020	0.77	\$ 377.00	\$ 290.29	Review motion for summary judgment (MSJ) outline	Motions practice
Rebecca Scholtz	9/24/2020	0.35	\$ 211.99	\$ 74.20	Amended complaint	Pleadings
Rebecca Scholtz	9/25/2020	0.25	\$ 211.99	\$ 53.00	Amended complaint strategy	Pleadings
Rebecca Scholtz	9/25/2020	1.07	\$ 211.99	\$ 226.83	TC K. Jackson re amended complaint	Pleadings
Michelle Mendez	9/25/2020	0.92	\$ 377.00	\$ 346.84	TC amended complaint	Pleadings
Rebecca Scholtz	9/25/2020	0.42	\$ 211.99	\$ 89.04	Summary judgment outline	Motions practice
Michelle Mendez	9/28/2020	1.33	\$ 377.00	\$ 501.41	TC co-counsel team	Case development
Rebecca Scholtz	9/28/2020	0.23	\$ 211.99	\$ 48.76	Amended complaint strategy	Pleadings
Rebecca Scholtz	9/29/2020	1.13	\$ 211.99	\$ 239.55	Review draft second amended complaint	Pleadings

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	9/29/2020	0.75	\$ 211.99	\$ 158.99	TC K. Jackson re second amended complaint	Pleadings
Rebecca Scholtz	9/30/2020	0.33	\$ 211.99	\$ 69.96	Review draft second amended complaint	Pleadings
Rebecca Scholtz	10/1/2020	0.50	\$ 211.99	\$ 106.00	Complaint	Pleadings
Rebecca Scholtz	10/2/2020	0.50	\$ 211.99	\$ 106.00	TC K. Jackson re second amended complaint	Pleadings
Rebecca Scholtz	10/3/2020	0.58	\$ 211.99	\$ 122.95	Review amended CAR	Case development
Rebecca Scholtz	10/4/2020	0.93	\$ 211.99	\$ 197.15	Review draft second amended complaint	Pleadings
Michelle Mendez	10/5/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel team	Case development
Rebecca Scholtz	10/5/2020	0.67	\$ 211.99	\$ 142.03	Review amended CAR	Case development
Michelle Mendez	10/7/2020	0.88	\$ 377.00	\$ 331.76	Call with Catholic Legal Services Miami	Case development
Michelle Mendez	10/9/2020	1.00	\$ 377.00	\$ 377.00	TC co-counsel team	Case development
Rebecca Scholtz	10/9/2020	1.00	\$ 211.99	\$ 211.99	Review A. Loucks response re PI communications with USCIS	Class counsel duties
Michelle Mendez	10/14/2020	0.75	\$ 377.00	\$ 282.75	TC re second amended complaint (SAC)	Case development
Michelle Mendez	10/15/2020	3.90	\$ 377.00	\$ 1,470.30	Creating AR Deficiencies Chart	Case development
Michelle Mendez	10/16/2020	0.75	\$ 377.00	\$ 282.75	TC co-counsel team	Case development
Michelle Mendez	10/23/2020	0.92	\$ 377.00	\$ 346.84	TC co-counsel team	Case development
Rebecca Scholtz	10/23/2020	0.17	\$ 211.99	\$ 36.04	Review admin record issues	Case development
Michelle Mendez	10/26/2020	0.75	\$ 377.00	\$ 282.75	TC co-counsel team	Case development
Michelle Mendez	11/2/2020	0.83	\$ 377.00	\$ 312.91	TC co-counsel team	Case development
Michelle Mendez	11/30/2020	0.75	\$ 377.00	\$ 282.75	TC co-counsel team	Case development
Michelle Mendez	12/7/2020	0.42	\$ 377.00	\$ 158.34	TC co-counsel team	Case development
Michelle Mendez	12/14/2020	0.25	\$ 377.00	\$ 94.25	TC co-counsel team	Case development
Michelle Mendez	12/21/2020	0.38	\$ 377.00	\$ 143.26	TC co-counsel team	Case development
Michelle Mendez	12/21/2020	1.50	\$ 377.00	\$ 565.50	Read JOP opinion	Case development
Rebecca Scholtz	12/21/2020	0.45	\$ 211.99	\$ 95.40	Read court's opinion on class cert and amended PI	Case development
Rebecca Scholtz	12/23/2020	1.28	\$ 211.99	\$ 271.35	Review draft second amended complaint	Pleadings
Rebecca Scholtz	12/26/2020	0.50	\$ 211.99	\$ 106.00	Review draft second amended complaint	Pleadings
Rebecca Scholtz	12/28/2020	1.00	\$ 211.99	\$ 211.99	TC co-counsel team	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	12/30/2020	0.22	\$ 377.00	\$ 82.94	Email to co-counsel and review of unpub BIA decision	Case development
Rebecca Scholtz	1/3/2021	1.65	\$ 220.76	\$ 364.25	TC K. Jackson re second amended complaint	Pleadings
Rebecca Scholtz	1/3/2021	2.07	\$ 220.76	\$ 456.97	Review draft second amended complaint	Pleadings
Rebecca Scholtz	1/4/2021	1.08	\$ 220.76	\$ 238.42	TC co-counsel team	Case development
Rebecca Scholtz	1/4/2021	1.17	\$ 220.76	\$ 258.29	TC K. Jackson re second amended complaint	Pleadings
Rebecca Scholtz	1/5/2021	0.10	\$ 220.76	\$ 22.08	Review letter to A. Loucks re Dec. 2020 court order	Case development
Michelle Mendez	1/8/2021	0.70	\$ 393.00	\$ 275.10	TC co-counsel team	Case development
Rebecca Scholtz	1/11/2021	0.95	\$ 220.76	\$ 209.72	TC co-counsel team	Case development
Michelle Mendez	1/12/2021	0.50	\$ 393.00	\$ 196.50	TC re NY Call	Case development
Rebecca Scholtz	1/15/2021	1.00	\$ 220.76	\$ 220.76	TC co-counsel team	Case development
Rebecca Scholtz	1/22/2021	0.37	\$ 220.76	\$ 81.68	Response to A. Loucks re compliance with Dec. 2020 order	Case development
Rebecca Scholtz	1/25/2021	0.50	\$ 220.76	\$ 110.38	TC co-counsel team	Case development
Rebecca Scholtz	1/29/2021	0.75	\$ 220.76	\$ 165.57	TC co-counsel team	Case development
Rebecca Scholtz	1/29/2021	0.17	\$ 220.76	\$ 37.53	Review previous settlement documents	ADR
Rebecca Scholtz	1/29/2021	1.00	\$ 220.76	\$ 220.76	TC M. Tanagho Ross and W. Wylegala re settlement proposal	ADR
Rebecca Scholtz	2/1/2021	0.83	\$ 220.76	\$ 183.23	TC co-counsel team	Case development
Rebecca Scholtz	2/1/2021	1.10	\$ 220.76	\$ 242.84	Settlement drafting	ADR
Rebecca Scholtz	2/8/2021	0.75	\$ 220.76	\$ 165.57	TC co-counsel team	Case development
Michelle Mendez	2/12/2021	0.67	\$ 393.00	\$ 263.31	TC co-counsel team	Case development
Rebecca Scholtz	2/16/2021	0.75	\$ 220.76	\$ 165.57	Settlement drafting	ADR
Rebecca Scholtz	2/17/2021	1.50	\$ 220.76	\$ 331.14	Review Defendants' answer	Pleadings
Rebecca Scholtz	2/17/2021	0.45	\$ 220.76	\$ 99.34	Conversation with M. Tanagho Ross and W. Wylegala re settlement proposal	ADR
Rebecca Scholtz	2/17/2021	0.47	\$ 220.76	\$ 103.76	Settlement drafting	ADR
Rebecca Scholtz	2/22/2021	0.60	\$ 220.76	\$ 132.46	TC co-counsel team	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	2/23/2021	0.92	\$ 393.00	\$ 361.56	Reviewing of Settlement Principles and outline of settlement agreement	ADR
Rebecca Scholtz	2/26/2021	0.50	\$ 220.76	\$ 110.38	TC co-counsel team	Case development
Rebecca Scholtz	3/3/2021	0.47	\$ 220.76	\$ 103.76	Draft email to A. Loucks re PI violation	Class counsel duties
Michelle Mendez	3/5/2021	0.77	\$ 393.00	\$ 302.61	TC co-counsel team	Case development
Michelle Mendez	3/10/2021	2.85	\$ 393.00	\$ 1,120.05	Merging SAC Annotated with Gov't Answer	Pleadings
Rebecca Scholtz	3/15/2021	0.33	\$ 220.76	\$ 72.85	TC co-counsel team	Case development
Rebecca Scholtz	4/8/2021	0.63	\$ 220.76	\$ 139.08	Communication with individual class member attys re reported PI violations	Class counsel duties
Rebecca Scholtz	4/9/2021	0.27	\$ 220.76	\$ 59.61	Review settlement proposal	ADR
Michelle Mendez	4/12/2021	1.02	\$ 393.00	\$ 400.86	TC co-counsel team	Case development
Michelle Mendez	4/14/2021	0.50	\$ 393.00	\$ 196.50	Reviewing settlement principles	ADR
Rebecca Scholtz	4/14/2021	0.62	\$ 220.76	\$ 136.87	Work on settlement	ADR
Rebecca Scholtz	4/16/2021	0.67	\$ 220.76	\$ 147.91	TC co-counsel team	ADR
Rebecca Scholtz	4/16/2021	0.43	\$ 220.76	\$ 94.93	Work on settlement	ADR
Rebecca Scholtz	4/19/2021	0.83	\$ 220.76	\$ 183.23	TC co-counsel team	ADR
Michelle Mendez	4/23/2021	0.47	\$ 393.00	\$ 184.71	TC co-counsel team	Case development
Rebecca Scholtz	4/23/2021	0.67	\$ 220.76	\$ 147.91	Work on settlement	ADR
Rebecca Scholtz	4/26/2021	1.17	\$ 220.76	\$ 258.29	Work on settlement	ADR
Rebecca Scholtz	4/27/2021	0.55	\$ 220.76	\$ 121.42	Work on settlement	ADR
Rebecca Scholtz	4/28/2021	0.18	\$ 220.76	\$ 39.74	Email to A. Loucks re PI violation	Class counsel duties
Rebecca Scholtz	4/29/2021	0.15	\$ 220.76	\$ 33.11	Draft email to A. Loucks re settlement	ADR
Rebecca Scholtz	5/3/2021	0.67	\$ 220.76	\$ 147.91	TC co-counsel team	Case development
Michelle Mendez	5/6/2021	0.20	\$ 393.00	\$ 78.60	Call with plaintiff	Case development
Rebecca Scholtz	5/12/2021	0.75	\$ 220.76	\$ 165.57	Research for settlement	ADR
Rebecca Scholtz	5/12/2021	0.93	\$ 220.76	\$ 205.31	JOP settlement strategy call	ADR
Rebecca Scholtz	5/16/2021	0.88	\$ 220.76	\$ 194.27	JOP settlement preparation	ADR
Rebecca Scholtz	5/17/2021	0.35	\$ 220.76	\$ 77.27	Co-counsel team TC re settlement	ADR
Rebecca Scholtz	5/18/2021	0.75	\$ 220.76	\$ 165.57	Co-counsel team TC re settlement	ADR
Rebecca Scholtz	5/19/2021	0.93	\$ 220.76	\$ 205.31	Class member follow up re PI violation issues	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	5/19/2021	0.93	\$ 393.00	\$ 365.49	Reviewing settlement doc	ADR
Rebecca Scholtz	5/19/2021	2.10	\$ 220.76	\$ 463.60	Draft settlement	ADR
Rebecca Scholtz	5/24/2021	0.48	\$ 220.76	\$ 105.96	Settlement preparation	ADR
Rebecca Scholtz	5/24/2021	0.43	\$ 220.76	\$ 94.93	Call re settlement preparation (with M. Tanagho Ross, K. DeJong, W. Wylegala)	ADR
Rebecca Scholtz	6/28/2021	0.38	\$ 220.76	\$ 83.89	TC co-counsel team	Case development
Rebecca Scholtz	7/2/2021	0.33	\$ 220.76	\$ 72.85	TC co-counsel team	Case development
Rebecca Scholtz	7/2/2021	0.50	\$ 220.76	\$ 110.38	Review Defendants' settlement proposal	ADR
Rebecca Scholtz	7/6/2021	1.00	\$ 220.76	\$ 220.76	TC co-counsel team	Case development
Rebecca Scholtz	7/12/2021	0.50	\$ 220.76	\$ 110.38	TC co-counsel team	Case development
Rebecca Scholtz	7/13/2021	0.35	\$ 220.76	\$ 77.27	Settlement proposal	ADR
Rebecca Scholtz	7/20/2021	0.58	\$ 220.76	\$ 128.04	Settlement proposal	ADR
Michelle Mendez	7/23/2021	0.57	\$ 393.00	\$ 224.01	TC co-counsel team	Case development
Michelle Mendez	8/6/2021	0.12	\$ 393.00	\$ 47.16	Reviewing of proposed email to gov't and email to co-counsel	ADR
Rebecca Scholtz	8/14/2021	1.25	\$ 220.76	\$ 275.95	Settlement proposal	ADR
Rebecca Scholtz	8/16/2021	1.15	\$ 220.76	\$ 253.87	TC co-counsel team	Case development
Rebecca Scholtz	8/17/2021	0.38	\$ 220.76	\$ 83.89	Draft settlement response	ADR
Rebecca Scholtz	8/20/2021	1.05	\$ 220.76	\$ 231.80	TC co-counsel team	Case development
Rebecca Scholtz	8/23/2021	1.00	\$ 220.76	\$ 220.76	TC co-counsel team	Case development
Rebecca Scholtz	9/9/2021	1.00	\$ 220.76	\$ 220.76	Review settlement document	ADR
Rebecca Scholtz	9/13/2021	0.50	\$ 220.76	\$ 110.38	TC co-counsel team	Case development
Michelle Mendez	9/20/2021	0.87	\$ 393.00	\$ 341.91	TC co-counsel team	Case development
Rebecca Scholtz	9/21/2021	0.67	\$ 220.76	\$ 147.91	Review settlement draft	ADR
Michelle Mendez	9/27/2021	0.97	\$ 393.00	\$ 381.21	TC co-counsel team	Case development
Rebecca Scholtz	10/5/2021	0.38	\$ 220.76	\$ 83.89	TC co-counsel team	Case development
Michelle Mendez	10/18/2021	0.75	\$ 393.00	\$ 294.75	TC co-counsel team	Case development
Michelle Mendez	11/15/2021	0.10	\$ 393.00	\$ 39.30	TC co-counsel team	Case development
Rebecca Scholtz	11/23/2021	0.93	\$ 220.76	\$ 205.31	Review Defendants' settlement proposal	ADR
Rebecca Scholtz	11/24/2021	0.83	\$ 220.76	\$ 183.23	TC re Defendants' settlement proposal	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	11/24/2021	1.17	\$ 220.76	\$ 258.29	Annotate settlement proposal	ADR
Michelle Mendez	11/29/2021	0.78	\$ 393.00	\$ 306.54	TC co-counsel team	Case development
Michelle Mendez	12/6/2021	1.07	\$ 393.00	\$ 420.51	TC co-counsel team	Case development
Rebecca Scholtz	12/13/2021	0.50	\$ 220.76	\$ 110.38	TC co-counsel team	Case development
Rebecca Scholtz	12/13/2021	0.17	\$ 220.76	\$ 37.53	Review gov't correspondence re settlement	ADR
Rebecca Scholtz	12/14/2021	1.47	\$ 220.76	\$ 324.52	Edit settlement draft	ADR
Rebecca Scholtz	12/16/2021	1.00	\$ 220.76	\$ 220.76	TC re K. Jackson settlement document	ADR
Rebecca Scholtz	12/20/2021	0.80	\$ 220.76	\$ 176.61	TC co-counsel team	Case development
Rebecca Scholtz	12/20/2021	0.62	\$ 220.76	\$ 136.87	Draft summary re class member issue	Class counsel duties
Rebecca Scholtz	12/20/2021	0.28	\$ 220.76	\$ 61.81	TC M. Mendez class member case	Class counsel duties
Rebecca Scholtz	12/22/2021	1.00	\$ 220.76	\$ 220.76	Review draft settlement agreement	ADR
Michelle Mendez	12/23/2021	0.48	\$ 393.00	\$ 188.64	Call with plaintiff	Case development
Rebecca Scholtz	12/23/2021	0.92	\$ 220.76	\$ 203.10	Follow up with class member's counsel	Class counsel duties
Michelle Mendez	1/3/2022	0.62	\$ 429.00	\$ 265.98	TC co-counsel team	Case development
Rebecca Scholtz	1/5/2022	0.50	\$ 240.89	\$ 120.45	Research re mediation	ADR
Rebecca Scholtz	1/5/2022	0.17	\$ 240.89	\$ 40.95	TC with attorney with experience re mediation program considerations	ADR
Rebecca Scholtz	1/5/2022	0.20	\$ 240.89	\$ 48.18	Email to team re mediation	ADR
Rebecca Scholtz	1/6/2022	0.50	\$ 240.89	\$ 120.45	TC with attorney with experience re mediation program considerations	ADR
Rebecca Scholtz	1/6/2022	0.50	\$ 240.89	\$ 120.45	Email to team re mediation	ADR
Rebecca Scholtz	1/7/2022	0.75	\$ 240.89	\$ 180.67	TC co-counsel team	Case development
Rebecca Scholtz	1/7/2022	0.25	\$ 240.89	\$ 60.22	Follow up correspondence with class member attorney	Class counsel duties
Michelle Mendez	1/8/2022	1.72	\$ 429.00	\$ 737.88	Review of proposed settlement agreement	Case development
Michelle Mendez	1/9/2022	0.35	\$ 429.00	\$ 150.15	Finish review of proposed settlement agreement and Federal Rules of Civ pro	ADR
Rebecca Scholtz	1/19/2022	1.07	\$ 240.89	\$ 257.75	TC with co-counsel team re settlement	ADR
Rebecca Scholtz	1/20/2022	0.17	\$ 240.89	\$ 40.95	Review settlement proposal	ADR
Michelle Mendez	1/21/2022	0.52	\$ 429.00	\$ 223.08	TC settlement agreement draft	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	1/21/2022	0.33	\$ 240.89	\$ 79.49	Review draft settlement agreement	ADR
Michelle Mendez	1/24/2022	0.42	\$ 429.00	\$ 180.18	Reviewing Mendez-Rojas template	Class counsel duties
Rebecca Scholtz	1/25/2022	2.00	\$ 240.89	\$ 481.78	Annotate settlement draft	ADR
Rebecca Scholtz	1/25/2022	1.03	\$ 240.89	\$ 248.12	Research re settlement	ADR
Rebecca Scholtz	1/26/2022	1.07	\$ 240.89	\$ 257.75	Revise settlement draft	ADR
Michelle Mendez	1/28/2022	0.40	\$ 429.00	\$ 171.60	Drafting email to team re case interventions	Class counsel duties
Rebecca Scholtz	1/28/2022	0.75	\$ 240.89	\$ 180.67	TC co-counsel team, K. Jackson re settlement	ADR
Rebecca Scholtz	1/31/2022	0.18	\$ 240.89	\$ 43.36	Review draft settlement	ADR
Rebecca Scholtz	2/1/2022	0.25	\$ 240.89	\$ 60.22	Review draft settlement	ADR
Michelle Mendez	2/3/2022	0.83	\$ 429.00	\$ 356.07	Review of Mendez Rojas Practice Alert	Class counsel duties
Michelle Mendez	2/4/2022	0.75	\$ 429.00	\$ 321.75	Review of color-coded settlement agreement draft and TC (11:59-11:30)	ADR
Rebecca Scholtz	2/4/2022	0.50	\$ 240.89	\$ 120.45	TC co-counsel team re settlement/mediation	ADR
Rebecca Scholtz	2/9/2022	0.62	\$ 240.89	\$ 149.35	Review case materials for class member who sent inquiry	Class counsel duties
Michelle Mendez	2/10/2022	0.57	\$ 429.00	\$ 244.53	Call with attorney re her JOP class member case before the CA9	Class counsel duties
Michelle Mendez	2/11/2022	0.15	\$ 429.00	\$ 64.35	Review email re Mendez Rojas distribution and respond with feedback	Class counsel duties
Rebecca Scholtz	2/11/2022	0.58	\$ 240.89	\$ 139.72	TC K. Jackson re ex parte letter for Magistrate	ADR
Rebecca Scholtz	2/14/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team re ex parte letter for Magistrate	ADR
Rebecca Scholtz	2/14/2022	0.25	\$ 240.89	\$ 60.22	Ex parte letter planning	ADR
Michelle Mendez	2/15/2022	0.20	\$ 429.00	\$ 85.80	Answer Goodwin pro bono team questions re PD process for class member	Class counsel duties
Rebecca Scholtz	2/15/2022	0.50	\$ 240.89	\$ 120.45	TC K. Jackson re settlement strategy	ADR
Rebecca Scholtz	2/18/2022	0.62	\$ 240.89	\$ 149.35	Team TC re ex parte letter	ADR
Rebecca Scholtz	2/23/2022	3.43	\$ 240.89	\$ 826.25	Draft ex parte letter	ADR
Michelle Mendez	2/24/2022	1.30	\$ 429.00	\$ 557.70	Review of facts section for ex-parte settlement letter	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	2/24/2022	2.00	\$ 240.89	\$ 481.78	Draft ex parte letter	ADR
Michelle Mendez	2/25/2022	0.47	\$ 429.00	\$ 201.63	Email attorney re class member case at CA9	Class counsel duties
Michelle Mendez	2/25/2022	0.77	\$ 429.00	\$ 330.33	TC co-counsel team	ADR
Rebecca Scholtz	2/25/2022	2.25	\$ 240.89	\$ 542.00	Draft ex parte letter	ADR
Michelle Mendez	3/1/2022	0.50	\$ 429.00	\$ 214.50	Provided sample paragraph to Kevin D. for ex parte letter	ADR
Michelle Mendez	3/3/2022	1.48	\$ 429.00	\$ 634.92	Review of ex-parte letter	ADR
Rebecca Scholtz	3/3/2022	1.67	\$ 240.89	\$ 402.29	Edit ex parte letter	ADR
Rebecca Scholtz	3/4/2022	0.95	\$ 240.89	\$ 228.85	Team TC re ex parte letter	ADR
Rebecca Scholtz	3/7/2022	0.65	\$ 240.89	\$ 156.58	Review ex parte letter	ADR
Michelle Mendez	3/8/2022	0.23	\$ 429.00	\$ 98.67	Email attorney re class member case at CA9	Class counsel duties
Michelle Mendez	3/11/2022	0.15	\$ 429.00	\$ 64.35	Email attorney re class member case at CA9	Class counsel duties
Rebecca Scholtz	3/14/2022	0.50	\$ 240.89	\$ 120.45	TC co-counsel team	Case development
Rebecca Scholtz	3/17/2022	1.05	\$ 240.89	\$ 252.93	Review Defendants' redline of settlement agreement	ADR
Michelle Mendez	3/18/2022	0.70	\$ 429.00	\$ 300.30	Team TC re mediation process	ADR
Michelle Mendez	3/19/2022	0.92	\$ 429.00	\$ 394.68	Call with plaintiff re settlement	ADR
Rebecca Scholtz	3/21/2022	0.87	\$ 240.89	\$ 209.57	Review supplemental ex parte letter	ADR
Rebecca Scholtz	3/21/2022	0.98	\$ 240.89	\$ 236.07	Team TC re supplemental mediation statement	ADR
Rebecca Scholtz	3/24/2022	0.33	\$ 240.89	\$ 79.49	Settlement planning, communications with class member attorney who reached out	ADR
Rebecca Scholtz	3/25/2022	1.00	\$ 240.89	\$ 240.89	Team TC re mediation talking points; TC with K. Jackson re settlement draft	ADR
Rebecca Scholtz	3/26/2022	0.70	\$ 240.89	\$ 168.62	Mediation prep	ADR
Rebecca Scholtz	3/28/2022	0.42	\$ 240.89	\$ 101.17	TC class member attorney	Class counsel duties
Rebecca Scholtz	3/28/2022	2.28	\$ 240.89	\$ 549.23	Talking points re mediation issues	ADR
Rebecca Scholtz	3/28/2022	1.08	\$ 240.89	\$ 260.16	Team TC re mediation talking points	ADR
Michelle Mendez	3/30/2022	0.52	\$ 429.00	\$ 223.08	Review talking points re mediation issues	ADR
Michelle Mendez	4/1/2022	0.18	\$ 429.00	\$ 77.22	Team TC re mediation process	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	4/4/2022	1.00	\$ 429.00	\$ 429.00	Team TC	Case development
Rebecca Scholtz	4/4/2022	0.20	\$ 240.89	\$ 48.18	Review talking points for mediation	ADR
Rebecca Scholtz	4/4/2022	0.45	\$ 240.89	\$ 108.40	Talking points re mediation issues	ADR
Rebecca Scholtz	4/4/2022	0.42	\$ 240.89	\$ 101.17	Review and annotate settlement draft	ADR
Rebecca Scholtz	4/6/2022	0.33	\$ 240.89	\$ 79.49	Prepare for mediation conference	ADR
Rebecca Scholtz	4/6/2022	1.05	\$ 240.89	\$ 252.93	Participate in mediation phone conference	ADR
Rebecca Scholtz	4/6/2022	0.42	\$ 240.89	\$ 101.17	Co-counsel team debrief re mediation	ADR
Rebecca Scholtz	4/7/2022	0.32	\$ 240.89	\$ 77.08	TC K. Jackson re mediation	ADR
Michelle Mendez	4/8/2022	0.55	\$ 429.00	\$ 235.95	Team TC	Case development
Rebecca Scholtz	4/8/2022	0.50	\$ 240.89	\$ 120.45	Communication with class members	Class counsel duties
Rebecca Scholtz	4/8/2022	0.37	\$ 240.89	\$ 89.13	Revise settlement draft	ADR
Rebecca Scholtz	4/11/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Michelle Mendez	4/11/2022	0.72	\$ 429.00	\$ 308.88	Suggest order to present talking points on mediation	ADR
Rebecca Scholtz	4/18/2022	0.25	\$ 240.89	\$ 60.22	TC co-counsel team	Case development
Rebecca Scholtz	4/19/2022	0.18	\$ 240.89	\$ 43.36	Mediation planning	ADR
Rebecca Scholtz	4/25/2022	0.50	\$ 240.89	\$ 120.45	TC co-counsel team	Case development
Rebecca Scholtz	4/26/2022	0.20	\$ 240.89	\$ 48.18	Mediation planning	ADR
Rebecca Scholtz	4/28/2022	0.33	\$ 240.89	\$ 79.49	Phone call with class member attorney re JOP case	Class counsel duties
Michelle Mendez	5/2/2022	0.62	\$ 429.00	\$ 265.98	TC co-counsel team	Case development
Michelle Mendez	5/6/2022	0.68	\$ 429.00	\$ 291.72	TC co-counsel team	Case development
Rebecca Scholtz	5/9/2022	0.13	\$ 240.89	\$ 31.32	Review materials from class member atty re PI violation	Class counsel duties
Michelle Mendez	5/9/2022	0.92	\$ 429.00	\$ 394.68	TC co-counsel team	Case development
Michelle Mendez	5/9/2022	0.17	\$ 429.00	\$ 72.93	Review JOP landing page content	Class counsel duties
Rebecca Scholtz	5/13/2022	1.33	\$ 240.89	\$ 320.38	Mediation preparation	ADR
Michelle Mendez	5/13/2022	1.63	\$ 429.00	\$ 699.27	TC co-counsel team (1.6 Kris)	Case development
Michelle Mendez	5/13/2022	1.33	\$ 429.00	\$ 570.57	Mediation preparation	ADR
Rebecca Scholtz	5/15/2022	1.66	\$ 240.89	\$ 399.88	Mediation preparation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	5/15/2022	1.30	\$ 429.00	\$ 557.70	Mediation preparation	ADR
Rebecca Scholtz	5/16/2022	7.50	\$ 240.89	\$ 1,806.68	Mediation with defendants	ADR
Michelle Mendez	5/16/2022	0.50	\$ 429.00	\$ 214.50	Mediation preparation	ADR
Michelle Mendez	5/16/2022	0.25	\$ 429.00	\$ 107.25	Team pre mediation mtg	ADR
Michelle Mendez	5/16/2022	7.50	\$ 429.00	\$ 3,217.50	Mediation with defendants (minus 40 min break)	ADR
Michelle Mendez	5/16/2022	0.37	\$ 429.00	\$ 158.73	Team debrief call	ADR
Rebecca Scholtz	5/17/2022	0.58	\$ 240.89	\$ 139.72	Edit settlement agreement in light of mediation conference	ADR
Michelle Mendez	5/19/2022	0.75	\$ 429.00	\$ 321.75	Review agreement	ADR
Rebecca Scholtz	5/20/2022	0.17	\$ 240.89	\$ 40.95	Review revised settlement agreement	ADR
Rebecca Scholtz	5/20/2022	0.30	\$ 240.89	\$ 72.27	Review agreement	ADR
Michelle Mendez	5/20/2022	0.67	\$ 429.00	\$ 287.43	TC Co-counsel team	Case development
Michelle Mendez	5/23/2022	0.27	\$ 429.00	\$ 115.83	TC co-counsel team	Case development
Rebecca Scholtz	5/24/2022	0.17	\$ 240.89	\$ 40.95	Communication re individual plaintiff	Case development
Rebecca Scholtz	5/24/2022	0.17	\$ 240.89	\$ 40.95	Review draft JSR for magistrate	ADR
Michelle Mendez	5/25/2022	0.18	\$ 429.00	\$ 77.22	Response to class member query	Class counsel duties
Rebecca Scholtz	5/27/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Rebecca Scholtz	5/27/2022	0.28	\$ 240.89	\$ 67.45	TC K. Jackson re mediation strategy	ADR
Michelle Mendez	5/27/2022	0.65	\$ 429.00	\$ 278.85	Review of JOP email alert	Class counsel duties
Rebecca Scholtz	5/31/2022	0.50	\$ 240.89	\$ 120.45	Mediation preparation	ADR
Rebecca Scholtz	5/31/2022	0.25	\$ 240.89	\$ 60.22	Response to class member query	Class counsel duties
Michelle Mendez	5/31/2022	0.15	\$ 429.00	\$ 64.35	Review of JOP email alert	Class counsel duties
Michelle Mendez	5/31/2022	1.00	\$ 429.00	\$ 429.00	TC Co-counsel team	Case development
Rebecca Scholtz	6/3/2022	0.75	\$ 240.89	\$ 180.67	TC co-counsel team	Case development
Rebecca Scholtz	6/6/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Michelle Mendez	6/6/2022	0.07	\$ 429.00	\$ 30.03	Shared email reminder re JOP and PD intersection with the field	Class counsel duties
Michelle Mendez	6/9/2022	0.15	\$ 429.00	\$ 64.35	Response to class member query	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	6/9/2022	0.33	\$ 429.00	\$ 141.57	Response to class member query (emails with co-counsel and to requestor)	Class counsel duties
Rebecca Scholtz	6/10/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Michelle Mendez	6/13/2022	1.00	\$ 429.00	\$ 429.00	TC Co-counsel team	Case development
Rebecca Scholtz	6/18/2022	1.68	\$ 240.89	\$ 404.70	Prep for 6.21.2022 mediation	ADR
Rebecca Scholtz	6/19/2022	0.83	\$ 240.89	\$ 199.94	Prep for 6.21.2022 mediation	ADR
Rebecca Scholtz	6/19/2022	0.75	\$ 240.89	\$ 180.67	Research	Case development
Michelle Mendez	6/20/2022	0.65	\$ 429.00	\$ 278.85	TC Co-counsel team	Case development
Rebecca Scholtz	6/21/2022	0.30	\$ 240.89	\$ 72.27	TC with AUSAs	ADR
Rebecca Scholtz	6/21/2022	0.32	\$ 240.89	\$ 77.08	Compose and send email to co-counsel team	Case development
Rebecca Scholtz	6/22/2022	0.17	\$ 240.89	\$ 40.95	Respond to class member query	Class counsel duties
Michelle Mendez	6/22/2022	0.15	\$ 429.00	\$ 64.35	Email to co-counsel re class member query	Class counsel duties
Michelle Mendez	6/26/2022	0.07	\$ 429.00	\$ 30.03	Follow up to class member inquiry	Class counsel duties
Michelle Mendez	6/27/2022	0.58	\$ 429.00	\$ 248.82	TC Co-counsel team	Case development
Michelle Mendez	6/30/2022	0.20	\$ 429.00	\$ 85.80	Follow up to class member inquiry	Class counsel duties
Rebecca Scholtz	7/1/2022	0.50	\$ 240.89	\$ 120.45	TC with K. Jackson and M. Mendez	Case development
Michelle Mendez	7/1/2022	0.45	\$ 429.00	\$ 193.05	Prep for Zoom Mediation Session on 7/12	ADR
Michelle Mendez	7/5/2022	0.40	\$ 429.00	\$ 171.60	Telephone call (TC) with KIND	Case development
Rebecca Scholtz	7/8/2022	0.50	\$ 240.89	\$ 120.45	Review Defendants' redlined agreement	ADR
Rebecca Scholtz	7/9/2022	0.70	\$ 240.89	\$ 168.62	Review Defendants' redlined agreement	ADR
Rebecca Scholtz	7/9/2022	0.90	\$ 240.89	\$ 216.80	TC K. Jackson	Case development
Rebecca Scholtz	7/9/2022	0.70	\$ 240.89	\$ 168.62	Update talking points document in light of Defendants' redline	ADR
Michelle Mendez	7/10/2022	0.25	\$ 429.00	\$ 107.25	Prep for Zoom Mediation Session on 7/12	ADR
Rebecca Scholtz	7/11/2022	0.70	\$ 240.89	\$ 168.62	TC co-counsel team to prep for mediation session	ADR
Rebecca Scholtz	7/11/2022	4.00	\$ 240.89	\$ 963.56	Mediation session	ADR
Rebecca Scholtz	7/11/2022	0.10	\$ 240.89	\$ 24.09	Co counsel meeting to debrief mediation session	ADR
Victoria Neilson	7/11/2022	3.75	\$ 240.89	\$ 903.34	TC co-counsel team; JOP mediation	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	7/12/2022	0.70	\$ 240.89	\$ 168.62	TC co-counsel team to prep for mediation session	ADR
Rebecca Scholtz	7/12/2022	4.20	\$ 240.89	\$ 1,011.74	Mediation session	ADR
Rebecca Scholtz	7/12/2022	0.30	\$ 240.89	\$ 72.27	Co counsel meeting to debrief mediation session	ADR
Michelle Mendez	7/12/2022	4.25	\$ 429.00	\$ 1,823.25	Zoom Mediation Session	ADR
Victoria Neilson	7/12/2022	4.75	\$ 240.89	\$ 1,144.23	Review docs; TC co-counsel team; JOP mediation	ADR
Rebecca Scholtz	7/13/2022	1.00	\$ 240.89	\$ 240.89	Revise settlement draft in light of 7/11 and 7/12 mediation sessions	ADR
Rebecca Scholtz	7/14/2022	0.80	\$ 240.89	\$ 192.71	TC K. Jackson re settlement agreement	ADR
Michelle Mendez	7/14/2022	0.25	\$ 429.00	\$ 107.25	Review of and edits to email to counsel of class member with removal order and case before BIA	Class counsel duties
Victoria Neilson	7/18/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Michelle Mendez	7/19/2022	0.17	\$ 429.00	\$ 72.93	Review of MA ACLU FOIA disclosures-- OPLA guidance	ADR
Rebecca Scholtz	7/20/2022	1.20	\$ 240.89	\$ 289.07	Preparation for August 2022 mediation conference	ADR
Victoria Neilson	7/25/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Rebecca Scholtz	7/28/2022	0.30	\$ 240.89	\$ 72.27	Review revised agreement sent from Ds	ADR
Victoria Neilson	7/28/2022	1.00	\$ 240.89	\$ 240.89	NIPNLG counsel call re background on case and disputed issues for mediation	ADR
Rebecca Scholtz	7/29/2022	0.50	\$ 240.89	\$ 120.45	Review revised agreement sent from Ds	ADR
Rebecca Scholtz	7/29/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Rebecca Scholtz	7/29/2022	0.20	\$ 240.89	\$ 48.18	Draft/edit revised agreement language	ADR
Michelle Mendez	7/29/2022	0.33	\$ 429.00	\$ 141.57	Review of D's edits to the settlement agreement draft and email to KJ and RS	ADR
Amber Qureshi	7/29/2022	1.00	\$ 240.89	\$ 240.89	Review settlement docs	ADR
Rebecca Scholtz	7/30/2022	0.50	\$ 240.89	\$ 120.45	TC with K. Jackson re settlement draft	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	7/30/2022	1.30	\$ 240.89	\$ 313.16	Draft/edit revised agreement language	ADR
Rebecca Scholtz	7/31/2022	1.00	\$ 240.89	\$ 240.89	TC with K. Jackson re settlement draft	ADR
Victoria Neilson	8/1/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Amber Qureshi	8/1/2022	0.50	\$ 240.89	\$ 120.45	Review settlement docs	ADR
Rebecca Scholtz	8/2/2022	0.90	\$ 240.89	\$ 216.80	Draft/edit revised agreement language	ADR
Michelle Mendez	8/2/2022	0.25	\$ 429.00	\$ 107.25	Review of CIJ Tracy Short's email "Taking Cases Off Calendar Pursuant to 8" C.F.R. § 1003.9(b)	Class counsel duties
Victoria Neilson	8/2/2022	1.00	\$ 240.89	\$ 240.89	NIPNLG counsel call re background on case and disputed issues for mediation	ADR
Rebecca Scholtz	8/4/2022	0.50	\$ 240.89	\$ 120.45	Draft/edit revised agreement language	ADR
Rebecca Scholtz	8/5/2022	0.20	\$ 240.89	\$ 48.18	Email response to query re class member issue re jxdn	Class counsel duties
Rebecca Scholtz	8/5/2022	0.30	\$ 240.89	\$ 72.27	Draft/edit revised agreement language	ADR
Michelle Mendez	8/5/2022	1.00	\$ 429.00	\$ 429.00	Team Call	Case development
Michelle Mendez	8/5/2022	0.22	\$ 429.00	\$ 94.38	Email to team re OPLA waiting to file the NTA with EOIR after the youth turns 18 years old	Class counsel duties
Michelle Mendez	8/8/2022	1.13	\$ 429.00	\$ 484.77	Team call and sharing notes	Case development
Michelle Mendez	8/15/2022	0.10	\$ 429.00	\$ 42.90	Review of revised agenda for mediation	ADR
Michelle Mendez	8/15/2022	1.00	\$ 429.00	\$ 429.00	Team Call	Case development
Michelle Mendez	8/18/2022	0.20	\$ 429.00	\$ 85.80	Proposed email to opposing counsel re sharing of class member removal proceedings info	Class counsel duties
Victoria Neilson	8/19/2022	2.00	\$ 240.89	\$ 481.78	Review settlement doc; TC co-counsel team	ADR
Michelle Mendez	8/22/2022	0.50	\$ 429.00	\$ 214.50	Prep	ADR
Victoria Neilson	8/22/2022	1.50	\$ 240.89	\$ 361.34	Review edits to settlement doc; TC co-counsel team	ADR
Michelle Mendez	8/23/2022	0.17	\$ 429.00	\$ 72.93	Review of email to opposing counsel re correspondence from Allen Loucks in 8/2019	ADR
Victoria Neilson	8/23/2022	3.75	\$ 240.89	\$ 903.34	TC co-counsel team; JOP mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Victoria Neilson	8/24/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel team	Case development
Michelle Mendez	8/25/2022	0.10	\$ 429.00	\$ 42.90	Shared JOP factsheet with listserv following query	Class counsel duties
Victoria Neilson	8/25/2022	3.75	\$ 240.89	\$ 903.34	TC co-counsel team; JOP mediation	ADR
Amber Qureshi	8/31/2022	0.90	\$ 240.89	\$ 216.80	Review settlement notes & draft agreement	ADR
Victoria Neilson	9/1/2022	1.50	\$ 240.89	\$ 361.34	Review edits to settlement doc; TC co-counsel team	ADR
Michelle Mendez	9/2/2022	0.33	\$ 429.00	\$ 141.57	Review of draft settlement agreement updates post mediation	ADR
Victoria Neilson	9/12/2022	1.00	\$ 240.89	\$ 240.89	TC co-counsel call	Case development
Amber Qureshi	9/12/2022	0.30	\$ 240.89	\$ 72.27	Review settlement agreement language	ADR
Amber Qureshi	9/16/2022	0.50	\$ 240.89	\$ 120.45	Feedback on settlement doc	ADR
Victoria Neilson	9/19/2022	0.50	\$ 240.89	\$ 120.45	JOP review revised settlement proposals.	ADR
Amber Qureshi	9/23/2022	0.20	\$ 240.89	\$ 48.18	Review edits to settlement doc	ADR
Victoria Neilson	9/26/2022	1.50	\$ 240.89	\$ 361.34	Review edits to settlement doc; TC co-counsel team	ADR
Victoria Neilson	10/17/2022	0.25	\$ 240.89	\$ 60.22	TC co-counsel team	Case development
Victoria Neilson	10/20/2022	2.00	\$ 240.89	\$ 481.78	Review docs for mediation	ADR
Victoria Neilson	10/20/2022	1.00	\$ 240.89	\$ 240.89	Counsel TC	Case development
Victoria Neilson	10/20/2022	2.00	\$ 240.89	\$ 481.78	Mediation with government	ADR
Victoria Neilson	10/20/2022	0.50	\$ 240.89	\$ 120.45	Counsel TC	Case development
Victoria Neilson	10/21/2022	1.00	\$ 240.89	\$ 240.89	Counsel TC	Case development
Victoria Neilson	10/24/2022	0.25	\$ 240.89	\$ 60.22	Review Kris's proposed changes	Case development
Victoria Neilson	10/24/2022	1.00	\$ 240.89	\$ 240.89	Counsel TC	Case development
Victoria Neilson	10/25/2022	0.50	\$ 240.89	\$ 120.45	Counsel TC	Case development
Victoria Neilson	10/25/2022	3.00	\$ 240.89	\$ 722.67	Mediation with government	ADR
Amber Qureshi	10/25/2022	0.60	\$ 240.89	\$ 144.53	Review docs for mediation	ADR
Amber Qureshi	10/25/2022	2.60	\$ 240.89	\$ 626.31	Mediation with government	ADR
Victoria Neilson	10/31/2022	1.00	\$ 240.89	\$ 240.89	Counsel TC	Case development
Victoria Neilson	11/14/2022	0.50	\$ 240.89	\$ 120.45	Review edits to settlement doc	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Victoria Neilson	11/14/2022	1.00	\$ 240.89	\$ 240.89	Counsel TC	Case development
Amber Qureshi	11/14/2022	0.30	\$ 240.89	\$ 72.27	Review settlement docs	ADR
Victoria Neilson	11/21/2022	0.50	\$ 240.89	\$ 120.45	Counsel TC	Case development
Victoria Neilson	12/9/2022	0.50	\$ 240.89	\$ 120.45	Review settlement docs	ADR
Victoria Neilson	12/9/2022	0.40	\$ 240.89	\$ 96.36	Counsel TC	Case development
Victoria Neilson	12/12/2022	0.25	\$ 240.89	\$ 60.22	Review docs for mediation	ADR
Victoria Neilson	12/12/2022	0.50	\$ 240.89	\$ 120.45	Counsel TC	Case development
Victoria Neilson	12/13/2022	0.50	\$ 240.89	\$ 120.45	Counsel TC	Case development
Victoria Neilson	12/19/2022	0.25	\$ 240.89	\$ 60.22	Counsel TC	Case development
Victoria Neilson	12/20/2022	0.25	\$ 240.89	\$ 60.22	Counsel emails re class member	Case development
Michelle Mendez	1/9/2023	0.25	\$ 540.00	\$ 135.00	Review filings in class member's case	Class counsel duties
Michelle Mendez	1/9/2023	0.70	\$ 540.00	\$ 378.00	TC co-counsel team	Case development
Michelle Mendez	1/12/2023	0.12	\$ 540.00	\$ 64.80	Email to counsel of class member with case at CA9	Class counsel duties
Rebecca Scholtz	1/23/2023	0.90	\$ 250.01	\$ 225.01	TC co-counsel team	Case development
Rebecca Scholtz	1/25/2023	0.20	\$ 250.01	\$ 50.00	Review class member case	Class counsel duties
Rebecca Scholtz	1/25/2023	1.00	\$ 250.01	\$ 250.01	Review settlement draft	ADR
Rebecca Scholtz	1/27/2023	1.25	\$ 250.01	\$ 312.51	TC K. Jackson re settlement	ADR
Rebecca Scholtz	1/30/2023	0.90	\$ 250.01	\$ 225.01	NIPNLG counsel meeting re settlement	Case development
Michelle Mendez	1/30/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Michelle Mendez	2/1/2023	0.58	\$ 540.00	\$ 313.20	Review of case materials and email to team re class members facing imminent removal	Class counsel duties
Rebecca Scholtz	2/3/2023	0.50	\$ 250.01	\$ 125.01	TC K. Jackson re settlement	ADR
Rebecca Scholtz	2/6/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Michelle Mendez	2/6/2023	0.23	\$ 540.00	\$ 124.20	Email to opposing counsel re PI violation	Class counsel duties
Michelle Mendez	2/7/2023	0.18	\$ 540.00	\$ 97.20	Draft and share with team proposed email response to inquiry on a listserv re JOP	Class counsel duties
Michelle Mendez	2/8/2023	0.02	\$ 540.00	\$ 10.80	Send email in response to inquiry on a listserv re JOP	Class counsel duties
Rebecca Scholtz	2/9/2023	0.50	\$ 250.01	\$ 125.01	Draft settlement agreement language	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	2/10/2023	0.33	\$ 540.00	\$ 178.20	Field assistance/education	Class counsel duties
Michelle Mendez	2/10/2023	0.12	\$ 540.00	\$ 64.80	Email response to opposing counsel regarding PI violation	Class counsel duties
Rebecca Scholtz	2/13/2023	0.25	\$ 250.01	\$ 62.50	Revise draft settlement agreement language	ADR
Rebecca Scholtz	2/13/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Michelle Mendez	2/15/2023	0.40	\$ 540.00	\$ 216.00	Field assistance/education	Class counsel duties
Michelle Mendez	2/15/2023	0.08	\$ 540.00	\$ 43.20	Email response to opposing counsel regarding PI violaton	Class counsel duties
Michelle Mendez	2/16/2023	0.25	\$ 540.00	\$ 135.00	Field assistance/education	Class counsel duties
Rebecca Scholtz	2/17/2023	0.25	\$ 250.01	\$ 62.50	Draft settlement agreement review	ADR
Michelle Mendez	2/17/2023	1.05	\$ 540.00	\$ 567.00	TC co-counsel team	Case development
Michelle Mendez	2/17/2023	0.20	\$ 540.00	\$ 108.00	Field assistance/education	Class counsel duties
Michelle Mendez	2/20/2023	0.20	\$ 540.00	\$ 108.00	Call with counsel to two class members (both over 18 and one with in absentia order)	Class counsel duties
Rebecca Scholtz	2/22/2023	0.25	\$ 250.01	\$ 62.50	Class member assistance	Class counsel duties
Rebecca Scholtz	2/22/2023	1.00	\$ 250.01	\$ 250.01	Revise draft settlement agreement language	ADR
Michelle Mendez	2/23/2023	0.20	\$ 540.00	\$ 108.00	Field assistance/education	Class counsel duties
Rebecca Scholtz	2/24/2023	0.25	\$ 250.01	\$ 62.50	Revise draft settlement agreement language	ADR
Michelle Mendez	2/24/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Michelle Mendez	2/24/2023	0.25	\$ 540.00	\$ 135.00	Field assistance/education	Class counsel duties
Rebecca Scholtz	2/27/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Rebecca Scholtz	2/27/2023	1.00	\$ 250.01	\$ 250.01	Webinar planning meeting	Class counsel duties
Michelle Mendez	2/27/2023	0.75	\$ 540.00	\$ 405.00	Email to counsel of class member	Class counsel duties
Rebecca Scholtz	2/28/2023	0.50	\$ 250.01	\$ 125.01	Mediation prep	ADR
Rebecca Scholtz	2/28/2023	0.50	\$ 250.01	\$ 125.01	TC K. Jackson re settlement	ADR
Rebecca Scholtz	2/28/2023	0.80	\$ 250.01	\$ 200.01	Mediation prep	ADR
Rebecca Scholtz	3/1/2023	1.30	\$ 250.01	\$ 325.01	TC co-counsel team	Case development
Rebecca Scholtz	3/2/2023	0.50	\$ 250.01	\$ 125.01	Mediation prep	ADR
Rebecca Scholtz	3/2/2023	0.50	\$ 250.01	\$ 125.01	TC co-counsel team	Case development
Rebecca Scholtz	3/2/2023	1.25	\$ 250.01	\$ 312.51	Mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	3/2/2023	0.25	\$ 250.01	\$ 62.50	TC co-counsel team	Case development
Rebecca Scholtz	3/2/2023	0.50	\$ 250.01	\$ 125.01	Draft follow up email to Defendants re settlement	ADR
Michelle Mendez	3/5/2023	0.50	\$ 540.00	\$ 270.00	TC with R. Scholtz	Case development
Rebecca Scholtz	3/6/2023	0.75	\$ 250.01	\$ 187.51	Prep for court conference call	Case development
Rebecca Scholtz	3/6/2023	0.25	\$ 250.01	\$ 62.50	TC co-counsel team	Case development
Rebecca Scholtz	3/6/2023	0.25	\$ 250.01	\$ 62.50	Notes write-up and debrief from call	Case development
Michelle Mendez	3/6/2023	0.25	\$ 540.00	\$ 135.00	Prep call for call with Judge Gallagher	Case development
Rebecca Scholtz	3/13/2023	0.50	\$ 250.01	\$ 125.01	Research re settlement term	ADR
Rebecca Scholtz	3/13/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Michelle Mendez	3/13/2023	0.25	\$ 540.00	\$ 135.00	Review of another settlement agreement regarding possible remedies	Case development
Rebecca Scholtz	3/16/2023	0.10	\$ 250.01	\$ 25.00	Class member assistance	Class counsel duties
Michelle Mendez	3/17/2023	0.46	\$ 540.00	\$ 248.40	Call with counsel on another matter re possible remedies	Case development
Rebecca Scholtz	3/19/2023	1.00	\$ 250.01	\$ 250.01	Settlement term research and drafting	ADR
Rebecca Scholtz	3/20/2023	0.25	\$ 250.01	\$ 62.50	Draft revisions to settlement terms	ADR
Rebecca Scholtz	3/20/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Rebecca Scholtz	3/20/2023	0.25	\$ 250.01	\$ 62.50	Review proposed settlement draft revisions	ADR
Michelle Mendez	3/24/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	3/25/2023	2.00	\$ 250.01	\$ 500.02	Mediation prep	ADR
Rebecca Scholtz	3/26/2023	0.60	\$ 250.01	\$ 150.01	TC K. Jackson re mediation	ADR
Michelle Mendez	3/26/2023	1.25	\$ 540.00	\$ 675.00	Prep for mediation with Judge Schulze	ADR
Rebecca Scholtz	3/27/2023	3.30	\$ 250.01	\$ 825.03	Mediation	ADR
Michelle Mendez	3/27/2023	1.00	\$ 540.00	\$ 540.00	Prep call for mediation with Judge Schulze	ADR
Michelle Mendez	3/27/2023	2.50	\$ 540.00	\$ 1,350.00	Mediation (left early)	ADR
Michelle Mendez	3/28/2023	0.08	\$ 540.00	\$ 43.20	Review of K. Jackson's proposed dec in class member case	Class counsel duties
Rebecca Scholtz	4/2/2023	1.00	\$ 250.01	\$ 250.01	Edit draft agreement	ADR
Rebecca Scholtz	4/3/2023	0.50	\$ 250.01	\$ 125.01	Review draft agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	4/3/2023	0.50	\$ 250.01	\$ 125.01	Planning meeting re free webinar for the field on J.O.P. updates	Class counsel duties
Michelle Mendez	4/3/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	4/4/2023	1.25	\$ 250.01	\$ 312.51	Present free webinar on J.O.P. updates	Class counsel duties
Michelle Mendez	4/4/2023	1.25	\$ 540.00	\$ 675.00	Present free webinar on J.O.P. updates	Class counsel duties
Michelle Mendez	4/4/2023	0.60	\$ 540.00	\$ 324.00	TC co-counsel team re settlement draft	ADR
Rebecca Scholtz	4/5/2023	0.50	\$ 250.01	\$ 125.01	Review draft agreement	ADR
Michelle Mendez	4/5/2023	0.60	\$ 540.00	\$ 324.00	Review draft agreement	ADR
Michelle Mendez	4/10/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	4/11/2023	0.50	\$ 250.01	\$ 125.01	Position statement drafting	ADR
Rebecca Scholtz	4/12/2023	1.50	\$ 250.01	\$ 375.02	Position statement drafting	ADR
Michelle Mendez	4/16/2023	0.50	\$ 540.00	\$ 270.00	Prepare for 6/28 mediation	Case development
Michelle Mendez	4/17/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Michelle Mendez	4/17/2023	0.67	\$ 540.00	\$ 361.80	Update mediation statement	ADR
Rebecca Scholtz	4/18/2023	0.50	\$ 250.01	\$ 125.01	Research re asylum confidentiality regulation	ADR
Rebecca Scholtz	4/18/2023	0.50	\$ 250.01	\$ 125.01	Class member assistance	Class counsel duties
Michelle Mendez	4/18/2023	0.67	\$ 540.00	\$ 361.80	Update mediation statement	ADR
Rebecca Scholtz	4/21/2023	0.75	\$ 250.01	\$ 187.51	Review draft mediation statement	ADR
Michelle Mendez	4/21/2023	0.60	\$ 540.00	\$ 324.00	TC co-counsel team	Case development
Rebecca Scholtz	4/22/2023	1.75	\$ 250.01	\$ 437.52	Draft mediation statement	ADR
Michelle Mendez	4/22/2023	0.75	\$ 540.00	\$ 405.00	Review draft mediation statement	ADR
Michelle Mendez	4/22/2023	0.34	\$ 540.00	\$ 183.60	Prepare for mediation	ADR
Rebecca Scholtz	4/23/2023	0.90	\$ 250.01	\$ 225.01	Draft mediation statement	ADR
Rebecca Scholtz	4/24/2023	0.30	\$ 250.01	\$ 75.00	Review Defendants' 4/24 draft agreement	ADR
Rebecca Scholtz	4/24/2023	0.50	\$ 250.01	\$ 125.01	Edits to draft mediation statement	ADR
Rebecca Scholtz	4/24/2023	0.25	\$ 250.01	\$ 62.50	Edits to draft mediation statement	ADR
Rebecca Scholtz	4/24/2023	0.50	\$ 250.01	\$ 125.01	Prepare for 4/26 mediation	ADR
Michelle Mendez	4/24/2023	0.25	\$ 540.00	\$ 135.00	Review Defendants' 4/24 draft agreement	ADR
Michelle Mendez	4/24/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	4/25/2023	4.00	\$ 250.01	\$ 1,000.04	Prepare for 4/26 mediation	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	4/25/2023	1.55	\$ 540.00	\$ 837.00	Prepare for 4/26 mediation	ADR
Michelle Mendez	4/25/2023	1.60	\$ 540.00	\$ 864.00	Mediation prep call with M. Tanagho Ross, K. DeJong, and R. Scholtz	ADR
Rebecca Scholtz	4/26/2023	0.50	\$ 250.01	\$ 125.01	Mediation prep call with M. Mendez, K. DeJong	ADR
Rebecca Scholtz	4/26/2023	4.00	\$ 250.01	\$ 1,000.04	Mediation (10:30am to 3pm Eastern with ~30 minute lunch break)	ADR
Michelle Mendez	4/26/2023	4.00	\$ 540.00	\$ 2,160.00	Mediation (10:30am to 3pm Eastern with ~30 minute lunch break)	ADR
Rebecca Scholtz	4/28/2023	0.80	\$ 250.01	\$ 200.01	Clean up and circulate notes from 4/26 mediation session	ADR
Rebecca Scholtz	5/1/2023	0.80	\$ 250.01	\$ 200.01	Revise draft agreement	ADR
Rebecca Scholtz	5/1/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Rebecca Scholtz	5/3/2023	0.25	\$ 250.01	\$ 62.50	Revise draft agreement	ADR
Rebecca Scholtz	5/3/2023	1.00	\$ 250.01	\$ 250.01	TC K. Jackson re settlement	ADR
Rebecca Scholtz	5/4/2023	0.70	\$ 250.01	\$ 175.01	Revise draft agreement	ADR
Michelle Mendez	5/4/2023	0.22	\$ 540.00	\$ 118.80	Field assistance/education	Class counsel duties
Michelle Mendez	5/5/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	5/7/2023	0.25	\$ 250.01	\$ 62.50	Review draft agreement	ADR
Rebecca Scholtz	5/8/2023	0.25	\$ 250.01	\$ 62.50	Review draft sample compliance report	ADR
Rebecca Scholtz	5/8/2023	0.60	\$ 250.01	\$ 150.01	TC K. Jackson re settlement draft	ADR
Michelle Mendez	5/8/2023	0.20	\$ 540.00	\$ 108.00	Review draft sample compliance report	ADR
Michelle Mendez	5/8/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	5/9/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team re settlement draft	ADR
Rebecca Scholtz	5/10/2023	0.55	\$ 250.01	\$ 137.51	TC K. Jackson re settlement draft	ADR
Rebecca Scholtz	5/10/2023	1.05	\$ 250.01	\$ 262.51	Edit draft agreement	ADR
Rebecca Scholtz	5/11/2023	0.40	\$ 250.01	\$ 100.00	Edit draft agreement	ADR
Michelle Mendez	5/11/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team re settlement draft	ADR
Michelle Mendez	5/11/2023	0.38	\$ 540.00	\$ 205.20	Review and edit draft agreement	ADR
Michelle Mendez	5/15/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	5/19/2023	0.80	\$ 250.01	\$ 200.01	TC co-counsel team	Case development
Rebecca Scholtz	5/22/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Rebecca Scholtz	5/22/2023	0.30	\$ 250.01	\$ 75.00	Review email to Ds re OPLA misstatements about J.O.P. certified class	Class counsel duties
Michelle Mendez	5/22/2023	0.84	\$ 540.00	\$ 453.60	Draft email regarding OPLA misstatements about J.O.P. certified class	Case development
Rebecca Scholtz	5/25/2023	0.50	\$ 250.01	\$ 125.01	Review draft notice of noncompliance	ADR
Rebecca Scholtz	5/31/2023	0.20	\$ 250.01	\$ 50.00	Review draft notice of noncompliance	ADR
Rebecca Scholtz	6/1/2023	0.50	\$ 250.01	\$ 125.01	Draft email to gov't counsel re potential PI violation	Class counsel duties
Rebecca Scholtz	6/1/2023	0.25	\$ 250.01	\$ 62.50	Review draft email to gov't counsel re a separate PI violation	Class counsel duties
Rebecca Scholtz	6/2/2023	1.50	\$ 250.01	\$ 375.02	Mediation preparation - research on court approval of class actions	ADR
Rebecca Scholtz	6/2/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Rebecca Scholtz	6/2/2023	0.40	\$ 250.01	\$ 100.00	Follow up from call - review potential injunction violations	Class counsel duties
Rebecca Scholtz	6/2/2023	0.30	\$ 250.01	\$ 75.00	TC K. Jackson re case strategy	ADR
Rebecca Scholtz	6/2/2023	0.50	\$ 250.01	\$ 125.01	USCIS webpage misinformation analysis	Class counsel duties
Rebecca Scholtz	6/5/2023	0.50	\$ 250.01	\$ 125.01	Draft email to D attorneys re USCIS webpage misinformation	Class counsel duties
Rebecca Scholtz	6/5/2023	1.00	\$ 250.01	\$ 250.01	Consideration of potential edits to draft agreement	ADR
Rebecca Scholtz	6/5/2023	2.00	\$ 250.01	\$ 500.02	Draft class notice	ADR
Rebecca Scholtz	6/5/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Rebecca Scholtz	6/8/2023	1.00	\$ 250.01	\$ 250.01	Review notice of noncompliance, work on class notice	ADR
Michelle Mendez	6/8/2023	0.25	\$ 540.00	\$ 135.00	Review of Notice of Noncompliance	Case development
Rebecca Scholtz	6/9/2023	1.25	\$ 250.01	\$ 312.51	Draft class notice	ADR
Michelle Mendez	6/9/2023	0.90	\$ 540.00	\$ 486.00	TC co-counsel team	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	6/12/2023	0.60	\$ 250.01	\$ 150.01	Draft email to D attorneys re JOP guidance in light of recent changes to filing procedures	Class counsel duties
Michelle Mendez	6/12/2023	0.60	\$ 540.00	\$ 324.00	TC co-counsel team	Case development
Rebecca Scholtz	6/13/2023	0.50	\$ 250.01	\$ 125.01	Review Defendant 6/13 draft of agreement	ADR
Michelle Mendez	6/13/2023	0.40	\$ 540.00	\$ 216.00	Review of Gov't Counterproposal for Notice of Compliance	ADR
Rebecca Scholtz	6/14/2023	0.20	\$ 250.01	\$ 50.00	Review email to Ds re postponement of mediation & scheduling	ADR
Michelle Mendez	6/14/2023	0.10	\$ 540.00	\$ 54.00	Review email to Ds re postponement of mediation & scheduling	ADR
Rebecca Scholtz	6/16/2023	0.80	\$ 250.01	\$ 200.01	Draft mediation statement	ADR
Rebecca Scholtz	6/16/2023	1.80	\$ 250.01	\$ 450.02	TC co-counsel team re mediation statement	ADR
Michelle Mendez	6/16/2023	1.70	\$ 540.00	\$ 918.00	Review mediation statement and D's edits to the Settlement Agreement	ADR
Rebecca Scholtz	6/19/2023	0.20	\$ 250.01	\$ 50.00	Edit draft class notice	ADR
Rebecca Scholtz	6/19/2023	1.80	\$ 250.01	\$ 450.02	Edit mediation statement	ADR
Rebecca Scholtz	6/19/2023	1.70	\$ 250.01	\$ 425.02	Review mediation statement	ADR
Michelle Mendez	6/19/2023	1.50	\$ 540.00	\$ 810.00	Update mediation statement	ADR
Michelle Mendez	6/19/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team re mediation statement	ADR
Rebecca Scholtz	6/20/2023	1.50	\$ 250.01	\$ 375.02	Draft questions to Ds in advance of 6/28 mediation, mediation prep, class notice drafting	ADR
Michelle Mendez	6/20/2023	1.16	\$ 540.00	\$ 626.40	Review and edit mediation statement	ADR
Michelle Mendez	6/20/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team re mediation statement	ADR
Rebecca Scholtz	6/23/2023	0.90	\$ 250.01	\$ 225.01	Prepare for 6/28 mediation	ADR
Michelle Mendez	6/23/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	6/26/2023	0.50	\$ 250.01	\$ 125.01	Edit draft class notice	ADR
Rebecca Scholtz	6/26/2023	2.00	\$ 250.01	\$ 500.02	Prepare for 6/28 mediation	ADR
Rebecca Scholtz	6/26/2023	1.10	\$ 250.01	\$ 275.01	TC co counsel team	Case development
Michelle Mendez	6/26/2023	0.50	\$ 540.00	\$ 270.00	Prepare for 6/28 mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	6/27/2023	1.30	\$ 250.01	\$ 325.01	Review talking points for 6/28 mediation	ADR
Michelle Mendez	6/27/2023	0.96	\$ 540.00	\$ 518.40	Prepare for 6/28 mediation	ADR
Rebecca Scholtz	6/28/2023	1.00	\$ 250.01	\$ 250.01	Prepare for 6/28 mediation	ADR
Rebecca Scholtz	6/28/2023	0.40	\$ 250.01	\$ 100.00	TC K. Jackson re mediation strategy	ADR
Rebecca Scholtz	6/28/2023	0.10	\$ 250.01	\$ 25.00	TC ACLU atty re settlement strategy	ADR
Rebecca Scholtz	6/28/2023	3.00	\$ 250.01	\$ 750.03	Mediation	ADR
Michelle Mendez	6/28/2023	0.25	\$ 540.00	\$ 135.00	Prepare for 6/28 mediation	ADR
Michelle Mendez	6/28/2023	0.50	\$ 540.00	\$ 270.00	TC co-counsel team re preparation for 6/28 mediation	ADR
Michelle Mendez	6/28/2023	3.00	\$ 540.00	\$ 1,620.00	Mediation	ADR
Michelle Mendez	6/28/2023	0.30	\$ 540.00	\$ 162.00	Co-counsel team debrief & next steps re 6/28 mediation	ADR
Michelle Mendez	7/3/2023	0.25	\$ 540.00	\$ 135.00	Review of I-589 instructions	Class counsel duties
Rebecca Scholtz	7/5/2023	1.50	\$ 250.01	\$ 375.02	Draft J.O.P.-related comments to USCIS I-589 instructions and web pages	Class counsel duties
Michelle Mendez	7/5/2023	0.30	\$ 540.00	\$ 162.00	Review of joint comment on I-589 instructions	Class counsel duties
Rebecca Scholtz	7/6/2023	0.75	\$ 250.01	\$ 187.51	Edit draft agreement	ADR
Rebecca Scholtz	7/6/2023	0.50	\$ 250.01	\$ 125.01	Research re termination date term in draft agreement	ADR
Michelle Mendez	7/6/2023	0.40	\$ 540.00	\$ 216.00	Review draft agreement	ADR
Rebecca Scholtz	7/7/2023	2.20	\$ 250.01	\$ 550.02	Edit draft agreement	ADR
Rebecca Scholtz	7/7/2023	1.20	\$ 250.01	\$ 300.01	TC co-counsel team	Case development
Rebecca Scholtz	7/10/2023	0.50	\$ 250.01	\$ 125.01	Write-up and analysis for team re proposed term for draft agreement	ADR
Michelle Mendez	7/10/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	7/12/2023	0.25	\$ 250.01	\$ 62.50	Class member assistance (PI violation)	Class counsel duties
Michelle Mendez	7/12/2023	0.25	\$ 540.00	\$ 135.00	Read new CA4 decision discussing UCs in footnote and email to co-counsel team	Class counsel duties
Rebecca Scholtz	7/14/2023	0.25	\$ 250.01	\$ 62.50	Review draft agreement	ADR
Rebecca Scholtz	7/14/2023	0.50	\$ 250.01	\$ 125.01	Listen to oral argument in class member case	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	7/14/2023	0.20	\$ 250.01	\$ 50.00	Email with class member re PI violation	Class counsel duties
Michelle Mendez	7/14/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Michelle Mendez	7/16/2023	0.08	\$ 540.00	\$ 43.20	Email counsel on CA4 case	Class counsel duties
Rebecca Scholtz	7/18/2023	1.20	\$ 250.01	\$ 300.01	Review information & documents related to class member PI violation, communicate with pro bono attorney, and write-up	Class counsel duties
Rebecca Scholtz	7/19/2023	0.70	\$ 250.01	\$ 175.01	Review Ds' response sent 7.18 and Ps' corresponding edits to draft agreement	ADR
Michelle Mendez	7/21/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Michelle Mendez	7/21/2023	0.25	\$ 540.00	\$ 135.00	Read gov't briefing in new CA decision	Class counsel duties
Rebecca Scholtz	7/24/2023	0.80	\$ 250.01	\$ 200.01	TC co-counsel team	Case development
Rebecca Scholtz	7/24/2023	0.90	\$ 250.01	\$ 225.01	Write-up to field re USCIS erroneous rejections of UC asylum applications	Class counsel duties
Rebecca Scholtz	7/24/2023	0.10	\$ 250.01	\$ 25.00	Review draft agreement	ADR
Rebecca Scholtz	7/27/2023	0.25	\$ 250.01	\$ 62.50	Edit write-up to field listed above	Class counsel duties
Michelle Mendez	8/4/2023	0.68	\$ 540.00	\$ 367.20	Review email from class member counsel, email counsel for class member, and email co-counsel team	Class counsel duties
Michelle Mendez	8/6/2023	0.17	\$ 540.00	\$ 91.80	Review 2023 Affirmative Asylum Procedures Manual for provisions relevant to J.O.P. and email co-counsel team	ADR
Rebecca Scholtz	8/7/2023	0.40	\$ 250.01	\$ 100.00	Review recently-released 2023 Affirmative Asylum Procedures Manual for provisions relevant to J.O.P.	ADR
Rebecca Scholtz	8/7/2023	0.30	\$ 250.01	\$ 75.00	Finalize and send email to listserv re USCIS erroneous rejections of UC asylum applications	Class counsel duties
Michelle Mendez	8/7/2023	0.80	\$ 540.00	\$ 432.00	TC co-counsel team	Case development
Rebecca Scholtz	8/8/2023	0.25	\$ 250.01	\$ 62.50	Class member assistance	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	8/9/2023	0.25	\$ 540.00	\$ 135.00	Review 2023 Affirmative Asylum Procedures Manual for provisions relevant to J.O.P. and email co-counsel team	ADR
Rebecca Scholtz	8/14/2023	0.70	\$ 250.01	\$ 175.01	TC co-counsel team	Case development
Rebecca Scholtz	8/15/2023	0.20	\$ 250.01	\$ 50.00	Draft revisions to erroneous jxdnal rejection notice from asylum vetting center	Class counsel duties
Rebecca Scholtz	8/18/2023	0.40	\$ 250.01	\$ 100.00	TC co-counsel team	Case development
Rebecca Scholtz	8/18/2023	0.70	\$ 250.01	\$ 175.01	Draft correspondence re incorrect USCIS guidance re UC filings	Class counsel duties
Rebecca Scholtz	8/21/2023	0.30	\$ 250.01	\$ 75.00	Review draft agreement sent by Defendants on 8.21.2023	ADR
Rebecca Scholtz	8/23/2023	1.75	\$ 250.01	\$ 437.52	Edit mediation statement	ADR
Michelle Mendez	8/23/2023	0.40	\$ 540.00	\$ 216.00	TC R. Scholtz re class member case	Class counsel duties
Rebecca Scholtz	8/24/2023	0.90	\$ 250.01	\$ 225.01	Edit mediation statement	ADR
Rebecca Scholtz	8/25/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Michelle Mendez	8/25/2023	0.25	\$ 540.00	\$ 135.00	Review email from class member counsel, email counsel for class member, and email co-counsel team	Class counsel duties
Rebecca Scholtz	8/26/2023	1.00	\$ 250.01	\$ 250.01	TC K. Jackson re mediation statement	ADR
Rebecca Scholtz	8/27/2023	0.50	\$ 250.01	\$ 125.01	Research re settlement term	ADR
Rebecca Scholtz	8/27/2023	0.40	\$ 250.01	\$ 100.00	Edit mediation statement	ADR
Rebecca Scholtz	8/27/2023	1.80	\$ 250.01	\$ 450.02	TC K. Jackson re mediation statement	ADR
Rebecca Scholtz	8/28/2023	1.00	\$ 250.01	\$ 250.01	Edit mediation statement and draft agenda for 9/6 session	ADR
Rebecca Scholtz	8/28/2023	0.40	\$ 250.01	\$ 100.00	Edit questions to send to Ds in advance of mediation session	ADR
Michelle Mendez	8/28/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	8/29/2023	1.50	\$ 250.01	\$ 375.02	Draft talking points for 9/6 mediation session	ADR
Rebecca Scholtz	8/29/2023	0.20	\$ 250.01	\$ 50.00	Research re settlement term (asylum confidentiality regulation)	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	8/30/2023	0.30	\$ 250.01	\$ 75.00	Final mediation statement review	ADR
Michelle Mendez	8/30/2023	0.68	\$ 540.00	\$ 367.20	TC K. Jackson re mediation	ADR
Rebecca Scholtz	8/31/2023	1.20	\$ 250.01	\$ 300.01	Draft talking points for 9/6 mediation	ADR
Michelle Mendez	8/31/2023	0.25	\$ 540.00	\$ 135.00	Review responses to questions and provide feedback	ADR
Michelle Mendez	8/31/2023	0.30	\$ 540.00	\$ 162.00	Prepare for 9/6 mediation	ADR
Rebecca Scholtz	9/1/2023	0.25	\$ 250.01	\$ 62.50	Prepare for 9/6 mediation	ADR
Rebecca Scholtz	9/1/2023	1.20	\$ 250.01	\$ 300.01	TC co-counsel team	Case development
Michelle Mendez	9/2/2023	1.50	\$ 540.00	\$ 810.00	Prepare for 9/6 mediation	ADR
Michelle Mendez	9/3/2023	2.00	\$ 540.00	\$ 1,080.00	Prepare for 9/6 mediation	ADR
Rebecca Scholtz	9/4/2023	1.75	\$ 250.01	\$ 437.52	Draft talking points for 9/6 mediation	ADR
Michelle Mendez	9/4/2023	2.00	\$ 540.00	\$ 1,080.00	Prepare for 9/6 mediation	ADR
Rebecca Scholtz	9/5/2023	0.70	\$ 250.01	\$ 175.01	Prepare for 9/6 mediation	ADR
Michelle Mendez	9/5/2023	0.50	\$ 540.00	\$ 270.00	TC K.Jackson re mediation	ADR
Michelle Mendez	9/5/2023	1.20	\$ 540.00	\$ 648.00	TC co-counsel team	Case development
Rebecca Scholtz	9/6/2023	1.20	\$ 250.01	\$ 300.01	Prepare for 9/6 mediation	ADR
Rebecca Scholtz	9/6/2023	3.00	\$ 250.01	\$ 750.03	Mediation	ADR
Michelle Mendez	9/6/2023	0.27	\$ 540.00	\$ 145.80	TC K. Jackson re mediation	ADR
Michelle Mendez	9/6/2023	3.00	\$ 540.00	\$ 1,620.00	Mediation	ADR
Michelle Mendez	9/6/2023	0.30	\$ 540.00	\$ 162.00	Debrief 9/6 mediation with co-counsel team	ADR
Rebecca Scholtz	9/8/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Rebecca Scholtz	9/11/2023	0.40	\$ 250.01	\$ 100.00	Settlement draft review	ADR
Rebecca Scholtz	9/11/2023	0.20	\$ 250.01	\$ 50.00	Edit draft notice of compliance report	ADR
Rebecca Scholtz	9/11/2023	0.20	\$ 250.01	\$ 50.00	Communications regarding D. Md. mediation	ADR
Rebecca Scholtz	9/11/2023	1.00	\$ 250.01	\$ 250.01	Review new EOIR proposed rule as it relates to draft settlement terms	ADR
Rebecca Scholtz	9/12/2023	1.55	\$ 250.01	\$ 387.52	Review new EOIR proposed rule as it relates to draft settlement terms	ADR
Michelle Mendez	9/12/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Michelle Mendez	9/15/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	9/18/2023	0.80	\$ 540.00	\$ 432.00	TC co-counsel team	Case development
Rebecca Scholtz	9/19/2023	0.10	\$ 250.01	\$ 25.00	Review draft request for status conference	Case development
Rebecca Scholtz	9/19/2023	0.25	\$ 250.01	\$ 62.50	PI violation follow up	Class counsel duties
Michelle Mendez	9/22/2023	0.23	\$ 540.00	\$ 124.20	Review email from class member counsel and email counsel for class member	Class counsel duties
Rebecca Scholtz	9/25/2023	0.50	\$ 250.01	\$ 125.01	Edit draft class notice	ADR
Michelle Mendez	9/25/2023	0.50	\$ 540.00	\$ 270.00	TC co-counsel team	Case development
Rebecca Scholtz	9/27/2023	0.20	\$ 250.01	\$ 50.00	Class member assistance	Class counsel duties
Rebecca Scholtz	10/6/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Michelle Mendez	10/6/2023	0.17	\$ 540.00	\$ 91.80	Call with K. Jackson	ADR
Rebecca Scholtz	10/12/2023	0.80	\$ 250.01	\$ 200.01	Draft agenda for 10/16 mediation; draft revisions to agreement	ADR
Rebecca Scholtz	10/12/2023	0.75	\$ 250.01	\$ 187.51	TC K. Jackson	Case development
Rebecca Scholtz	10/12/2023	0.30	\$ 250.01	\$ 75.00	Agenda and email to team re mediation planning	ADR
Rebecca Scholtz	10/12/2023	1.50	\$ 250.01	\$ 375.02	Prepare for 10/16 mediation	ADR
Rebecca Scholtz	10/13/2023	1.00	\$ 250.01	\$ 250.01	TC K. Jackson	Case development
Rebecca Scholtz	10/13/2023	2.00	\$ 250.01	\$ 500.02	Review Defendants' 10.13 draft of the agreement	ADR
Michelle Mendez	10/13/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Michelle Mendez	10/13/2023	0.08	\$ 540.00	\$ 43.20	Respond to class member's counsel	Class counsel duties
Rebecca Scholtz	10/14/2023	2.00	\$ 250.01	\$ 500.02	Prepare for 10/16 mediation	ADR
Rebecca Scholtz	10/14/2023	1.00	\$ 250.01	\$ 250.01	TC K. Jackson	Case development
Rebecca Scholtz	10/15/2023	2.50	\$ 250.01	\$ 625.03	Prepare for 10/16 mediation	ADR
Rebecca Scholtz	10/16/2023	3.00	\$ 250.01	\$ 750.03	Prepare for 10/16 mediation (including team meeting during part of this time)	ADR
Rebecca Scholtz	10/16/2023	3.50	\$ 250.01	\$ 875.04	Virtual mediation session with Defendants	ADR
Rebecca Scholtz	10/16/2023	0.50	\$ 250.01	\$ 125.01	Co-counsel team debrief re today's mediation session	ADR
Michelle Mendez	10/16/2023	0.17	\$ 540.00	\$ 91.80	Review Ms. L Settlement Agreement	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	10/17/2023	1.50	\$ 250.01	\$ 375.02	Prepare for 10/17 mediation	ADR
Rebecca Scholtz	10/17/2023	1.00	\$ 250.01	\$ 250.01	Co-counsel prep meeting for today's mediation session	ADR
Rebecca Scholtz	10/17/2023	0.75	\$ 250.01	\$ 187.51	Virtual mediation session with Defendants	ADR
Rebecca Scholtz	10/17/2023	0.25	\$ 250.01	\$ 62.50	Co-counsel team debrief re today's mediation session	ADR
Rebecca Scholtz	10/19/2023	0.30	\$ 250.01	\$ 75.00	TC K. Jackson	Case development
Rebecca Scholtz	10/23/2023	0.20	\$ 250.01	\$ 50.00	Review new I589 filing guidance; draft Qs for Ds in light of this guidance re Class Member filing	Class counsel duties
Rebecca Scholtz	10/23/2023	3.00	\$ 250.01	\$ 750.03	Review draft agreement & exhibits	ADR
Michelle Mendez	10/23/2023	0.42	\$ 540.00	\$ 226.80	Review Ms. L Settlement Agreement and email R. Scholtz	ADR
Michelle Mendez	10/24/2023	0.80	\$ 540.00	\$ 432.00	Review draft agreement	ADR
Michelle Mendez	10/24/2023	1.07	\$ 540.00	\$ 577.80	TC co-counsel team	Case development
Michelle Mendez	10/25/2023	0.68	\$ 540.00	\$ 367.20	Review follow up questions	ADR
Rebecca Scholtz	10/26/2023	0.55	\$ 250.01	\$ 137.51	Review draft agreement & exhibits	ADR
Rebecca Scholtz	10/26/2023	1.05	\$ 250.01	\$ 262.51	Work on draft class notice	ADR
Rebecca Scholtz	10/26/2023	0.20	\$ 250.01	\$ 50.00	Class member assistance - PI violation	Class counsel duties
Rebecca Scholtz	10/27/2023	0.80	\$ 250.01	\$ 200.01	TC co-counsel team	Case development
Michelle Mendez	10/27/2023	0.45	\$ 540.00	\$ 243.00	Call with R. Scholtz and review of notes	Case development
Rebecca Scholtz	10/30/2023	0.25	\$ 250.01	\$ 62.50	TC co-counsel team	Case development
Michelle Mendez	10/30/2023	0.22	\$ 540.00	\$ 118.80	Review KDJ's talking points for conference with mag. judge	ADR
Michelle Mendez	10/31/2023	0.50	\$ 540.00	\$ 270.00	Team meeting to prepare for court conference call	Case development
Michelle Mendez	10/31/2023	0.10	\$ 540.00	\$ 54.00	Debrief with team re court conference call	Case development
Rebecca Scholtz	11/6/2023	0.80	\$ 250.01	\$ 200.01	TC co-counsel team	Case development
Michelle Mendez	11/6/2023	0.13	\$ 540.00	\$ 70.20	Email response to listserv re UC-related question	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	11/8/2023	1.00	\$ 250.01	\$ 250.01	Class member assistance - PI violation	Class counsel duties
Michelle Mendez	11/8/2023	0.17	\$ 540.00	\$ 91.80	Email response to class member counsel	Class counsel duties
Rebecca Scholtz	11/9/2023	1.50	\$ 250.01	\$ 375.02	Draft mediation statement	ADR
Rebecca Scholtz	11/10/2023	0.70	\$ 250.01	\$ 175.01	Class member assistance - PI violation	Class counsel duties
Rebecca Scholtz	11/10/2023	1.00	\$ 250.01	\$ 250.01	Draft mediation statement	ADR
Michelle Mendez	11/10/2023	1.10	\$ 540.00	\$ 594.00	TC co-counsel team	Case development
Rebecca Scholtz	11/11/2023	0.75	\$ 250.01	\$ 187.51	Draft mediation statement	ADR
Rebecca Scholtz	11/12/2023	2.50	\$ 250.01	\$ 625.03	Draft mediation statement	ADR
Rebecca Scholtz	11/13/2023	1.00	\$ 250.01	\$ 250.01	Draft mediation statement	ADR
Rebecca Scholtz	11/13/2023	0.50	\$ 250.01	\$ 125.01	Mediation statement revisions	ADR
Michelle Mendez	11/13/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Michelle Mendez	11/13/2023	1.50	\$ 540.00	\$ 810.00	Mediation statement revisions	ADR
Rebecca Scholtz	11/14/2023	1.00	\$ 250.01	\$ 250.01	Mediation statement revisions	ADR
Michelle Mendez	11/14/2023	0.83	\$ 540.00	\$ 448.20	Mediation statement revisions	ADR
Rebecca Scholtz	11/15/2023	1.50	\$ 250.01	\$ 375.02	Mediation statement revisions	ADR
Rebecca Scholtz	11/15/2023	2.10	\$ 250.01	\$ 525.02	Final edits to mediation statement	ADR
Rebecca Scholtz	11/20/2023	0.30	\$ 250.01	\$ 75.00	Research re class notice	ADR
Rebecca Scholtz	11/20/2023	0.80	\$ 250.01	\$ 200.01	TC co-counsel team	Case development
Rebecca Scholtz	11/20/2023	0.30	\$ 250.01	\$ 75.00	Scheduling for December mediations	ADR
Rebecca Scholtz	11/20/2023	1.00	\$ 250.01	\$ 250.01	Revise draft class notice	ADR
Rebecca Scholtz	11/29/2023	0.50	\$ 250.01	\$ 125.01	Class member assistance - PI violation	Class counsel duties
Rebecca Scholtz	11/29/2023	0.20	\$ 250.01	\$ 50.00	Answering query from practitioner representing asylum seeker re J.O.P. injunction	Class counsel duties
Rebecca Scholtz	11/30/2023	0.20	\$ 250.01	\$ 50.00	review draft notice of M.A.L.C. death	Case development
Rebecca Scholtz	12/1/2023	0.30	\$ 250.01	\$ 75.00	Class member assistance - PI violation	Class counsel duties
Rebecca Scholtz	12/4/2023	0.70	\$ 250.01	\$ 175.01	TC co-counsel team	Case development
Rebecca Scholtz	12/4/2023	0.75	\$ 250.01	\$ 187.51	Draft JOP update to field	Class counsel duties
Rebecca Scholtz	12/4/2023	0.70	\$ 250.01	\$ 175.01	Review govt settlement draft rec'd today	ADR
Rebecca Scholtz	12/5/2023	0.10	\$ 250.01	\$ 25.00	review draft notice of MALC death	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	12/8/2023	1.00	\$ 250.01	\$ 250.01	TC co-counsel team	Case development
Michelle Mendez	12/11/2023	1.00	\$ 540.00	\$ 540.00	TC co-counsel team	Case development
Rebecca Scholtz	12/11/2023	0.50	\$ 250.01	\$ 125.01	Review govt settlement draft	ADR
Rebecca Scholtz	12/11/2023	0.60	\$ 250.01	\$ 150.01	Analyze settlement draft re enforcement provisions	ADR
Rebecca Scholtz	12/11/2023	0.60	\$ 250.01	\$ 150.01	Research settlement reporting terms	ADR
Rebecca Scholtz	12/11/2023	0.80	\$ 250.01	\$ 200.01	Consult with class member counsel re PI violation	Class counsel duties
Rebecca Scholtz	12/12/2023	0.90	\$ 250.01	\$ 225.01	Follow up re class member PI violation case	Class counsel duties
Rebecca Scholtz	12/14/2023	0.30	\$ 250.01	\$ 75.00	Phone consult with ACLU attorney re Aleman Gonzalez	ADR
Rebecca Scholtz	12/19/2023	1.50	\$ 250.01	\$ 375.02	Class member PI violation assistance	Class counsel duties
Rebecca Scholtz	12/21/2023	0.30	\$ 250.01	\$ 75.00	Identifying potential dates for in-person mediation conference	ADR
Rebecca Scholtz	12/21/2023	0.20	\$ 250.01	\$ 50.00	Class member PI violation assistance	Class counsel duties
Rebecca Scholtz	12/26/2023	0.40	\$ 250.01	\$ 100.00	Class member PI violation assistance	Class counsel duties
Rebecca Scholtz	12/27/2023	0.50	\$ 250.01	\$ 125.01	TC Kris Jackson	Case development
Rebecca Scholtz	12/28/2023	3.50	\$ 250.01	\$ 875.04	Reseach on enforcement of settlement	ADR
Rebecca Scholtz	12/28/2023	0.50	\$ 250.01	\$ 125.01	Phone consult with ACLU attorney re Aleman Gonzalez	ADR
Rebecca Scholtz	12/29/2023	0.80	\$ 250.01	\$ 200.01	Reseach on enforcement of settlement	ADR
Rebecca Scholtz	1/3/2024	0.20	\$ 255.27	\$ 51.05	Class member assistance - PI violation	Class counsel duties
Rebecca Scholtz	1/4/2024	0.20	\$ 255.27	\$ 51.05	Class member assistance - PI violation	Class counsel duties
Rebecca Scholtz	1/5/2024	0.20	\$ 255.27	\$ 51.05	Class member assistance - PI violation	Class counsel duties
Rebecca Scholtz	1/8/2024	0.50	\$ 255.27	\$ 127.64	Prepare mediation statement	ADR
Rebecca Scholtz	1/8/2024	1.50	\$ 255.27	\$ 382.91	Edit settlement agreement draft	ADR
Michelle Mendez	1/8/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	1/9/2024	0.50	\$ 255.27	\$ 127.64	Edit settlement agreement draft	ADR
Rebecca Scholtz	1/10/2024	0.20	\$ 255.27	\$ 51.05	Class member assistance - PI violation	ADR
Rebecca Scholtz	1/10/2024	1.00	\$ 255.27	\$ 255.27	Edit settlement agreement draft	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	1/10/2024	0.20	\$ 255.27	\$ 51.05	Draft mediation statement	ADR
Rebecca Scholtz	1/12/2024	0.40	\$ 255.27	\$ 102.11	Edit settlement agreement draft	ADR
Rebecca Scholtz	1/16/2024	0.20	\$ 255.27	\$ 51.05	Consult with class member attorney re J.O.P. preliminary injunction	Class counsel duties
Rebecca Scholtz	1/17/2024	0.20	\$ 255.27	\$ 51.05	Advise J.O.P. class member's attorney	Class counsel duties
Rebecca Scholtz	1/17/2024	0.80	\$ 255.27	\$ 204.22	Provide advice to plaintiff	Case development
Rebecca Scholtz	1/17/2024	2.50	\$ 255.27	\$ 638.18	Draft mediation statement	ADR
Michelle Mendez	1/17/2024	0.80	\$ 551.00	\$ 440.80	Consult with attorney of child with UC determination regarding J.O.P. injunction	Class counsel duties
Rebecca Scholtz	1/18/2024	0.70	\$ 255.27	\$ 178.69	Research re settlement agreement term	ADR
Rebecca Scholtz	1/18/2024	0.10	\$ 255.27	\$ 25.53	Respond to query from class member's attorney about J.O.P. injunction	Class counsel duties
Rebecca Scholtz	1/18/2024	0.70	\$ 255.27	\$ 178.69	Consult with outside litigators regarding enforcement of settlement agreements after Aleman Gonzalez	ADR
Rebecca Scholtz	1/18/2024	1.50	\$ 255.27	\$ 382.91	Draft mediation statement	ADR
Rebecca Scholtz	1/19/2024	0.50	\$ 255.27	\$ 127.64	Edit settlement agreement draft	ADR
Rebecca Scholtz	1/19/2024	0.20	\$ 255.27	\$ 51.05	Class member assistance - PI violation	Class counsel duties
Michelle Mendez	1/19/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	1/22/2024	0.30	\$ 255.27	\$ 76.58	Draft mediation statement	ADR
Rebecca Scholtz	1/22/2024	0.10	\$ 255.27	\$ 25.53	Edit settlement agreement draft	ADR
Michelle Mendez	1/22/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Michelle Mendez	1/23/2024	0.75	\$ 551.00	\$ 413.25	Draft section of mediation statement	ADR
Rebecca Scholtz	1/25/2024	0.50	\$ 255.27	\$ 127.64	Draft mediation statement	ADR
Rebecca Scholtz	1/26/2024	0.50	\$ 255.27	\$ 127.64	Draft mediation statement	ADR
Michelle Mendez	1/26/2024	0.67	\$ 551.00	\$ 369.17	Draft section of mediation statement	ADR
Michelle Mendez	1/26/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	1/29/2024	0.40	\$ 255.27	\$ 102.11	Edit talking points to go over with named plaintiffs during update/check-in	ADR
Rebecca Scholtz	1/29/2024	0.40	\$ 255.27	\$ 102.11	Edit settlement agreement draft	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	1/29/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	2/2/2024	0.20	\$ 255.27	\$ 51.05	Class member assistance	Class counsel duties
Rebecca Scholtz	2/5/2024	0.30	\$ 255.27	\$ 76.58	Draft mediation statement	ADR
Rebecca Scholtz	2/5/2024	0.60	\$ 255.27	\$ 153.16	TC co-counsel team	Case development
Rebecca Scholtz	2/5/2024	0.50	\$ 255.27	\$ 127.64	Draft mediation statement	ADR
Rebecca Scholtz	2/5/2024	0.10	\$ 255.27	\$ 25.53	Class member assistance	Class counsel duties
Rebecca Scholtz	2/6/2024	0.30	\$ 255.27	\$ 76.58	Class member assistance	Class counsel duties
Rebecca Scholtz	2/7/2024	1.30	\$ 255.27	\$ 331.85	Draft mediation statement	ADR
Rebecca Scholtz	2/7/2024	0.90	\$ 255.27	\$ 229.74	Class member assistance (Zoom meeting)	Class counsel duties
Rebecca Scholtz	2/9/2024	0.90	\$ 255.27	\$ 229.74	TC co-counsel team	Case development
Michelle Mendez	2/11/2024	0.65	\$ 551.00	\$ 358.15	Review mediation statement draft	ADR
Rebecca Scholtz	2/12/2024	0.30	\$ 255.27	\$ 76.58	Prepare for March 2024 mediation	ADR
Rebecca Scholtz	2/12/2024	1.00	\$ 255.27	\$ 255.27	Draft mediation statement	ADR
Rebecca Scholtz	2/12/2024	0.20	\$ 255.27	\$ 51.05	Review answers received from Defendants re correcting erroneous USCIS rejections	ADR
Michelle Mendez	2/12/2024	0.90	\$ 551.00	\$ 495.90	TC co-counsel team	Case development
Rebecca Scholtz	2/13/2024	0.40	\$ 255.27	\$ 102.11	Draft mediation statement	ADR
Rebecca Scholtz	2/13/2024	0.40	\$ 255.27	\$ 102.11	Class member assistance	Class counsel duties
Rebecca Scholtz	2/14/2024	0.60	\$ 255.27	\$ 153.16	Draft response to Defendants re correcting erroneous rejections	ADR
Rebecca Scholtz	2/16/2024	0.70	\$ 255.27	\$ 178.69	Prepare for March 2024 mediation	ADR
Rebecca Scholtz	2/16/2024	0.60	\$ 255.27	\$ 153.16	Draft mediation statement	ADR
Michelle Mendez	2/16/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	2/21/2024	2.00	\$ 255.27	\$ 510.54	Prepare for March 2024 mediation	ADR
Rebecca Scholtz	2/22/2024	0.20	\$ 255.27	\$ 51.05	Class member assistance - PI violation	Class counsel duties
Rebecca Scholtz	2/23/2024	0.60	\$ 255.27	\$ 153.16	Prepare for March 2024 mediation	ADR
Michelle Mendez	2/23/2024	1.10	\$ 551.00	\$ 606.10	TC co-counsel team	Case development
Rebecca Scholtz	2/26/2024	1.80	\$ 255.27	\$ 459.49	Prepare for March 2024 mediation	ADR
Michelle Mendez	2/26/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team to prepare for mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	2/28/2024	0.40	\$ 255.27	\$ 102.11	Draft response to Ds' email about use of Contact Center to correct erroneous rejections	ADR
Rebecca Scholtz	2/28/2024	0.50	\$ 255.27	\$ 127.64	Prepare for March 2024 mediation	ADR
Rebecca Scholtz	2/29/2024	0.70	\$ 255.27	\$ 178.69	Review talking points for March 2024 mediation	ADR
Michelle Mendez	2/29/2024	1.07	\$ 551.00	\$ 589.57	Phone calls with Plaintiff KRC re settlement	ADR
Rebecca Scholtz	3/1/2024	1.00	\$ 255.27	\$ 255.27	Prepare for March 2024 mediation	ADR
Michelle Mendez	3/1/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel to prepare for mediation	ADR
Michelle Mendez	3/2/2024	2.00	\$ 551.00	\$ 1,102.00	Prepare for mediation	ADR
Rebecca Scholtz	3/3/2024	3.50	\$ 255.27	\$ 893.45	Prepare for March 2024 mediation	ADR
Michelle Mendez	3/3/2024	3.00	\$ 551.00	\$ 1,653.00	Team meeting to prepare for mediation	ADR
Michelle Mendez	3/3/2024	0.75	\$ 551.00	\$ 413.25	Review talking points for mediation	ADR
Rebecca Scholtz	3/4/2024	7.00	\$ 255.27	\$ 1,786.89	Mediation (day 1) at Greenbelt Courthouse	ADR
Rebecca Scholtz	3/4/2024	1.00	\$ 255.27	\$ 255.27	Prepare for March 5 mediation	ADR
Michelle Mendez	3/4/2024	7.00	\$ 551.00	\$ 3,857.00	Mediation at the District Court (Greenbelt)	ADR
Michelle Mendez	3/4/2024	1.50	\$ 551.00	\$ 826.50	Prepare for second day of mediation	ADR
Rebecca Scholtz	3/5/2024	1.00	\$ 255.27	\$ 255.27	Prepare for March 5 mediation	ADR
Rebecca Scholtz	3/5/2024	12.50	\$ 255.27	\$ 3,190.88	Mediation (day 2) at Greenbelt Courthouse	ADR
Michelle Mendez	3/5/2024	12.50	\$ 551.00	\$ 6,887.50	Mediation at the District Court (Greenbelt)	ADR
Rebecca Scholtz	3/6/2024	1.20	\$ 255.27	\$ 306.32	Review edits to draft agreement	ADR
Rebecca Scholtz	3/6/2024	0.50	\$ 255.27	\$ 127.64	TC K. Jackson re settlement	ADR
Michelle Mendez	3/6/2024	0.60	\$ 551.00	\$ 330.60	Review edits to draft agreement	ADR
Rebecca Scholtz	3/7/2024	0.70	\$ 255.27	\$ 178.69	Analyze settlement issues	ADR
Rebecca Scholtz	3/7/2024	0.50	\$ 255.27	\$ 127.64	Assistance to immigration counsel re PI/class scope	Class counsel duties
Michelle Mendez	3/7/2024	1.00	\$ 551.00	\$ 551.00	Meeting with NIPNLG team re settlement	ADR
Michelle Mendez	3/7/2024	0.20	\$ 551.00	\$ 110.20	Review AILA-Chicago AO meeting notes and email team # stat	ADR
Michelle Mendez	3/8/2024	0.60	\$ 551.00	\$ 330.60	TC co-counsel team	Case development



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	3/11/2024	0.50	\$ 255.27	\$ 127.64	TC co-counsel team (RS joined late)	Case development
Rebecca Scholtz	3/14/2024	0.40	\$ 255.27	\$ 102.11	Assistance to immigration counsel re PI/class scope	Class counsel duties
Michelle Mendez	3/14/2024	1.00	\$ 551.00	\$ 551.00	Research fees	ADR
Michelle Mendez	3/15/2024	0.90	\$ 551.00	\$ 495.90	TC co-counsel team	Case development
Rebecca Scholtz	3/18/2024	0.80	\$ 255.27	\$ 204.22	TC co-counsel team	Case development
Rebecca Scholtz	3/21/2024	0.70	\$ 255.27	\$ 178.69	Update draft class notice	ADR
Rebecca Scholtz	3/22/2024	0.60	\$ 255.27	\$ 153.16	Assistance to immigration counsel - PI violation	Class counsel duties
Rebecca Scholtz	3/25/2024	0.70	\$ 255.27	\$ 178.69	TC co-counsel team	Case development
Michelle Mendez	3/29/2024	0.50	\$ 551.00	\$ 275.50	Review updated draft class notice	ADR
Rebecca Scholtz	4/5/2024	0.30	\$ 255.27	\$ 76.58	Communications with class members who had reached out for advice	Class counsel duties
Michelle Mendez	4/5/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	4/8/2024	0.20	\$ 255.27	\$ 51.05	Answer query from immigration counsel re PI	Class counsel duties
Michelle Mendez	4/8/2024	0.25	\$ 551.00	\$ 137.75	Review draft notice of noncompliance	ADR
Michelle Mendez	4/12/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Michelle Mendez	4/19/2024	0.40	\$ 551.00	\$ 220.40	TC co-counsel team	Case development
Michelle Mendez	4/22/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	4/24/2024	0.20	\$ 255.27	\$ 51.05	Communication with attorney for prospective class member with removal order	Class counsel duties
Rebecca Scholtz	4/24/2024	0.80	\$ 255.27	\$ 204.22	Settlement next steps - agreement and exhibit finalization process	ADR
Michelle Mendez	4/24/2024	0.17	\$ 551.00	\$ 93.67	Email to local MD counsel re objections process and fairness hearing	ADR
Rebecca Scholtz	4/26/2024	1.00	\$ 255.27	\$ 255.27	TC co-counsel team	Case development
Michelle Mendez	5/2/2024	0.25	\$ 551.00	\$ 137.75	Email to local MD counsel re class notice mediums	ADR
Rebecca Scholtz	5/3/2024	0.30	\$ 255.27	\$ 76.58	Settlement finalization process next steps - agreement and exhibit clean-up	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	5/3/2024	0.90	\$ 255.27	\$ 229.74	TC co-counsel team	Case development
Michelle Mendez	5/3/2024	0.33	\$ 551.00	\$ 181.83	Review draft order for joint preliminary approval of the settlement	ADR
Rebecca Scholtz	5/7/2024	0.30	\$ 255.27	\$ 76.58	Correspondence with detained class member's immigration attorney	Class counsel duties
Rebecca Scholtz	5/10/2024	0.20	\$ 255.27	\$ 51.05	Planning next steps in settlement finalization process	ADR
Rebecca Scholtz	5/10/2024	0.30	\$ 255.27	\$ 76.58	Draft follow-up questions regarding settlement finalization process	ADR
Rebecca Scholtz	5/10/2024	0.10	\$ 255.27	\$ 25.53	Prepare estimate request for class notice Spanish translation	ADR
Michelle Mendez	5/10/2024	0.70	\$ 551.00	\$ 385.70	TC co-counsel team	Case development
Rebecca Scholtz	5/13/2024	0.30	\$ 255.27	\$ 76.58	Edit draft orders for approval of agreement (exhibits)	ADR
Rebecca Scholtz	5/20/2024	0.90	\$ 255.27	\$ 229.74	Finalize draft preliminary class notice (exhibit)	ADR
Rebecca Scholtz	5/20/2024	1.00	\$ 255.27	\$ 255.27	Final review & clean-up of agreement, replacing placeholders	ADR
Michelle Mendez	5/20/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Michelle Mendez	5/20/2024	0.50	\$ 551.00	\$ 275.50	Discuss with Rebecca Scholtz EOIR regs impact on current agreement	ADR
Michelle Mendez	5/20/2024	0.60	\$ 551.00	\$ 330.60	TC co-counsel team to discuss next steps after conference w/ Magistrate Judge	ADR
Rebecca Scholtz	5/21/2024	0.70	\$ 255.27	\$ 178.69	Finalize 5 exhibits to agreement	ADR
Rebecca Scholtz	5/21/2024	0.30	\$ 255.27	\$ 76.58	Final clean-up of agreement	ADR
Michelle Mendez	5/21/2024	0.25	\$ 551.00	\$ 137.75	Review settlement draft	ADR
Rebecca Scholtz	5/22/2024	0.40	\$ 255.27	\$ 102.11	Respond to query from class member's attorney about J.O.P. PI (2 class members)	Class counsel duties
Rebecca Scholtz	5/22/2024	0.30	\$ 255.27	\$ 76.58	TC K. DeJong re preparing final exhibits to send to Defendants	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	5/22/2024	1.20	\$ 255.27	\$ 306.32	Draft updated class notice (exhibit to agreement)	ADR
Rebecca Scholtz	5/24/2024	1.00	\$ 255.27	\$ 255.27	TC co-counsel team	Case development
Rebecca Scholtz	5/28/2024	0.50	\$ 255.27	\$ 127.64	Finalize updated class notice draft (exhibit to agreement)	ADR
Rebecca Scholtz	6/7/2024	0.20	\$ 255.27	\$ 51.05	Compose and circulate to-dos in preparing mtn for prelim approval	ADR
Rebecca Scholtz	6/7/2024	0.50	\$ 255.27	\$ 127.64	Draft joint letter to Judge Gallagher w procedural questions re class notice	ADR
Michelle Mendez	6/7/2024	0.90	\$ 551.00	\$ 495.90	TC co counsel team	Case development
Michelle Mendez	6/7/2024	1.30	\$ 551.00	\$ 716.30	Update client counseling talking points	ADR
Rebecca Scholtz	6/14/2024	0.60	\$ 255.27	\$ 153.16	Initial planning and outreach to communications teams at each firm re forthcoming settlement agreement	Case development
Rebecca Scholtz	6/14/2024	1.00	\$ 255.27	\$ 255.27	TC co-counsel team	Case development
Rebecca Scholtz	6/17/2024	0.30	\$ 255.27	\$ 76.58	TC class member counsel with merits hearing in imm ct next week	Class counsel duties
Rebecca Scholtz	6/17/2024	0.20	\$ 255.27	\$ 51.05	Prepare agenda for 6/17/24 team meeting	Case development
Michelle Mendez	6/17/2024	1.10	\$ 551.00	\$ 606.10	TC co-counsel team	Case development
Rebecca Scholtz	6/18/2024	0.20	\$ 255.27	\$ 51.05	Email communication with named plaintiff	Case development
Rebecca Scholtz	6/18/2024	0.30	\$ 255.27	\$ 76.58	Review talking points for conversations with named plaintiffs re update on settlement negotiations	Case development
Rebecca Scholtz	6/19/2024	0.20	\$ 255.27	\$ 51.05	Coordinate and schedule meeting among co-counsel team and communications staff at the co-counsel firms re forthcoming settlement agreement	Case development
Rebecca Scholtz	6/20/2024	2.00	\$ 255.27	\$ 510.54	Review draft motion for preliminary approval	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	6/20/2024	0.20	\$ 255.27	\$ 51.05	Organize next steps for seeking preliminary approval of agreement, email co-counsel team	Case development
Michelle Mendez	6/20/2024	1.07	\$ 551.00	\$ 589.57	TC with comms & policy org reps re settlement	Case development
Michelle Mendez	6/20/2024	0.40	\$ 551.00	\$ 220.40	Implement Wendy's suggestions into client counseling doc	ADR
Michelle Mendez	6/20/2024	0.93	\$ 551.00	\$ 512.43	Call with plaintiff EDG	ADR
Rebecca Scholtz	6/24/2024	0.70	\$ 255.27	\$ 178.69	TC co-counsel team (RS had to step away for 10 minutes)	Case development
Rebecca Scholtz	6/24/2024	0.20	\$ 255.27	\$ 51.05	Revise draft joint letter to Judge Gallagher seeking clarification re notice process	ADR
Rebecca Scholtz	6/24/2024	1.20	\$ 255.27	\$ 306.32	Final settlement exhibit review (checking PDF versions for accuracy and completeness)	ADR
Michelle Mendez	6/24/2024	0.20	\$ 551.00	\$ 110.20	TC with R. Scholtz re plaintiff contact progress	Case development
Rebecca Scholtz	6/26/2024	0.70	\$ 255.27	\$ 178.69	Final settlement exhibit typo correction & completion	ADR
Yulie Landan	6/27/2024	0.08	\$ 255.27	\$ 20.42	Reviewing notices and settlement for purposes of designing notices to class	ADR
Rebecca Scholtz	6/27/2024	1.30	\$ 255.27	\$ 331.85	Edit joint motion for preliminary approval	ADR
Rebecca Scholtz	6/27/2024	0.60	\$ 255.27	\$ 153.16	TC future class member counsel seeking advice	Class counsel duties
Yulie Landan	6/28/2024	3.60	\$ 255.27	\$ 918.97	Drafting class notices	ADR
Rebecca Scholtz	6/28/2024	0.50	\$ 255.27	\$ 127.64	TC Yulie Landan (colleague at NIPNLG) re class notice design	Class counsel duties
Rebecca Scholtz	6/28/2024	0.30	\$ 255.27	\$ 76.58	Draft notice of settlement for practitioners	Class counsel duties
Rebecca Scholtz	6/28/2024	0.20	\$ 255.27	\$ 51.05	Edit joint letter to court seeking guidance on procedural questions re class notice	Case development
Rebecca Scholtz	6/28/2024	0.30	\$ 255.27	\$ 76.58	Organize and summarize action items re settlement finalization and fee petition, email team	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	6/28/2024	1.50	\$ 255.27	\$ 382.91	Draft alert re executed settlement agreement for field	Class counsel duties
Michelle Mendez	6/28/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Yulie Landan	7/1/2024	4.00	\$ 255.27	\$ 1,021.08	Drafting notices	ADR
Rebecca Scholtz	7/1/2024	0.80	\$ 255.27	\$ 204.22	Edit practice alert on executed settlement agreement for field	Class counsel duties
Rebecca Scholtz	7/1/2024	0.30	\$ 255.27	\$ 76.58	Organize and summarize action items re settlement finalization and fee petition, email team	Case development
Michelle Mendez	7/1/2024	0.50	\$ 551.00	\$ 275.50	Review and edit practice alert on proposed settlement agreement	Class counsel duties
Michelle Mendez	7/1/2024	0.70	\$ 551.00	\$ 385.70	Team Call	Case development
Yulie Landan	7/2/2024	0.40	\$ 255.27	\$ 102.11	Meeting with Rebecca Scholtz and editing notice	ADR
Rebecca Scholtz	7/2/2024	0.40	\$ 255.27	\$ 102.11	Review internal talking points for media queries re settlement agreement	Class counsel duties
Rebecca Scholtz	7/2/2024	0.60	\$ 255.27	\$ 153.16	Review preliminary class notice with added formatting/design	Class counsel duties
Rebecca Scholtz	7/8/2024	0.40	\$ 255.27	\$ 102.11	Edit designed preliminary class notice	Class counsel duties
Rebecca Scholtz	7/8/2024	0.20	\$ 255.27	\$ 51.05	Draft and send email to team summarizing today's call and action items for this week	Case development
Michelle Mendez	7/8/2024	0.90	\$ 551.00	\$ 495.90	Team Call	Case development
Michelle Mendez	7/9/2024	0.30	\$ 551.00	\$ 165.30	call with with UC legal rep (Michaela)	Class counsel duties
Rebecca Scholtz	7/12/2024	0.80	\$ 255.27	\$ 204.22	Finalize practice alert to field re executed settlement agreement	Class counsel duties
Rebecca Scholtz	7/12/2024	0.50	\$ 255.27	\$ 127.64	Draft updates to class counsel J.O.P. webpage	Class counsel duties
Michelle Mendez	7/12/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Michelle Mendez	7/15/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Michelle Mendez	7/18/2024	0.47	\$ 551.00	\$ 258.97	Telephone call (TC) with KIND	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	7/19/2024	0.30	\$ 551.00	\$ 165.30	Review Unofficial Minutes and AO Statistics from AO Liaison Meeting 6/27/2 and email team the TVPRA asylum stats out of the Chicago AO	Class counsel duties
Michelle Mendez	7/20/2024	0.30	\$ 551.00	\$ 165.30	Respond to AILA removal defense listerve UC asylum practice and proposed settlement agreement	Class counsel duties
Rebecca Scholtz	7/23/2024	0.50	\$ 255.27	\$ 127.64	Review Defendants' edits to motion for preliminary approval	ADR
Rebecca Scholtz	7/23/2024	0.80	\$ 255.27	\$ 204.22	TC co-counsel team re joint motion for preliminary approval draft/edits	ADR
Rebecca Scholtz	7/23/2024	0.50	\$ 255.27	\$ 127.64	Review Defendants' edits to motion for preliminary approval	ADR
Michelle Mendez	7/23/2024	0.40	\$ 551.00	\$ 220.40	Email co-counsel team re decisions on response to gov't	Case development
Rebecca Scholtz	7/24/2024	0.80	\$ 255.27	\$ 204.22	Reseach on enforcement of settlement	ADR
Rebecca Scholtz	7/24/2024	0.20	\$ 255.27	\$ 51.05	TC K. DeJong re edits to joint motion for preliminary approval	ADR
Rebecca Scholtz	7/24/2024	0.30	\$ 255.27	\$ 76.58	Revise joint motion for preliminary approval	ADR
Michelle Mendez	7/25/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	7/29/2024	0.20	\$ 255.27	\$ 51.05	Draft agenda for 7/29 co-counsel planning call	Case development
Rebecca Scholtz	7/29/2024	1.00	\$ 255.27	\$ 255.27	TC co-counsel team	Case development
Rebecca Scholtz	7/29/2024	0.20	\$ 255.27	\$ 51.05	Work with communications team to post class counsel J.O.P. website updates	Class counsel duties
Rebecca Scholtz	7/29/2024	0.60	\$ 255.27	\$ 153.16	Final preparation of practice alert to field re settlement	Class counsel duties
Rebecca Scholtz	7/30/2024	0.50	\$ 255.27	\$ 127.64	Revise class notices in light of instructions received from chambers	Class counsel duties
Michelle Mendez	7/30/2024	0.30	\$ 551.00	\$ 165.30	Email the JOP practice alert to stakeholders	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	7/31/2024	0.80	\$ 255.27	\$ 204.22	Class member outreach about motion for preliminary approval; advising and responding to email	Class counsel duties
Rebecca Scholtz	8/1/2024	0.50	\$ 255.27	\$ 127.64	Respond to class member inquiries received after posting update re motion for preliminary approval	Class counsel duties
Rebecca Scholtz	8/2/2024	0.20	\$ 255.27	\$ 51.05	Follow up from today's call - class member correspondence, fee petition action items	Case development
Michelle Mendez	8/2/2024	1.20	\$ 551.00	\$ 661.20	TC co-counsel team	Case development
Rebecca Scholtz	8/12/2024	0.20	\$ 255.27	\$ 51.05	Coordinate and plan webinar to field re proposed agreement	Class counsel duties
Rebecca Scholtz	8/12/2024	0.30	\$ 255.27	\$ 76.58	Draft and send email to team summarizing today's call and action items for this week	Case development
Michelle Mendez	8/12/2024	1.10	\$ 551.00	\$ 606.10	TC co-counsel team	Case development
Rebecca Scholtz	8/16/2024	0.30	\$ 255.27	\$ 76.58	Advise immigration counsel of detained class member	Class counsel duties
Rebecca Scholtz	8/16/2024	0.70	\$ 255.27	\$ 178.69	TC co-counsel team	Case development
Rebecca Scholtz	8/16/2024	0.40	\$ 255.27	\$ 102.11	Draft and send email to team summarizing today's call and decisions/actions	Case development
Rebecca Scholtz	8/16/2024	0.20	\$ 255.27	\$ 51.05	Locate and send redlined class notice to K. Jackson to send to Spanish translator to update class notice translation	Class counsel duties
Rebecca Scholtz	8/19/2024	0.20	\$ 255.27	\$ 51.05	Respond to class member attorney query	Class counsel duties
Rebecca Scholtz	8/19/2024	0.10	\$ 255.27	\$ 25.53	Create agenda for 8.19 co-counsel call	Case development
Rebecca Scholtz	8/19/2024	1.00	\$ 255.27	\$ 255.27	Review Spanish translation of class notice	Class counsel duties
Rebecca Scholtz	8/19/2024	0.10	\$ 255.27	\$ 25.53	Identify potential proposed dates for fairness hearing based on team availability	Class counsel duties
Rebecca Scholtz	8/19/2024	0.50	\$ 255.27	\$ 127.64	Draft outline to settlement agreement Q&A webinar on 9.9.2024	Class counsel duties
Rebecca Scholtz	8/19/2024	1.00	\$ 255.27	\$ 255.27	TC co-counsel team	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	8/19/2024	0.20	\$ 255.27	\$ 51.05	Draft and send email to team summarizing today's call and action items for this week	Case development
Michelle Mendez	8/19/2024	0.90	\$ 551.00	\$ 495.90	Review Spanish translation of class notice and email team	Class counsel duties
Rebecca Scholtz	8/20/2024	0.30	\$ 255.27	\$ 76.58	Respond to query from NGO representing UCs re proposed agreement	Class counsel duties
Rebecca Scholtz	8/23/2024	0.30	\$ 255.27	\$ 76.58	Review court's order granting preliminary approval & create timeline/action items	Case development
Rebecca Scholtz	8/23/2024	0.70	\$ 255.27	\$ 178.69	Finalize class notice in light of court order granting preliminary approval	Class counsel duties
Rebecca Scholtz	8/23/2024	0.70	\$ 255.27	\$ 178.69	Draft class counsel J.O.P. webpage update and email distributing class notice in light of court order granting preliminary approval	Class counsel duties
Rebecca Scholtz	8/23/2024	0.30	\$ 255.27	\$ 76.58	Update practice alert on settlement in light of court's order granting preliminary approval	Class counsel duties
Rebecca Scholtz	8/23/2024	0.40	\$ 255.27	\$ 102.11	Final proofread of class notice	Class counsel duties
Rebecca Scholtz	8/23/2024	0.60	\$ 255.27	\$ 153.16	TC co-counsel team	Case development
Rebecca Scholtz	8/23/2024	0.10	\$ 255.27	\$ 25.53	Finalize class notice, convert to PDF	Class counsel duties
Rebecca Scholtz	8/23/2024	0.20	\$ 255.27	\$ 51.05	Draft and send email to team summarizing today's call and decisions/actions	Case development
Rebecca Scholtz	8/26/2024	0.50	\$ 255.27	\$ 127.64	Create class notice distribution plan & finalize Spanish class notice	Class counsel duties
Rebecca Scholtz	8/26/2024	0.70	\$ 255.27	\$ 178.69	TC co-counsel team	Case development
Rebecca Scholtz	8/26/2024	0.70	\$ 255.27	\$ 178.69	Finalize Spanish class notice	Class counsel duties
Rebecca Scholtz	8/28/2024	0.80	\$ 255.27	\$ 204.22	Consult with putative class member attorney	Class counsel duties
Rebecca Scholtz	8/28/2024	0.30	\$ 255.27	\$ 76.58	Organize final posting of class notice on webpage and correspondent with communications staff to make webpage updates	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	8/28/2024	0.20	\$ 255.27	\$ 51.05	Review proposed response to query from the field re settlement agreement	Class counsel duties
Michelle Mendez	8/28/2024	0.20	\$ 551.00	\$ 110.20	Respond to email on Child Immigrant Nonprofits Collaborative listserv re proposed settlement agreement and practice alert	Class counsel duties
Rebecca Scholtz	9/3/2024	0.20	\$ 255.27	\$ 51.05	Prepare for webinar on settlement agreement for Acacia network	Class counsel duties
Rebecca Scholtz	9/3/2024	0.30	\$ 255.27	\$ 76.58	Respond to query from attorney working with class members	Class counsel duties
Rebecca Scholtz	9/3/2024	0.20	\$ 255.27	\$ 51.05	Correspondence with co counsel re class notice distribution	Class counsel duties
Rebecca Scholtz	9/3/2024	1.40	\$ 255.27	\$ 357.38	Review Defendants' edits to class notice	Class counsel duties
Rebecca Scholtz	9/4/2024	1.00	\$ 255.27	\$ 255.27	Identify and correct errors to class notice	Class counsel duties
Rebecca Scholtz	9/4/2024	0.80	\$ 255.27	\$ 204.22	Prepare for webinar on settlement agreement for Acacia network	Class counsel duties
Rebecca Scholtz	9/4/2024	1.00	\$ 255.27	\$ 255.27	Meeting with W. Wylegala and M. Tanagho Ross to discuss error correction on class notice, revise class notice distribution plan, and plan 9.9 Acacia webinar	Class counsel duties
Rebecca Scholtz	9/4/2024	1.10	\$ 255.27	\$ 280.80	Planning meeting with W. Wylegala and M. Tanagho Ross re 9.9 Acacia webinar	Class counsel duties
Rebecca Scholtz	9/5/2024	0.20	\$ 255.27	\$ 51.05	TC W. Wylegala re class notice distribution	Class counsel duties
Rebecca Scholtz	9/5/2024	0.50	\$ 255.27	\$ 127.64	Distribute class notice on listservs	Class counsel duties
Rebecca Scholtz	9/5/2024	0.50	\$ 255.27	\$ 127.64	Respond to queries from practitioners representing class members re settlement	Class counsel duties
Rebecca Scholtz	9/5/2024	0.50	\$ 255.27	\$ 127.64	Meet with staff from Acacia to plan 9.9 webinar	Class counsel duties
Rebecca Scholtz	9/5/2024	0.50	\$ 255.27	\$ 127.64	Draft and send logistics email to co-counsel team re 9.9 webinar plan	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	9/5/2024	1.50	\$ 255.27	\$ 382.91	Prepare for webinar on settlement agreement for Acacia network	Class counsel duties
Rebecca Scholtz	9/5/2024	0.50	\$ 255.27	\$ 127.64	Respond to query from class member attorney	Class counsel duties
Rebecca Scholtz	9/6/2024	0.20	\$ 255.27	\$ 51.05	Respond to query from class member attorney	Class counsel duties
Michelle Mendez	9/6/2024	0.50	\$ 551.00	\$ 275.50	TC co-counsel team (arrived late)	Case development
Rebecca Scholtz	9/8/2024	1.00	\$ 255.27	\$ 255.27	Prepare for webinar on settlement agreement for Acacia network	Class counsel duties
Michelle Mendez	9/8/2024	0.40	\$ 551.00	\$ 220.40	Prep for webinar for Acacia network on proposed agreement	Class counsel duties
Rebecca Scholtz	9/9/2024	0.50	\$ 255.27	\$ 127.64	Prepare for webinar on settlement agreement for Acacia network	Class counsel duties
Rebecca Scholtz	9/9/2024	1.00	\$ 255.27	\$ 255.27	Present during webinar on proposed settlement for Acacia network	Class counsel duties
Michelle Mendez	9/9/2024	1.50	\$ 551.00	\$ 826.50	Prep and offer webinar for Acacia network on proposed agreement	Class counsel duties
Michelle Mendez	9/9/2024	0.30	\$ 551.00	\$ 165.30	Respond to AILA removal defense listerve UC asylum practice and proposed settlement agreement	Class counsel duties
Michelle Mendez	9/9/2024	0.10	\$ 551.00	\$ 55.10	Respond to email to DG-JOPClassCounsel@goodwinlaw.com asking for information on how to register for the 9/23 webinar	Class counsel duties
Rebecca Scholtz	9/10/2024	0.50	\$ 255.27	\$ 127.64	Draft description for 9.30 webinar on settlement agreement	Class counsel duties
Rebecca Scholtz	9/10/2024	0.30	\$ 255.27	\$ 76.58	Respond to query from class member attorney re PI violation	Class counsel duties
Rebecca Scholtz	9/10/2024	0.50	\$ 255.27	\$ 127.64	Prepare presentation re proposed settlement for large meeting of advocates	Class counsel duties
Rebecca Scholtz	9/10/2024	0.90	\$ 255.27	\$ 229.74	Attend large meeting of advocates & present re proposed agreement	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	9/11/2024	0.30	\$ 255.27	\$ 76.58	Draft and send email to co-counsel team re upcoming webinar re proposed settlement	Class counsel duties
Rebecca Scholtz	9/11/2024	0.50	\$ 255.27	\$ 127.64	Draft 9.30 webinar registration page and distribution email	Class counsel duties
Michelle Mendez	9/12/2024	0.20	\$ 551.00	\$ 110.20	Email with UC legal rep (Kevin) re case followed by phone call	Class counsel duties
Rebecca Scholtz	9/13/2024	1.00	\$ 255.27	\$ 255.27	Attend national asylum working group meeting to present re proposed settlement	Class counsel duties
Rebecca Scholtz	9/16/2024	0.30	\$ 255.27	\$ 76.58	Advise immigration counsel of class member with pending BIA appeal	Class counsel duties
Rebecca Scholtz	9/16/2024	1.00	\$ 255.27	\$ 255.27	TC co-counsel team	Case development
Rebecca Scholtz	9/16/2024	0.60	\$ 255.27	\$ 153.16	Advise immigration counsel of class member with pending BIA appeal	Class counsel duties
Rebecca Scholtz	9/16/2024	0.30	\$ 255.27	\$ 76.58	Draft and send email to co-counsel team summarizing today's call and action items for this week	Case development
Rebecca Scholtz	9/16/2024	0.60	\$ 255.27	\$ 153.16	Prepare for 9.30 webinar regarding settlement agreement	Class counsel duties
Rebecca Scholtz	9/17/2024	0.50	\$ 255.27	\$ 127.64	Edit proposed response to pro se queries received to class counsel email address	Class counsel duties
Michelle Mendez	9/17/2024	0.70	\$ 551.00	\$ 385.70	Draft and share possible responses to the email queries that we are receiving on our team counsel listserv hosted by Goodwin	Class counsel duties
Michelle Mendez	9/20/2024	0.50	\$ 551.00	\$ 275.50	Translate final English version of response to email queries that we are receiving on our team counsel listserv hosted by Goodwin	Class counsel duties
Rebecca Scholtz	9/23/2024	0.70	\$ 255.27	\$ 178.69	Prepare for 9.30 webinar regarding settlement agreement	Class counsel duties
Rebecca Scholtz	9/23/2024	0.10	\$ 255.27	\$ 25.53	Prepare agenda items for today's co-counsel team meeting	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	9/23/2024	0.70	\$ 551.00	\$ 385.70	TC co-counsel team	Case development
Michelle Mendez	9/23/2024	0.40	\$ 551.00	\$ 220.40	Respond to 4 emails in Spanish sent to DG-JOPClassCounsel@goodwinlaw.com	Class counsel duties
Rebecca Scholtz	9/27/2024	0.70	\$ 255.27	\$ 178.69	Prepare for 9.30 webinar regarding settlement agreement	Class counsel duties
Rebecca Scholtz	9/27/2024	0.50	\$ 255.27	\$ 127.64	TC co-counsel team	Case development
Rebecca Scholtz	9/27/2024	0.20	\$ 255.27	\$ 51.05	Prepare for 9.30 webinar regarding settlement agreement	Class counsel duties
Rebecca Scholtz	9/27/2024	0.40	\$ 255.27	\$ 102.11	Identify which portions of final class notice are in need of Spanish translation in light of translated preliminary class notice	Class counsel duties
Michelle Mendez	9/29/2024	0.50	\$ 551.00	\$ 275.50	Prep for Sept. 30th webinar re settlement agreement	Class counsel duties
Rebecca Scholtz	9/30/2024	0.80	\$ 255.27	\$ 204.22	Prepare for 9.30 webinar regarding settlement agreement	Class counsel duties
Rebecca Scholtz	9/30/2024	1.40	\$ 255.27	\$ 357.38	Present during webinar re settlement agreement (plus pre and post webinar tasks)	Class counsel duties
Rebecca Scholtz	9/30/2024	0.20	\$ 255.27	\$ 51.05	Respond to query from class member attorney	Class counsel duties
Michelle Mendez	9/30/2024	1.30	\$ 551.00	\$ 716.30	Prep for Sept. 30th webinar re settlement agreement	Class counsel duties
Rebecca Scholtz	10/2/2024	0.30	\$255.27	\$ 76.58	Respond to query from class member's attorney	Class counsel duties
Rebecca Scholtz	10/2/2024	0.30	\$255.27	\$ 76.58	Respond to query from prospective class member's attorney	Class counsel duties
Michelle Mendez	10/4/2024	1.10	\$ 551.00	\$ 606.10	TC co-counsel team	Case development
Michelle Mendez	10/4/2024	0.08	\$ 551.00	\$ 44.08	Review of portion of KIND's JOP alert for KIND pro bono attorneys and email team	Class counsel duties
Rebecca Scholtz	10/4/2024	0.80	\$255.27	\$ 204.22	Draft and send email to team summarizing today's call and action items for this week	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	10/7/2024	0.10	\$ 551.00	\$ 55.10	Review email draft to opp counsel re 508 compliance and email team	Class counsel duties
Rebecca Scholtz	10/7/2024	0.20	\$255.27	\$ 51.05	Respond to query from prospective class member's attorney	Class counsel duties
Rebecca Scholtz	10/8/2024	0.10	\$255.27	\$ 25.53	Follow up response to prospective class member's attorney	Class counsel duties
Rebecca Scholtz	10/8/2024	0.10	\$255.27	\$ 25.53	Respond to query from class member's attorney	Class counsel duties
Rebecca Scholtz	10/10/2024	0.20	\$255.27	\$ 51.05	Respond to query from class member's attorney	Class counsel duties
Michelle Mendez	10/11/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Rebecca Scholtz	10/11/2024	0.50	\$255.27	\$ 127.64	Prepare slides & outline for 10.22.2024 webinar hosted by ABA-CILA about J.O.P. proposed settlement	Class counsel duties
Rebecca Scholtz	10/16/2024	0.80	\$255.27	\$ 204.22	Zoom consult with class member's attorney re PI violation	Class counsel duties
Rebecca Scholtz	10/16/2024	0.70	\$255.27	\$ 178.69	Analysis & write-up for team about PI violation	Class counsel duties
Michelle Mendez	10/17/2024	0.45	\$ 551.00	\$ 247.95	Phone call with Javier from Public Counsel re class member outreach ideas	Class counsel duties
Rebecca Scholtz	10/17/2024	0.20	\$255.27	\$ 51.05	Respond to immigration attorney query re JOP settlement agreement	Class counsel duties
Rebecca Scholtz	10/17/2024	0.20	\$255.27	\$ 51.05	Plan timeline and next steps for settlement finalization and fee petition prep; draft agenda for 10/18 team call	Case development
Michelle Mendez	10/18/2024	0.80	\$ 551.00	\$ 440.80	TC co-counsel team	Case development
Rebecca Scholtz	10/21/2024	0.80	\$255.27	\$ 204.22	Prepare for 10.22.2024 webinar hosted by ABA-CILA regarding J.O.P. proposed settlement	Class counsel duties
Rebecca Scholtz	10/22/2024	0.10	\$255.27	\$ 25.53	Advise immigration counsel of class member	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	10/22/2024	1.50	\$255.27	\$ 382.91	Present during ABA-CILA webinar about J.O.P. settlement (approx. 250 attendees)	Class counsel duties
Rebecca Scholtz	10/22/2024	1.00	\$255.27	\$ 255.27	Draft email about PI violation for Defendants' counsel	Class counsel duties
Rebecca Scholtz	10/23/2024	0.80	\$255.27	\$ 204.22	Revise email about PI violation for Ds' counsel; review relevant records provided by class member	Class counsel duties
Rebecca Scholtz	10/23/2024	0.30	\$255.27	\$ 76.58	Analyze and write-up query from class member's attorney for team input	Class counsel duties
Rebecca Scholtz	10/23/2024	0.20	\$255.27	\$ 51.05	Respond to query from detained class member's attorney	Class counsel duties
Rebecca Scholtz	10/23/2024	0.20	\$255.27	\$ 51.05	Respond to listserv query re J.O.P. issue	Class counsel duties
Rebecca Scholtz	10/24/2024	0.20	\$255.27	\$ 51.05	Draft agenda for 10/25 call & proposed action items	Case development
Rebecca Scholtz	10/24/2024	0.20	\$255.27	\$ 51.05	Review edits to final class notice re settlement agreement	Class counsel duties
Michelle Mendez	10/25/2024	0.40	\$ 551.00	\$ 220.40	Draft Spanish script for TikTok video (class member outreach) and email Javier from Public Counsel	Class counsel duties
Michelle Mendez	10/25/2024	1.20	\$ 551.00	\$ 661.20	TC co-counsel team	Case development
Rebecca Scholtz	10/25/2024	0.70	\$255.27	\$ 178.69	Consult with putative class member's counsel	Class counsel duties
Michelle Mendez	10/28/2024	1.75	\$ 551.00	\$ 964.25	Draft English script for TikTok video and longer Spanish video (class member outreach)	Class counsel duties
Rebecca Scholtz	10/28/2024	0.40	\$255.27	\$ 102.11	Conduct follow-up tasks in light of 10.25 team call; email call summary to team	Case development
Michelle Mendez	10/29/2024	0.07	\$ 551.00	\$ 38.57	Provide feedback on seeking further guidance from opp counsel re alleged PI violation	Class counsel duties
Rebecca Scholtz	10/29/2024	0.40	\$255.27	\$ 102.11	Review Spanish script for TikTok video to be disseminated upon final approval of settlement	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	10/29/2024	0.40	\$255.27	\$ 102.11	TC class member's attorney	Class counsel duties
Rebecca Scholtz	10/29/2024	0.10	\$255.27	\$ 25.53	Email class member's attorney re DHS response to email about alleged PI violation	Class counsel duties
Rebecca Scholtz	10/30/2024	0.20	\$255.27	\$ 51.05	TC counsel of detained class member with final removal order	Class counsel duties
Rebecca Scholtz	10/31/2024	0.30	\$255.27	\$ 76.58	Provide technical assistance to attorney of prospective class member with in absentia removal order	Class counsel duties
Michelle Mendez	11/1/2024		\$ 551.00	\$ -	TC co-counsel team	Case development
Rebecca Scholtz	11/1/2024	0.30	\$255.27	\$ 76.58	Summarize action items from 11.1 call and email team	Case development
Michelle Mendez	11/8/2024	0.25	\$ 551.00	\$ 137.75	Script for longer English video (class member outreach)	Class counsel duties
Michelle Mendez	11/8/2024	0.45	\$ 551.00	\$ 247.95	TC co-counsel team	Class counsel duties
Rebecca Scholtz	11/8/2024	1.00	\$255.27	\$ 255.27	Review Spanish translation of final class notice	Class counsel duties
Rebecca Scholtz	11/8/2024	0.60	\$255.27	\$ 153.16	Respond to queries from two different class members' attorneys	Class counsel duties
Rebecca Scholtz	11/12/2024	0.40	\$255.27	\$ 102.11	Respond to class member attorney's query	Class counsel duties
Rebecca Scholtz	11/13/2024	0.30	\$255.27	\$ 76.58	Respond to class member attorney's query	Class counsel duties
Rebecca Scholtz	11/14/2024	0.60	\$255.27	\$ 153.16	Respond to query from class member's attorney	Class counsel duties
Rebecca Scholtz	11/14/2024	0.30	\$255.27	\$ 76.58	Respond to query from prospective class member's attorney	Class counsel duties
Rebecca Scholtz	11/16/2024	1.30	\$255.27	\$ 331.85	Review Spanish class notice	Class counsel duties
Rebecca Scholtz	11/16/2024	2.30	\$255.27	\$ 587.12	Draft revisions to public-facing resources to be made upon court's final approval of settlement agreement (e.g. webpages, practice alert)	Class counsel duties
Michelle Mendez	11/18/2024	0.05	\$ 551.00	\$ 27.55	Email Javier re TikTok video in Spanish	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	11/18/2024	0.37	\$ 551.00	\$ 203.87	Review Spanish class notice	Class counsel duties
Michelle Mendez	11/18/2024	0.70	\$ 551.00	\$ 385.70	TC co counsel team	Case development
Michelle Mendez	11/20/2024	0.12	\$ 551.00	\$ 66.12	Email Javier re TikTok video in Spanish	Class counsel duties
Michelle Mendez	11/21/2024	0.45	\$ 551.00	\$ 247.95	Review of Notice of Final Agreement in Spanish	Class counsel duties
Rebecca Scholtz	11/21/2024	0.40	\$255.27	\$ 102.11	Edit Spanish translation of final class notice	Class counsel duties
Rebecca Scholtz	11/21/2024	0.20	\$255.27	\$ 51.05	Advise counsel of class member with pending BIA appeal	Class counsel duties
Rebecca Scholtz	11/21/2024	0.20	\$255.27	\$ 51.05	Respond to query from class member's attorney re settlement	Class counsel duties
Rebecca Scholtz	11/22/2024	0.60	\$255.27	\$ 153.16	Review Spanish translation of Notice of Noncompliance	Class counsel duties
Rebecca Scholtz	11/22/2024	0.40	\$255.27	\$ 102.11	Finalize revisions to public-facing resources to be made upon court's final approval of settlement agreement	Class counsel duties
Michelle Mendez	11/24/2024	0.67	\$ 551.00	\$ 369.17	Review Spanish translation of Notice of Noncompliance	Class counsel duties
Michelle Mendez	11/25/2024	2.00	\$ 551.00	\$ 1,102.00	Fairness Hearing	Class counsel duties
Michelle Mendez	11/25/2024	0.20	\$ 551.00	\$ 110.20	TC R.Scholtz	Case development
Michelle Mendez	11/25/2024	0.80	\$ 551.00	\$ 440.80	TC co-counsel team	Case development
Michelle Mendez	11/25/2024	0.08	\$ 551.00	\$ 44.08	Call with EDG re final settlement approval following the fairness hearing	Case development
Michelle Mendez	11/25/2024	0.05	\$ 551.00	\$ 27.55	Review draft email to Defendants' counsel confirming class cut-off date in light of court's final approval order	Class counsel duties
Michelle Mendez	11/25/2024	0.02	\$ 551.00	\$ 11.02	Leave voicemail for Matt (Opp Counsel)	Class counsel duties
Michelle Mendez	11/25/2024	0.05	\$ 551.00	\$ 27.55	Call with Matt (Opp Counsel)	Class counsel duties
Rebecca Scholtz	11/25/2024	0.40	\$255.27	\$ 102.11	Revise Notice of Noncompliance (Spanish and English)	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Rebecca Scholtz	11/25/2024	1.20	\$255.27	\$ 306.32	Update and prepare public-facing resources in light of court's final approval of settlement	Class counsel duties
Rebecca Scholtz	11/25/2024	0.50	\$255.27	\$ 127.64	Draft email to Defendants' counsel confirming class cut-off date in light of court's final approval order	Case development
Rebecca Scholtz	11/25/2024	0.50	\$255.27	\$ 127.64	Finalize class notices in English and Spanish in light of final approval order	Class counsel duties
Michelle Mendez	11/26/2024	0.07	\$ 551.00	\$ 38.57	Review of final settlement agreement notice for listservs	Class counsel duties
Michelle Mendez	11/26/2024	0.25	\$ 551.00	\$ 137.75	Distribution class notice on various listservs	Class counsel duties
Michelle Mendez	11/26/2024	0.17	\$ 551.00	\$ 93.67	Respond to inquiry on counsel email address (M.Curtis)	Class counsel duties
Rebecca Scholtz	11/26/2024	0.50	\$255.27	\$ 127.64	Distribution class notice on various listservs	Class counsel duties
Michelle Mendez	12/2/2024	1.20	\$ 551.00	\$ 661.20	TC co-counsel team & follow up	Case development
Michelle Mendez	12/3/2024	0.25	\$ 551.00	\$ 137.75	Discuss TikTok dissemination with ED and email team regarding tiktok status	Class counsel duties
Michelle Mendez	12/3/2024	0.20	\$ 551.00	\$ 110.20	Review final notice sent by gov't, email team, upload on Teams, and ask comms to post on org website	Class counsel duties
Rebecca Scholtz	12/3/2024	0.20	\$255.27	\$ 51.05	Respond to query from prospective class member's attorney	Class counsel duties
Rebecca Scholtz	12/5/2024	0.40	\$255.27	\$ 102.11	Respond to query from prospective class member's attorney	Class counsel duties
Rebecca Scholtz	12/6/2024	1.00	\$255.27	\$ 255.27	TC co-counsel team	Case development
Rebecca Scholtz	12/6/2024	0.80	\$255.27	\$ 204.22	Respond to queries from prospective class members' attorneys	Class counsel duties
Michelle Mendez	12/9/2024	1.00	\$ 551.00	\$ 551.00	TC co-counsel team	Case development
Michelle Mendez	12/9/2024	0.15	\$ 551.00	\$ 82.65	Check in with Comms regarding posting video in Spanish	Class counsel duties
Michelle Mendez	12/9/2024	0.12	\$ 551.00	\$ 66.12	Review NON Spanish translation	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Michelle Mendez	12/9/2024	0.12	\$ 551.00	\$ 66.12	Review Spanish TikTok video questions and email team	Class counsel duties
Michelle Mendez	12/10/2024	0.23	\$ 551.00	\$ 126.73	Review stock message, respond to counsel email queries with stock message, and update the doc on Teams	Class counsel duties
Rebecca Scholtz	12/10/2024	1.00	\$255.27	\$ 255.27	Draft one-pager to field re J.O.P. settlement agreement	Class counsel duties
Michelle Mendez	12/11/2024	0.10	\$ 551.00	\$ 55.10	Respond to JOP query on national immigration project listserv	Class counsel duties
Rebecca Scholtz	12/11/2024	0.20	\$255.27	\$ 51.05	Respond to query from class member's attorney	Class counsel duties
Rebecca Scholtz	12/15/2024	0.40	\$255.27	\$ 102.11	Respond to query from class member's attorney	Class counsel duties
Rebecca Scholtz	12/15/2024	0.20	\$255.27	\$ 51.05	Draft and circulate agenda for 12.16.2024 call	Case development
<b>TOTALS</b>		<b>1131.98</b>		<b>\$357,071.26</b>		

# Exhibit B

**Expenses incurred by class counsel relating to *J.O.P. v D.H.S.* : National Immigration Project**

<b>Name</b>	<b>Amount incurred</b>	<b>Date incurred</b>	<b>Paid to</b>	<b>Purpose</b>
Rebecca Scholtz	\$548.39	12/28/2023	Delta	Plane ticket for trip to Greenbelt (MSP to DCA) for March 2024 mediation
Michelle Mendez	\$43.15	3/3/2024	GS Mileage Rate	Travel from home to Crowne Plaza Hotel in Greenbelt and back for team prep for mediation (32.2 miles each way x .67 miles)
Rebecca Scholtz	\$174.02	3/4/2024	Crowne Plaza Hotel, Greenbelt	hotel stay for mediation, 3/4 - 3/5
Rebecca Scholtz	\$68.67	3/3/2024	Lyft	Transportation related to March 2024 mediation
Michelle Mendez	\$21.57	3/3/2024	GS Mileage Rate	Travel from home to Crowne Plaza Hotel in Greenbelt for mediation (32.2 miles x .67 miles)
Michelle Mendez	\$119.53	3/4/2024	Crowne Plaza Hotel, Greenbelt	hotel stay for mediation, 3/4 - 3/5
Rebecca Scholtz	\$48.86	3/4/2024	Lyft	Transportation related to March 2024 mediation
Michelle Mendez	\$21.57	3/5/2024	GS Mileage Rate	Travel from Crowne Plaza Hotel in Greenbelt to home following mediation (32.2 miles x .67 miles)
Rebecca Scholtz	\$20.98	3/6/2024	Lyft	Transportation related to March 2024 mediation
Rebecca Scholtz	\$32.40	3/6/2024	MSP Sunshine Taxi	Transportation related to March 2024 mediation

**TOTAL            \$1,099.14**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION

J.O.P., et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, et al.,

Defendants.

Civil Action No. 8:19-CV-01944-SAG

DECLARATION OF KEVIN J. DEJONG IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES

I, Kevin J. DeJong, declare:

1. I am an attorney licensed to practice in the State of New Hampshire and the Commonwealth of Massachusetts. I have appeared in this Court *pro hac vice*. I have personal knowledge of the facts in this declaration, and if called upon to testify, I could and would testify competently to the facts herein.

2. I am currently serving as Counsel at Goodwin Procter LLP ("Goodwin Procter"). I have been co-counsel to the named Plaintiffs in this litigation from its inception, and the Court appointed Goodwin Procter as one of the counsel to the Plaintiff Class in December 2020. I make this declaration in support of Plaintiffs' motion as prevailing party for recovery of attorneys' fees and expenses.

Goodwin Procter

3. Goodwin Procter is a global law firm with more than 1,800 attorneys operating from 16 offices across North America, Europe, and Asia. Goodwin Procter focuses on complex

transactional work, high-stakes litigation and advisory services in matters involving financial institutions, intellectual property, private equity, real estate capital markets, securities litigation, white collar defense, technology and life sciences.

4. Goodwin Procter attorneys also routinely assist in pro bono representation of individuals in need, including representation in the criminal justice and immigration systems, and assisting individuals to secure safe housing, public benefits, and veterans' benefits. As part of Goodwin Procter's pro bono efforts, firm lawyers represent unaccompanied children in proceedings before the Immigration Courts, before the Board of Immigration Appeals, in administrative proceedings before Defendant U.S. Citizenship and Immigration Services ("USCIS"), and in ancillary proceedings in state courts. Goodwin Procter has a long-standing relationship with Kids in Need of Defense ("KIND"), and in the last ten (10) years, Goodwin Procter has received more than 160 referrals from KIND to represent unaccompanied children in immigration proceedings.

#### **My Professional Background and Qualifications**

5. I began work at Goodwin Procter in 2009, after graduating magna cum laude from the University of New Hampshire School of Law (formerly Franklin Pierce Law). I was admitted to the bars of the Commonwealth of Massachusetts and the State of New Hampshire in 2009. I am also admitted to practice before the District Court for the District of Massachusetts, the District Court for the District of New Hampshire, and the U.S. Court of Appeals for the Federal Circuit.

6. Nearly all of my practice since 2009 has involved litigation in federal court, in courts throughout the United States. In addition to cases in the U.S. District Court for the District of Massachusetts and the District of New Hampshire, I have been admitted *pro hac vice* in the District Courts of the District of Delaware, the District of New Jersey, the Southern District of New York,



the Eastern District of Virginia, and the Northern District of Alabama. Most of my work has involved litigation related to intellectual property, including patents and trademarks. I have drafted and argued numerous motions filed in federal courts, handled status conferences, and have participated in many trials in federal courts. As a result of my litigation practice, I have become very familiar with the Federal Rules of Civil Procedure, and general practices in federal courts.

7. Over the last 15 years, I have also represented numerous children in immigration proceedings, mainly through referrals and mentorship from KIND. My work has included representing children in state court proceedings (seeking Special Immigrant Juvenile status), and in proceedings before USCIS, and in immigration court. I have also successfully represented children and adults seeking asylum before immigration courts and USCIS.

**Work Performed by Goodwin in Connection With This Matter**

8. Goodwin Procter has been involved in this matter from the very beginning in 2019. By 2019, Goodwin Procter already had a long-standing relationship with KIND, including as a result of Goodwin's representation of unaccompanied children referred by KIND, and in undertaking amicus curiae briefing with KIND in matters related to unaccompanied children. I personally became involved at the very outset of this case, and led efforts to assemble a team of lawyers that could quickly mobilize to challenge the underlying policy issued by USCIS that appeared on USCIS's website on June 14, 2019. The policy was to go into effect on June 30, 2019, and therefore time was of the essence, with only about two weeks to file a challenge in federal court. The Goodwin Procter team had the resources and specialized knowledge to undertake this matter, in partnership with our co-counsel.

9. The Goodwin Procter team quickly mobilized to conduct legal research and draft the Complaint and motion for a temporary restraining order (“TRO”). The Complaint and motion for a TRO were filed on July 1, 2019. The Court heard argument on the motion for a TRO on July 19, 2019. Mr. Brian Burgess and I, along with co-counsel Michelle Mendez from the National Immigration Project – National Lawyers Guild (“NIP-NLG”), argued on behalf of Plaintiffs.

10. Brian Burgess is a partner at Goodwin Procter, and he likewise worked on the matter from the outset. Mr. Burgess has extensive experience in federal court litigation, and in particular, has significant experience in challenges to government policies under the Administrative Procedure Act (“APA”). He also has significant experience and expertise in class certification. Mr. Burgess contributed to strategy in developing arguments that could be raised to challenge the USCIS policies at issue in this litigation, as well as the strategy for class litigation.

11. Mr. Stephen Shaw, a former associate at Goodwin, was also heavily involved in work on this litigation during its initial stages. Mr. Shaw drafted portions the Complaint, motion for a TRO, as well as other motions filed during the course of this litigation, including with respect to class certification.

12. Since filing the complaint and TRO motion on July 1, 2019, the Goodwin Procter team has engaged in legal research and writing, including drafting pleadings, motions (including the motion for a preliminary injunction; opposition to Defendants’ motion to dismiss; motion for class certification; and motion to amend the preliminary injunction), and other court filings; reviewed and analyzed the government’s Administrative Record; attended virtual and in-person mediation sessions; and handled communications with opposing counsel, including communications to provide notice of violations of the preliminary injunction.

13. I have served as a lead counsel for this litigation, including serving as the primary contact with government counsel. I have taken the lead in each status conference with the Court and with meet and confers with government counsel. I drafted portions of every motion (and opposition brief) filed with this Court as part of this litigation, coordinated numerous court filings and status reports, and participated in numerous strategy meetings with my co-counsel. Over the last few years, through assistance of my co-counsel, I also raised numerous issues to government counsel regarding the Defendants' compliance with the Court's injunction. I have also personally been involved with all efforts to achieve a settlement in this litigation, including attending all video conferences and the in-person mediation sessions with Chief Magistrate Judge Timothy Sullivan and Magistrate Judge Jillyn Shulze. I also drafted portions of Plaintiffs' mediation statements submitted to the magistrate judges. I also took the lead at the Fairness Hearing held on November 25, 2024.

14. Ms. Genovese-Bova, an associate at Goodwin Procter, became involved in this matter in 2024. Ms. Genovese-Bova performed legal research related to the motion for preliminary approval of the settlement agreement and drafted portions of that motion. Ms. Genovese-Bova also performed legal research related to Plaintiffs' request for recovery of attorneys' fees, and drafted portions of the related motion.

15. The time and labor that Goodwin Procter expended in this case was essential to Plaintiffs' success and was commensurate with the significant and complex issues that arose during the litigation—which ultimately resulted in a robust settlement agreement negotiated with government counsel.

16. Goodwin Procter took this on this matter pro bono. If the Court grants an award of Goodwin Procter's fees, the fees awarded will be disbursed to the non-profit agencies that have

partnered with Goodwin Procter on this litigation: KIND, Public Counsel, NIP-NLG, and Bet Tzedek.

17. The Goodwin Procter team on this matter has included more than 10 attorneys and two summer associates, as well as several paralegals and staff in our Court Procedures group (who handled all court filings in this matter). The total amount of hours spent on this case by the Goodwin Procter team is more than 2,400 hours for all timekeepers, in more than five years of litigation. Goodwin Procter is not requesting a recovery of fees for each of these timekeepers, although they were essential to the ultimate success. Goodwin Procter is only requesting recovery of fees for time incurred by myself, Mr. Burgess, Mr. Shaw, and Ms. Genovese-Bova. Furthermore, the requested recovery of fees for these attorneys does not represent all of the time they spent on this matter, but instead only those time entries that involved essential work for the matter, including legal research; drafting briefs; preparing for and attending court hearings and status conferences; communications with government counsel; and participation in mediation sessions.

18. Attached to this declaration is Exhibit A, setting forth itemized entries describing tasks that myself, Mr. Burgess, Mr. Shaw, and Ms. Genovese-Bova performed in this matter, the date of the task, and the time spent on each task. The table reflects contemporaneous entries kept with electronic time-tracking tools. The exhibit includes time spent in each of the following general categories: Pleadings; Motions Practice; Case Development; Alternative Dispute Resolution; Class Counsel Duties; and Fee Petition Preparation.

19. Our co-counsel team held calls generally once or twice per week throughout the litigation in order to respond promptly to developments in the case, and to develop case strategy with the benefit of all members' analysis. For the majority of the team calls in this matter, I was the only

Goodwin Procter attorney that participated. At the outset of the case, there were team calls that required participation of Mr. Burgess, myself, and other Goodwin Procter attorneys, which was essential as we developed the arguments raised in the Complaint and the various motions, including for class certification. For these calls, Goodwin Procter is requesting that Plaintiffs be awarded fees for both Goodwin Procter attorneys on the calls as they were essential to developing the strategy and the drafting of the related motions.

20. Goodwin Procter is not seeking recovery of fees at the standard rates for Goodwin Procter attorneys. Rather, the fees requested are based on an adjusted EAJA rate, as shown below:

<b>Year Work Performed</b>	<b>Adjusted EAJA Rate</b>
<i>Attorneys' Rates</i>	
2019	209.88
2020	211.99
2021	220.76
2022	240.89
2023	250.01
2024	255.27

21. The above adjusted EAJA rates are substantially lower than Goodwin Procter's standard rates for Mr. Burgess, Mr. Shaw, and Ms. Genovese-Bova, and me. For example, my billing rate in September 2024 was \$1290/hour, and therefore the adjusted EAJA rate for 2024 is approximately an 80% reduction of the standard rate.

22. As set forth in the attached Exhibit A, the total number of hours for which recovery is sought is 1265.7 hours for me, Mr. Burgess, Mr. Shaw, and Ms. Genovese-Bova. At the adjusted EAJA rates, this amounts to a total of \$282,679.

23. Exhibit B is a true and correct copy of an excerpt of the transcript for the July 19, 2019 hearing on Plaintiffs' Motion for a Temporary Restraining Order in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed Dec. 24, 2024, in Hingham, Massachusetts.

/s/ Kevin J. DeJong  
Kevin J. DeJong

# Exhibit A



Goodwin Procter LLP Time Records, *J.O.P. v. DHS*, 2019 through November 30, 2024

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	6/10/2019	0.30	\$ 209.88	\$ 62.96	Research regarding arguments to challenge asylum policy	Case development
Burgess, Brian	6/11/2019	2.00	\$ 209.88	\$ 419.76	Review materials and research; participate in internal call and call with client	Case development
DeJong, Kevin	6/11/2019	3.50	\$ 209.88	\$ 734.58	Prepare for and attend call with client; research in support of legal strategy	Case development
Burgess, Brian	6/12/2019	0.60	\$ 209.88	\$ 125.93	Develop research questions	Case development
DeJong, Kevin	6/12/2019	1.70	\$ 209.88	\$ 356.80	Assess legal arguments to challenge new asylum policy	Case development
Burgess, Brian	6/14/2019	1.30	\$ 209.88	\$ 272.84	Review relevant materials and confer with team	Case development
DeJong, Kevin	6/14/2019	3.80	\$ 209.88	\$ 797.54	Assess legal arguments for a challenge to new asylum policy	Case development
Burgess, Brian	6/17/2019	1.00	\$ 209.88	\$ 209.88	Review research and related materials in connection to planned litigation	Case development
DeJong, Kevin	6/17/2019	3.70	\$ 209.88	\$ 776.56	Research arguments in support of challenge to asylum policy	Case development
Burgess, Brian	6/18/2019	4.40	\$ 209.88	\$ 923.47	Internal meetings and emails; review relevant documents and research	Case development
DeJong, Kevin	6/18/2019	7.50	\$ 209.88	\$ 1,574.10	Draft and edit complaint and TRO papers; research potential arguments for legal challenge to asylum policy	Pleadings
Burgess, Brian	6/19/2019	1.00	\$ 209.88	\$ 209.88	Strategize with team regarding litigation	Case development
DeJong, Kevin	6/19/2019	8.00	\$ 209.88	\$ 1,679.04	Research in support of TRO motion; draft and edit TRO and complaint papers	Pleadings
Burgess, Brian	6/20/2019	2.80	\$ 209.88	\$ 587.66	Attention to research on potential causes of action	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	6/20/2019	7.10	\$ 209.88	\$ 1,490.15	Draft and edit complaint and TRO papers; research in support of TRO	Pleadings
Burgess, Brian	6/21/2019	2.60	\$ 209.88	\$ 545.69	Meetings regarding litigation; comment on complaint	Pleadings
DeJong, Kevin	6/21/2019	5.60	\$ 209.88	\$ 1,175.33	Draft and edit complaint and TRO papers; research in support of TRO	Pleadings
Shaw, Stephen	6/21/2019	2.90	\$ 209.88	\$ 608.65	Telephone with Mr. [ ] DeJong; review background materials for asylum policy challenge; telephone call with team	Motions practice
DeJong, Kevin	6/22/2019	4.00	\$ 209.88	\$ 839.52	Draft and edit complaint and TRO papers	Pleadings
Shaw, Stephen	6/22/2019	2.10	\$ 209.88	\$ 440.75	Research Fourth Circuit law regarding APA legal standard and injunctive relief legal standard; research irreparable harm prong	Motions practice
DeJong, Kevin	6/23/2019	5.50	\$ 209.88	\$ 1,154.34	Draft and edit complaint and TRO papers	Pleadings
Shaw, Stephen	6/23/2019	3.90	\$ 209.88	\$ 818.53	Draft irreparable harm section of temporary restraining order brief	Motions practice
Burgess, Brian	6/24/2019	3.40	\$ 209.88	\$ 713.59	Participate in strategy call (0.5); draft arbitrary and capricious argument for TRO brief (2.9)	Pleadings
DeJong, Kevin	6/24/2019	10.60	\$ 209.88	\$ 2,224.73	Draft and edit complaint and TRO papers	Pleadings
Shaw, Stephen	6/24/2019	3.60	\$ 209.88	\$ 755.57	Draft public interest and balance of harms section of temporary restraining order brief	Motions practice
Burgess, Brian	6/25/2019	2.90	\$ 209.88	\$ 608.65	Participate in team call (0.6); revise TRO brief (2.3)	Pleadings
DeJong, Kevin	6/25/2019	6.30	\$ 209.88	\$ 1,322.24	Draft and edit complaint and TRO papers	Pleadings
Burgess, Brian	6/26/2019	4.80	\$ 209.88	\$ 1,007.42	Revise TRO and Complaint	Pleadings
DeJong, Kevin	6/26/2019	10.60	\$ 209.88	\$ 2,224.73	Draft and edit complaint and TRO papers	Pleadings
Burgess, Brian	6/27/2019	1.40	\$ 209.88	\$ 293.83	Revise complaint; participate in strategy call	Pleadings
DeJong, Kevin	6/27/2019	10.20	\$ 209.88	\$ 2,140.78	Draft and edit complaint and TRO papers	Pleadings

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Burgess, Brian	6/28/2019	2.50	\$ 209.88	\$ 524.70	Draft introduction of TRO brief and review other sections of brief	Pleadings
DeJong, Kevin	6/28/2019	4.00	\$ 209.88	\$ 839.52	Draft and edit TRO and complaint papers	Pleadings
Shaw, Stephen	6/28/2019	1.90	\$ 209.88	\$ 398.77	Draft motion to seal and accompanying papers; coordinate collection of various papers to accompany filing	Motions practice
DeJong, Kevin	6/29/2019	6.70	\$ 209.88	\$ 1,406.20	Draft and edit papers for case filing and TRO	Pleadings
Shaw, Stephen	6/29/2019	2.50	\$ 209.88	\$ 524.70	Research requirements for declaration signatures; cite check temporary restraining order brief; research requirements for motion to file pseudonymously	Motions practice
Burgess, Brian	6/30/2019	1.40	\$ 209.88	\$ 293.83	Draft argument regarding pretext issue and review complaint	Pleadings
Shaw, Stephen	6/30/2019	7.40	\$ 209.88	\$ 1,553.11	Cite check temporary restraining order brief; transfer outside counsel comments to temporary restraining order brief; research case supporting grant of temporary restraining order; research sliding scale standard for injunctive relief	Motions practice
DeJong, Kevin	7/1/2019	11.60	\$ 209.88	\$ 2,434.61	Edit complaint and TRO papers and coordinate filing	Pleadings
Shaw, Stephen	7/1/2019	10.00	\$ 209.88	\$ 2,098.80	Transfer edits to Complaint into master draft; revise declaration from Mr. [ ] Burgess; transfer edits to temporary restraining order into master draft; revise Complaint; revise various supporting papers for filing; revise temporary restraining order draft; review table of authorities and table of contents	Pleadings

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	7/9/2019	2.10	\$ 209.88	\$ 440.75	Email clerk regarding TRO hearing; prepare argument for TRO hearing	Motions practice
DeJong, Kevin	7/10/2019	3.70	\$ 209.88	\$ 776.56	Prepare argument for TRO hearing; assess strategy for declarations; research common interest privilege	Motions practice
DeJong, Kevin	7/11/2019	5.10	\$ 209.88	\$ 1,070.39	Confer regarding strategy; draft expert retainer agreements; emails to government; prepare for TRO hearing	Motions practice
Shaw, Stephen	7/11/2019	4.90	\$ 209.88	\$ 1,028.41	Draft talking points outline for temporary restraining order hearing; research cases to support likelihood of success on the merits	Motions practice
DeJong, Kevin	7/12/2019	2.40	\$ 209.88	\$ 503.71	Prepare argument for TRO hearing; edit lawyer declaration	Motions practice
DeJong, Kevin	7/13/2019	3.80	\$ 209.88	\$ 797.54	Prepare for TRO hearing	Motions practice
Burgess, Brian	7/14/2019	4.80	\$ 209.88	\$ 1,007.42	Prepare model questions for hearing (2.5); research and outline next steps for litigation (2.3)	Motions practice
DeJong, Kevin	7/14/2019	9.60	\$ 209.88	\$ 2,014.85	Prepare for TRO hearing; assess case law cited in TRO brief	Motions practice
DeJong, Kevin	7/15/2019	4.80	\$ 209.88	\$ 1,007.42	Prepare for TRO hearing	Motions practice
DeJong, Kevin	7/16/2019	6.80	\$ 209.88	\$ 1,427.18	Prepare for TRO hearing; read and assess cases cited in TRO brief	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Shaw, Stephen	7/17/2019	5.40	\$ 209.88	\$ 1,133.35	Telephone with Mr.[_]DeJong regarding preparation for difficult questions at temporary restraining order hearing; research distinction between interpretive and legislative rules; research due process and retroactivity doctrine; prepare draft answers to difficult due process questions for temporary restraining order hearing; research potential subsequent history of MACO decision	Motions practice
Burgess, Brian	7/18/2019	7.00	\$ 209.88	\$ 1,469.16	Prepare for TRO hearing	Motions practice
DeJong, Kevin	7/18/2019	10.00	\$ 209.88	\$ 2,098.80	Prepare for argument at TRO hearing; email government attorneys regarding hearing; moot argument for hearing	Motions practice
Burgess, Brian	7/19/2019	7.00	\$ 209.88	\$ 1,469.16	Prepare for and attend TRO hearing	Motions practice
DeJong, Kevin	7/19/2019	7.50	\$ 209.88	\$ 1,574.10	Prepare for and attend TRO hearing (7.5)	Attending court hearings
Burgess, Brian	7/22/2019	0.20	\$ 209.88	\$ 41.98	Review class certification materials	Motions practice
DeJong, Kevin	7/22/2019	0.70	\$ 209.88	\$ 146.92	Confer regarding strategy for class certification motion; research regarding due process argument	Motions practice
Burgess, Brian	7/23/2019	0.30	\$ 209.88	\$ 62.96	Confer regarding asylum applicant who received denial under new policy	Class counsel duties
Shaw, Stephen	7/23/2019	0.20	\$ 209.88	\$ 41.98	Initiate request for transcript of temporary restraining order hearing	Case development
DeJong, Kevin	7/25/2019	0.40	\$ 209.88	\$ 83.95	Assess tasks for case upon entry of a TRO	Case development
Burgess, Brian	7/30/2019	0.30	\$ 209.88	\$ 62.96	Revise supplemental letter	Pleadings
Shaw, Stephen	7/30/2019	0.30	\$ 209.88	\$ 62.96	Coordinate filing of supplemental letter regarding temporary restraining order hearing	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	7/31/2019	1.90	\$ 209.88	\$ 398.77	Assess case schedule and deadlines; confer regarding motion to certify class; email c-counsel regarding class cert	Motions practice
Shaw, Stephen	7/31/2019	0.70	\$ 209.88	\$ 146.92	Telephone call with Messrs.[_]Burgess and DeJong regarding motion for class certification; research class certification motions	Motions practice
Shaw, Stephen	8/2/2019	3.10	\$ 209.88	\$ 650.63	Telephone call with team regarding case strategy; e-mail with Ms.[_]Alvarado regarding class certification research; review temporary restraining order opinion; research class certification standards	Motions practice
Burgess, Brian	8/4/2019	1.10	\$ 209.88	\$ 230.87	Confer with team regarding next steps in litigation and prepare email to opposing counsel	Case development
DeJong, Kevin	8/4/2019	2.10	\$ 209.88	\$ 440.75	Prepare for and attend team call regarding strategy and tasks; email to government regarding PI	Motions practice
Burgess, Brian	8/5/2019	1.00	\$ 209.88	\$ 209.88	Emails and call with co-counsel regarding next steps in litigation	Case development
Shaw, Stephen	8/5/2019	4.60	\$ 209.88	\$ 965.45	Draft motion for class certification	Motions practice
Burgess, Brian	8/6/2019	0.40	\$ 209.88	\$ 83.95	Strategize with team regarding next steps in litigation	Case development
Shaw, Stephen	8/6/2019	8.40	\$ 209.88	\$ 1,762.99	Draft motion for class certification	Motions practice
Burgess, Brian	8/7/2019	1.10	\$ 209.88	\$ 230.87	Attention to issues of class certification and discovery	Motions practice
DeJong, Kevin	8/7/2019	1.40	\$ 209.88	\$ 293.83	Review and edit motion for class cert; confer regarding research on scope of APA discovery	Motions practice
Shaw, Stephen	8/7/2019	3.20	\$ 209.88	\$ 671.62	Provide research feedback for Ms.[_]Alvarado; revise class certification motion	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Burgess, Brian	8/8/2019	2.10	\$ 209.88	\$ 440.75	Call with government counsel; follow-up with team regarding government extension request	Case development
DeJong, Kevin	8/9/2019	1.30	\$ 209.88	\$ 272.84	Team call; research regarding extending TRO; review and assess motion to extend	Motions practice
Shaw, Stephen	8/9/2019	0.30	\$ 209.88	\$ 62.96	Review government motion for extension to comply with injunction	Motions practice
Burgess, Brian	8/10/2019	1.20	\$ 209.88	\$ 251.86	Comment on opposition to government motion to extend injunction deadline	Motions practice
DeJong, Kevin	8/10/2019	3.90	\$ 209.88	\$ 818.53	Draft opposition to motion to extend; confer regarding strategy	Motions practice
Burgess, Brian	8/11/2019	0.40	\$ 209.88	\$ 83.95	Comment on opposition to government motion to extend injunction deadline	Motions practice
DeJong, Kevin	8/11/2019	1.20	\$ 209.88	\$ 251.86	Edit opposition to motion to extend time	Motions practice
DeJong, Kevin	8/12/2019	3.90	\$ 209.88	\$ 818.53	Edit and coordinate filing of opposition to motion to extend time; prepare for court teleconference	Motions practice
DeJong, Kevin	8/13/2019	1.80	\$ 209.88	\$ 377.78	Prepare for and argue in court teleconference	Attending court hearings
Burgess, Brian	8/14/2019	0.40	\$ 209.88	\$ 83.95	Participate in conference call to discuss proposed judgment	Case development
DeJong, Kevin	8/14/2019	2.50	\$ 209.88	\$ 524.70	Research regarding attorneys fees; call with government regarding proposed judgment; confer with team regarding proposed judgment; edit email response to government	Motions practice
Shaw, Stephen	8/14/2019	0.50	\$ 209.88	\$ 104.94	Review proposed order; telephone call with team regarding proposed order	Case development
DeJong, Kevin	8/15/2019	0.80	\$ 209.88	\$ 167.90	Edit and send email response to government regarding proposed judgment	Motions practice



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Burgess, Brian	8/20/2019	1.20	\$ 209.88	\$ 251.86	Confer with co-counsel regarding litigation strategy	Case development
Shaw, Stephen	8/20/2019	0.80	\$ 209.88	\$ 167.90	Telephone call with team regarding response to opposing counsel's e-mail about withdrawing policy	Case development
DeJong, Kevin	8/21/2019	0.60	\$ 209.88	\$ 125.93	Draft and send email response to the government regarding meet and confer	Case development
Burgess, Brian	8/26/2019	1.80	\$ 209.88	\$ 377.78	Confer with Mr.[_]DeJong regarding judgment issues (0.5); confer with co-counsel regarding the same (0.7); confer with government counsel regarding TRO (0.6)	Motions practice
DeJong, Kevin	8/26/2019	2.20	\$ 209.88	\$ 461.74	Confer with team regarding strategy for case; prepare for and attend meet and confer	Case development
DeJong, Kevin	8/27/2019	1.10	\$ 209.88	\$ 230.87	Edit motion for extension; confer regarding case strategy	Motions practice
Shaw, Stephen	8/27/2019	1.40	\$ 209.88	\$ 293.83	Draft motion to extend temporary restraining order	Motions practice
Burgess, Brian	8/28/2019	0.30	\$ 209.88	\$ 62.96	Revise motion to extend TRO	Motions practice
DeJong, Kevin	8/28/2019	1.40	\$ 209.88	\$ 293.83	Draft and edit proposed order; email government regarding motion for extension	Motions practice
Shaw, Stephen	8/28/2019	0.50	\$ 209.88	\$ 104.94	Coordinate filing motion to extend temporary restraining order; revise motion to extend temporary restraining order	Motions practice
DeJong, Kevin	8/29/2019	1.60	\$ 209.88	\$ 335.81	Edit proposed judgment; email government regarding meet and confer; confer with team regarding case strategy	Motions practice
DeJong, Kevin	8/30/2019	0.40	\$ 209.88	\$ 83.95	Call with government lawyer; email to team regarding case strategy	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	9/5/2019	0.60	\$ 209.88	\$ 125.93	Assess strategy on government default and email team regarding same	Case development
Burgess, Brian	9/6/2019	0.10	\$ 209.88	\$ 20.99	Review revisions to proposed order	Motions practice
DeJong, Kevin	9/10/2019	1.30	\$ 209.88	\$ 272.84	Confer regarding case strategy; edit proposed order of dismissal; email proposal to defendants	Case development
DeJong, Kevin	9/12/2019	1.50	\$ 209.88	\$ 314.82	Edit motion for extension of time; confer regarding case strategy	Motions practice
DeJong, Kevin	9/13/2019	0.80	\$ 209.88	\$ 167.90	Confer with team regarding case strategy; email government regarding extension and PI	Motions practice
DeJong, Kevin	9/16/2019	0.60	\$ 209.88	\$ 125.93	Confer with team regarding case strategy; prepare and send email response to the government	Case development
Burgess, Brian	9/18/2019	0.70	\$ 209.88	\$ 146.92	Confer with government counsel and follow-up with team	Case development
DeJong, Kevin	9/20/2019	2.10	\$ 209.88	\$ 440.75	Confer with team regarding case strategy; prepare for and attend meet and confer with government; draft motion for extension and coordinate filing	Case development
DeJong, Kevin	9/24/2019	0.50	\$ 209.88	\$ 104.94	Call to clerk regarding TRO extension; review TRO order	Motions practice
Burgess, Brian	9/26/2019	0.10	\$ 209.88	\$ 20.99	Review revisions to proposed judgment	Motions practice
Burgess, Brian	9/27/2019	1.00	\$ 209.88	\$ 209.88	Confer with co-counsel regarding revised proposed order (0.9); review revisions to order (0.1)	Motions practice
Burgess, Brian	9/30/2019	0.50	\$ 209.88	\$ 104.94	Confer with Mr.[_]DeJong regarding government request on Answer extension and correspondence regarding preliminary injunction	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	9/30/2019	2.50	\$ 209.88	\$ 524.70	Draft and send response to government regarding PI; email government proposed judgment	Motions practice
Burgess, Brian	10/3/2019	0.10	\$ 209.88	\$ 20.99	Correspond with government counsel regarding preliminary injunction	Motions practice
DeJong, Kevin	10/3/2019	0.90	\$ 209.88	\$ 188.89	Draft and send email to government regarding PI	Motions practice
DeJong, Kevin	10/4/2019	0.80	\$ 209.88	\$ 167.90	Draft motion for preliminary injunction	Motions practice
Burgess, Brian	10/6/2019	0.20	\$ 209.88	\$ 41.98	Comment on draft of preliminary injunction motion	Motions practice
DeJong, Kevin	10/6/2019	3.10	\$ 209.88	\$ 650.63	Draft preliminary injunction motion; assess recent asylum denial; research case law on contempt; draft contempt motion	Motions practice
Burgess, Brian	10/7/2019	1.00	\$ 209.88	\$ 209.88	Review revised preliminary injunction draft (0.1); confer with co-counsel to discuss next steps in litigation (0.9).	Motions practice
DeJong, Kevin	10/7/2019	2.40	\$ 209.88	\$ 503.71	Confer regarding case strategy; draft contempt motion; draft PI motion	Motions practice
DeJong, Kevin	10/8/2019	1.50	\$ 209.88	\$ 314.82	Draft PI and contempt motion; update team with case tasks	Motions practice
Shaw, Stephen	10/8/2019	0.60	\$ 209.88	\$ 125.93	Revise motion for preliminary injunction	Motions practice
Burgess, Brian	10/9/2019	0.30	\$ 209.88	\$ 62.96	Attention to preliminary injunction motion	Motions practice
Shaw, Stephen	10/9/2019	0.40	\$ 209.88	\$ 83.95	Revise motion for preliminary injunction; prepare motion for preliminary injunction for filing	Motions practice
Shaw, Stephen	10/11/2019	0.40	\$ 209.88	\$ 83.95	Telephone call with chambers regarding pending motion for preliminary injunction and expiring temporary restraining order	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Burgess, Brian	10/14/2019	1.00	\$ 209.88	\$ 209.88	Confer with co-counsel regarding next steps and potential TRO violation	Motions practice
Burgess, Brian	10/16/2019	1.00	\$ 209.88	\$ 209.88	Prepare email to government counsel regarding TRO violation	Motions practice
Shaw, Stephen	10/16/2019	0.30	\$ 209.88	\$ 62.96	Telephone Judge Hazel's chambers regarding preliminary injunction motion and expiring temporary restraining order	Motions practice
Burgess, Brian	10/21/2019	0.80	\$ 209.88	\$ 167.90	Confer with co-counsel regarding enforcement issues (0.5 hours); confer with Mr.[_]DeJong about the same (0.3 hours)	Class counsel duties
DeJong, Kevin	10/24/2019	0.30	\$ 209.88	\$ 62.96	Assess case strategy in view of email from government lawyer	Case development
Burgess, Brian	10/28/2019	0.40	\$ 209.88	\$ 83.95	Email with co-counsel regarding enforcement of judgment (0.2); confer with Mr.[_]DeJong regarding motion (0.2)	Motions practice
DeJong, Kevin	11/4/2019	2.60	\$ 209.88	\$ 545.69	Attend team call to discuss case strategy; prepare for and attend call with opposing counsel regarding settlement	ADR
DeJong, Kevin	11/5/2019	0.70	\$ 209.88	\$ 146.92	Assess proposed settlement order	ADR
DeJong, Kevin	11/8/2019	2.30	\$ 209.88	\$ 482.72	Confer regarding case strategy; call and emails with opposing counsel regarding settlement and extension to respond to complaint	Motions practice
Burgess, Brian	11/18/2019	0.40	\$ 209.88	\$ 83.95	Emails with opposing counsel regarding extension	Motions practice
DeJong, Kevin	11/18/2019	0.40	\$ 209.88	\$ 83.95	Email opposing counsel regarding extensions; edit motion to enforce judgment	Motions practice
Shaw, Stephen	11/20/2019	0.70	\$ 209.88	\$ 146.92	Draft motion for extension of time to respond	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	11/26/2019	2.10	\$ 209.88	\$ 440.75	Assess case strategy; work on opposition to motion to dismiss	Motions practice
Burgess, Brian	12/2/2019	1.30	\$ 209.88	\$ 272.84	Review research memorandum on agency delay claim and participate in call to discuss amended complaint	Motions practice
DeJong, Kevin	12/2/2019	1.20	\$ 209.88	\$ 251.86	Work on opposition to motion to dismiss	Motions practice
DeJong, Kevin	12/3/2019	2.80	\$ 209.88	\$ 587.66	Confer regarding case strategy; work on opposition to motion to dismiss	Motions practice
DeJong, Kevin	12/4/2019	1.00	\$ 209.88	\$ 209.88	Work on opposition to motion to dismiss	Motions practice
Burgess, Brian	12/5/2019	0.20	\$ 209.88	\$ 41.98	Confer with Mr.[_]DeJong regarding opposition to motion to dismiss	Motions practice
DeJong, Kevin	12/5/2019	0.80	\$ 209.88	\$ 167.90	Emails regarding extension of deadlines for filings	Motions practice
Burgess, Brian	12/6/2019	1.00	\$ 209.88	\$ 209.88	Participate in strategy call to discuss amending complaint	Pleadings
DeJong, Kevin	12/6/2019	2.40	\$ 209.88	\$ 503.71	Attend team call regarding case strategy; draft joint motion to extend time; emails and call with opposing counsel	Motions practice
DeJong, Kevin	12/9/2019	0.60	\$ 209.88	\$ 125.93	Prepare corrected joint extension motion; edit protective order	Motions practice
DeJong, Kevin	12/10/2019	0.80	\$ 209.88	\$ 167.90	Work on opposition to motion to dismiss	Motions practice
DeJong, Kevin	12/11/2019	0.80	\$ 209.88	\$ 167.90	Work on opposition to motion to dismiss	Motions practice
Shaw, Stephen	12/11/2019	1.20	\$ 209.88	\$ 251.86	Draft protective order	Case development
Burgess, Brian	12/12/2019	1.20	\$ 209.88	\$ 251.86	Review and comment on amended complaint	Pleadings
DeJong, Kevin	12/12/2019	3.60	\$ 209.88	\$ 755.57	Work on opposition to motion to dismiss	Motions practice
Burgess, Brian	12/13/2019	0.60	\$ 209.88	\$ 125.93	Confer with co-counsel to discuss amended complaint	Pleadings

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	12/13/2019	3.00	\$ 209.88	\$ 629.64	Edit amended complaint; attend team call to discuss case strategy; email opposing counsel regarding protective order	Pleadings
Shaw, Stephen	12/14/2019	1.80	\$ 209.88	\$ 377.78	Research procedural requirements for amended complaint	Pleadings
Burgess, Brian	12/16/2019	1.50	\$ 209.88	\$ 314.82	Review and comment on opposition to motion to dismiss	Motions practice
DeJong, Kevin	12/16/2019	2.00	\$ 209.88	\$ 419.76	Work on opposition to motion to dismiss and supporting papers	Motions practice
DeJong, Kevin	12/17/2019	4.50	\$ 209.88	\$ 944.46	Work on opposition to motion to dismiss	Motions practice
Burgess, Brian	12/18/2019	1.00	\$ 209.88	\$ 209.88	Review and revise opposition to motion to dismiss	Motions practice
DeJong, Kevin	12/18/2019	3.40	\$ 209.88	\$ 713.59	Work on opposition to motion to dismiss and supporting papers	Motions practice
Shaw, Stephen	12/18/2019	1.00	\$ 209.88	\$ 209.88	Draft summary of procedural issues for co-counsel	Case development
DeJong, Kevin	12/19/2019	7.00	\$ 209.88	\$ 1,469.16	Work on brief and supporting papers in opposition to motion for summary judgment	Motions practice
Shaw, Stephen	12/19/2019	3.70	\$ 209.88	\$ 776.56	Draft supporting motions for amended complaint filing	Pleadings
Burgess, Brian	12/20/2019	3.00	\$ 209.88	\$ 629.64	Revise brief and complaint; call regarding same	Pleadings
DeJong, Kevin	12/20/2019	7.50	\$ 209.88	\$ 1,574.10	Work on opposition to motion for summary judgment, and supporting papers	Motions practice
Shaw, Stephen	12/20/2019	5.20	\$ 209.88	\$ 1,091.38	Revise supporting motions for amended complaint filing; revise amended complaint	Pleadings
DeJong, Kevin	12/23/2019	1.50	\$ 209.88	\$ 314.82	Work on reply brief in support of motion to enforce preliminary injunction	Motions practice
Burgess, Brian	1/2/2020	0.50	\$ 211.99	\$ 106.00	Review motion to dismiss	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	1/2/2020	1.00	\$ 211.99	\$ 211.99	Work on reply brief in support of motion to enforce injunction	Motions practice
Burgess, Brian	1/3/2020	1.60	\$ 211.99	\$ 339.18	Review and comment on reply for motion to enforce	Motions practice
DeJong, Kevin	1/3/2020	0.20	\$ 211.99	\$ 42.40	Work on reply brief in support of motion to enforce injunction	Motions practice
Shaw, Stephen	1/3/2020	1.20	\$ 211.99	\$ 254.39	Review motion to dismiss	Motions practice
DeJong, Kevin	1/6/2020	3.70	\$ 211.99	\$ 784.36	Attend team call; work on reply brief in support of motion to enforce injunction	Motions practice
DeJong, Kevin	1/7/2020	2.70	\$ 211.99	\$ 572.37	Work on reply brief in support of motion to enforce injunction; call with co-counsel regarding strategy	Motions practice
Shaw, Stephen	1/7/2020	0.40	\$ 211.99	\$ 84.80	Draft shell opposition to motion to dismiss	Motions practice
DeJong, Kevin	1/8/2020	1.80	\$ 211.99	\$ 381.58	Edit affidavit of service; work on reply brief in support of motion to enforce injunction	Motions practice
Shaw, Stephen	1/8/2020	2.40	\$ 211.99	\$ 508.78	Review motion to dismiss; draft opposition outline	Motions practice
DeJong, Kevin	1/9/2020	0.40	\$ 211.99	\$ 84.80	Work on opposition to motion to dismiss	Motions practice
DeJong, Kevin	1/10/2020	0.20	\$ 211.99	\$ 42.40	Work on opposition to motion to dismiss	Motions practice
Shaw, Stephen	1/10/2020	1.00	\$ 211.99	\$ 211.99	Telephone call with team regarding opposition to motion to dismiss and other case strategy	Motions practice
Burgess, Brian	1/14/2020	1.60	\$ 211.99	\$ 339.18	Comment on outline of opposition to motion to dismiss (0.5); participate in team strategy call (1.1)	Motions practice
DeJong, Kevin	1/14/2020	4.60	\$ 211.99	\$ 975.15	Draft outline for opposition to motion to dismiss amended complaint	Motions practice
Shaw, Stephen	1/14/2020	1.40	\$ 211.99	\$ 296.79	Telephone call with team; review outline for opposition brief	Motions practice



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	1/15/2020	0.10	\$ 211.99	\$ 21.20	Work on opposition to motion to dismiss	Motions practice
Shaw, Stephen	1/15/2020	0.20	\$ 211.99	\$ 42.40	Telephone chambers regarding status of pending motion for extension	Motions practice
DeJong, Kevin	1/16/2020	1.90	\$ 211.99	\$ 402.78	Work on briefing for pending motions	Motions practice
Shaw, Stephen	1/16/2020	0.20	\$ 211.99	\$ 42.40	Review motion to dismiss	Motions practice
Burgess, Brian	1/17/2020	1.20	\$ 211.99	\$ 254.39	Draft opposition to motion to dismiss	Motions practice
DeJong, Kevin	1/17/2020	4.40	\$ 211.99	\$ 932.76	Work on reply brief in support of motion to enforce injunction; attend team call to discuss strategy; email to opposing counsel regarding hearing date	Motions practice
Shaw, Stephen	1/17/2020	8.20	\$ 211.99	\$ 1,738.32	Telephone call with team regarding upcoming briefing; draft mootness, standing, and extrinsic materials sections of opposition brief	Motions practice
DeJong, Kevin	1/18/2020	1.20	\$ 211.99	\$ 254.39	Work on opposition to motion to dismiss amended complaint	Motions practice
Burgess, Brian	1/19/2020	1.10	\$ 211.99	\$ 233.19	Draft opposition to motion to dismiss	Motions practice
Burgess, Brian	1/20/2020	5.60	\$ 211.99	\$ 1,187.14	Draft opposition to motion to dismiss	Motions practice
DeJong, Kevin	1/20/2020	0.80	\$ 211.99	\$ 169.59	Work on opposition to motion to dismiss	Motions practice
Burgess, Brian	1/21/2020	1.70	\$ 211.99	\$ 360.38	Draft opposition to motion to dismiss	Motions practice
DeJong, Kevin	1/21/2020	4.00	\$ 211.99	\$ 847.96	Work on opposition to motion to dismiss and reply brief in support of motion to enforce injunction	Motions practice
Shaw, Stephen	1/21/2020	0.40	\$ 211.99	\$ 84.80	Analyze merits and costs of filing motion to strike; draft e-mail to co-counsel regarding motion to strike	Motions practice
Shaw, Stephen	1/22/2020	3.90	\$ 211.99	\$ 826.76	Telephone call with team regarding filing; research support for reply brief; revise opposition brief in light of co-counsel's edits	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Burgess, Brian	1/23/2020	0.90	\$ 211.99	\$ 190.79	Revise opposition to motion to dismiss	Motions practice
DeJong, Kevin	1/23/2020	4.70	\$ 211.99	\$ 996.35	Work on opposition to motion to dismiss and reply brief in support of motion to enforce injunction	Motions practice
Shaw, Stephen	1/23/2020	5.20	\$ 211.99	\$ 1,102.35	Revise reply brief and opposition brief; draft introductions for opposition brief	Motions practice
Burgess, Brian	1/24/2020	0.40	\$ 211.99	\$ 84.80	Revise reply brief for motion to enforce	Motions practice
DeJong, Kevin	1/24/2020	4.60	\$ 211.99	\$ 975.15	Work on opposition to motion to dismiss and reply brief in support of motion to enforce injunction	Motions practice
Shaw, Stephen	1/24/2020	7.40	\$ 211.99	\$ 1,568.73	Revise opposition and reply briefs; review cite check of opposition brief; coordinate filings of opposition and reply briefs	Motions practice
DeJong, Kevin	1/30/2020	0.50	\$ 211.99	\$ 106.00	Call with opposing counsel; email to team regarding call	Case development
Burgess, Brian	1/31/2020	0.10	\$ 211.99	\$ 21.20	Email co-counsel regarding response from government counsel on hearing dates and BIA stay	Motions practice
DeJong, Kevin	1/31/2020	1.90	\$ 211.99	\$ 402.78	Confer on case strategy; review and case request for hearing	Motions practice
DeJong, Kevin	2/10/2020	0.60	\$ 211.99	\$ 127.19	Confer regarding case strategy	Case development
DeJong, Kevin	2/11/2020	0.30	\$ 211.99	\$ 63.60	Confer regarding case strategy	Case development
DeJong, Kevin	2/14/2020	1.10	\$ 211.99	\$ 233.19	Confer with team on case strategy; email opposing counsel regarding stay of BIA case	Case development
DeJong, Kevin	2/17/2020	1.40	\$ 211.99	\$ 296.79	Attend team call regarding case strategy; review and assess government reply brief	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Shaw, Stephen	2/19/2020	1.70	\$ 211.99	\$ 360.38	Telephone chambers regarding hearing schedule; review briefs for principal cases and statutes	Motions practice
Shaw, Stephen	2/20/2020	0.80	\$ 211.99	\$ 169.59	Review briefs for principal cases and statutes	Motions practice
DeJong, Kevin	2/26/2020	0.70	\$ 211.99	\$ 148.39	Prepare for hearing on pending motions	Motions practice
Shaw, Stephen	2/26/2020	1.30	\$ 211.99	\$ 275.59	Research notice of supplemental authority; e-mail team regarding notice of supplemental authority; review documents for potential inclusion in notice of supplemental authority	Motions practice
DeJong, Kevin	2/27/2020	0.60	\$ 211.99	\$ 127.19	Prepare for hearing on pending motions	Motions practice
Shaw, Stephen	2/27/2020	3.00	\$ 211.99	\$ 635.97	Telephone with Mr. [ ] DeJong regarding case development; draft notice of supplemental authority; telephone with Ms. [ ] Frederick regarding motion for class certification; review case materials in preparation for potential motion argument	Motions practice
DeJong, Kevin	2/28/2020	0.80	\$ 211.99	\$ 169.59	Review and edit supplemental authority	Motions practice
Shaw, Stephen	2/28/2020	1.10	\$ 211.99	\$ 233.19	Revise notice of supplemental authority; file notice of supplemental authority	Motions practice
Shaw, Stephen	3/2/2020	3.30	\$ 211.99	\$ 699.57	File contempt order in connection with notice of supplemental authority; telephone call with team; revise motion for class certification	Motions practice
DeJong, Kevin	3/5/2020	0.50	\$ 211.99	\$ 106.00	Review and edit motion for class cert	Motions practice
Shaw, Stephen	3/5/2020	2.00	\$ 211.99	\$ 423.98	Revise motion for class certification; e-mail co-counsel regarding motion for class certification	Motions practice
Shaw, Stephen	3/6/2020	0.60	\$ 211.99	\$ 127.19	Telephone call with team; review declaration from co-counsel	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	3/9/2020	0.50	\$ 211.99	\$ 106.00	Confer regarding case strategy; emails regarding motion for class cert	Case development
Shaw, Stephen	3/9/2020	0.90	\$ 211.99	\$ 190.79	Telephone with Mr. [ ] DeJong regarding hearing preparation; review plaintiff declarations; e-mails regarding administrative record	Motions practice
Burgess, Brian	3/10/2020	0.50	\$ 211.99	\$ 106.00	Attention to upcoming hearing	Attending court hearings
DeJong, Kevin	3/10/2020	1.00	\$ 211.99	\$ 211.99	Scheduling emails; email clerk regarding hearing; prepare for hearing	Motions practice
DeJong, Kevin	3/12/2020	0.20	\$ 211.99	\$ 42.40	Prepare for court hearing	Motions practice
Burgess, Brian	3/13/2020	0.80	\$ 211.99	\$ 169.59	Draft questions for telephonic conference	Attending court hearings
DeJong, Kevin	3/13/2020	0.20	\$ 211.99	\$ 42.40	Prepare for court hearing; email clerk regarding hearing	Motions practice
Shaw, Stephen	3/13/2020	0.20	\$ 211.99	\$ 42.40	E-mails with team regarding preparation for hearing	Motions practice
Shaw, Stephen	3/14/2020	4.80	\$ 211.99	\$ 1,017.55	Prepare for hearing	Motions practice
Burgess, Brian	3/15/2020	0.50	\$ 211.99	\$ 106.00	Respond to Mr. [ ] DeJong's email in preparation for telephonic hearing	Attending court hearings
DeJong, Kevin	3/15/2020	2.10	\$ 211.99	\$ 445.18	Prepare for court teleconference	Motions practice
Shaw, Stephen	3/15/2020	2.10	\$ 211.99	\$ 445.18	Prepare for hearing	Motions practice
DeJong, Kevin	3/16/2020	1.90	\$ 211.99	\$ 402.78	Prepare for court teleconference; attend team call to discuss case strategy	Motions practice
Shaw, Stephen	3/16/2020	1.10	\$ 211.99	\$ 233.19	Prepare for hearing; telephone call with team	Motions practice
Shaw, Stephen	3/19/2020	2.60	\$ 211.99	\$ 551.17	Revise motion for class certification	Motions practice
Shaw, Stephen	3/23/2020	1.70	\$ 211.99	\$ 360.38	Telephone call with team; review co-counsel declarations; e-mail Goodwin team regarding case developments	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	3/27/2020	0.20	\$ 211.99	\$ 42.40	Assess recent potential violation of preliminary injunction	Class counsel duties
DeJong, Kevin	3/31/2020	0.70	\$ 211.99	\$ 148.39	Draft email to opposing counsel regarding violation of injunction	Class counsel duties
Burgess, Brian	4/1/2020	0.10	\$ 211.99	\$ 21.20	Email Mr.[ ]DeJong regarding communication with US Attorney	Case development
DeJong, Kevin	4/1/2020	0.40	\$ 211.99	\$ 84.80	Edit email to opposing counsel regarding violation of injunction	Class counsel duties
DeJong, Kevin	4/3/2020	0.80	\$ 211.99	\$ 169.59	Email to opposing counsel regarding violation of injunction	Class counsel duties
DeJong, Kevin	4/8/2020	0.50	\$ 211.99	\$ 106.00	Assess potential injunction violation	Class counsel duties
DeJong, Kevin	4/9/2020	0.20	\$ 211.99	\$ 42.40	Assess strategy for responding to opposing counsel regarding injunction violations	Class counsel duties
DeJong, Kevin	4/15/2020	0.30	\$ 211.99	\$ 63.60	Emails to team regarding case strategy	Case development
DeJong, Kevin	4/22/2020	0.80	\$ 211.99	\$ 169.59	Phone call with opposing counsel regarding potential injunction violation, and follow-up with team regarding same	Class counsel duties
Shaw, Stephen	5/5/2020	2.00	\$ 211.99	\$ 423.98	Draft class certification declaration	Motions practice
DeJong, Kevin	5/15/2020	1.30	\$ 211.99	\$ 275.59	Call with team to discuss case strategy; email to opposing counsel regarding violations of injunction	Class counsel duties
DeJong, Kevin	6/4/2020	0.10	\$ 211.99	\$ 21.20	Email to opposing counsel regarding meet and confer	Case development
Burgess, Brian	6/5/2020	1.60	\$ 211.99	\$ 339.18	Review district court decision and participate on strategy call with team	Case development
Shaw, Stephen	6/5/2020	1.80	\$ 211.99	\$ 381.58	Research deadline to produce administrative record	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Shaw, Stephen	6/8/2020	1.00	\$ 211.99	\$ 211.99	Review class certification briefing; e-mails about call with Mr. [ ] Loucks; e-mails about class certification motion	Motions practice
Shaw, Stephen	6/9/2020	1.30	\$ 211.99	\$ 275.59	Telephone with Mr. [ ] Loucks regarding case scheduling	Case development
Shaw, Stephen	6/10/2020	3.70	\$ 211.99	\$ 784.36	Telephone with team regarding call with Mr. [ ] Loucks; revise class certification motion	Motions practice
Shaw, Stephen	6/11/2020	0.90	\$ 211.99	\$ 190.79	Review materials to determine whether Plaintiffs' A#s were provided to the government; research Plaintiffs' A#s; e-mail A#s to Mr. [ ] Loucks	Motions practice
Burgess, Brian	6/12/2020	0.70	\$ 211.99	\$ 148.39	Draft email to government counsel regarding scheduling	Case development
Shaw, Stephen	6/12/2020	0.40	\$ 211.99	\$ 84.80	Revise proposed e-mail to Mr. [ ] Loucks; send proposed e-mail to team	Case development
Burgess, Brian	6/14/2020	1.00	\$ 211.99	\$ 211.99	Review class certification papers	Motions practice
Shaw, Stephen	6/15/2020	9.30	\$ 211.99	\$ 1,971.51	Team call; draft motion for class certification	Motions practice
Shaw, Stephen	6/16/2020	1.20	\$ 211.99	\$ 254.39	Draft scheduling motion; circulate scheduling motion	Case development
Burgess, Brian	6/18/2020	1.30	\$ 211.99	\$ 275.59	Confer with government counsel and team regarding briefing schedule	Case development
Burgess, Brian	6/19/2020	0.70	\$ 211.99	\$ 148.39	Emails regarding class certification	Motions practice
DeJong, Kevin	6/19/2020	0.40	\$ 211.99	\$ 84.80	Edit joint scheduling motion	Motions practice
Shaw, Stephen	6/19/2020	0.30	\$ 211.99	\$ 63.60	Revise scheduling motion; file scheduling motion; e-mails with Mr. [ ] Broussard regarding docket research on administrative record timing	Motions practice
Shaw, Stephen	6/24/2020	2.80	\$ 211.99	\$ 593.57	Research for motion to amend preliminary injunction	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Shaw, Stephen	6/25/2020	5.30	\$ 211.99	\$ 1,123.55	Draft motion to amend preliminary injunction; e-mails to team regarding motion to amend	Motions practice
DeJong, Kevin	6/26/2020	1.20	\$ 211.99	\$ 254.39	Attend team call to discuss case strategy; assess strategy for motion to amend injunction	Motions practice
Shaw, Stephen	6/26/2020	2.70	\$ 211.99	\$ 572.37	Draft motion to amend preliminary injunction; telephone call with team	Motions practice
Shaw, Stephen	6/27/2020	6.20	\$ 211.99	\$ 1,314.34	Draft motion to amend preliminary injunction	Motions practice
DeJong, Kevin	6/29/2020	0.20	\$ 211.99	\$ 42.40	Review and edit motion for amended injunction	Motions practice
Shaw, Stephen	6/29/2020	0.90	\$ 211.99	\$ 190.79	Call chambers regarding scheduling order; telephone call with team	Motions practice
Burgess, Brian	6/30/2020	1.20	\$ 211.99	\$ 254.39	Review and comment on draft of motion to amend preliminary injunction	Motions practice
DeJong, Kevin	6/30/2020	2.10	\$ 211.99	\$ 445.18	Review and edit motion to amend the preliminary injunction; research case law on amending a preliminary injunction order	Motions practice
Shaw, Stephen	6/30/2020	1.10	\$ 211.99	\$ 233.19	Revise motion to amend preliminary injunction; e-mails regarding motion to amend	Motions practice
Shaw, Stephen	7/1/2020	2.40	\$ 211.99	\$ 508.78	Revise motion to amend preliminary injunction	Motions practice
DeJong, Kevin	7/2/2020	0.90	\$ 211.99	\$ 190.79	Edit motion to amend preliminary injunction	Motions practice
Shaw, Stephen	7/4/2020	0.50	\$ 211.99	\$ 106.00	E-mails with co-counsel regarding motion to amend preliminary injunction	Motions practice
Burgess, Brian	7/6/2020	0.60	\$ 211.99	\$ 127.19	Review draft of motion to amend preliminary injunction order	Motions practice
DeJong, Kevin	7/6/2020	1.60	\$ 211.99	\$ 339.18	Review and edit brief in support of motion to amend preliminary injunction; participate in team call on case strategy	Motions practice
Shaw, Stephen	7/6/2020	2.90	\$ 211.99	\$ 614.77	Revise motion to amend; team call	Motions practice



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	7/7/2020	2.20	\$ 211.99	\$ 466.38	Review and edits papers in support of motion to amend preliminary injunction	Motions practice
Shaw, Stephen	7/7/2020	8.80	\$ 211.99	\$ 1,865.51	Revise motion to amend; file motion to amend; draft supporting papers for motion to amend	Motions practice
DeJong, Kevin	7/8/2020	0.80	\$ 211.99	\$ 169.59	Review case schedule and tasks; submit research assignment for summer associate	Motions practice
DeJong, Kevin	7/9/2020	0.50	\$ 211.99	\$ 106.00	Emails regarding case strategy; review checklist for administrative record	Case development
Burgess, Brian	7/10/2020	0.30	\$ 211.99	\$ 63.60	Attention to motion to enforce	Motions practice
Burgess, Brian	7/13/2020	0.70	\$ 211.99	\$ 148.39	Review class certification opposition	Motions practice
DeJong, Kevin	7/13/2020	3.30	\$ 211.99	\$ 699.57	Email to government regarding A numbers; emails to team regarding case strategy; attend team call to discuss case strategy; review and assess opposition to class cert motion	Motions practice
DeJong, Kevin	7/14/2020	1.10	\$ 211.99	\$ 233.19	Review and assess opposition to class cert motion	Motions practice
Shaw, Stephen	7/14/2020	2.00	\$ 211.99	\$ 423.98	Telephone with Mr.[ ]DeJong and Ms.[ ]Dee; schedule class certification strategy meeting; review class certification opposition	Motions practice
DeJong, Kevin	7/15/2020	1.90	\$ 211.99	\$ 402.78	Assess opposition to motion for class cert, and confer with team regarding same; assess email to government regarding violation of injunction	Motions practice
Shaw, Stephen	7/15/2020	3.40	\$ 211.99	\$ 720.77	Calls with team regarding class certification strategy; e-mail Mr.[ ]Broussard and Ms.[ ]Alvarado regarding class certification research; review class certification materials	Motions practice
DeJong, Kevin	7/16/2020	0.20	\$ 211.99	\$ 42.40	Email government regarding violation of injunction	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	7/18/2020	0.70	\$ 211.99	\$ 148.39	Edit draft protective order	Case development
Shaw, Stephen	7/19/2020	5.30	\$ 211.99	\$ 1,123.55	Research and draft reply to motion for class certification	Motions practice
DeJong, Kevin	7/20/2020	1.10	\$ 211.99	\$ 233.19	Edit draft protective order, and send to opposing counsel; attend team call to discuss case strategy	Case development
Shaw, Stephen	7/20/2020	6.20	\$ 211.99	\$ 1,314.34	Team call; research and draft reply to motion for class certification	Motions practice
Burgess, Brian	7/21/2020	1.20	\$ 211.99	\$ 254.39	Comment on reply draft for class certification	Motions practice
DeJong, Kevin	7/21/2020	0.20	\$ 211.99	\$ 42.40	Assess government opposition to motion to amend injunction	Motions practice
Shaw, Stephen	7/21/2020	2.80	\$ 211.99	\$ 593.57	Revise reply to motion for class certification	Motions practice
Shaw, Stephen	7/23/2020	1.40	\$ 211.99	\$ 296.79	E-mails with team regarding case developments; review opposition to motion to amend preliminary injunction	Motions practice
Shaw, Stephen	7/24/2020	1.90	\$ 211.99	\$ 402.78	Team call; review administrative record	Case development
Shaw, Stephen	7/25/2020	3.20	\$ 211.99	\$ 678.37	Revise reply to motion for class certification	Motions practice
DeJong, Kevin	7/26/2020	1.20	\$ 211.99	\$ 254.39	Review protective order; edit reply brief in support of class certification motion	Motions practice
Shaw, Stephen	7/26/2020	1.90	\$ 211.99	\$ 402.78	Revise class certification reply brief	Motions practice
Burgess, Brian	7/27/2020	2.00	\$ 211.99	\$ 423.98	Review reply in support of class certification and government opposition to motion to amend the preliminary injunction	Motions practice
Shaw, Stephen	7/27/2020	5.80	\$ 211.99	\$ 1,229.54	Team call; revise class certification reply brief; proof and cite check class certification reply brief; file class certification reply brief; telephone call regarding motion to amend preliminary injunction reply; review materials in preparation for same	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	7/28/2020	1.70	\$ 211.99	\$ 360.38	Review administrative record; edit protective order; email government regarding redactions	Case development
Shaw, Stephen	7/28/2020	0.30	\$ 211.99	\$ 63.60	Review materials for motion to amend preliminary injunction reply brief	Motions practice
DeJong, Kevin	7/29/2020	1.20	\$ 211.99	\$ 254.39	Edit protective order and send to opposing counsel; email opposing counsel regarding deficiencies in record	Case development
Shaw, Stephen	7/29/2020	2.60	\$ 211.99	\$ 551.17	Draft motion to amend reply	Motions practice
Burgess, Brian	7/30/2020	1.70	\$ 211.99	\$ 360.38	Revise/comment on reply for amending preliminary injunction	Motions practice
DeJong, Kevin	7/30/2020	0.40	\$ 211.99	\$ 84.80	Review and edit reply brief in support of motion to amend injunction	Motions practice
Shaw, Stephen	7/30/2020	6.80	\$ 211.99	\$ 1,441.53	Draft motion to amend reply; revise reply	Motions practice
Shaw, Stephen	7/31/2020	2.90	\$ 211.99	\$ 614.77	Team call; revise reply to motion to amend preliminary injunction	Motions practice
DeJong, Kevin	8/1/2020	1.40	\$ 211.99	\$ 296.79	Draft letter regarding deficiencies in administrative record	Case development
DeJong, Kevin	8/2/2020	4.20	\$ 211.99	\$ 890.36	Draft letter to opposing counsel regarding deficiencies in administrative record	Case development
Shaw, Stephen	8/2/2020	2.60	\$ 211.99	\$ 551.17	Revise draft letter regarding administrative record; revise class certification reply brief	Motions practice
DeJong, Kevin	8/3/2020	2.30	\$ 211.99	\$ 487.58	Attend team call to discuss case strategy; edit letter to opposing counsel regarding deficiencies in administrative record	Case development
DeJong, Kevin	8/4/2020	1.60	\$ 211.99	\$ 339.18	Edit reply brief in support of motion to amend injunction; edit letter regarding deficiencies in record, and sent to government counsel; research regarding privilege waiver	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Shaw, Stephen	8/4/2020	2.90	\$ 211.99	\$ 614.77	Revise class certification reply; draft supporting papers for class certification reply; file class certification reply	Motions practice
DeJong, Kevin	8/6/2020	0.40	\$ 211.99	\$ 84.80	Assess strategy regarding administrative record issues	Case development
Shaw, Stephen	8/6/2020	0.50	\$ 211.99	\$ 106.00	Draft joint motion to stay summary judgment briefing	Motions practice
DeJong, Kevin	8/7/2020	0.60	\$ 211.99	\$ 127.19	Edit motion to stay summary judgment schedule; draft email to opposing counsel regarding AR and stay of schedule	Motions practice
DeJong, Kevin	8/10/2020	1.20	\$ 211.99	\$ 254.39	Review joint motion to stay schedule; review edits to protective order; attend team call to discuss case strategy	Case development
DeJong, Kevin	8/11/2020	0.20	\$ 211.99	\$ 42.40	Email to opposing counsel regarding meet and confer	Case development
DeJong, Kevin	8/13/2020	0.40	\$ 211.99	\$ 84.80	Review and edit protective order	Case development
DeJong, Kevin	8/17/2020	1.50	\$ 211.99	\$ 317.99	Attend team call to discuss case strategy; review draft protective order and send to opposing counsel	Case development
DeJong, Kevin	8/18/2020	0.80	\$ 211.99	\$ 169.59	Assess response to opposing counsel regarding administrative record	Case development
DeJong, Kevin	8/21/2020	0.50	\$ 211.99	\$ 106.00	Draft email to opposing counsel on issues with administrative record	Case development
Shaw, Stephen	8/21/2020	0.30	\$ 211.99	\$ 63.60	Review emails regarding administrative record disputes	Case development
DeJong, Kevin	8/24/2020	2.30	\$ 211.99	\$ 487.58	Draft letter to opposing counsel regarding administrative record; attend team call to discuss case strategy	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	8/25/2020	0.80	\$ 211.99	\$ 169.59	Work on letter to opposing counsel regarding the administrative record	Case development
Shaw, Stephen	8/25/2020	0.80	\$ 211.99	\$ 169.59	Revise and file protective order	Pleadings
DeJong, Kevin	8/27/2020	1.60	\$ 211.99	\$ 339.18	Work on letter to opposing counsel regarding administrative record	Case development
DeJong, Kevin	8/28/2020	2.90	\$ 211.99	\$ 614.77	Draft letter to opposing counsel regarding issues with administrative record	Case development
DeJong, Kevin	8/31/2020	1.80	\$ 211.99	\$ 381.58	Attend team call regarding case strategy; work on letter to opposing regarding issues with administrative record	Case development
DeJong, Kevin	9/2/2020	3.50	\$ 211.99	\$ 741.97	Edit letter to opposing counsel regarding administrative record issues; confer with team regarding case strategy	Case development
Shaw, Stephen	9/2/2020	0.80	\$ 211.99	\$ 169.59	Emails regarding motion for summary judgment; revise letter to A. Loucks	Motions practice
DeJong, Kevin	9/3/2020	0.80	\$ 211.99	\$ 169.59	Emails regarding case strategy; confer with team regarding case strategy; email opposing counsel regarding violations of injunction	Case development
DeJong, Kevin	9/8/2020	1.20	\$ 211.99	\$ 254.39	Attend team call to discuss case strategy; edit joint status report and send to opposing counsel	Pleadings
DeJong, Kevin	9/9/2020	0.10	\$ 211.99	\$ 21.20	Review draft motion	Motions practice
Shaw, Stephen	9/10/2020	0.40	\$ 211.99	\$ 84.80	Revise and file joint status report	Case development
Shaw, Stephen	9/15/2020	2.00	\$ 211.99	\$ 423.98	Meet and confer with A. Loucks; telephone with K. DeJong and M. Ross; draft email summarizing calls; review materials relating to listserv guidance; emails regarding due process claim and summary judgment record	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	9/16/2020	1.30	\$ 211.99	\$ 275.59	Email opposing counsel regarding administrative record issues; email opposing counsel regarding follow-up to meet and confer	Case development
Shaw, Stephen	9/18/2020	0.30	\$ 211.99	\$ 63.60	Review responses to administrative record letter	Case development
DeJong, Kevin	9/21/2020	2.20	\$ 211.99	\$ 466.38	Attend team call to discuss case strategy; review notices sent by opposing counsel; assess government's response on administrative record issues; email to opposing counsel on administrative record issues	Case development
DeJong, Kevin	9/22/2020	0.90	\$ 211.99	\$ 190.79	Edit letter regarding protective order violations	Class counsel duties
DeJong, Kevin	9/23/2020	1.00	\$ 211.99	\$ 211.99	Edit and send letter to opposing counsel regarding injunction violations	Class counsel duties
Shaw, Stephen	9/23/2020	0.50	\$ 211.99	\$ 106.00	Review joint status report	Case development
Shaw, Stephen	9/25/2020	2.50	\$ 211.99	\$ 529.98	Team call; review summary judgment materials	Motions practice
Shaw, Stephen	9/28/2020	1.90	\$ 211.99	\$ 402.78	Team call; review memorandum of potential summary judgment arguments in preparation for call	Motions practice
Shaw, Stephen	9/30/2020	3.20	\$ 211.99	\$ 678.37	Review administrative record; research motion to compel; draft outline for motion to compel	Motions practice
DeJong, Kevin	10/5/2020	1.00	\$ 211.99	\$ 211.99	Attend team call to discuss case strategy; email to opposing counsel regarding injunction violations	Class counsel duties
DeJong, Kevin	10/6/2020	0.60	\$ 211.99	\$ 127.19	Draft joint status report	Case development
DeJong, Kevin	10/7/2020	0.90	\$ 211.99	\$ 190.79	Draft joint status report	Case development
DeJong, Kevin	10/8/2020	0.50	\$ 211.99	\$ 106.00	Edit joint status report	Case development
DeJong, Kevin	10/9/2020	2.10	\$ 211.99	\$ 445.18	Attend team call to discuss case strategy; edit joint status report, and emails to opposing counsel regarding same	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	10/14/2020	0.70	\$ 211.99	\$ 148.39	Draft email to opposing counsel on injunction issues	Class counsel duties
DeJong, Kevin	10/15/2020	1.40	\$ 211.99	\$ 296.79	Draft email to opposing counsel regarding injunction issues	Class counsel duties
DeJong, Kevin	10/16/2020	1.30	\$ 211.99	\$ 275.59	Attend team call to discuss case strategy; assess administrative record deficiencies	Case development
DeJong, Kevin	10/20/2020	0.40	\$ 211.99	\$ 84.80	Legal research on administrative record issues	Case development
DeJong, Kevin	10/21/2020	0.80	\$ 211.99	\$ 169.59	Legal research on administrative record issues	Case development
Burgess, Brian	10/23/2020	0.20	\$ 211.99	\$ 42.40	Email team regarding status report	Case development
DeJong, Kevin	10/23/2020	2.00	\$ 211.99	\$ 423.98	Attend team call to discuss case strategy; legal research in support of a motion to strike	Case development
DeJong, Kevin	10/27/2020	0.20	\$ 211.99	\$ 42.40	Draft email to opposing counsel	Case development
DeJong, Kevin	10/28/2020	0.40	\$ 211.99	\$ 84.80	Draft email to opposing counsel	Case development
DeJong, Kevin	10/29/2020	0.40	\$ 211.99	\$ 84.80	Email to opposing counsel	Case development
Shaw, Stephen	11/4/2020	0.70	\$ 211.99	\$ 148.39	Draft joint status report	Case development
DeJong, Kevin	11/5/2020	0.20	\$ 211.99	\$ 42.40	Edit joint status report	Case development
Shaw, Stephen	11/5/2020	0.30	\$ 211.99	\$ 63.60	Revise joint status report	Case development
Shaw, Stephen	11/6/2020	0.80	\$ 211.99	\$ 169.59	Emails with team and opposing counsel regarding joint status report; filing same	Case development
DeJong, Kevin	11/12/2020	0.40	\$ 211.99	\$ 84.80	Assess opposing counsel response regarding injunction violation issues	Class counsel duties
DeJong, Kevin	11/17/2020	0.70	\$ 211.99	\$ 148.39	Assess case strategy; edit letter to opposing regarding injunction issues	Class counsel duties
DeJong, Kevin	11/18/2020	0.80	\$ 211.99	\$ 169.59	Edit and send letter to opposing counsel; email to opposing regarding violations of injunction	Class counsel duties
DeJong, Kevin	11/20/2020	0.50	\$ 211.99	\$ 106.00	Email opposing counsel regarding injunction violations	Class counsel duties



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	11/23/2020	0.70	\$ 211.99	\$ 148.39	Draft email to opposing counsel regarding injunction violation	Class counsel duties
DeJong, Kevin	12/1/2020	1.10	\$ 211.99	\$ 233.19	Edit joint status report; draft email to opposing counsel regarding injunction issues	Case development
Shaw, Stephen	12/1/2020	1.20	\$ 211.99	\$ 254.39	Draft joint status report; emails regarding joint status report	Case development
DeJong, Kevin	12/3/2020	0.60	\$ 211.99	\$ 127.19	Review joint status report	Case development
Shaw, Stephen	12/3/2020	0.60	\$ 211.99	\$ 127.19	Emails with team and opposing counsel regarding joint status report	Case development
DeJong, Kevin	12/4/2020	1.10	\$ 211.99	\$ 233.19	Attend team call to discuss case strategy; edit joint status report	Case development
Shaw, Stephen	12/4/2020	2.40	\$ 211.99	\$ 508.78	Emails with team and opposing counsel regarding joint status report; revise joint status report; file status report	Case development
Shaw, Stephen	12/7/2020	1.20	\$ 211.99	\$ 254.39	Team call; review opposing status report	Case development
DeJong, Kevin	12/8/2020	0.20	\$ 211.99	\$ 42.40	Email opposing counsel	Case development
Shaw, Stephen	12/9/2020	0.20	\$ 211.99	\$ 42.40	Emails with K. DeJong regarding EOIR issue	Class counsel duties
DeJong, Kevin	12/16/2020	0.10	\$ 211.99	\$ 21.20	Email to opposing counsel	Case development
DeJong, Kevin	12/18/2020	0.40	\$ 211.99	\$ 84.80	Email to opposing counsel	Case development
Burgess, Brian	12/21/2020	0.50	\$ 211.99	\$ 106.00	Review preliminary injunction opinion	Motions practice
Shaw, Stephen	12/21/2020	2.20	\$ 211.99	\$ 466.38	Team call; review memorandum opinion	Motions practice
Burgess, Brian	12/28/2020	1.20	\$ 211.99	\$ 254.39	Provide comments on amended complaint	Pleadings
DeJong, Kevin	1/4/2021	2.50	\$ 220.76	\$ 551.90	Attend team call to discuss case strategy; draft letter regarding injunction issues	Case development
DeJong, Kevin	1/5/2021	1.00	\$ 220.76	\$ 220.76	Draft letter regarding injunction issues	Case development
Shaw, Stephen	1/6/2021	0.90	\$ 220.76	\$ 198.68	Emails regarding second amended complaint	Pleadings

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Shaw, Stephen	1/7/2021	1.40	\$ 220.76	\$ 309.06	Research supporting papers for amended complaint; draft email to team regarding advice on class issues with amended complaint; email opposing counsel regarding consent for supporting motions; review research on class issues with amended complaint	Pleadings
Shaw, Stephen	1/9/2021	1.50	\$ 220.76	\$ 331.14	Revise amended complaint	Pleadings
Shaw, Stephen	1/10/2021	3.40	\$ 220.76	\$ 750.58	Revise amended complaint; draft supporting papers; emails regarding same	Pleadings
DeJong, Kevin	1/11/2021	0.90	\$ 220.76	\$ 198.68	Review and edit amended complaint papers; attend team call to discuss case strategy	Pleadings
Shaw, Stephen	1/11/2021	6.10	\$ 220.76	\$ 1,346.64	Team call; revise amended complaint; prepare amended complaint and supporting papers; file amended complaint and supporting papers	Pleadings
DeJong, Kevin	1/12/2021	0.20	\$ 220.76	\$ 44.15	Review amended complaint filings	Pleadings
DeJong, Kevin	1/19/2021	0.30	\$ 220.76	\$ 66.23	Draft email to opposing regarding injunction issues	Class counsel duties
DeJong, Kevin	1/22/2021	1.20	\$ 220.76	\$ 264.91	Emails regarding motion for extension	Motions practice
DeJong, Kevin	1/25/2021	2.00	\$ 220.76	\$ 441.52	Draft opposition to motion for extension; attend team call to discuss case strategy; email opposing counsel regarding injunction issues	Motions practice
Burgess, Brian	1/26/2021	0.30	\$ 220.76	\$ 66.23	Attention to stipulation	Pleadings
Shaw, Stephen	1/26/2021	0.50	\$ 220.76	\$ 110.38	Draft joint stipulation	Pleadings
DeJong, Kevin	1/27/2021	0.40	\$ 220.76	\$ 88.30	Edit joint stipulation	Case development
DeJong, Kevin	1/28/2021	0.20	\$ 220.76	\$ 44.15	Email to opposing counsel	Case development
DeJong, Kevin	1/29/2021	1.50	\$ 220.76	\$ 331.14	Call with opposing counsel regarding settlement; attend team call to discuss case strategy	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	2/3/2021	1.30	\$ 220.76	\$ 286.99	Call with opposing counsel regarding settlement, and follow-up email to team; email opposing regarding violations of injunction	ADR
DeJong, Kevin	2/4/2021	0.20	\$ 220.76	\$ 44.15	Emails regarding stipulation	Motions practice
Burgess, Brian	2/8/2021	0.10	\$ 220.76	\$ 22.08	Email Mr. [ ] DeJong regarding settlement issues	ADR
DeJong, Kevin	2/8/2021	1.50	\$ 220.76	\$ 331.14	Attend team call to discuss case strategy; assess settlement strategy	ADR
Shaw, Stephen	2/12/2021	1.50	\$ 220.76	\$ 331.14	Telephone with A. Loucks; review settlement proposals; team call	ADR
Shaw, Stephen	2/19/2021	0.70	\$ 220.76	\$ 154.53	Review answer	Pleadings
Burgess, Brian	2/22/2021	0.20	\$ 220.76	\$ 44.15	Email K. [ ] DeJong regarding notice of appeal	Pleadings
DeJong, Kevin	2/26/2021	0.80	\$ 220.76	\$ 176.61	Email to opposing counsel regarding settlement; attend team call to discuss case strategy	ADR
Burgess, Brian	3/2/2021	0.20	\$ 220.76	\$ 44.15	Attention to settlement discussion	ADR
DeJong, Kevin	3/3/2021	1.00	\$ 220.76	\$ 220.76	Call with opposing counsel; email to team regarding settlement	ADR
Shaw, Stephen	3/3/2021	0.20	\$ 220.76	\$ 44.15	File notices of appearance; emails regarding same	Case development
DeJong, Kevin	3/4/2021	1.20	\$ 220.76	\$ 264.91	Email opposing counsel regarding injunction violation; emails regarding settlement	Class counsel duties
DeJong, Kevin	3/8/2021	0.30	\$ 220.76	\$ 66.23	Emails to opposing counsel	Case development
DeJong, Kevin	3/9/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	3/12/2021	0.40	\$ 220.76	\$ 88.30	Emails to opposing counsel	Case development
DeJong, Kevin	3/15/2021	0.50	\$ 220.76	\$ 110.38	Attend team call to discuss case strategy; email to opposing counsel	Case development
Shaw, Stephen	3/15/2021	0.20	\$ 220.76	\$ 44.15	Emails with Court Procedures regarding notice of appearance in appeal	Case development
DeJong, Kevin	3/16/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	3/17/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	3/19/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
Shaw, Stephen	3/19/2021	0.50	\$ 220.76	\$ 110.38	Team call; review appeal docket for schedule	Case development
DeJong, Kevin	3/22/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	3/23/2021	0.20	\$ 220.76	\$ 44.15	Email to opposing counsel	Case development
Shaw, Stephen	3/24/2021	0.30	\$ 220.76	\$ 66.23	Complete and file docketing statement	Case development
DeJong, Kevin	3/25/2021	0.60	\$ 220.76	\$ 132.46	Email to opposing counsel	Case development
Shaw, Stephen	3/29/2021	0.20	\$ 220.76	\$ 44.15	Emails regarding consent to motion to extend deadlines in appeal	Motions practice
DeJong, Kevin	3/30/2021	0.10	\$ 220.76	\$ 22.08	Review appeal motion	Motions practice
DeJong, Kevin	4/1/2021	0.60	\$ 220.76	\$ 132.46	Email to opposing counsel	Motions practice
DeJong, Kevin	4/9/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Motions practice
DeJong, Kevin	4/13/2021	0.40	\$ 220.76	\$ 88.30	Email defendants regarding PI violation	Class counsel duties
DeJong, Kevin	4/14/2021	0.20	\$ 220.76	\$ 44.15	Review defendants' rescission notice	Case development
DeJong, Kevin	4/20/2021	0.20	\$ 220.76	\$ 44.15	Review defendants' proposed settlement terms	ADR
DeJong, Kevin	4/22/2021	1.40	\$ 220.76	\$ 309.06	Review and assess settlement agreement	ADR
DeJong, Kevin	4/28/2021	1.00	\$ 220.76	\$ 220.76	Email to opposing counsel; draft email regarding settlement	ADR
DeJong, Kevin	4/29/2021	0.20	\$ 220.76	\$ 44.15	Email opposing counsel regarding settlement	ADR
DeJong, Kevin	5/4/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	5/5/2021	0.50	\$ 220.76	\$ 110.38	Prepare for settlement phone call	ADR
Burgess, Brian	5/6/2021	0.50	\$ 220.76	\$ 110.38	Respond to K.[_]DeJong regarding settlement discussions	ADR
DeJong, Kevin	5/7/2021	0.40	\$ 220.76	\$ 88.30	Emails regarding settlement	ADR
DeJong, Kevin	5/19/2021	0.40	\$ 220.76	\$ 88.30	Email opposing counsel regarding settlement	ADR
DeJong, Kevin	5/20/2021	0.90	\$ 220.76	\$ 198.68	Review and edit settlement proposal	ADR
Burgess, Brian	5/21/2021	0.40	\$ 220.76	\$ 88.30	Review settlement terms	ADR
DeJong, Kevin	5/21/2021	0.60	\$ 220.76	\$ 132.46	Confer with team regarding settlement; email opposing counsel regarding settlement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	5/24/2021	2.20	\$ 220.76	\$ 485.67	Prepare for settlement call; call with opposing counsel and email to the team regarding same	ADR
DeJong, Kevin	5/28/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	6/3/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	6/8/2021	0.10	\$ 220.76	\$ 22.08	Circulate motion for extension	Motions practice
DeJong, Kevin	6/11/2021	0.20	\$ 220.76	\$ 44.15	Email to opposing counsel	Case development
DeJong, Kevin	6/15/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	6/29/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	7/2/2021	0.40	\$ 220.76	\$ 88.30	Attend team call to discuss settlement strategy	ADR
DeJong, Kevin	7/6/2021	2.70	\$ 220.76	\$ 596.05	Prepare for and attend team call to discuss settlement strategy; legal research on class action settlement	ADR
DeJong, Kevin	7/7/2021	0.80	\$ 220.76	\$ 176.61	Emails regarding government's motion for extension	Motions practice
DeJong, Kevin	7/9/2021	2.30	\$ 220.76	\$ 507.75	Prepare for and attend call with AUSA regarding settlement	ADR
DeJong, Kevin	7/14/2021	0.70	\$ 220.76	\$ 154.53	Email opposing counsel regarding injunction violation	Class counsel duties
DeJong, Kevin	7/19/2021	0.10	\$ 220.76	\$ 22.08	Emails to opposing counsel	Case development
DeJong, Kevin	8/2/2021	0.10	\$ 220.76	\$ 22.08	Email opposing counsel	Case development
DeJong, Kevin	8/6/2021	0.50	\$ 220.76	\$ 110.38	Email opposing counsel regarding injunction violation	Class counsel duties
DeJong, Kevin	8/9/2021	1.00	\$ 220.76	\$ 220.76	Attend team call to discuss case strategy; email to opposing counsel	Case development
DeJong, Kevin	8/10/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	8/19/2021	1.10	\$ 220.76	\$ 242.84	Email to team regarding strategy; work on settlement proposal; call with Ms. Scholz regarding settlement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	8/25/2021	0.80	\$ 220.76	\$ 176.61	Draft and send email to defendants; emails to co-counsel regarding same	Case development
DeJong, Kevin	8/30/2021	0.40	\$ 220.76	\$ 88.30	Draft settlement agreement	ADR
DeJong, Kevin	8/31/2021	0.20	\$ 220.76	\$ 44.15	Draft settlement agreement	ADR
DeJong, Kevin	9/2/2021	2.00	\$ 220.76	\$ 441.52	Draft settlement agreement	ADR
DeJong, Kevin	9/3/2021	1.60	\$ 220.76	\$ 353.22	Draft settlement agreement	ADR
DeJong, Kevin	9/7/2021	1.40	\$ 220.76	\$ 309.06	Draft settlement agreement	ADR
DeJong, Kevin	9/8/2021	0.40	\$ 220.76	\$ 88.30	Email regarding appeal status report; email to co-counsel regarding settlement	ADR
DeJong, Kevin	9/20/2021	1.80	\$ 220.76	\$ 397.37	Draft email to opposing counsel regarding class member; attend team call to discuss case strategy	Class counsel duties
DeJong, Kevin	9/21/2021	0.50	\$ 220.76	\$ 110.38	Email opposing counsel	Case development
DeJong, Kevin	9/27/2021	0.70	\$ 220.76	\$ 154.53	Attend team call to discuss case strategy; email co-counsel	Case development
DeJong, Kevin	9/30/2021	0.50	\$ 220.76	\$ 110.38	Emails to team regarding settlement	ADR
DeJong, Kevin	10/1/2021	0.20	\$ 220.76	\$ 44.15	Emails to opposing counsel	ADR
DeJong, Kevin	10/4/2021	1.50	\$ 220.76	\$ 331.14	Prepare for and attend call with opposing counsel	ADR
DeJong, Kevin	10/5/2021	0.60	\$ 220.76	\$ 132.46	Email opposing counsel regarding class member	Class counsel duties
DeJong, Kevin	10/6/2021	0.50	\$ 220.76	\$ 110.38	Email opposing counsel regarding class member	Class counsel duties
DeJong, Kevin	10/7/2021	0.60	\$ 220.76	\$ 132.46	Draft email to opposing counsel regarding settlement	ADR
DeJong, Kevin	10/8/2021	0.30	\$ 220.76	\$ 66.23	Email to opposing counsel regarding settlement	ADR
DeJong, Kevin	10/12/2021	1.40	\$ 220.76	\$ 309.06	Edit joint status report; emails to opposing counsel	Pleadings
DeJong, Kevin	10/19/2021	0.30	\$ 220.76	\$ 66.23	Draft email response to opposing counsel	Case development
DeJong, Kevin	10/20/2021	0.30	\$ 220.76	\$ 66.23	Email opposing counsel regarding class member	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	10/21/2021	0.30	\$ 220.76	\$ 66.23	Emails to opposing counsel	Class counsel duties
DeJong, Kevin	10/29/2021	0.30	\$ 220.76	\$ 66.23	Email to opposing counsel	Motions practice
DeJong, Kevin	11/1/2021	0.20	\$ 220.76	\$ 44.15	Review notice of rescission	Case development
DeJong, Kevin	11/4/2021	0.10	\$ 220.76	\$ 22.08	Email to opposing counsel	Case development
DeJong, Kevin	11/8/2021	0.20	\$ 220.76	\$ 44.15	Email opposing counsel regarding settlement	ADR
DeJong, Kevin	11/11/2021	0.70	\$ 220.76	\$ 154.53	Email to opposing counsel regarding appeal; email to opposing counsel regarding settlement	ADR
DeJong, Kevin	11/12/2021	1.30	\$ 220.76	\$ 286.99	Attend team call; edit joint status letter	Case development
DeJong, Kevin	11/15/2021	0.10	\$ 220.76	\$ 22.08	Email to co-counsel	Case development
DeJong, Kevin	11/22/2021	0.30	\$ 220.76	\$ 66.23	Confer regarding settlement	ADR
DeJong, Kevin	11/24/2021	0.90	\$ 220.76	\$ 198.68	Attend team call regarding settlement	ADR
DeJong, Kevin	11/29/2021	0.90	\$ 220.76	\$ 198.68	Confer with team regarding settlement	ADR
Burgess, Brian	12/1/2021	0.20	\$ 220.76	\$ 44.15	Comment on draft of email to government counsel regarding state of settlement negotiations	ADR
DeJong, Kevin	12/1/2021	2.00	\$ 220.76	\$ 441.52	Draft email to government regarding settlement, and confer regarding strategy	ADR
DeJong, Kevin	12/3/2021	0.50	\$ 220.76	\$ 110.38	Attend team call to discuss case strategy; draft email response regarding settlement	ADR
DeJong, Kevin	12/9/2021	0.50	\$ 220.76	\$ 110.38	Email opposing counsel regarding joint status report; review settlement draft; email to team regarding updates to Court	Case development
DeJong, Kevin	12/13/2021	2.10	\$ 220.76	\$ 463.60	Attend team call to discuss settlement; edit joint status report for appeal	ADR
DeJong, Kevin	12/14/2021	0.20	\$ 220.76	\$ 44.15	Email to opposing counsel	Case development
DeJong, Kevin	12/15/2021	0.70	\$ 220.76	\$ 154.53	Prepare for call with opposing counsel regarding mediation	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	12/16/2021	1.60	\$ 220.76	\$ 353.22	Prepare for and lead call with opposing counsel regarding settlement	ADR
DeJong, Kevin	12/20/2021	1.30	\$ 220.76	\$ 286.99	Prepare for settlement discussions; draft email to opposing counsel regarding class member; attend team call	ADR
DeJong, Kevin	12/21/2021	0.50	\$ 220.76	\$ 110.38	Email opposing counsel regarding settlement	ADR
DeJong, Kevin	12/23/2021	0.30	\$ 220.76	\$ 66.23	Email to opposing counsel regarding injunction violation	Class counsel duties
DeJong, Kevin	1/4/2022	0.50	\$ 240.89	\$ 120.45	Email opposing counsel regarding class member issue	Class counsel duties
DeJong, Kevin	1/7/2022	2.40	\$ 240.89	\$ 578.14	Attend team call to discuss case strategy; email government counsel regarding settlement	ADR
DeJong, Kevin	1/10/2022	0.40	\$ 240.89	\$ 96.36	Email to opposing counsel regarding class member; review and edit draft settlement agreement	ADR
DeJong, Kevin	1/11/2022	0.60	\$ 240.89	\$ 144.53	Email to government counsel regarding status report; edit settlement agreement	ADR
DeJong, Kevin	1/12/2022	1.00	\$ 240.89	\$ 240.89	Edit joint request for mediation, and send to opposing counsel; emails regarding class member order	ADR
DeJong, Kevin	1/13/2022	0.70	\$ 240.89	\$ 168.62	Edit joint request for mediation, and coordinate filing of same	ADR
DeJong, Kevin	1/14/2022	0.20	\$ 240.89	\$ 48.18	Edit settlement agreement	ADR
DeJong, Kevin	1/16/2022	1.60	\$ 240.89	\$ 385.42	Edit settlement agreement	ADR
Burgess, Brian	1/19/2022	2.00	\$ 240.89	\$ 481.78	Review and comment on draft settlement agreement (0.9); confer with co-counsel regarding revisions to draft settlement agreement (1.1)	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	1/19/2022	2.20	\$ 240.89	\$ 529.96	Legal research regarding attorneys fees, and email to team regarding same; review motion to substitute counsel; confer with team regarding settlement agreement; email to opposing counsel regarding class substitution	Motions practice
DeJong, Kevin	1/20/2022	0.10	\$ 240.89	\$ 24.09	Review settlement agreement	ADR
DeJong, Kevin	1/21/2022	1.00	\$ 240.89	\$ 240.89	Review and edit motion to substitute class counsel; attend team call to discuss settlement	Motions practice
DeJong, Kevin	1/25/2022	1.20	\$ 240.89	\$ 289.07	Edit motion to substitute class counsel; email to opposing counsel regarding settlement	Motions practice
DeJong, Kevin	1/26/2022	0.10	\$ 240.89	\$ 24.09	Edit motion to substitute class counsel, and coordinate filing of same	Motions practice
DeJong, Kevin	2/16/2022	0.40	\$ 240.89	\$ 96.36	Email to team regarding class member issue; work on mediation statement	ADR
DeJong, Kevin	2/17/2022	0.20	\$ 240.89	\$ 48.18	Email to team regarding response from opposing counsel on class member issue	Class counsel duties
DeJong, Kevin	2/18/2022	0.70	\$ 240.89	\$ 168.62	Attend team meeting to discuss case strategy; email to opposing counsel regarding settlement	ADR
DeJong, Kevin	2/23/2022	0.10	\$ 240.89	\$ 24.09	Work on mediation statement	ADR
DeJong, Kevin	2/25/2022	1.50	\$ 240.89	\$ 361.34	Prepare for and attend call with opposing counsel; attend team call to discuss case strategy; email to opposing counsel regarding class member	Motions practice
DeJong, Kevin	2/28/2022	1.80	\$ 240.89	\$ 433.60	Draft mediation statement	ADR
DeJong, Kevin	3/1/2022	2.60	\$ 240.89	\$ 626.31	Work on mediation statement	ADR
DeJong, Kevin	3/2/2022	5.20	\$ 240.89	\$ 1,252.63	Work on mediation statement	ADR
Burgess, Brian	3/3/2022	0.50	\$ 240.89	\$ 120.45	Review draft of mediation statement	ADR
DeJong, Kevin	3/3/2022	0.60	\$ 240.89	\$ 144.53	Work on mediation statement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Burgess, Brian	3/4/2022	1.00	\$ 240.89	\$ 240.89	Participate in strategy conference to discuss mediation statement	ADR
DeJong, Kevin	3/7/2022	3.30	\$ 240.89	\$ 794.94	Attend team call to discuss case strategy; work on mediation statement and send to Judge Schulze	ADR
DeJong, Kevin	3/10/2022	0.30	\$ 240.89	\$ 72.27	Email to opposing counsel	Case development
DeJong, Kevin	3/14/2022	1.30	\$ 240.89	\$ 313.16	Email to opposing counsel regarding settlement and inquiry regarding class member; attend team call to discuss case strategy	Case development
DeJong, Kevin	3/17/2022	0.70	\$ 240.89	\$ 168.62	Work on supplemental mediation statement; phone call to Judge Schulze	ADR
DeJong, Kevin	3/18/2022	1.60	\$ 240.89	\$ 385.42	Phone calls with Judge Schulze; attend team call to discuss case strategy	ADR
Burgess, Brian	3/23/2022	0.20	\$ 240.89	\$ 48.18	Review submission to mediator	ADR
DeJong, Kevin	3/23/2022	0.70	\$ 240.89	\$ 168.62	Work on supplemental mediation statement, and send to magistrate judge	ADR
DeJong, Kevin	3/24/2022	0.30	\$ 240.89	\$ 72.27	Email to opposing counsel regarding class member issue	Class counsel duties
DeJong, Kevin	3/29/2022	1.30	\$ 240.89	\$ 313.16	Prepare for mediation calls	ADR
DeJong, Kevin	3/30/2022	0.30	\$ 240.89	\$ 72.27	Call with Judge Schulze	ADR
DeJong, Kevin	3/31/2022	0.30	\$ 240.89	\$ 72.27	Email to opposing counsel regarding mediation	ADR
DeJong, Kevin	4/1/2022	0.70	\$ 240.89	\$ 168.62	Attend team call to discuss case strategy; prepare for mediation calls; email to Judge Schulze regarding mediation	ADR
DeJong, Kevin	4/4/2022	2.30	\$ 240.89	\$ 554.05	Attend team call regarding case strategy; prepare for mediation calls	ADR
DeJong, Kevin	4/5/2022	3.00	\$ 240.89	\$ 722.67	Prepare for and attend call with opposing counsel regarding mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	4/6/2022	3.70	\$ 240.89	\$ 891.29	Prepare for and attend mediation call with government counsel	ADR
DeJong, Kevin	4/7/2022	0.10	\$ 240.89	\$ 24.09	Email regarding mediation	ADR
DeJong, Kevin	4/8/2022	0.70	\$ 240.89	\$ 168.62	Attend team meeting to discuss case strategy; email opposing counsel regarding mediation	ADR
DeJong, Kevin	4/13/2022	0.90	\$ 240.89	\$ 216.80	Email to counsel regarding mediation; confer regarding mediation strategy; email to counsel regarding appeal joint status report	ADR
DeJong, Kevin	4/15/2022	0.90	\$ 240.89	\$ 216.80	Email team regarding attorneys' fees; email to opposing counsel regarding mediation	ADR
DeJong, Kevin	4/20/2022	0.90	\$ 240.89	\$ 216.80	Emails to opposing counsel regarding mediation	ADR
DeJong, Kevin	4/21/2022	0.90	\$ 240.89	\$ 216.80	Email to magistrate judge regarding mediation schedule; emails to opposing counsel regarding mediation	ADR
DeJong, Kevin	4/27/2022	0.10	\$ 240.89	\$ 24.09	Emails regarding mediation	ADR
DeJong, Kevin	5/5/2022	0.10	\$ 240.89	\$ 24.09	Email to opposing counsel regarding mediation	ADR
DeJong, Kevin	5/6/2022	1.40	\$ 240.89	\$ 337.25	Emails to opposing counsel regarding mediation; work on fees petition; attend team call to discuss case strategy	ADR
DeJong, Kevin	5/9/2022	0.10	\$ 240.89	\$ 24.09	Emails regarding mediation	ADR
DeJong, Kevin	5/11/2022	0.30	\$ 240.89	\$ 72.27	Review and edit appeal status report	Case development
DeJong, Kevin	5/15/2022	0.70	\$ 240.89	\$ 168.62	Prepare for mediation session	ADR
DeJong, Kevin	5/16/2022	8.40	\$ 240.89	\$ 2,023.48	Prepare for and attend mediation	ADR
DeJong, Kevin	5/17/2022	0.10	\$ 240.89	\$ 24.09	Email regarding mediation	ADR
DeJong, Kevin	5/19/2022	0.60	\$ 240.89	\$ 144.53	Review and edit settlement agreement	ADR
Burgess, Brian	5/24/2022	0.50	\$ 240.89	\$ 120.45	Respond to K.[_]DeJong regarding standing question for LMZ	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	5/24/2022	0.50	\$ 240.89	\$ 120.45	Edit mediation status report; attend to case strategy	ADR
DeJong, Kevin	5/27/2022	1.20	\$ 240.89	\$ 289.07	Attend team call to discuss case strategy; email to opposing counsel	Case development
DeJong, Kevin	6/1/2022	0.10	\$ 240.89	\$ 24.09	Email to opposing counsel	Case development
DeJong, Kevin	6/3/2022	1.00	\$ 240.89	\$ 240.89	Attend team call to discuss strategy; email to opposing counsel regarding mediation	ADR
DeJong, Kevin	6/10/2022	0.60	\$ 240.89	\$ 144.53	Review and edit appeal joint status report, and email to opposing counsel regarding same; assess mediation strategy	Case development
DeJong, Kevin	6/22/2022	1.30	\$ 240.89	\$ 313.16	Draft joint mediation status report, emails to co-counsel and opposing counsel regarding same, and coordinate filing of same	Case development
DeJong, Kevin	7/1/2022	0.20	\$ 240.89	\$ 48.18	Email to opposing counsel regarding mediation	ADR
DeJong, Kevin	7/6/2022	1.00	\$ 240.89	\$ 240.89	Prepare for mediation	ADR
DeJong, Kevin	7/7/2022	1.40	\$ 240.89	\$ 337.25	Prepare for mediation meeting, and confer with team regarding same	ADR
DeJong, Kevin	7/8/2022	2.00	\$ 240.89	\$ 481.78	Review settlement draft and prepare for mediation	ADR
DeJong, Kevin	7/10/2022	1.20	\$ 240.89	\$ 289.07	Review settlement draft and prepare for mediation	ADR
DeJong, Kevin	7/11/2022	4.70	\$ 240.89	\$ 1,132.18	Prepare for and attend mediation call with opposing counsel	ADR
DeJong, Kevin	7/12/2022	4.60	\$ 240.89	\$ 1,108.09	Prepare for and attend mediation	ADR
DeJong, Kevin	7/13/2022	1.00	\$ 240.89	\$ 240.89	Review and edit appeal joint status report, and emails with opposing counsel regarding same	Case development
DeJong, Kevin	7/15/2022	0.80	\$ 240.89	\$ 192.71	Attend team meeting to discuss settlement draft; email draft to opposing counsel	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	7/20/2022	0.60	\$ 240.89	\$ 144.53	Assess case strategy; email to opposing counsel regarding class member	Case development
DeJong, Kevin	7/26/2022	0.50	\$ 240.89	\$ 120.45	Confer regarding settlement strategy	ADR
DeJong, Kevin	7/28/2022	0.40	\$ 240.89	\$ 96.36	Review and assess draft settlement agreement	ADR
DeJong, Kevin	7/29/2022	1.40	\$ 240.89	\$ 337.25	Attend team call to discuss settlement draft; draft and coordinate filing of joint mediation status report	ADR
DeJong, Kevin	8/2/2022	0.20	\$ 240.89	\$ 48.18	Email to opposing counsel regarding class member issue	Class counsel duties
DeJong, Kevin	8/3/2022	0.10	\$ 240.89	\$ 24.09	Email team regarding government response to issue raised for class member	Class counsel duties
DeJong, Kevin	8/4/2022	0.20	\$ 240.89	\$ 48.18	Email team regarding government response to issue raised for class member	Class counsel duties
DeJong, Kevin	8/11/2022	0.80	\$ 240.89	\$ 192.71	Confer with Ms. Ross regarding settlement agreement; review draft of appeal joint status report	ADR
DeJong, Kevin	8/12/2022	0.30	\$ 240.89	\$ 72.27	Review and edits appeal joint status report, and send to opposing counsel; email regarding strategy issue	Case development
DeJong, Kevin	8/15/2022	1.20	\$ 240.89	\$ 289.07	Attend team meeting to discuss settlement draft and case strategy	ADR
DeJong, Kevin	8/16/2022	1.10	\$ 240.89	\$ 264.98	Review settlement agreement draft, and send to government counsel; email government counsel regarding appeal	ADR
DeJong, Kevin	8/22/2022	2.10	\$ 240.89	\$ 505.87	Prepare for mediation conference, and confer with team regarding same	ADR
DeJong, Kevin	8/23/2022	4.40	\$ 240.89	\$ 1,059.92	Prepare for and attend settlement mediation; email follow-up regarding notice issue	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	8/24/2022	1.00	\$ 240.89	\$ 240.89	Confer with team regarding settlement	ADR
DeJong, Kevin	8/25/2022	3.90	\$ 240.89	\$ 939.47	Prepare for and attend mediation conference	ADR
DeJong, Kevin	8/26/2022	0.30	\$ 240.89	\$ 72.27	Emails regarding case strategy	ADR
DeJong, Kevin	8/29/2022	0.40	\$ 240.89	\$ 96.36	Assess draft of settlement agreement	ADR
DeJong, Kevin	9/1/2022	0.80	\$ 240.89	\$ 192.71	Attend team call to discuss settlement	ADR
DeJong, Kevin	9/2/2022	0.80	\$ 240.89	\$ 192.71	Draft joint mediation status report, and coordinate filling of same; review settlement draft, and send to defendants	ADR
DeJong, Kevin	9/12/2022	1.20	\$ 240.89	\$ 289.07	Attend team call to discuss settlement strategy; review and circulate joint status report for appeal	ADR
DeJong, Kevin	9/15/2022	0.30	\$ 240.89	\$ 72.27	Email to opposing counsel regarding settlement draft	ADR
DeJong, Kevin	9/16/2022	0.10	\$ 240.89	\$ 24.09	Review draft settlement agreement	ADR
DeJong, Kevin	9/19/2022	0.40	\$ 240.89	\$ 96.36	Email to opposing counsel regarding settlement; review settlement draft	ADR
DeJong, Kevin	9/26/2022	1.10	\$ 240.89	\$ 264.98	Email opposing counsel regarding mediation; attend team call to discuss settlement	ADR
DeJong, Kevin	9/29/2022	0.20	\$ 240.89	\$ 48.18	Review and comment on draft settlement agreement	ADR
DeJong, Kevin	10/3/2022	0.70	\$ 240.89	\$ 168.62	Draft and circulate joint mediation status report, and coordinate filing of same	Pleadings
DeJong, Kevin	10/18/2022	0.50	\$ 240.89	\$ 120.45	Prepare for mediation conference; phone call to government counsel regarding mediation	ADR
DeJong, Kevin	10/19/2022	0.40	\$ 240.89	\$ 96.36	Phone call to government counsel; prepare for mediation conference	ADR
DeJong, Kevin	10/20/2022	3.00	\$ 240.89	\$ 722.67	Prepare for and attend mediation conference	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	10/21/2022	0.20	\$ 240.89	\$ 48.18	Email to government regarding settlement agreement	ADR
DeJong, Kevin	10/24/2022	1.10	\$ 240.89	\$ 264.98	Attend team meeting to discuss settlement draft and prepare for mediation conference; circulate order from appeal	ADR
DeJong, Kevin	10/25/2022	3.70	\$ 240.89	\$ 891.29	Prepare for and attend mediation conference	ADR
DeJong, Kevin	10/27/2022	0.30	\$ 240.89	\$ 72.27	Legal research related to settlement issues	ADR
DeJong, Kevin	10/31/2022	1.10	\$ 240.89	\$ 264.98	Attend team meeting to discuss settlement agreement	ADR
DeJong, Kevin	11/3/2022	0.40	\$ 240.89	\$ 96.36	Review draft settlement agreement, and send to government counsel	ADR
DeJong, Kevin	11/14/2022	1.10	\$ 240.89	\$ 264.98	Email to government counsel regarding appeal status report; attend team strategy call; email to Judge Schulze	ADR
DeJong, Kevin	11/15/2022	0.40	\$ 240.89	\$ 96.36	Draft joint mediation status report	Case development
DeJong, Kevin	11/17/2022	0.10	\$ 240.89	\$ 24.09	Email to government counsel regarding joint status report	Case development
DeJong, Kevin	11/18/2022	0.20	\$ 240.89	\$ 48.18	Coordinate filing of joint mediation status report	Case development
DeJong, Kevin	12/7/2022	0.20	\$ 240.89	\$ 48.18	Email to government counsel	Case development
DeJong, Kevin	12/12/2022	0.70	\$ 240.89	\$ 168.62	Attend team call regarding settlement agreement and strategy	ADR
DeJong, Kevin	12/13/2022	0.50	\$ 240.89	\$ 120.45	Attend team meeting to discuss settlement agreement	ADR
DeJong, Kevin	12/14/2022	1.00	\$ 240.89	\$ 240.89	Email to government counsel regarding mediation; review and edit appeal joint status report	ADR
DeJong, Kevin	12/15/2022	0.20	\$ 240.89	\$ 48.18	Email to government counsel regarding mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	12/16/2022	0.20	\$ 240.89	\$ 48.18	Email to government counsel regarding class member issue (0.2)	Class counsel duties
DeJong, Kevin	12/20/2022	0.20	\$ 240.89	\$ 48.18	Email to government counsel regarding class member issue	Class counsel duties
DeJong, Kevin	12/21/2022	0.30	\$ 240.89	\$ 72.27	Edit joint mediation status report and send to government counsel (0.3)	Case development
DeJong, Kevin	12/22/2022	0.20	\$ 240.89	\$ 48.18	Coordinate filing of joint mediation status report	Case development
DeJong, Kevin	12/23/2022	0.10	\$ 240.89	\$ 24.09	Review and circulate joint mediation status report	ADR
DeJong, Kevin	1/17/2023	0.10	\$ 250.01	\$ 25.00	Review declaration for class member issue	Class counsel duties
DeJong, Kevin	2/2/2023	0.10	\$ 250.01	\$ 25.00	Assess issue with improper USCIS notice for class member	Class counsel duties
DeJong, Kevin	2/16/2023	0.30	\$ 250.01	\$ 75.00	Circulate joint status report; assess settlement strategy	ADR
DeJong, Kevin	2/20/2023	0.10	\$ 250.01	\$ 25.00	Emails regarding class member issue	Class counsel duties
DeJong, Kevin	2/22/2023	0.50	\$ 250.01	\$ 125.01	Draft and circulate joint mediation status report and send to government counsel; assess class member issue	Case development
DeJong, Kevin	2/23/2023	0.90	\$ 250.01	\$ 225.01	Edit joint mediation status report, emails to government counsel, and coordinate filing of same; confer with Ms. Jackson regarding settlement strategy	ADR
DeJong, Kevin	2/24/2023	1.10	\$ 250.01	\$ 275.01	Attend team to discuss case strategy and class member issues	ADR
DeJong, Kevin	2/27/2023	1.60	\$ 250.01	\$ 400.02	Emails regarding status conference with court; attend team meeting to discuss case strategy and settlement issues	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	2/28/2023	0.70	\$ 250.01	\$ 175.01	Call with government counsel, and emails regarding same; emails to court clerk	Case development
DeJong, Kevin	3/1/2023	1.70	\$ 250.01	\$ 425.02	Attend team call to discuss settlement strategy; prepare for status conference with the court	Case development
DeJong, Kevin	3/2/2023	2.90	\$ 250.01	\$ 725.03	Prepare for and attend mediation conference	ADR
DeJong, Kevin	3/3/2023	0.90	\$ 250.01	\$ 225.01	Prepare for status conference with the Court; emails to Judge Schulze	ADR
DeJong, Kevin	3/4/2023	0.20	\$ 250.01	\$ 50.00	Prepare for call with Judge Schulze	ADR
DeJong, Kevin	3/5/2023	0.50	\$ 250.01	\$ 125.01	Prepare for court status conference	Case development
DeJong, Kevin	3/6/2023	1.80	\$ 250.01	\$ 450.02	Prepare for and attend call with Magistrate Judge Schulze; call with team regarding strategy; prepare for and attend court status conference	ADR
DeJong, Kevin	3/9/2023	0.40	\$ 250.01	\$ 100.00	Email to opposing counsel; prepare for mediation conference	ADR
DeJong, Kevin	3/10/2023	0.10	\$ 250.01	\$ 25.00	Emails to Judge Schulze and government counsel regarding mediation	ADR
DeJong, Kevin	3/13/2023	1.20	\$ 250.01	\$ 300.01	Emails regarding conference call with Judge Schulze; attend team call to discuss settlement strategy	ADR
DeJong, Kevin	3/14/2023	1.20	\$ 250.01	\$ 300.01	Prepare for and attend conference call with Judge Schulze, and emails to team regarding same; confer with Ms. Jackson regarding settlement strategy	ADR
DeJong, Kevin	3/15/2023	0.10	\$ 250.01	\$ 25.00	Circulate appeal status report; emails regarding mediation conference	Case development
DeJong, Kevin	3/16/2023	0.20	\$ 250.01	\$ 50.00	Emails regarding mediation conference	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	3/20/2023	1.10	\$ 250.01	\$ 275.01	Confer with team regarding class member issues and settlement strategy; email to government counsel	Class counsel duties
DeJong, Kevin	3/23/2023	0.70	\$ 250.01	\$ 175.01	Draft and edit joint mediation status report, send to government counsel, and coordinate filing thereof; assess settlement strategy	ADR
DeJong, Kevin	3/24/2023	0.90	\$ 250.01	\$ 225.01	Call with team regarding settlement	ADR
DeJong, Kevin	3/27/2023	5.50	\$ 250.01	\$ 1,375.06	Prepare for and attend mediation conference	ADR
DeJong, Kevin	3/28/2023	0.70	\$ 250.01	\$ 175.01	Emails regarding mediation conference planning, and confer with Ms. Jackson regarding same	ADR
DeJong, Kevin	3/29/2023	0.10	\$ 250.01	\$ 25.00	Email to Judge Schulze regarding mediation (0.1)	ADR
DeJong, Kevin	3/30/2023	0.20	\$ 250.01	\$ 50.00	Review correspondence regarding class member issue	Class counsel duties
DeJong, Kevin	4/3/2023	1.20	\$ 250.01	\$ 300.01	Attend team call to discuss settlement agreement	ADR
DeJong, Kevin	4/10/2023	0.20	\$ 250.01	\$ 50.00	Assess strategy for mediation conference	ADR
DeJong, Kevin	4/13/2023	0.10	\$ 250.01	\$ 25.00	Assess strategy for mediation statement	ADR
DeJong, Kevin	4/18/2023	1.20	\$ 250.01	\$ 300.01	Review and edit mediation statement	ADR
DeJong, Kevin	4/19/2023	3.30	\$ 250.01	\$ 825.03	Review and edit mediation statement, and confer with team regarding same	ADR
DeJong, Kevin	4/20/2023	0.20	\$ 250.01	\$ 50.00	Email to government counsel regarding settlement agreement; assess correspondence regarding class member issue	ADR
DeJong, Kevin	4/21/2023	2.00	\$ 250.01	\$ 500.02	Calls to government counsel; attend call with team regarding mediation	ADR
DeJong, Kevin	4/24/2023	2.00	\$ 250.01	\$ 500.02	Edit mediation statement, and send to Judge Schulze; prepare for mediation conference	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	4/25/2023	1.50	\$ 250.01	\$ 375.02	Confer with team regarding settlement draft and prepare for mediation conference; email to Judge Schulze regarding mediation conference	ADR
DeJong, Kevin	4/26/2023	5.60	\$ 250.01	\$ 1,400.06	Prepare for and attend mediation conference	ADR
DeJong, Kevin	4/27/2023	0.30	\$ 250.01	\$ 75.00	Email to Judge Schulze regarding mediation schedule; review attorneys' fees records	ADR
DeJong, Kevin	5/4/2023	0.40	\$ 250.01	\$ 100.00	Assess draft settlement agreement	ADR
DeJong, Kevin	5/5/2023	1.20	\$ 250.01	\$ 300.01	Review and assess settlement agreement draft, and confer with team regarding same	ADR
DeJong, Kevin	5/8/2023	0.90	\$ 250.01	\$ 225.01	Attend team call to discuss settlement agreement	ADR
DeJong, Kevin	5/9/2023	0.40	\$ 250.01	\$ 100.00	Prepare for and attend call with government counsel	ADR
DeJong, Kevin	5/10/2023	0.90	\$ 250.01	\$ 225.01	Prepare for mediation conferences	ADR
DeJong, Kevin	5/11/2023	1.00	\$ 250.01	\$ 250.01	Confer with team regarding settlement agreement and mediation strategy	ADR
DeJong, Kevin	5/12/2023	0.90	\$ 250.01	\$ 225.01	Review and edit settlement agreement and compliance report and send to government counsel	ADR
DeJong, Kevin	5/15/2023	0.20	\$ 250.01	\$ 50.00	Review and edit joint appeal status report, and send to government counsel	Case development
DeJong, Kevin	5/19/2023	0.80	\$ 250.01	\$ 200.01	Attend team call regarding mediation	ADR
DeJong, Kevin	5/23/2023	0.20	\$ 250.01	\$ 50.00	Assess response to class member issue	Class counsel duties
DeJong, Kevin	5/24/2023	0.50	\$ 250.01	\$ 125.01	Email government counsel regarding issues with OPLA	Class counsel duties
DeJong, Kevin	6/1/2023	0.30	\$ 250.01	\$ 75.00	Email to government counsel regarding OPLA issue	Class counsel duties

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	6/7/2023	0.10	\$ 250.01	\$ 25.00	Email to government counsel regarding OPLA issue	Class counsel duties
DeJong, Kevin	6/9/2023	0.20	\$ 250.01	\$ 50.00	Email to government counsel regarding USCIS issues	Class counsel duties
DeJong, Kevin	6/20/2023	1.50	\$ 250.01	\$ 375.02	Review mediation statement; attend team call to discuss mediation strategy; email to government counsel regarding concerns regarding OPLA	ADR
DeJong, Kevin	6/21/2023	1.60	\$ 250.01	\$ 400.02	Edit mediation statement, and send to Judge Schulze; edit mediation questions and send to government counsel	ADR
DeJong, Kevin	6/22/2023	0.10	\$ 250.01	\$ 25.00	Assess correspondence regarding OPLA issue	Class counsel duties
DeJong, Kevin	6/23/2023	1.30	\$ 250.01	\$ 325.01	Attend team call to discuss case strategy and issues related to injunction; emails to government counsel	Class counsel duties
DeJong, Kevin	6/24/2023	0.10	\$ 250.01	\$ 25.00	Email to government counsel regarding mediation	ADR
DeJong, Kevin	6/27/2023	1.30	\$ 250.01	\$ 325.01	Prepare for mediation session	ADR
DeJong, Kevin	6/28/2023	5.30	\$ 250.01	\$ 1,325.05	Prepare for and attend mediation session; email to Judge Schulze regarding mediation	ADR
DeJong, Kevin	6/29/2023	0.70	\$ 250.01	\$ 175.01	Edit letter regarding MACO; email and calls to Magistrate Judge Schulze regarding mediation; email to government counsel regarding questions on draft settlement agreement	ADR
DeJong, Kevin	6/30/2023	0.30	\$ 250.01	\$ 75.00	Call with Magistrate Judge Schulze, and follow-up email to team regarding same (0.3)	ADR
DeJong, Kevin	7/5/2023	0.10	\$ 250.01	\$ 25.00	Email government counsel regarding mediation	ADR
DeJong, Kevin	7/6/2023	0.30	\$ 250.01	\$ 75.00	Email to Magistrate Judge Schulze regarding mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	7/7/2023	0.90	\$ 250.01	\$ 225.01	Attend team call regarding settlement agreement	ADR
DeJong, Kevin	7/10/2023	1.30	\$ 250.01	\$ 325.01	Attend team meeting to discuss draft settlement agreement; prepare attorneys' fees records for April through June 2023	ADR
DeJong, Kevin	7/13/2023	0.30	\$ 250.01	\$ 75.00	Emails to government counsel, and magistrate judge, regarding mediation	ADR
DeJong, Kevin	7/14/2023	1.30	\$ 250.01	\$ 325.01	Emails regarding fees letter; attend team call regarding settlement; email government counsel regarding settlement; review JOP appeal status report, and emails regarding same	ADR
DeJong, Kevin	7/17/2023	0.20	\$ 250.01	\$ 50.00	Email to government counsel regarding settlement draft	ADR
DeJong, Kevin	7/20/2023	0.30	\$ 250.01	\$ 75.00	Email regarding class member issue; edit letter regarding USCIS website	Class counsel duties
DeJong, Kevin	7/21/2023	1.20	\$ 250.01	\$ 300.01	Attend team call regarding settlement; email government counsel regarding injunction violation	Class counsel duties
DeJong, Kevin	7/24/2023	1.10	\$ 250.01	\$ 275.01	Attend team meeting to discuss settlement agreement	ADR
DeJong, Kevin	7/31/2023	0.20	\$ 250.01	\$ 50.00	Review settlement draft papers, and send to government counsel	ADR
DeJong, Kevin	8/2/2023	0.20	\$ 250.01	\$ 50.00	Email to Judge Schulze	ADR
DeJong, Kevin	8/7/2023	0.20	\$ 250.01	\$ 50.00	Emails regarding mediation	ADR
DeJong, Kevin	8/10/2023	0.10	\$ 250.01	\$ 25.00	Email to government counsel	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	8/14/2023	1.00	\$ 250.01	\$ 250.01	Review and circulate joint status report for appeal; attend weekly team call regarding mediation strategy and class member issues; email government counsel regarding settlement-related questions	ADR
DeJong, Kevin	8/15/2023	0.10	\$ 250.01	\$ 25.00	Assess correspondence regarding class member issue	Class counsel duties
DeJong, Kevin	8/18/2023	0.30	\$ 250.01	\$ 75.00	Email to government counsel regarding USCIS rejection notice	Class counsel duties
DeJong, Kevin	8/24/2023	0.10	\$ 250.01	\$ 25.00	Review correspondence regarding class member issue	Class counsel duties
DeJong, Kevin	8/25/2023	1.40	\$ 250.01	\$ 350.01	Email to Judge Schulze; attend team meeting regarding settlement and class member issues; assess correspondence regarding class member issue	ADR
DeJong, Kevin	8/28/2023	2.00	\$ 250.01	\$ 500.02	Emails to Judge Schulze and government counsel regarding mediation; email to government counsel regarding Ms. Ross; attend team call regarding settlement; review and edit mediation statement	ADR
DeJong, Kevin	8/29/2023	0.30	\$ 250.01	\$ 75.00	Email to government counsel regarding class member issue	Class counsel duties
DeJong, Kevin	8/30/2023	2.00	\$ 250.01	\$ 500.02	Review and edit mediation statement, and send to Judge Schulze; email to government counsel regarding mediation	ADR
DeJong, Kevin	9/1/2023	1.20	\$ 250.01	\$ 300.01	Attend team call regarding settlement agreement	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	9/5/2023	1.50	\$ 250.01	\$ 375.02	Email to Judge Schulze regarding mediation; attend team call regarding mediation and settlement agreement	ADR
DeJong, Kevin	9/6/2023	4.90	\$ 250.01	\$ 1,225.05	Prepare for and attend mediation conference	ADR
DeJong, Kevin	9/7/2023	0.90	\$ 250.01	\$ 225.01	Prepare for and attend call with government counsel regarding mediation	ADR
DeJong, Kevin	9/8/2023	1.00	\$ 250.01	\$ 250.01	Attend team call regarding mediation and settlement agreement	ADR
DeJong, Kevin	9/11/2023	0.50	\$ 250.01	\$ 125.01	Draft email to government counsel regarding mediation	ADR
DeJong, Kevin	9/12/2023	0.10	\$ 250.01	\$ 25.00	Email to government counsel regarding mediation	ADR
DeJong, Kevin	9/15/2023	1.30	\$ 250.01	\$ 325.01	Attend team call regarding mediation and settlement agreement	ADR
DeJong, Kevin	9/21/2023	0.20	\$ 250.01	\$ 50.00	Assess strategy regarding request for status conference	Case development
DeJong, Kevin	9/22/2023	0.10	\$ 250.01	\$ 25.00	Assess request for status conference	Case development
DeJong, Kevin	9/25/2023	0.80	\$ 250.01	\$ 200.01	Attend team call to discuss mediations and class member issues; edit request for status conference	Class counsel duties
DeJong, Kevin	9/26/2023	0.40	\$ 250.01	\$ 100.00	Edit request for status conference, and coordinate filing of same	Case development
DeJong, Kevin	9/27/2023	0.50	\$ 250.01	\$ 125.01	Emails to government counsel, and court, regarding status conference	Case development
DeJong, Kevin	10/10/2023	0.30	\$ 250.01	\$ 75.00	Prepare for mediation sessions	ADR
DeJong, Kevin	10/11/2023	0.50	\$ 250.01	\$ 125.01	Prepare for mediation sessions	ADR
DeJong, Kevin	10/12/2023	0.10	\$ 250.01	\$ 25.00	Email to government counsel regarding mediation	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	10/13/2023	0.90	\$ 250.01	\$ 225.01	Attend meeting to prepare for mediation; review and edit joint status report for appeal	ADR
DeJong, Kevin	10/15/2023	1.50	\$ 250.01	\$ 375.02	Prepare for mediation session	ADR
DeJong, Kevin	10/16/2023	6.30	\$ 250.01	\$ 1,575.06	Prepare for and attend mediation session	ADR
DeJong, Kevin	10/17/2023	2.60	\$ 250.01	\$ 650.03	Prepare for and attend mediation session	ADR
DeJong, Kevin	10/25/2023	0.20	\$ 250.01	\$ 50.00	Email to government counsel; review settlement agreement	ADR
DeJong, Kevin	10/27/2023	0.80	\$ 250.01	\$ 200.01	Attend call to prepare for mediation	ADR
DeJong, Kevin	10/29/2023	0.40	\$ 250.01	\$ 100.00	Review drafts of settlement papers, and send to government counsel	ADR
DeJong, Kevin	10/30/2023	1.50	\$ 250.01	\$ 375.02	Prepare for court status conference; prepare for and attend call with government counsel	ADR
DeJong, Kevin	10/31/2023	1.40	\$ 250.01	\$ 350.01	Attending court hearings	Case development
DeJong, Kevin	11/6/2023	0.90	\$ 250.01	\$ 225.01	Attend team call regarding mediation and settlement strategy	ADR
DeJong, Kevin	11/8/2023	0.80	\$ 250.01	\$ 200.01	Prepare for and attend call with magistrate judge	ADR
DeJong, Kevin	11/10/2023	0.80	\$ 250.01	\$ 200.01	Attend weekly call regarding mediation and settlement; email to government counsel regarding injunction violation; review appeal joint status report	ADR
DeJong, Kevin	11/11/2023	1.50	\$ 250.01	\$ 375.02	Assess and compile summary of injunction violations	Class counsel duties
DeJong, Kevin	11/12/2023	0.10	\$ 250.01	\$ 25.00	Review mediation statement	ADR
DeJong, Kevin	11/13/2023	1.20	\$ 250.01	\$ 300.01	Review and edit mediation statement; confer with team regarding settlement	ADR
DeJong, Kevin	11/14/2023	0.10	\$ 250.01	\$ 25.00	Review mediation statement	ADR
DeJong, Kevin	11/16/2023	2.50	\$ 250.01	\$ 625.03	Review and edit mediation statement (2.5)	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	11/17/2023	1.80	\$ 250.01	\$ 450.02	Edit and send mediation statement to magistrate judge	ADR
DeJong, Kevin	11/19/2023	0.70	\$ 250.01	\$ 175.01	Assess settlement strategy	ADR
DeJong, Kevin	11/20/2023	1.60	\$ 250.01	\$ 400.02	Assess procedure for court approval for settlement agreement; attend team call regarding settlement	ADR
DeJong, Kevin	11/21/2023	0.30	\$ 250.01	\$ 75.00	Assess filings required for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	11/22/2023	0.70	\$ 250.01	\$ 175.01	Confer regarding legal research and drafting of motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	11/28/2023	0.10	\$ 250.01	\$ 25.00	Email to Judge Sullivan	ADR
DeJong, Kevin	12/4/2023	1.10	\$ 250.01	\$ 275.01	Edit and send email to government counsel regarding violation of injunction	Class counsel duties
DeJong, Kevin	12/11/2023	1.40	\$ 250.01	\$ 350.01	Attend team call regarding settlement strategy; email to Judge Sullivan chambers; email to government counsel regarding settlement draft; coordinate filing of notice of death of plaintiff	ADR
DeJong, Kevin	12/12/2023	0.10	\$ 250.01	\$ 25.00	Email to magistrate judge clerk	ADR
DeJong, Kevin	12/19/2023	1.10	\$ 250.01	\$ 275.01	Call with Magistrate Judge Sullivan; assess settlement strategy	ADR
DeJong, Kevin	12/20/2023	0.30	\$ 250.01	\$ 75.00	Emails to government counsel regarding class member issue	Class counsel duties
DeJong, Kevin	12/22/2023	1.00	\$ 250.01	\$ 250.01	Confer with team regarding settlement; email to government counsel and court regarding mediation dates	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	12/27/2023	0.30	\$ 250.01	\$ 75.00	Assess court order regarding mediation; email government counsel regarding class member issue	ADR
DeJong, Kevin	1/5/2024	0.10	\$ 255.27	\$ 25.53	Email government counsel regarding class member issue	Class counsel duties
DeJong, Kevin	1/9/2024	0.30	\$ 255.27	\$ 76.58	Email government counsel regarding settlement draft	ADR
DeJong, Kevin	1/12/2024	0.20	\$ 255.27	\$ 51.05	Attend to joint status report; email to government counsel regarding draft agreement	Case development
DeJong, Kevin	1/17/2024	0.10	\$ 255.27	\$ 25.53	Review correspondence regarding class member	Class counsel duties
DeJong, Kevin	1/22/2024	1.10	\$ 255.27	\$ 280.80	Attend team meeting regarding settlement; email to government counsel regarding settlement agreement	ADR
DeJong, Kevin	1/29/2024	1.30	\$ 255.27	\$ 331.85	Attend team call regarding settlement; call to government counsel regarding settlement draft	ADR
DeJong, Kevin	2/3/2024	0.20	\$ 255.27	\$ 51.05	Email to government counsel regarding class member issue	Class counsel duties
DeJong, Kevin	2/11/2024	0.30	\$ 255.27	\$ 76.58	Review and edit status report; prepare for settlement conference	Case development
DeJong, Kevin	2/16/2024	0.90	\$ 255.27	\$ 229.74	Review and edit mediation statement	ADR
DeJong, Kevin	2/20/2024	0.50	\$ 255.27	\$ 127.64	Prepare for settlement conference	ADR
DeJong, Kevin	2/21/2024	0.40	\$ 255.27	\$ 102.11	Emails to government counsel regarding settlement agreement	ADR
DeJong, Kevin	2/22/2024	0.20	\$ 255.27	\$ 51.05	Email to government counsel regarding class size	ADR
DeJong, Kevin	2/23/2024	1.30	\$ 255.27	\$ 331.85	Confer with team regarding settlement; assess strategy for settlement	ADR
DeJong, Kevin	2/26/2024	1.10	\$ 255.27	\$ 280.80	Attend meeting to confer regarding settlement strategy	ADR

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	2/27/2024	0.10	\$ 255.27	\$ 25.53	Prepare for settlement conference	ADR
DeJong, Kevin	2/28/2024	0.20	\$ 255.27	\$ 51.05	Email to government counsel regarding class member issue	Class counsel duties
DeJong, Kevin	2/29/2024	0.50	\$ 255.27	\$ 127.64	Prepare for settlement conference	ADR
DeJong, Kevin	3/1/2024	1.10	\$ 255.27	\$ 280.80	Prepare for settlement conference	ADR
DeJong, Kevin	3/3/2024	4.50	\$ 255.27	\$ 1,148.72	Prepare for settlement conference	ADR
DeJong, Kevin	3/4/2024	8.50	\$ 255.27	\$ 2,169.80	Prepare for and attend settlement conference	ADR
DeJong, Kevin	3/5/2024	12.50	\$ 255.27	\$ 3,190.88	Attend settlement conference	ADR
DeJong, Kevin	3/8/2024	0.50	\$ 255.27	\$ 127.64	Confer with team regarding settlement agreement	ADR
DeJong, Kevin	3/18/2024	0.80	\$ 255.27	\$ 204.22	Attend team meeting regarding settlement and attorneys' fees	ADR
DeJong, Kevin	3/19/2024	0.10	\$ 255.27	\$ 25.53	Assess orders for approval of settlement agreement	Motions practice
DeJong, Kevin	3/25/2024	0.20	\$ 255.27	\$ 51.05	Email to government counsel regarding injunction violation	Class counsel duties
DeJong, Kevin	4/5/2024	1.00	\$ 255.27	\$ 255.27	Attend team meeting regarding settlement	ADR
DeJong, Kevin	4/9/2024	0.20	\$ 255.27	\$ 51.05	Email team regarding case tasks	Case development
DeJong, Kevin	4/10/2024	0.30	\$ 255.27	\$ 76.58	Confer regarding case tasks	Case development
DeJong, Kevin	4/12/2024	1.20	\$ 255.27	\$ 306.32	Attend team meeting regarding cases tasks and strategy; email to government counsel regarding injunction violation	Class counsel duties
DeJong, Kevin	4/19/2024	2.10	\$ 255.27	\$ 536.07	Draft orders for preliminary and final approval of settlement agreement, and legal research in support of same	Motions practice
DeJong, Kevin	4/24/2024	1.00	\$ 255.27	\$ 255.27	Edit preliminary and final approval orders (0.5); email and call with Judge Sullivan, and follow-up email to team (0.5)	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	4/26/2024	1.10	\$ 255.27	\$ 280.80	Attend team meeting regarding settlement	ADR
DeJong, Kevin	5/1/2024	0.10	\$ 255.27	\$ 25.53	Edit proposed orders for approval of settlement agreement	Motions practice
DeJong, Kevin	5/3/2024	1.00	\$ 255.27	\$ 255.27	Attend team call regarding settlement and case strategy	ADR
DeJong, Kevin	5/10/2024	1.10	\$ 255.27	\$ 280.80	Attend team call regarding settlement and case tasks	ADR
DeJong, Kevin	5/13/2024	0.90	\$ 255.27	\$ 229.74	Review and edit joint status report; edit preliminary and final approval orders for settlement agreement	Case development
DeJong, Kevin	5/15/2024	0.30	\$ 255.27	\$ 76.58	Prepare for call to Judge Sullivan	ADR
DeJong, Kevin	5/16/2024	0.30	\$ 255.27	\$ 76.58	Call to Judge Sullivan (0.1); assess strategy for attorneys' fees (0.2)	ADR
DeJong, Kevin	5/17/2024	0.80	\$ 255.27	\$ 204.22	Prepare for and attend call with Judge Sullivan; email to Judge Sullivan	ADR
DeJong, Kevin	5/22/2024	1.10	\$ 255.27	\$ 280.80	Emails regarding outreach by class member (0.1); review and edit exhibits to settlement agreement, confer with Ms. Schulz regarding same, and send to government counsel (1.0)	ADR
DeJong, Kevin	5/23/2024	0.10	\$ 255.27	\$ 25.53	Assess correspondence regarding class member issue	Class counsel duties
DeJong, Kevin	5/24/2024	1.00	\$ 255.27	\$ 255.27	Attend team call regarding settlement and class member issues	Case development
Genovese Bova, Jacqueline	5/24/2024	2.00	\$ 255.27	\$ 510.54	Review motion for approval of settlement and related research	Motions practice
DeJong, Kevin	5/28/2024	0.20	\$ 255.27	\$ 51.05	Email to Judge Sullivan regarding schedule	ADR



Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	6/7/2024	2.30	\$ 255.27	\$ 587.12	Attend team call regarding settlement agreement and fees strategy; assess case law on preliminary approval of settlement agreements	ADR
DeJong, Kevin	6/10/2024	0.40	\$ 255.27	\$ 102.11	Sign settlement agreement and send to government counsel (0.1); work on motion for preliminary approval of settlement agreement (0.3)	Motions practice
Genovese Bova, Jacqueline	6/10/2024	4.40	\$ 255.27	\$ 1,123.19	Continue research regarding factors for approval settlement agreement in the Fourth Circuit; continue drafting motion for approval of settlement	Motions practice
DeJong, Kevin	6/11/2024	0.70	\$ 255.27	\$ 178.69	Work on motion for preliminary approval of settlement agreement (0.5); review and edit joint status letter for appeal (0.2)	Motions practice
Genovese Bova, Jacqueline	6/11/2024	6.20	\$ 255.27	\$ 1,582.67	Continue research regarding factors for approval settlement agreement in the Fourth Circuit; continue drafting motion for approval of settlement	Motions practice
DeJong, Kevin	6/12/2024	0.90	\$ 255.27	\$ 229.74	Work on motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	6/13/2024	0.60	\$ 255.27	\$ 153.16	Work on motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	6/14/2024	1.30	\$ 255.27	\$ 331.85	Edit motion for preliminary approval of settlement agreement (1.2); prepare for and call government counsel regarding settlement (0.1)	Motions practice
Genovese Bova, Jacqueline	6/14/2024	1.50	\$ 255.27	\$ 382.91	Attend team call; review legal research results from D.Farraye and conduct additional legal research	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	6/17/2024	2.10	\$ 255.27	\$ 536.07	Work on motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	6/18/2024	6.10	\$ 255.27	\$ 1,557.15	Work on motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	6/20/2024	2.40	\$ 255.27	\$ 612.65	Work on motion for preliminary approval of settlement agreement	Motions practice
Genovese Bova, Jacqueline	6/21/2024	4.40	\$ 255.27	\$ 1,123.19	Review and revise motion for preliminary approval of settlement; conduct legal research	Motions practice
Genovese Bova, Jacqueline	6/23/2024	1.80	\$ 255.27	\$ 459.49	Review edits from pro-bono counsel; review case law regarding legal standard for settlement approval; review and revise brief in view of comments and edits	Motions practice
DeJong, Kevin	6/24/2024	2.00	\$ 255.27	\$ 510.54	Work on motion for preliminary approval of settlement agreement; attend team call to confer regarding strategy	Motions practice
DeJong, Kevin	6/25/2024	3.00	\$ 255.27	\$ 765.81	Edit motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	6/26/2024	1.00	\$ 255.27	\$ 255.27	Work on motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	7/1/2024	1	\$ 255.27	\$ 255.27	Attend team call; email government counsel regarding settlement agreement	ADR
DeJong, Kevin	7/3/2024	0.1	\$ 255.27	\$ 25.53	Work on motion for preliminary approval of settlement	Motions practice
Genovese Bova, Jacqueline	7/3/2024	2.7	\$ 255.27	\$ 689.23	Work on motion for preliminary approval	Motions practice
DeJong, Kevin	7/8/2024	1.3	\$ 255.27	\$ 331.85	Attend team call regarding strategy; work on motion for preliminary approval of settlement agreement	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	7/9/2024	0.7	\$ 255.27	\$ 178.69	Edit motion for preliminary approval of settlement agreement, and send to government counsel	Motions practice
DeJong, Kevin	7/12/2024	1.5	\$ 255.27	\$ 382.91	Send edited joint status report to Defendants; email Defendants regarding motion for preliminary approval of settlement agreement; attend team call regarding class member issues	Case development
DeJong, Kevin	7/15/2024	1.3	\$ 255.27	\$ 331.85	Review updated class notices and joint letter, and email government counsel regarding same	Case development
DeJong, Kevin	7/18/2024	0.2	\$ 255.27	\$ 51.05	Call to government counsel regarding motion for preliminary approval of settlement agreement, and emails to team regarding same	Motions practice
DeJong, Kevin	7/19/2024	0.5	\$ 255.27	\$ 127.64	Attend team call regarding settlement and class member issues	Class counsel duties
DeJong, Kevin	7/23/2024	1.2	\$ 255.27	\$ 306.32	Call to government counsel, and review of governments' edis to brief in support of motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	7/24/2024	0.3	\$ 255.27	\$ 76.58	Review and assess government edits to motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	7/25/2024	0.7	\$ 255.27	\$ 178.69	Prepare for and attend call with government counsel regarding motion for preliminary approval of settlement agreement	Motions practice
DeJong, Kevin	7/26/2024	0.2	\$ 255.27	\$ 51.05	Emails to government counsel regarding joint letter	Motions practice

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
Genovese Bova, Jacqueline	7/26/2024	2.1	\$ 255.27	\$ 536.07	Attend team call to strategize on motion for fees and forthcoming motion for approval of settlement; review and consider strategy proposed via email; continue review of fees worksheet	Case development
Genovese Bova, Jacqueline	7/27/2024	0.7	\$ 255.27	\$ 178.69	Review and revise motion for approval of settlement	Motions practice
Genovese Bova, Jacqueline	7/28/2024	1.6	\$ 255.27	\$ 408.43	Review and revise motion for approval of settlement	Motions practice
Burgess, Brian	7/29/2024	0.2	\$ 255.27	\$ 51.05	Review settlement notices	Case development
Genovese Bova, Jacqueline	7/29/2024	7.3	\$ 255.27	\$ 1,863.47	Attend team call regarding case strategy; review, revise, and finalize all documents related to the Joint Motion for Preliminary Approval; draft cover motion; oversee filing	Motions practice
DeJong, Kevin	7/30/2024	0.3	\$ 255.27	\$ 76.58	Email government counsel regarding corrected motion papers (0.1); assess court response to logistical questions (0.2)	Case development
DeJong, Kevin	8/6/2024	0.1	\$ 255.27	\$ 25.53	Call to government counsel regarding class notice exhibits	Motions practice
Genovese Bova, Jacqueline	8/7/2024	1.6	\$ 255.27	\$ 408.43	Review and revise all exhibits to be filed; finalize exhibits for filing; review email correspondence regarding motion for fees	Motions practice
DeJong, Kevin	8/15/2024	0.2	\$ 255.27	\$ 51.05	Email to team regarding court requests relating to fairness hearing	Motions practice
DeJong, Kevin	8/16/2024	0.4	\$ 255.27	\$ 102.11	Attend team meeting regarding case strategy (0.3); emails to government counsel and court regarding fairness hearing (0.1)	Motions practice
DeJong, Kevin	8/20/2024	0.1	\$ 255.27	\$ 25.53	Email to government counsel	Case development

Name	Date	Hours Worked	Hourly Rate	Amount Billed	Description	Litigation Phase
DeJong, Kevin	8/21/2024	0.7	\$ 255.27	\$ 178.69	Assess strategy, and email to Court regarding fairness hearing	Motions practice
DeJong, Kevin	8/27/2024	0.3	\$ 255.27	\$ 76.58	Review class notices, and emails to team and government counsel regarding same	Motions practice
Genovese Bova, Jacqueline	8/30/2024	0.6	\$ 255.27	\$ 153.16	Meet with K.DeJong to discuss motion for fees briefing	Fee petition prep
DeJong, Kevin	9/4/2024	0.1	\$ 255.27	\$ 25.53	Email government counsel regarding class notice	Case development
Genovese Bova, Jacqueline	9/22/2024	1.5	\$ 255.27	\$ 382.91	Research and draft brief on reasonable fees	Fee petition prep
Genovese Bova, Jacqueline	9/23/2024	2.8	\$ 255.27	\$ 714.76	Research and draft brief on reasonable fees	Fee petition prep
DeJong, Kevin	10/8/2024	0.10	\$ 255.27	\$ 25.53	Email to government counsel regarding final notices	Case development
DeJong, Kevin	10/23/2024	0.20	\$ 255.27	\$ 51.05	Assess strategy and email on violation of PI for class member	Class counsel duties
DeJong, Kevin	10/30/2024	0.30	\$ 255.27	\$ 76.58	Emails regarding strategy for class member issue	Class counsel duties
DeJong, Kevin	11/6/2024	0.20	\$ 255.27	\$ 51.05	Prepare for argument for fairness hearing	Case development
DeJong, Kevin	11/12/2024	2.80	\$ 255.27	\$ 714.76	Prepare for fairness hearing (2.0); review and edit declarations in support of motion to attorneys' fees (0.7); emails to government counsel (0.1)	Case development
DeJong, Kevin	11/19/2024	0.50	\$ 255.27	\$ 127.64	Prepare for fairness hearing	Case development
DeJong, Kevin	11/20/2024	0.20	\$ 255.27	\$ 51.05	Prepare for fairness hearing	Case development
DeJong, Kevin	11/22/2024	2.60	\$ 255.27	\$ 663.70	Prep for fairness hearing	Case development
DeJong, Kevin	11/24/2024	5.20	\$ 255.27	\$ 1,327.40	Prepare for fairness hearing	Case development
<b>TOTALS</b>		<b>1265.7</b>		<b>\$282,679.37</b>		

# Exhibit B

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MARYLAND

J.O.P., et al., )  
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 Plaintiffs, )  
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 vs. )  
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 U.S. DEPARTMENT OF )  
 HOMELAND SECURITY, )  
 et al., )  
 )  
 Defendants. )  
 )

Case Number 8:19-cv-01944-GJH

TRANSCRIPT OF PROCEEDINGS  
HEARING FOR TEMPORARY RESTRAINING ORDER  
BEFORE THE HONORABLE GEORGE JARROD HAZEL  
FRIDAY, JULY 19, 2019; 2:00 P.M.  
GREENBELT, MARYLAND

FOR THE PLAINTIFFS:

Brian Burgess, Esquire  
Stephen Shaw, Esquire  
GOODWIN PROCTER, LLP  
901 New York Avenue, NW  
Washington, DC 2001

FOR THE DEFENDANTS:

Allen F. Loucks, Assistant United States Attorney  
Vickie E. LeDuc, Assistant United States Attorney  
OFFICE OF THE UNITED STATES ATTORNEY  
36 S. Charles Street, Fourth Floor  
Baltimore, MD 21201

Proceedings recorded by mechanical stenography; transcript  
produced by computer-aided transcription.

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CINDY S. DAVIS, RPR  
FEDERAL OFFICIAL COURT REPORTER  
6500 CHERRYWOOD LANE, SUITE 200  
GREENBELT, MD 20770



1 FOR THE PLAINTIFFS (continued):

2 Kevin J. DeJong, Esquire  
3 Elaine H. Blais, Esquire  
4 GOODWIN PROCTER, LLP  
5 100 Northern Avenue  
6 Boston, MA 02210

7 Michelle Mendez, Esquire  
8 CATHOLIC LEGAL IMMIGRATION NETWORK, INC.  
9 8757 Georgia Avenue, Suite 850  
10 Silver Spring, MD 20910  
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P R O C E E D I N G S

(Call to order of the Court.)

THE COURT: Good afternoon. You may be seated. If you could call the case.

THE COURTROOM DEPUTY: The matter now pending before this Court is civil docket number GJH-19-1944, J.O.P. et al., versus U.S. Department of Homeland Security, et al. We're here for a motions hearing.

Beginning with the Plaintiffs, will counsel please state your names for the record.

MR. BURGESS: Good afternoon, Your Honor. Brian Burgess for the Plaintiffs.

THE COURT: Good afternoon.

MR. DEJONG: Good afternoon, Your Honor. Kevin DeJong for the Plaintiffs.

THE COURT: Good afternoon.

MS. MENDEZ: Good afternoon, Your Honor. Michelle Mendez for the Plaintiffs.

THE COURT: Good afternoon.

MR. BLAIS: Good afternoon, Your Honor. Elaine Blais for the Plaintiffs.

THE COURT: Good afternoon.

MR. SHAW: Good afternoon, Your Honor. Steve Shaw for the Plaintiffs.

THE COURTROOM DEPUTY: And for the Defendants.

1 MR. LOUCKS: Good afternoon, Your Honor. Allen  
2 Loucks for the Defendants. Vickie LeDuc, from the U.S.  
3 Attorney's Office, is with me. Next to her is Dorothea Lay,  
4 who is from USCIS. Next to her is Colleen Zengotitabengoa, who  
5 is also USCIS.

6 THE COURT: Good afternoon to all of you.

7 MR. LOUCKS: Your Honor, I have two preliminary --

8 THE COURT: Sure.

9 MR. LOUCKS: Actually, the one preliminary would be  
10 about Count Two of the complaint.

11 THE COURT: Okay.

12 MR. LOUCKS: Count Two of the complaint addresses the  
13 retroactivity issue, and the Government is prepared for the  
14 entry of a TRO. I have two orders that I'd like to bring up to  
15 the Court. They're slightly different. May I approach?

16 THE COURT: Sure. Have Plaintiffs seen whatever  
17 you're about to give me?

18 MR. LOUCKS: They will be seeing it as well.

19 THE COURT: Oh, is this your first time hearing that?

20 MR. BURGESS: This is, yes.

21 THE COURT: Well, congratulations.

22 (Document handed to the Court.)

23 MR. LOUCKS: Your Honor, you have two different  
24 orders in front of you. The first, the one that is -- the one  
25 that's not stapled is an order that we would ask the Court to

1 enter. It grants the temporary restraining order against the  
2 use of the 2019 policy as for the four named Plaintiffs in this  
3 case.

4 Now, because we know what the Plaintiffs are interested  
5 in, I gave you a second order. That's the stapled order, and  
6 you'll see that's broader.

7 At this point, though, and what I would ask the Court to  
8 consider, not right this instant entering the order but ask the  
9 Court to listen to the argument as it goes, to decide which way  
10 the Court wants to go in terms of entering the order for just  
11 the four named Plaintiffs or a more global order. But our goal  
12 with this is to take the retroactivity part of the case off the  
13 table so that we can move forward with the rest of it.

14 THE COURT: All right. Give me a moment just to -- I  
15 understand what you said, but give me a moment just to actually  
16 read both of them.

17 All right. Any other preliminary issues?

18 MR. LOUCKS: The only other is, Your Honor, I'd like  
19 to preserve an objection to the Plaintiffs' Exhibit 2. That's  
20 the undated or dated but unidentified document. I have no  
21 objection to them using it today. Just in the fulness of time,  
22 I don't want to have waived an objection to its authenticity,  
23 frankly.

24 THE COURT: I have questions about authenticity  
25 myself, so I would assume that at the appropriate time you

1 would lodge that objection. But that's fine, it's fine to  
2 lodge it now.

3 Any other preliminary issues?

4 MR. BURGESS: Nothing from us, Your Honor.

5 THE COURT: Just give me one moment, actually.

6 So, of course, we are here on the motion for temporary  
7 restraining order. Obviously, now part of it, at least some  
8 part of it has been resolved. But I will hear first from  
9 Plaintiffs, since it's their motion. I will hear then from  
10 defense counsel, and then the Plaintiffs will get the last word  
11 since it's their motion.

12 So I see Mr. Burgess starting to shift in his seat, so I  
13 assume he'll be speaking on behalf of the Plaintiffs.

14 **ARGUMENT BY MR. BURGESS FOR THE PLAINTIFFS**

15 MR. BURGESS: Good afternoon, Your Honor. My name is  
16 Brian Burgess for the Plaintiffs. I will be leading off, but  
17 counsel on the Plaintiffs' side was hoping to divide up the  
18 argument, if the Court is amenable to that.

19 I will note, as I did at the beginning, this is the first  
20 we are seeing this order. So to the extent the Court has  
21 questions about our views on it, we might want some time to  
22 confer.

23 THE COURT: If you want a couple minutes, you can, if  
24 you like. If that's what you're suggesting.

25 MR. BURGESS: Sure, if we could have just maybe five,

1 ten minutes at the outset, that might be helpful.

2 THE COURT: Sure. We can take a 10-minute recess if  
3 you --

4 MR. BURGESS: Sure, that would be great, Your Honor.

5 THE COURT: Ten-minute recess.

6 (Recess from 2:05 p.m. to 2:20 p.m.)

7 THE COURT: You may be seated again. So I'll hear  
8 from the Plaintiffs in terms of where we are, given the two  
9 potential proposed orders.

10 Let me first just ask to make sure I understand. Are all  
11 four of the Plaintiffs you currently represent individuals who  
12 would fall into the category of sort of the retroactive  
13 plaintiffs, plaintiffs who would be impacted because of the  
14 retroactive portion of this?

15 MR. BURGESS: Yes, Your Honor.

16 THE COURT: I'm not sure I appreciated that  
17 immediately. So I'll hear from you in terms of where you think  
18 we are at this point.

19 MR. BURGESS: Sure. Thank you, Your Honor. Brian  
20 Burgess. Thank you for the opportunity to confer on the  
21 proposed order. So I thought I would start by explaining our  
22 reactions to it and where we think that gets us and doesn't get  
23 us, and then we might of sort of go forward with our  
24 presentation.

25 So of the two, it probably won't surprise you to learn we

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CERTIFICATE OF OFFICIAL REPORTER

I, Cindy S. Davis, Federal Official Court Reporter in and for the United States District Court for the Southern District of Maryland, do hereby certify that I reported, by machine shorthand and computer-aided transcription, in my official capacity the proceedings had in the case of J.O.P., et al., versus U.S. Department of Homeland Security, et al., case number 8:19-cv-01944-GJH, in said court on July 19, 2019.

I further certify that the foregoing 86 pages constitute the official transcript of said proceedings, as taken from my electronic notes to the best of my ability.

In witness whereof, I have hereto subscribed my name this 29th day of July 2019.

*Cindy S Davis*

---

CINDY S. DAVIS, RPR  
FEDERAL OFFICIAL COURT REPORTER



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)**

J.O.P., *et al.*,

Plaintiffs,

v.

U.S. Department of Homeland Security, *et al.*,

Defendants.

Civil Action No. SAG-19-01944

**DECLARATION OF MATT ADAMS  
IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES**

I, Matt Adams, declare as follows:

1. I am an attorney at law, admitted in the State of Washington. I make this declaration in support of Plaintiffs' motion for recovery of attorneys' fees. I have personal knowledge of the facts in this declaration, and if called on to testify, I could and would testify competently to the facts stated here.

2. I am the Legal Director at Northwest Immigrant Rights Project (NWIRP), which I joined over twenty-six years ago. NWIRP's work includes direct representation, community education, and impact litigation. NWIRP represents noncitizens applying for immigration benefits and defends noncitizens who have been placed in deportation/removal proceedings, including children and youth. NWIRP also engages in impact litigation before federal courts at a national level and this is the focus of my work.

**My Background and Experience**

3. I have extensive experience in cases focusing on immigration law and immigrant rights.

During the last twenty-six years, I have litigated hundreds of cases and personally argued on behalf of immigrants before immigration judges, the Board of Immigration Appeals, federal district courts, the Ninth Circuit Court of Appeals, and the United States Supreme Court. I have represented prevailing petitioners before the Ninth Circuit Court of Appeals in the following published cases: *Koonwaiyou v. Blinken*, 69, F.4th 1004 (9th Cir. 2023) (reversing district court and holding statute applies retroactively, entitling U.S. national status to child born in Western Samoa to American Samoan mother); *Moreno Galvez v. Jaddou*, 52 F.4th 821(9th Cir. 2022) (upholding permanent injunction issued on behalf of class of special immigrant visa petitioners); *Hernandez-Garland v. Garland*, 996 F.3d 1030 (9th Cir. 2021) (finding mother and child established exceptional circumstances warranting rescission of in absentia removal orders in order to allow them to pursue asylum); *Reynaga Hernandez v. Skinner*, 969 F.3d 930 (9th Cir. 2020) (upholding district court order denying defendants qualified immunity and granting summary judgment under 42 U.S.C. 1983 for violating Fourth Amendment rights); *Flores Tejada v. Godfrey*, 954 F.3d 1245 (9th Cir. 2020) (affirming permanent injunction providing bond hearings for class of persons in withholding of removal proceedings after they have been detained for six months), *rev'd and remanded sub nom. Garland v. Aleman Gonzalez*, 142 S. Ct. 2057 (2022); *Padilla v. ICE*, 953 F.3d 1134 (9th Cir. 2020) (affirming preliminary injunction providing bond hearings to class of persons referred to immigration court after being found to have a credible fear of persecution) *cert. granted, judgment vacated* 141 S. Ct. 1041 (2021); *C.J.L.G. v. Barr*, 923 F.3d 622 (9th Cir. 2019) (en banc) (holding that immigration judge was required to advise youth of potential eligibility for special immigration juvenile visa); *Lanuza v. Love*, 899 F.3d 1019 (9th Cir. 2018) (finding that *Bivens* remedy extends to ICE attorney who fabricated documents to strip plaintiff of opportunity for relief in removal proceedings); *Nguyen v. Sessions*, 901 F.3d 1093 (9th Cir. 2018) (reversing agency position that admission to controlled substance abuse triggered the stop-time rule barring relief for

cancellation of removal); *Ramirez v. Brown*, 852 F.3d 954 (9th Cir. 2017) (affirming district court order granting summary judgment on behalf of holder of temporary protected status who was denied opportunity to apply for adjustment of status based on agency's failure to acknowledge his inspection and admission as TPS holder); *Duran-Gonzales v. DHS*, 702 F.3d 504 (9th Cir. 2013) (reversing its prior opinion, finding that class members benefit from retroactivity test where agency changes rules pursuant to Supreme Court's decision in *Brand X*); *Chay Ixcot v. Holder*, 646 F.3d 1202 (9th Cir. 2011) (vacating reinstatement order as unlawful retroactive bar to asylum claim); *Lopez-Birrueta v. Holder*, 633 F.3d 1211(9th Cir. 2011) (rejecting agency's restrictive interpretation of battery for purposes of establishing eligibility for cancellation of removal for victims of domestic violence); *Cortez-Guillen v. Holder*, 623 F.3d 933 (9th Cir. 2010) (holding that agency is bound by elements as laid out in plain language of statute with regards to the realistic probability test, and accordingly, Alaskan coercion statute does not categorically qualify as aggravated felony crime of violence); *Bromfield v. Mukasey*, 543 F.3d 1071 (9th Cir. 2008) (recognizing a pattern and practice of persecution targeting gay men in Jamaica); *Mandujano-Real v. Mukasey*, 526 F.3d 585 (9th Cir. 2008) (finding that petitioner's concession while unrepresented did not preclude him from challenging legal basis on appeal and further holding that ID theft conviction did not constitute aggravated felony theft conviction); *Suazo Perez v. Mukasey*, 512 F.3d 1222 (9th Cir. 2008) (finding that domestic violence conviction was not a crime of violence and thus not a deportable offense); *Hosseini v. Gonzales*, 471 F.3d 953 (9th Cir. 2006) (granting relief under the Convention Against Torture to asylum applicant who had been charged as having been engaged in terrorist activities); *Hernandez-Guadarrama v. Ashcroft*, 394 F.3d 674 (9th Cir. 2005) (holding that the government could not rely on the statements made by witnesses where the government deported those witnesses); *Perez-Gonzalez v. Ashcroft*, 379 F.3d 783 (9th Cir. 2004) (preventing government from reinstating prior deportation order where person had a pending

application for residence along with the corresponding waiver); *Garcia-Lopez v. Ashcroft*, 334 F.3d 840 (9th Cir. 2003) (requiring DHS to afford full effect to modification of conviction from felony to misdemeanor); and *Castro-Cortez v. INS*, 239 F.3d 1037 (9th Cir. 2001) (prohibiting retroactive application of reinstatement to persons who were deported prior to change in law).

4. I have litigated and presented arguments in federal district courts, including the Eastern and Western Districts of Washington, the Southern, Central, and Northern Districts of California, the District of Montana, the Southern District of Florida, and the Southern and Eastern Districts of New York. In addition, I have successfully moved for class certification and been approved by federal courts as class counsel in fifteen different class actions on behalf of immigrants: *Mansor v. U.S. Citizenship and Immigr. Servs.*, 345 F.R.D. 193, 208 (W.D. Wash. 2023) (certifying nationwide class of Temporary Protected Status applicants challenging the government's denial of interim employment authorization); *Favela Avendaño v. Asher*, No. C20-0700JLR-MLP, 2021 WL 1056113, at \*2 (W.D. Wash. Mar. 18, 2021) (certifying class of detained individuals at Northwest Detention Center who have heightened risk of severe illness or death from COVID-19); *Nightingale v. U.S. Citizenship & Immigration Servs.*, 2019 WL 5191066, at \*1 (N.D. Cal. Oct. 15, 2019) (certifying two national classes challenging USCIS and ICE for failing to timely produce A-Files under FOIA); *Moreno Galvez v. Cuccinelli*, No. C19-0321 RSL, 2019 WL 3219372 (W.D. Wash. July 17, 2019) (granting preliminary injunction for certified class of noncitizen youth seeking Special Immigrant Juvenile Status); *Wagafe v. Trump*, No. C17-0094-RAJ, 2017 WL 2671254 (W.D. Wash. June 21, 2017) (certifying nationwide classes challenging application of CARRP to applicants for adjustment of status and naturalization); *Mendez Rojas v. Johnson*, No. C-16-1024-RSM, 2017 WL 1397749 (W.D. Wash. Jan. 10, 2017) (certifying nationwide classes of persons seeking asylum who were denied notice and opportunity to timely file applications); *Martinez Baños v. Asher*, No. C-16-1454-JLR-BAT, 2017 WL 9938446 (W.D. Wash. Dec. 11,

2017) (certification granted on behalf of class of detained persons in withholding-only proceedings in the Western District of Washington facing prolonged detention without individual custody hearings); *F.L.B. v. Lynch*, No. C14-1026 TSZ, 2016 WL 3458352 (W.D. Wash. June 24, 2016) (certification granted on behalf of circuit-wide class of unrepresented children in removal proceedings); *Padilla v. U.S. Immigration and Customs Enforcement*, No. C19-928 MJP, 2019 WL 1056466 (W.D. Wash. Mar. 6, 2016) (certifying nationwide classes of asylum seekers challenging delays in credible fear interviews and bond hearings, and seeking procedural protections in bond hearings); *Rivera v. Holder*, 307 F.R.D. 539 (W.D. Wash. 2015) (granting class certification and summary judgment clarifying that Immigration Judges must consider whether to release immigration detainees on conditional parole as well as monetary bond); *Khoury v. Asher*, 3 F. Supp. 2d 877 (W.D. Wash. 2014) (class certification and declaratory relief granted on behalf of class, detained immigrants unlawfully subjected to mandatory detention); *A.B.T. v. USCIS*, No. C11-2108 RAJ, 2013 WL 5913323 (W.D. Wash. 2013) (nationwide challenge to asylum work authorization denials); *Franco-Gonzalez v. Holder*, No. CV 10-02211 DMG (DTBx), 2011 WL 11705815 (C.D. Cal. Nov. 21, 2011) (granting class certification) and 2013 WL 8115423 (C.D. Cal. Apr. 23, 2013) (granting permanent injunction ordering the government to provide free legal representation to immigrants with serious mental disabilities); *Roshandel v. Chertoff*, 554 F. Supp. 2d 1194 (W.D. Wash. 2008) (successful class action on behalf of 450 naturalization applicants); and *Duran Gonzales v. U.S. Dep't. of Homeland Sec.*, 239 F.R.D. 620 (W.D. Wash. 2006) (certification granted for circuit-wide class).

### **My Experience Litigating on Behalf of Unaccompanied Immigrant Children and Youth**

5. My federal litigation experience has allowed me to advocate on behalf of immigrant children, including unaccompanied children.
6. My work in both *Moreno Galvez v. Cuccinelli*, No. C19-0321 RSL, 2019 WL 3219372

(W.D. Wash. July 17, 2019), *Moreno Galvez v. Jaddou*, 52 F.4th 821(9th Cir. 2022), and *C.J.L.G. v. Barr*, 923 F.3d 622 (9th Cir. 2019) (en banc) successfully challenged agency actions denying access to special immigrant juvenile visas, a form of protection for which many unaccompanied children are eligible. In *Moreno Galvez v. Cuccinelli*, No. C19-0321 RSL, 2019 WL 3219372 (W.D. Wash. July 17, 2019) the U.S. District Court for the Western District of Washington issued a permanent injunction barring USCIS from applying its policy that made certain immigrant youth in Washington State ineligible for special immigrant juvenile status and additionally, required USCIS to adjudicate the special immigrant juvenile status applications of Washington youth within 180 days, as required by the Immigration and Nationality Act. The Ninth Circuit subsequently upheld the U.S. district court's order in *Moreno Galvez v. Jaddou*, 52 F.4th 821(9th Cir. 2022) thereby requiring USCIS to adhere to the 180-day deadline for adjudicating special immigrant juvenile status for class members, which consists of current and future SIJ applicants in Washington State. In *C.J.L.G. v. Barr*, 923 F.3d 622 (9th Cir. 2019), the en banc court held that an immigration judge erred by failing to advise an immigrant youth in removal proceedings of the possibility of applying for special immigrant juvenile status. A concurrence in the case also agreed that the government violated the youth's due process rights by not appointing counsel for him.

7. In *F.L.B. v. Lynch*, No. C14-1026 TSZ, 2016 WL 3458352 (W.D. WA 2016), the district court appointed myself and co-counsel as class representatives for a class of children and youth who are unrepresented in removal proceedings, are unable to find legal representation, and are seeking to establish the right to appointed counsel. However, the Ninth Circuit subsequently held that the jurisdiction-stripping provisions of 8 U.S.C. § 1252 prevented plaintiffs from bringing their claims on a class wide basis in district court. *J.E.F.M. v Lynch*, 837 F.3d 1026 (9th Cir. 2016).

8. Throughout my career, I have received numerous recognitions. I was selected for the

Washington State Bar Association's 2016 Award of Merit, WSBA's highest honor. I have twice been awarded the American Immigration Lawyers Association Jack Wasserman Memorial Award for excellence in litigation; most recently, in 2014 for my work on the litigation team in *Franco-Gonzalez v. Holder*, establishing the right to appointed counsel for detained persons with serious mental disorders. I have also received the 2008 Access to Justice Leadership Award, from the Washington State Bar Access to Justice Board, and the 2005 Washington State Chapter AILA Award for Most Significant Impact in Pro Bono Litigation.

**My Familiarity with the Work of Class Counsel**

9. During my tenure at NWIRP I have collaborated with Public Counsel, National Immigration Project, and Kids in Needs of Defense in various capacities including co-counseling on impact litigation. My experience representing immigrant children, both in individual cases and in impact litigation in federal court, has taught me that there are very few non-profit organizations with experience in both representing unaccompanied children in immigration matters and in bringing federal litigation to protect their unique rights. There are only a handful of organizations in the country that possess this combination of direct representation and federal litigation experience, which is required for cases like this one. Through my work I am familiar with Kristen Jackson, Michelle Mendez, and Wendy Wylegala, who are seeking enhanced fees in this matter.

10. I worked closely with Ms. Jackson for more than a decade, including when we worked together as co-counsel representing the class of unrepresented children in removal proceedings that was certified by the district court in *F.L.B. v. Lynch*, No. C14-1026 TSZ, 2016 WL 3458352 (W.D. WA 2016). In addition, we were co-counsel in *C.J.L.G. v. Barr*, 923 F.3d 622 (9th Cir. 2019), where we represented a youth in removal proceedings and successfully sought en banc rehearing at the Ninth Circuit Court of Appeals. We were also co-counsel in *Hernandez-Galand v. Garland*, 996 F.3d 1030 (9th Cir. 2021), successfully representing a mother and child who had been ordered

removed in absentia and the agency had subsequently refused to reopen their removal proceedings. My work with Ms. Jackson has made clear to me that she is one of the best litigators I have worked with and one of the most skilled immigration advocates in the country. I have known Ms. Mendez since 2014. We have interacted in different contexts, including preparing immigration law presentations for national trainings and participating in litigation strategy meetings to address emerging challenges affecting client populations. She is known nationally for the trainings she provides immigration practitioners, both with her work at that National Immigration Project, and prior to that at CLINIC, as well as with the National Institute for Trial Advocacy. Ms. Wylegala is the Senior Director for Legal Strategy at KIND. KIND is the preeminent national organization providing free representation to detained and released unaccompanied children in removal proceedings, and their work extends to policy advocacy, strategic litigation, and serving migrant children beyond the U.S. I have worked with KIND for more than fifteen years, providing and seeking case consultations, amicus briefing, and non-party supporting declarations; and coordinating efforts to provide broader representation to children in proceedings.

11. Ms. Jackson, Ms. Mendez, and Ms. Wylegala all have significant knowledge and experience both in representing unaccompanied children in immigration proceedings and in representing children in immigration-related matters in federal court.

12. There is no question to me that their skills were necessary to the successful resolution of this case. The successful injunction that stopped the 2019 policy soon after it was initiated reflects their skills. The co-counsel team would not have secured the injunction without their years of experience applying the Trafficking Victims Protection Reauthorization Act (TVPRA) of 2008 and USCIS and EOIR policy updates to their unaccompanied children clients and supporting them through their trauma. The settlement agreement includes important benefits, including benefits beyond the injunction that only counsel with their knowledge and experience would have sought. For example,



counsel without their experience may have overlooked the provisions on stays of removal orders, motions to reopen removal proceedings, and motions to terminate. However, because Ms. Jackson, Ms. Mendez, and Ms. Wylegala understand the various ways in which Immigration and Customs Enforcement's actions can gut the TVPRA's protections for unaccompanied children, the co-counsel team successfully advocated for these protections.

### **Fees for Attorneys' Work in This Matter**

13. I reviewed the operative complaint and answer, the final settlement agreement, the billing records prepared by class counsel, and the declarations of Ms. Jackson, Ms. Mendez, and Ms. Wylegala. Based on my review of these documents, and my experience litigating class action cases, it is my opinion that counsel's fee petition that seeks approximately \$1,830,206 in attorneys' fees for over 4900 hours of work collectively performed through December 15, 2024 is reasonable and consistent with the efforts required in this complex litigation. If these attorneys had not taken on the case, I do not believe that the Plaintiff class would have been represented by counsel with the necessary experience and knowledge who would have been willing and able to successfully litigate this case for the standard EAJA rate.

14. I understand that counsel for the Plaintiffs seek recovery for the work of Ms. Jackson, Ms. Mendez, and Ms. Wylegala at enhanced rates derived from guidelines in this Court's local rules, adjusted to account for the passage of time since those rates were adopted in 2014 by applying the average annual consumer price index factors for Maryland. Based on my direct knowledge of these three attorneys and my collaborations with the organizations that support the work of all three, and based on the relevant expertise evidenced in their declarations, enhanced rates are more than justified. I believe that enhanced rates, rather than standard EAJA rates, better reflect their contributions to the results achieved in this litigation.

15. I have no interest in the outcome of these proceedings and am not associated with or

employed by Plaintiffs, Defendants, or their attorneys. Nor will I receive any compensation for this declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Seattle, WA on the 19th of December, 2024.

A handwritten signature in black ink, appearing to read "Matt Adams".

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Matt Adams, WSBA No. 28287  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)**

J.O.P., *et al.*,

Plaintiffs,

v.

U.S. Department of Homeland Security, *et al.*,

Defendants.

Civil Action No. SAG-19-01944

**DECLARATION OF CATHERINE WEISS  
IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES**

I, Catherine Weiss, declare as follows:

1. I am an attorney licensed by the States of New York and New Jersey. I make this declaration in support of Plaintiffs' motion for recovery of attorneys' fees. I have personal knowledge of the facts in this declaration, and if called on to testify, I could and would testify competently to the facts stated here.

2. I am of counsel to the firm of Lowenstein Sandler LLP, which I joined in 2010. From June 2012 through May 2024, I served as Chair of the Lowenstein Center for Public Interest, leading the pro bono practice of our firm of more than 350 lawyers. During my tenure in that role, I collaborated on multiple occasions with five of the six nonprofit lawyers who have appeared in this matter, and I have knowledge of the professional accomplishments of all six and the extent of their expertise in unaccompanied children's asylum law and practice. I am familiar with the legal issues in this case, and I and my colleagues at Lowenstein Sandler have provided legal services to members of the certified class and to other unaccompanied children.

### **My Background and Experience**

3. I am admitted to practice before United States Supreme Court, the United States Courts of Appeals for the First, Third, Fourth, Fifth, Sixth, and Ninth Circuits; the United States District Court for the Southern District of New York; and the United States District Court for the District of New Jersey.

4. I received my bachelor's degree from Princeton University and a master's degree from Yale University. After receiving my law degree from Yale Law School in 1987, I clerked for the Honorable Alvin Rubin, U.S. Court of Appeals for the Fifth Circuit.

5. I then worked for the New York Civil Liberties Union and the American Civil Liberties Union (ACLU), including serving as the Director of the Reproductive Freedom Project at the ACLU national office from 1997-2002. While at the ACLU, I litigated numerous federal and state constitutional cases aimed at protecting reproductive rights. From 2003-2004, I worked as a consulting attorney for the ACLU, Human Rights Watch, and Planned Parenthood of NYC, and I taught as an adjunct professor at Rutgers University School of Law. From 2004-2006, I was staff counsel and then Deputy Director of the Democracy Program at the Brennan Center for Justice at NYU School of Law, where I focused on voting rights. In 2006, I was asked to create and manage the Division of Public Interest Advocacy within the New Jersey Department of the Public Advocate, and I served as its director until 2010 when I joined Lowenstein Sandler. While at the Department of the Public Advocate, I oversaw a program of litigation and advocacy focused on housing stability, voting rights, and the prevention of lead-poisoning in children.

6. During my nearly fifteen years at Lowenstein Sandler—twelve as chair of the Lowenstein Center for the Public Interest (“the Center”)—I managed a pro bono practice comprising more than 20,000 hours per year. In any given year, approximately 15-25% of those hours were dedicated to representing individual clients in immigration matters, pursuing class-

wide relief for immigrants harmed by illegal government policies or practices, and representing nonprofits whose mission was to serve and advocate for immigrants. I ensured that our lawyers of all experience levels received the required training and supervision for their pro bono work. To achieve this goal, I and other lawyers in the Center worked closely with the nonprofit lawyers in our partner organizations: we trained volunteer lawyers together and often supervised them jointly as well. Through these efforts, I built relationships with a range of nonprofit legal services organizations, including those that are class counsel in this matter.

7. As part of the firm's pro bono practice, I have personally dedicated more than 5,500 hours to representing immigrants in their applications for humanitarian relief, including asylum and Special Immigrant Juvenile Status; litigating class actions on behalf of clients seeking to reverse invalid immigration policies; seeking damages from the United States for immigrant parents and children who were forcibly separated at the border; and working on an array of related issues. Although I have represented numerous adults and families, my immigration practice focuses on unaccompanied immigrant children and youth.

8. As further described below, I have litigated immigration-related matters before the federal courts and state supreme courts, including *W.A.O. v. Jaddou*, No. 2:19-cv-11696 (D.N.J.) (class action challenging USCIS policy affecting immigrant youth); *Argueta v. U.S. Immigration and Customs Enforcement*, 643 F.3d 60 (3d Cir. 2011), No. 3:08-cv-1652 (D.N.J.) (challenging pre-dawn, warrantless home raids by ICE agents); *J.A.L.C. v. United States*, No. 3:22-cv-06587 (D.N.J.) (federal tort action—one of three litigated together at the firm—seeking damages for families harmed by the federal government's 2018 family separation policy); and *H.S.P. v. J.K.*, 223 N.J. 196 (N.J. 2015) (case of first impression clarifying role of state family courts in making predicate findings necessary for immigrant youth to apply to federal authorities

for Special Immigrant Juvenile Status). In *Ms. L v. ICE*, 310 F. Supp. 3d 1133 (S.D. Cal. 2018), the ACLU's class action aimed at overturning the family separation policy implemented at the border in 2017-2018, I filed objections on behalf of legal services providers for immigrant children to an early settlement proposal that did not take adequate account of the needs of the thousands of children who had been separated from their parents. I continued to represent the interests of separated children, who were not initially part of the class, throughout the litigation. In addition to *W.A.O.* and *Ms. L*, I have represented clients in several other class actions, including *Johnson v. Bush*, No. 05-212, *cert. petition filed*, U.S. Sup. Ct. (2005), a challenge to Florida's lifetime disenfranchisement of people with felony convictions, and *Hope v. Perales*, 634 N.E.2d 183 (N.Y. 1994), a challenge under the New York State Constitution to restrictions on Medicaid funding for abortion.

9. I frequently speak on legal topics including pro bono legal services, legal ethics for immigration practitioners, and legal services for immigrant youth. For example, in collaboration with other advocates for immigrant children, I twice briefed Congressional staff on the need to preserve Special Immigrant Juvenile Status to protect immigrant children from abuse, neglect, abandonment, or similar harms by their parents (Oct. 14, 2015; Feb. 19, 2016). Also in collaboration with other advocates, I led a panel on practice tips for Special Immigrant Juvenile Status cases after the New Jersey Supreme Court's decision in *H.S.P. v. J.K.* (2016). I have led interactive presentations on ethical issues in representing immigrant children at the Immigrant Advocates Response Collaborative Conference (Dec. 3, 2021; Oct. 26, 2018), the New York City Bar Association (Jan. 28, 2021, June 16, 2014), the ABA/KIND Unaccompanied Children's Conference (Dec. 13, 2019), the New York Pro Bono Counsel Annual Conference (Feb. 13,

2018), the Pro Bono Institute Conference (March 24, 2016), and the Equal Justice Conference (May 7, 2015).

10. Among the professional commendations I have received are:

- Juan P. Osuna Memorial Award from Kids in Need of Defense (KIND) for exceptional compassion, kindness, and commitment to the rights and protection of unaccompanied immigrant and refugee children (2024),
- Partner in Justice Award from Volunteer Lawyers for Justice for advancing equal access to justice in New Jersey (2024),
- Pro Bono Publico Award for exceptional pro bono legal service to low-income communities from The Legal Aid Society of New York (2021),
- Pillar of Justice Award from the New Jersey State Bar Association (2020),
- Immigration Trailblazer Award from the *National Law Journal* (2018),
- Award of Excellence from the Thurgood Marshall College Fund (2017), and
- Lifetime Achievement Award from the *New Jersey Law Journal* (2016).

### **My Experience Representing and Advocating for Unaccompanied Immigrant Children and Youth**

11. Advocacy on behalf of immigrant children has been a major focus of my pro bono work at Lowenstein, alongside other work on civil and human rights. Since 2010, Lowenstein lawyers have undertaken pro bono matters on behalf of approximately 50 immigrant children in cases referred and mentored by KIND. I guided the firm's provision of pro bono legal services to these unaccompanied children in matters relating to asylum, Special Immigrant Juvenile Status, and other forms of humanitarian relief. In 35 of these cases, I directly represented and/or supervised the representation of individual clients who reached the United States as unaccompanied children and needed help to establish their right to remain in this

country. Since 2010, the firm has also represented approximately 20 adult asylum-seekers, and I supervised and/or assisted in several of these cases as well.

12. Starting in early 2019, I served as lead counsel in a class action filed on behalf of more than 700 young immigrants to challenge a U.S. Citizenship and Immigration Services (“USCIS”) policy that disqualified youth between the ages of 18 and 21 from receiving Special Immigrant Juvenile Status, a form of humanitarian immigration relief based on parental abuse, neglect, abandonment, or similar harm. *See W.A.O. v. Jaddou*, 2:19-cv-11696 (D.N.J.). The plaintiffs alleged that USCIS employed an extra-statutory eligibility requirement in violation of the Administrative Procedure Act. The court entered a preliminary injunction against application of the challenged policy in July 2019 and certified the class in September 2019. In January 2022, the parties reached a settlement in which USCIS agreed not to enforce the challenged policy. USCIS also agreed to pay \$500,000 in attorneys’ fees for the work performed over a two-year-plus period. Based in part on my leading role in *W.A.O.*, given its many commonalities with the instant case, I am well positioned to opine as to the reasonableness of the hours worked by class counsel in this matter, their proposed hourly rates, and their specialized skill, as discussed below.

13. In 2015, I co-founded the New Jersey Consortium for Immigrant Children, which began as a forum for providers of legal services for unaccompanied immigrant children to share resources and expertise. Today, the Consortium is a statewide legal services and policy advocacy organization dedicated to advancing the rights of immigrant youth. I sit on its board of trustees.

14. In 2017, in response to concerns over immigration law enforcement actions that separated children from caregivers, I collaborated with faculty at the Rutgers Law School’s Child



Advocacy Clinic to create a template power-of-attorney so that parents could designate alternative caregivers for their children if the parents were apprehended and detained by ICE. I later worked with Rutgers faculty to draft amendments to the New Jersey law governing such parental delegations. The statute passed, enabling us to clarify and expand the model power-of-attorney.<sup>1</sup> I have also worked with the ACLU to develop resources for advocates assisting undocumented immigrant children who are subject to illegal or discriminatory school enrollment practices, and in a number of instances, successfully challenged the use of unlawful practices such as demands for students' or caretakers' Social Security numbers. And I have helped prepare resources for nonprofits facing possible ICE enforcement actions.<sup>2</sup>

15. Between 2020 and 2023, I spearheaded a series of *amicus curiae* briefs filed on behalf of youth at risk of removal from the United States even though USCIS had approved their petitions for SIJS, qualifying them to apply for green cards when a visa became available—generally after a years-long wait as USCIS worked through a long backlog. In briefing these matters to the Courts of Appeals for the First, Third, Sixth, and Tenth Circuits, and to the District Court for the Eastern District of Virginia, I collaborated with a coalition of nonprofits serving immigrant youth, which included all the nonprofits that employ the attorneys who have appeared in this matter: Kristen Jackson, Michelle Mendez, Rebecca Scholtz, Scott Schuchart, Mary Tanagho Ross, and Wendy Wylegala. Our arguments were based in part on statutory interpretation and in part on the imperative not to circumvent protections that Congress enacted

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<sup>1</sup> Available at <https://static1.squarespace.com/static/6270343397fdb3056f3ee9f2/t/672133f6c2d4065523f44309/1730229239028/Bilingual+Power+of+Attorney+Form.pdf>.

<sup>2</sup> Available at <https://www.lowenstein.com/media/vapdqy2i/advisory-for-nonprofits-on-immigration-enforcement.pdf>.

for vulnerable youth in recognition of their particular needs.<sup>3</sup> In each of these cases, the Department of Homeland Security agreed to refrain from removing the young person from the United States.

### **My Familiarity with the Work of Class Counsel**

16. I am familiar with the work of the nonprofit lawyers who have appeared in this matter through numerous interactions over the course of more than a decade. I have collaborated with five of these attorneys (all but Ms. Jackson) on various projects, including the series of amicus briefs described in the last paragraph. I have consulted with several of them on legal and practice questions relating to the representation of unaccompanied children. I have attended multiple training presentations conducted by the organizations comprising the class counsel team. I have frequently referred to guidance authored by Ms. Mendez, Ms. Scholtz, or their colleagues at the National Immigration Project or at their previous place of employment, the Catholic Legal Immigration Network (CLINIC). And, in my very first representation of a child client in a SIJS matter, back in 2010, Ms. Wylegala was my KIND mentor and guided me through every aspect of the case. Through these matters and other collaborations, I came to recognize the significant knowledge and experience of each of these lawyers in the law and policy affecting the welfare of unaccompanied children.

### **Fees for Attorneys' Work in This Matter**

17. I reviewed the docket sheet for this matter, the operative complaint and answer, the proposed settlement agreement, the billing records prepared by class counsel, and the declarations of Ms. Jackson, Ms. Mendez, Ms. Wylegala, and Ms. Tanagho Ross. Through my

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<sup>3</sup> The amicus briefs are available at <https://www.lowenstein.com/pro-bono/pro-bono-briefs/immigration>.

own practice, I am familiar with the factors involved in assessing the reasonableness of attorneys' hourly rates and the reasonableness of the amount of time expended in prosecuting class actions and actions on behalf of child clients. I have used those factors in reviewing the fee recovery requested by Plaintiffs. Based on my review of these documents and on my litigation experience, it is my opinion that the fee recovery Plaintiffs seek is reasonable and consistent with the demands of this litigation.

18. The 2019 policy challenged in this litigation rolled back valuable rights afforded to asylum seekers who arrived as unaccompanied children. Because that policy took effect just thirty days after the date of the policy memorandum, Plaintiffs' counsel's fast action in obtaining injunctive relief was essential to limit the number of asylum-seekers impacted by the policy. The settlement agreement provides class members with valuable benefits, including a non-adversarial forum for their asylum claims and relief from a one-year time limit for filing their applications. Such a deadline is onerous for young people who have fled threats to their safety and may struggle to articulate what they experienced. Further valuable benefits of the settlement include staying a final order of removal while a class member's asylum claim is pending and agreements by Immigration and Customs Enforcement relating to motion practice during class members' removal proceedings. Litigating and settling this action—mounting successful arguments for enjoining the 2019 policy and for expanding that injunction, defending against two motions to dismiss, evaluating the administrative record, and negotiating for more than three years to reach a beneficial settlement—required a detailed understanding of the evolution of unaccompanied children's asylum procedures since 2008 and, more generally, knowledge of the processes unaccompanied children face in the U.S. immigration system. Specifically, through their years of service to this vulnerable population, the members of the class counsel team have

demonstrated an intimate understanding of the factors that force unaccompanied children to flee their countries of origin; the perils they face in transit to the U.S.; the challenges of adjusting to education systems in the United States and acclimating to changes in family life; barriers to receiving needed services and recovering from trauma-induced harms; and the difficulties of securing legal representation, developing sufficient trust to disclose traumatic facts to counsel and to adjudicators, and facing the adversarial courtroom setting in which removal proceedings are conducted. Conducting this litigation required not only in-depth knowledge of asylum law and procedure, but also an understanding of children's needs as they navigate that legal landscape.

19. Because the vast majority of immigration decisions are made by administrative agencies, lawyers specializing in legal services for immigrants are not typically experienced in federal litigation. Conversely, most federal litigators have little experience in immigration law or in delivering legal services to child clients. Accordingly, I know of few litigators who have the requisite knowledge and experience to prosecute this case. I believe that even fewer would be prepared to commit to providing such services in a multi-year undertaking, with the responsibility for representing a large, diverse, and vulnerable class.

20. Based in part on my leading role in *W.A.O. v. Jaddou* (the class action that successfully challenged, under the Administrative Procedure Act, a USCIS policy that unlawfully disqualified 18- to 20-year-olds from SIJS), I do not believe this class action could have been successfully litigated except by lawyers, such as class counsel here, who have rare combined expertise in unaccompanied children's asylum law and practice and in federal challenges to agency-rulemaking. Public Counsel and the National Immigration Project are among a small handful of organizations that have significant successful track records in federal

immigration litigation, including on behalf of asylum-seekers, unaccompanied children, and other vulnerable immigrants. While KIND's federal court litigation and amicus work is comparatively new, KIND brought to this case the breadth of its experience as the only nonprofit organization serving unaccompanied children on a national scale; because of its long engagement in policy advocacy, KIND was well-equipped to assess the impacts of the challenged policy on the class. Bet Tzedek likewise brought to bear its experience in providing direct representation to hundreds of unaccompanied immigrant youth each year and the experience of its impact litigation team, currently led by Ms. Tanagho Ross. I understand that, in addition to dedicating thousands of hours to this case, Goodwin Procter represents a number of pro bono clients who arrived in the United States as unaccompanied children, including some who are members of the certified class. This experience positioned Goodwin Procter to supplement the nonprofit attorneys' expertise with the firm's broader federal court strategy expertise and resources.

21. Based on my experience litigating impact cases, I am familiar with the time commitment and competency required to prevail in a class action challenging flawed administrative policies. As was true in *W.A.O.*, this case entailed a multi-pronged challenge to an unlawful USCIS policy and required responses to a series of rationales for the agency's actions. This case presented additional demands associated with representing a class believed to number in the thousands over a span of nearly six years. In my opinion, the hours worked by class counsel in this matter were reasonable and commensurate with the needs of a class action on behalf of vulnerable and youthful clients in a range of postures and circumstances.

22. Based on my review of the fee statements, the subtotals of time expended on each category of work were reasonable for this litigation. For instance, in the "pleadings" and "motions practice" categories combined, for the drafting of an initial complaint and two

amendments in response to newly discovered claims, the analysis of two answers, and procuring nationwide injunctive relief and certification of a nationwide class, the expenditure of approximately 1330 hours is reasonable. Also well within the bounds of reasonableness is the expenditure of approximately 1,230 hours across the life of the case in the case development category, including the regular full-team conference calls, which have proven efficient in my experience. Moreover, the expenditure of approximately 1,800 hours in preparing settlement agreement drafts and mediation statements, and preparing for and attending mediation sessions, is comparable to my experience in similar matters, in view of the protracted timeline of the settlement process and the class interests at stake here. In addition, the expenditure of approximately 430 hours appears reasonable and necessary for responding to concerns of class members during the course of the case and providing guidance in the wake of the settlement being docketed. By committing to a settlement process, class counsel avoided the expense of further litigation including summary judgment motions. I also understand that class counsel exercised appropriate judgment in removing from their statements time that was actually expended but could potentially be viewed as duplicative or unnecessary, even where this Court's rules did not require such reductions.

23. I understand that counsel for the Plaintiffs seek recovery for the work of Ms. Jackson, Ms. Mendez, and Ms. Wylegala at enhanced rates derived from guidelines in this Court's local rules, adjusted to account for the passage of time since those rates were adopted in 2014 by applying the average annual consumer price index factors for Maryland. Based on my direct knowledge of the work of two of these attorneys and my collaborations with the organizations that support the work of all three, and based on the additional expertise evidenced in their declarations, enhanced rates are more than justified. I believe that enhanced rates, rather

than standard EAJA rates, better reflect their contributions to the results achieved in this litigation.

24. I understand that Plaintiffs seek recovery for all other timekeepers' work at the statutory EAJA rate with annual consumer price index adjustments. In my observation, these rates are far lower than customary market rates for work of comparable complexity and quality. I and others at my firm have spent thousands of hours in collaboration with nonprofit organizations on both direct services and impact litigation projects. Based on this experience, it is my opinion that the work contributed by law firms of the stature of Goodwin Procter is essential to the ability of nonprofit organizations to undertake litigation at the scale and duration of this matter. Such partnerships between law firms and nonprofit organizations are efficient combinations of litigation expertise and subject matter expertise, and thus recovery of fees for the work of both Goodwin Procter and the nonprofit organizations in this matter is appropriate. In my opinion, recovery at these baseline rates is more than justified by the complexity of this litigation and the organizations' sustained investment in reaching a favorable result for the Plaintiff class, as well as the timekeepers' knowledge and experience in unaccompanied children's asylum law and practice.

Executed on December 13, 2024, in Roseland, New Jersey.

/s/\*Catherine Weiss  
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\*Counsel hereby certifies that she has a signed copy of the foregoing document, which is available for inspection at any time by the court or a party to this action.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)**

J.O.P., *et al.*,

Plaintiffs,

v.

U.S. Department of Homeland Security, *et al.*,

Defendants.

Civil Action No. SAG-19-01944

**DECLARATION OF ANDREW D. FREEMAN**

1. I, Andrew D. Freeman, am over 21 years of age and am competent to testify. I submit this declaration in support of Plaintiffs' Motion for an Award of Attorneys' Fees and Costs in this case.

2. I have been a member of the bar of the State of Maryland since 1986. I have been a partner in the Baltimore-based law firm of Brown, Goldstein & Levy since 1994 and was previously an associate with the firm from 1987 through 1993. Before that, I was a law clerk to the Honorable Norman P. Ramsey of this Court. I am an honors graduate of Harvard College and Stanford Law School.

3. My law practice primarily consists of litigation on behalf of plaintiffs, including civil rights cases (including claims for racial discrimination, gender discrimination, disability rights, wrongful convictions, police excessive force, and other constitutional violations), as well as other litigation in which attorneys' fees are awarded to prevailing plaintiffs, such as actions brought on behalf of consumers under both state and federal law. I have successfully litigated hundreds of cases in federal and state trial and appellate courts.

4. In 2012 to 2013, at the invitation of then-Chief Judge Deborah K. Chasanow, I served on the Fee Petition Subcommittee of the Bench-Bar Committee of



this Court. I also served on panels regarding obtaining attorneys' fees awards at the Maryland Partners for Justice Conference in 2010 and 2011. I have experience in litigating attorneys' fees, including obtaining a fee award of \$1.5 million in this Court. *See Thompson v. HUD*, Civ. Action No. MJG-95-309, 2001 WL 1636517 (D. Md. Dec. 12, 2001) (Report & Recommendation of Grimm, M.J., adopted by Judge Garbis in a Memorandum and Order re Award of Fees and Costs, Feb. 28, 2002).

5. My litigation and advocacy efforts have been recognized by selection as a Fellow of the American College of Trial Lawyers (since 2014), by Chambers USA as a ranked attorney in Litigation: General Commercial in Maryland (since 2020), and with an AV (highest) rating by Martindale-Hubbell Law Directory (since 1996). I have been included among Lawdragon's 500 Leading Lawyers in America (2021–24), 500 Leading Litigators in America (2023–25), 500 Leading Plaintiff Employment and Civil Rights Lawyers (2021–25), and 500 Leading Plaintiff Employment Lawyers in America (2018–20). I was selected as the Maryland Trial Lawyer of the Year for 2000 by the Maryland Trial Lawyers Association. My peers voted me the *Best Lawyers* Baltimore Lawyer of the Year for Civil Rights for 2024, for Bet-the-Company Litigation for 2023, for Litigation - Labor and Employment for 2022, for Personal Injury Litigation – Plaintiffs for 2020 and 2025, for Mass Tort Litigation/Class Actions – Plaintiffs for 2014, 2019, and 2025, and for Employment Law – Individuals for 2018. I have been included in *Best Lawyers in America* in most or all of the following categories every year since 2012: Appellate Practice, Bet-the-Company Litigation, Civil Rights, Commercial Litigation, Employment Law (Individuals), Labor & Employment Litigation, Mass Tort Litigation/Class Actions (Plaintiffs), and Personal Injury Litigation (Plaintiffs). I have been selected as a “Maryland Super Lawyer” every year since 2007 and a “Top 100 Maryland Super Lawyer” in 2018, 2023, and 2024. I received a Leadership in Law award from the Daily Record in 2006, a Champion of Justice Award from the Legal Aid Bureau in 2009, and the Robert M. Bell Award for Leadership in Public Service from the

University of Baltimore Students for Public Interest Law in 2010. I have also been honored by the Lawyers Committee for Civil Rights Under Law, the Maryland Food Committee, and the Coalition to End Childhood Lead Poisoning.

6. I have no financial interest in this case.

7. Brown, Goldstein & Levy has been honored as Maryland's "Pro Bono Firm of the Year" by the Maryland State Bar Association's Pro Bono Resource Center and as the nation's "Civil Rights Firm of the Year" by the National Law Journal, and the firm received the "Outstanding Achievement Award in the Field of Fair Housing" from the Washington Lawyers' Committee for Civil Rights, among other awards.

8. I am familiar with the hourly rates that other Maryland law firms charge for litigation in the Baltimore region. To set our firm's rates and to file fee petitions in our cases (as well as others in which I've served as fees counsel), I keep track of rates charged by other attorneys by talking with my peers and by reading surveys of firms' fees, fee petitions filed by other firms (on behalf of both plaintiffs and defendants), and court opinions regarding fees. Brown, Goldstein & Levy uses that information to be sure that our rates are within the range of market rates charged by comparable firms for comparable work in the Baltimore region.

9. Brown, Goldstein & Levy charges our fee-paying clients \$725 an hour for our senior partners, including me, for representation in litigation in courts throughout the Baltimore region in 2024 and plans to increase that rate to \$775 an hour in 2025. If Kristen Jackson or Wendy Wylegala were partners at BGL, that is the hourly rate we would charge for their time. For attorneys with experience comparable to Michelle Méndez (a 2008 law school graduate), we would charge their time at or above \$650 an hour in 2024 and \$700 an hour in 2025. For our paralegals and law clerks, we currently charge from \$250 to \$300 an hour, depending on their experience. I am confident that BGL's rates are at or below market rates for attorneys of comparable experience in the Baltimore region.

10. Clients regularly pay Brown, Goldstein & Levy at our full hourly rates (i.e., the rates described in the preceding paragraph). Judges and arbitrators in Maryland have approved BGL's full hourly rates in civil rights matters. See, e.g., *Rivera v. Mo's Fisherman Exchange, Inc.*, Case No. ELH-15-1427 (D. Md. Oct. 11, 2018), ECF Nos. 169-3, 170 (approving settlement in Fair Labor Standards Act collective action in which BGL petitioned for attorneys' fees at its customary 2018 hourly rates, including \$595 for partner time, \$300 per hour for a third-year associate, and \$195 per hour for paralegal time). Following contested fee petition briefing in an arbitration proceeding in 2020, the Honorable James R. Eyler (Ret.) awarded (in early 2021) attorneys' fees at BGL's regular market rates of \$625 per hour for partner Andrew D. Levy (a 1982 law school graduate), \$330 per hour (our 2019 rate) for a fourth-year associate, and \$190 to \$225 per hour for law clerk and paralegal time, finding that those rates were within Baltimore's market rates. And in 2015, an arbitrator in *Johnson v. Hooters of America, LLC* awarded plaintiff the firm's then-regular rates for an associate, a paralegal, and me.

11. I have reviewed the declarations of Ms. Jackson, Ms. Méndez, Ms. Wylegala, and Ms. Tanagho Ross. I am familiar with the reputation and experience of the National Immigration Project in litigating complex immigration law issues, many of which implicate civil and constitutional rights. The National Immigration Project is one of only a handful of immigration advocacy and education organizations with national scope and is recognized as a leader in the field. I understand that Public Counsel, through its litigation and direct services, has made significant contributions to the development of immigration law affecting unaccompanied children. I understand that Kids in Need of Defense is the only nonprofit organization of nationwide scope serving unaccompanied children through direct legal and psychosocial services, advocacy, and (since 2019) litigation.

12. Based on my knowledge of the Baltimore area legal market and my review of the above declarations, the range of rates requested for Kristen Jackson and Wendy

Wylegala (\$453 - \$616.36, admitted to practice in 2003) and for Michelle Méndez (\$373 - \$551.48, admitted to practice in 2008) are below the range prevailing in the Baltimore legal community for similar services by lawyers of reasonably comparable skill and expertise. I understand that, as the nonprofit organizations appointed class counsel do not bill their clients for legal work, the rates for the above three attorneys were derived from this Court's Guidelines Regarding Hourly Rates by selecting the high end of the ranges for lawyers with comparable experience (ranging from eleven to over twenty years over the course of this litigation). Because the Guidelines were promulgated in July 2014, Plaintiffs adjusted those rates for each year using the annual average Consumer Price Index – All Urban Residents (CPI-U) for Maryland.<sup>1</sup>

13. For all other attorneys, Plaintiffs request recovery at the rate specified in the Equal Access to Justice Act (EAJA), adjusted according to the annual average CPI-U for Maryland, as is customary practice for attorneys seeking recovery at EAJA rates. For paralegals, Plaintiffs seek recovery at \$115 per hour, which is approximately half the average EAJA rate for lawyers during this litigation (and is below the midpoint of the range for reasonable paralegal rates under this Court's Guidelines, which were promulgated over a decade ago, when market rates were considerably lower than today). Based on my knowledge of the Baltimore area legal market these rates are substantially below the range prevailing in the Baltimore legal community for similar services by lawyers and paralegals of reasonably comparable skill and expertise.

14. Although Goodwin Procter LLP does not have an office in Maryland, I am familiar with their national reputation in litigation, and I have litigated against other lawyers in the firm in complex civil litigation in this court. I understand that all of their

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<sup>1</sup> Specifically, I understand that Plaintiffs multiplied the Guidelines rates by the annual average CPI-U in Maryland for the year in which the work was performed, divided by the CPI-U factor for July 2014, the month the Local Rules with the current fee guidelines took effect.

work in this litigation was performed pro bono. Recovery for their work at EAJA rates is more than reasonable.

15. Most of Goodwin Procter's work on this case was done by lawyers in their Boston (Mr. DeJong) or Washington, DC offices (Mr. Burgess, Ms. Bova, and Mr. Shaw). I understand that KIND sought out Goodwin Procter's participation in this lawsuit based in part on their specialized knowledge of the issues in play gained in prior collaborations. My firm, like other Maryland firms I know of, would not have been available to take on a lawsuit of this scope and duration, and lacks adequate specialized knowledge to undertake this case.

16. In sum, based upon my knowledge and experience as described above, it is my opinion to a reasonable degree of professional certainty that the hourly rates sought by Ms. Jackson, Ms. Méndez, and Ms. Wylegala in this case are below the customary and reasonable rates charged by lawyers of their experience and caliber in the Baltimore legal market. It is also my opinion that the hourly rates sought by the remaining timekeepers are substantially below the customary and reasonable rates charged by lawyers and paralegals of their experience and caliber in the Baltimore legal market.

17. I have also reviewed the time and fees for which Plaintiffs seek compensation in this case. This was a challenging case involving an evolving area of the law. Plaintiffs' counsel did an excellent job overcoming Defendants' vigorous defense and were able to secure an expanded preliminary injunction against Defendants' 2019 policy as well as a settlement that embodies the protections of that injunction plus additional benefits for the class. For a case of this length and complexity, it is my opinion based on my knowledge and experience in similar cases that the approximately 5,100 hours and \$1,879,760 in fees for which plaintiffs seek compensation is commensurate with, and indeed significantly below, what I would expect would be necessary and appropriate in order to achieve their success.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 12, 2024, in Baltimore, Maryland.

\_\_\_\_\_/s/\_\_\_\_\_<sup>\*</sup>  
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\*Counsel hereby certifies that he or she has a signed copy of the foregoing document available for inspection at any time by the court or a party to this action.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, SOUTHERN DIVISION**

**J.O.P., et al.,**

Plaintiffs,

v.

**U.S. DEPARTMENT OF HOMELAND  
SECURITY, et al.,**

Defendants.

Civil Action No. 8:19-CV-01944-SAG

**[PROPOSED] ORDER ON PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND  
EXPENSES**

Upon consideration of Plaintiffs' Motion for Attorneys' Fees and Expenses, in which Plaintiffs request an award of \$1,830,206 in attorneys' fees and \$4,812 in expenses, pursuant to Equal Access to Justice Act, 28 U.S.C. § 2412, the court hereby finds that:

Plaintiffs are the prevailing party and are entitled to an award of attorneys' fees and expenses. The hourly rates requested for each attorney are reasonable and appropriate, and the number of hours of work for which recovery is sought was reasonably necessary to successfully pursue this litigation and the resulting settlement.

Therefore, for the reasons set forth in Plaintiffs' motion, it is hereby ORDERED that Plaintiffs be awarded attorneys' fees in the amount of \$1,830,206 and expenses in the amount of \$4,812.

**IT IS SO ORDERED.**

Dated this \_\_\_ day of \_\_\_, 2025.

\_\_\_\_\_  
U.S. District Judge Stephanie A. Gallagher