

CAUSE NO. D-1-GN-11-003130

THE TEXAS TAXPAYER & STUDENT	§	IN THE DISTRICT COURT
FAIRNESS COALITION, et al;	§	
CALHOUN COUNTY ISD, et al;	§	
EDGEWOOD ISD, et al;	§	
FORT BEND ISD, et al.,	§	
TEXAS CHARTER SCHOOL	§	
ASSOCIATION, et al.	§	
	§	
Plaintiffs,	§	
	§	
JOYCE COLEMAN, et al.,	§	
	§	
Intervenors,	§	
	§	
vs.	§	TRAVIS COUNTY, TEXAS
	§	
MICHAEL WILLIAMS, COMMISSIONER	§	
OF EDUCATION, IN HIS OFFICIAL	§	
CAPACITY; SUSAN COMBS,	§	
TEXAS COMPTROLLER OF PUBLIC	§	
ACCOUNTS, IN HER OFFICIAL	§	
CAPACITY; TEXAS STATE BOARD	§	
OF EDUCATION,	§	
	§	
Defendants.	§	250th JUDICIAL DISTRICT

**NOTICE OF FILING**

Pursuant to the agreement of the parties and authorization by the Court, the Plaintiffs Edgewood I.S.D., *et. al.* (“Edgewood ISD Plaintiffs”), hereby give notice of the filing of the attached Affidavit of Roger Rice, as proof of their claim for attorney’s fees in the above styled matter.

Plaintiffs Edgewood I.S.D., *et. al.* respectfully request that they be awarded their reasonable attorney’s fees as set forth in the attached Affidavit.

DATED: March 5, 2013

Respectfully Submitted,

**Mexican American Legal Defense and  
Educational Fund, Inc.**

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By:  /s/ David G. Hinojosa  
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Jessica Romero, Plaintiffs

**CERTIFICATE OF SERVICE**

By my signature below, I certify that on March 5, 2013, I served the foregoing document

via electronic mail to all the other parties listed below:

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s/David G. Hinojosa  
David G. Hinojosa

Unofficial copy Travis Co. District Clerk Velda L. Price



litigation. I was co-counsel at trial in this court with MALDEF in *Edgewood v. Kirby*, 777 S.W.2d 391 (Tex. 1989)(on appeal) and in *West Orange-Cove v. Neeley*, 176 S.W. 3rd 746 (on appeal) also trial counsel in *U.S. v. Texas Education Agency (Bilingual)* (1979); *Keyes v. Denver School District, No. 1* (1983); and *Castaneda v. Pickard* (1981) in the U.S. District Court for the Southern District of Texas in Brownsville. I participated in *Lau v. Nichols* (1974), the leading case in this area, both at the Court of Appeals and Supreme Court levels and in other language rights and educational equity cases in Massachusetts (Boston, Lynn, Lowell, Worcester, Randolph, Springfield, Holyoke), Rhode Island, California, New York, Texas, New Mexico, Illinois, Pennsylvania, Florida and North Carolina.

3. I have 43 years experience as a practicing civil rights lawyer. Since 1983 I have been Executive Director of Multicultural Education, Training and Advocacy, Inc., a national public interest civil rights legal organization with offices in Massachusetts and California which specializes in the educational rights of immigrant, non-English speaking and other poor and minority schoolchildren to equal educational opportunity. During the past 20 years our office has either brought or been asked to assist and consult on virtually every reported case involving the rights of immigrant schoolchildren. Before that I was staff attorney at the Harvard Center for Law and Education in Cambridge, Massachusetts for 14 years. My legal work at the Center again focused on the educational rights of non-English speaking and minority schoolchildren.
4. My co-counsel in this matter is Attorney Miguel Perez Vargas. Attorney Perez Vargas graduated from Interamerican University of Puerto Rico in 1986 and from the Interamerican University Law School in 1989. He is admitted to practice in the Commonwealth of Puerto Rico, the United States District Court for the District of

Puerto Rico, the United States District Court for the District of Colorado and is member of the bar of the 1<sup>st</sup> United States Courts of Appeals. He has also been admitted to practice *pro hac vice* before the following courts: the United States District Court for the District of Alabama, the United States District Court for the District of Massachusetts, the United States District Court for the Southern District of Illinois and the United States Court of Appeals for the 11<sup>th</sup> Cir.

5. Attorney Perez Vargas has been involved since 1990 as a Staff Attorney, now Senior Staff Attorney at Multicultural Education, Training & Advocacy, Inc.
6. In his 23 years as an attorney he has practiced law in the areas of civil rights, labor and employment law, and has handled cases of police misconduct, employment discrimination and education civil rights particularly regarding the rights of linguistic minority schoolchildren. He is currently co-counsel in a number of education civil rights cases including, in United States District Court for the District of Massachusetts, in Federal District Court for the District of Colorado; in the Federal District Court for the Southern District of Florida and in the U.S. District Court for the District of New Mexico among others.
7. In 2004, this Court awarded attorney fees for my work in *West Orange Cove* based upon an Austin rate at the time of \$350 per hour. Based upon our experience since then, I believe that an attorney with similar years of experience in a specialized area of the law would normally command an hourly rate in the range of \$ 350-\$450 in Austin. I believe that based upon such local rates my hourly rate in this matter should be \$420. I also believe that based upon such local rates my co-counsel Miguel Perez Vargas' hourly rate would be \$325.
8. This affidavit is made in support of the Edgewood Plaintiffs' motion for an award of costs and attorneys' fees under the Uniform Declaratory Judgment Act ("UDJA"),

Tex. Civ. Prac. & Rem. Code § 37.009, with respect to Edgewood Plaintiffs' claims for declaratory relief under the UDJA. The summary of hours expended for legal work directly related to this case and attached hereto is based on contemporaneous records maintained by me throughout the course of this litigation. The time represented herein was reasonable and necessary to the successful prosecution of the Edgewood Plaintiffs' UDJA claims. The attached statement of work performed, as I shall endeavor to explain, reflects only a part of the time over this period which was spent on this case. This time amounts to 629.95 hours for Roger Rice and 235.75 for Attorney Miguel Perez Vargas. Our office has also incurred costs of \$4,408 for travel connected with this matter as of today. In sum the claim for our office is \$341,197.75 in fees (\$ 264,579 for Attorney Rice, \$ 76,618.75 for Attorney Perez Vargas plus \$4,408 in costs for a total of \$ 345,605.75. Our detailed time sheets are attached to this affidavit.

9. Although my involvement with the issues in this case began some 27 years ago in the *Edgewood* case, and again in *West Orange Cove* in 2004, our participation as co-counsel in the instant litigation began at the end of October 2011. The current litigation involves issues of the adequacy and suitability of current programs and resources for students as well as the need for equity as between wealthy and poor school districts. The state and the nation have recently embarked on an ambitious effort to dramatically increase the standards of public education in every aspect. Texas, with its new STAAR assessments, aims to ensure that every student achieves at college and career ready world- class standards of education. This has placed unique demands on school districts, and particularly low wealth school districts with poor and limited English proficient students. The resulting legal issues are similarly complex and demanding.

10. META, Inc. was asked by the attorneys for the Edgewood Plaintiffs, to become co-counsel and to be responsible for all aspects of the case and to play a lead role in those aspects that concerned bilingual education and the education of limited English proficient students. This included, but in no ways has been limited to, preparation of expert witness testimony, working with fact witnesses and consulting experts, review of the adequacy of the current weight for bilingual education in Texas, deposing witnesses for the defendants who may have knowledge of these issues, collecting and analyzing voluminous amounts of data from TEA and local districts that pertains to their populations of limited English proficient students and similar trial preparation work.
11. The work described above, however, could not be easily confined. In preparing our case we were concerned, for example, with issues of the shortage of certified bilingual and ESL teachers, the need for teacher training, pre-school for LEP students, the interpretation of assessment results on the TAKS and STAAR examinations, and the adequacy of funding for programs for LEP and immigrant students and other poor students. This meant that we were compelled to thoroughly understand the testimony of virtually all of the many dozens of expert witnesses called by all parties because in nearly every case the area of expertise could or did intersect with issues of adequate and suitable education for limited English children.
12. Within the context of this complex case our office had several roles. First, I consulted by phone and email on a constant basis about all aspects of the case with lead counsel David Hinojosa including legal and trial strategies. Second, I reviewed and commented upon all filings by the Edgewood Plaintiffs and reviewed all filings by all parties. Third, I shared the role of identifying potential Plaintiff experts including researching their writings and testimony in other cases. Fourth, I was chiefly responsible for preparing the parts of the case concerning English Language

Learners (ELLs), including but not limited to the performance of ELLs on TAKS, TELPAS and STAAR, and what constitutes an adequate and suitable education program for ELLs. The latter included research on pre-K for ELLs, hiring and training of teachers, the need for materials and technology and support services among other aspects. Fifth, Attorney Perez Vargas and I worked directly to prepare Edgewood Plaintiffs experts on these and other ELL related issues including analysis of ELL funding weights in Texas and nationally. Attorney Perez Vargas was principally charged with reviewing data on the current programs and resources for ELL students in the Edgewood plaintiff school districts. Sixth, I analyzed the data on ELLs presented by the Defendants' ELL witnesses and assisted in preparing deposition and trial examination of those witnesses. Seventh, I reviewed the expert testimony of all witnesses and helped in the examination of those witnesses including but not limited to national school finance experts and experts on teachers and student outcomes. Eighth, I reviewed the deposition and trial testimony of all witnesses in terms of ELL students. Ninth, I researched and prepared for the examination of the Charter Intervenors witnesses. Tenth, Attorney Perez Vargas drafted and I reviewed and edited the preparation of Edgewood's Pleas to the Jurisdiction of the Charter Intervenors claims. Finally, during June the Defendants responded to Edgewood Plaintiffs discovery by submitting in excess of 100,000 pages of documents as well as the links to a great many Texas Education Agency websites. The Defendants also produced many additional documents in response to the discovery requests of the other plaintiffs. I was chiefly responsible for reviewing and analyzing those documents for trial.

13. The 629.95 hours listed here in connection with this work, as mentioned above, reflect only a fraction of the entire time spent in this matter. I have carefully reviewed my records and, for example, as a reasonable billing judgment deleted more

than 350 additional hours that I believe would be otherwise compensable. For example, in the nature of the work of our small office, Attorney Perez Vargas and I work closely as a team. It is my estimate that during the approximately 40 weeks between March and the end of November 2012, Attorney Perez Vargas and myself conferred daily on this case. While we have listed in the attached hours, a few of these conferences, my best judgment is that there were an additional 100 hours of such conferences over this period for which we have not billed. In addition, I consulted almost daily during this period with co-lead trial attorney David Hinojosa and other co-counsel. Save for conference calls of the entire legal team, most of these conferences are not claimed for. I also deleted all time spent in reviewing and analyzing discovery produced by the Defendants to the Fort Bend, Calhoun County and Coalition plaintiffs and the Charter Intervenors all of which I estimate amounted to another 250 hours during the July-January period.

14. Similarly, Attorney Perez Vargas' time does not include many additional hours spent in this matter. For example, he has, as a reasonable billing judgment excluded more than 100 hours spent in conferences over 40 weeks with Attorney Rice. He has further deleted all time spent in reviewing and analyzing pleadings filed by the Defendants, the Fort Bend, Calhoun County and Coalition plaintiffs and the Charter Intervenors all of which is estimated to amount to another 150 hours during the July-January period. He has also excluded many hours spent in conference and/or email correspondence with individual MALDEF co-counsel and support staff which would amount to an additional 36 hours. He has also not billed the review of close to 500 emails from co-counsel. Finally, Attorney Perez Vargas has billed for only half of his travel time in connection with attending depositions and the trial.
15. In sum given the complexity of and importance of the issues in this matter, I believe that the award sought is "reasonable and just" within the applicable legal standards.

Roger L. Rice  
Roger L. Rice, Esq.

February 27, 2013

Unofficial copy Travis Co. District Clerk Velda L. Price

Exhibit 1

Time Sheet for Roger L. Rice

Texas Payer & Student Fairness Coalition, Edgewood ISD et al v. Williams

2011

November

7 review MALDEF school finance info sheet, discuss w. DH 1

December

9 review, comment on draft of Plaintiffs' Original Petition 2

12 review Colorado school finance decision re: ELLs, experts 2

review and edit draft of final Original Edgewood Petition 1.5

2012

January

3 review letter from San Benito ESL teacher, email to DH re: plaintiff districts 0.5

17 review policy study on Texas ELL grad from potential expert, comment to DH 0.8

23 confer w. DH re: strategy 0.75

review Defendants' Original Answer 0.5

24 review reports from potential experts filed in Colorado finance case 2

Feb

2 review articles on remarks of defendant Scott 0.1

3 review draft of counsel agreement and email to DH re: experts Baker, Duncombe 0.25

6 review latest draft of proposed scheduling order 0.1

8 confer in D.C. w. potential expert DP 1

10 review West Orange Cove FOF, confer w. DH re: using historical record 0.5

13 review documents on STAAR from expert DP 1

14 research TAKS results for LEPs, non-LEPS from TEA website 2

15 review DH list for fact gathering at client districts, 1

compare with WOC FOFs on bilingual, revise and send 1

review TAKS results for three years for plaintiff districts 2

review AEIS reports for three years for plaintiff districts 1.5

16 review TEA website re: STAAR 2.5

review proposed scheduling order 0.25

17 draft email to potential expert A. Cortez re: proof 0.5

email to MB re: date for STAAR data, review response 0.1

plaintiffs' attorneys bi-weekly conf. call to review scheduling proposal 0.5

20 review draft proposed order from MT 0.25

21 begin review of teacher preparation for LEPs data on TEA website 0.5

22 confer with expert A. Cortez re: STAAR proof approach 1

outline LEP proof, expert reports, state data and documents 0.5

24 review plea in intervention 0.5

29 review proposed pre-trial agreement 0.2

March

3 meeting with Texas school finance litigation expert, Al Kaufman to discuss trial strategy 2

5 review pretrial draft agreements 0.1

research Texas federally funded bilingual/ESL teacher dev. Grants 0.5

8 confer w. DH, re: interviews w. pl districts, experts, strategy 1

review FAST report for plaintiff districts, send summary to DH 1

9 research cost of stipends for bilingual teachers 0.25

16 review research on ELL early childhood and achievement 0.4

review research study on Educational Trajectory of ELLs in Texas 1

review latest draft of comment interest agreement 0.2

19 review draft of Edgewood First Amended Petition 0.3

20 review Snapshot of district wealth from TEA website and send to DH 0.4

review vita of potential expert on bilingual 0.1

	26 review latest draft of Edgewood First Amended Petition	0.1
	confer w. DH re: constitutional standard	0.1
	29 email to DH re: interrogatory questions, possible experts	0.3
	29 confer w. DH	1.2
	30 review sample pleas to jurisdiction, discuss w. MPV	1
April		
	2 review Defendants Reponse to Requests for Disclosure	0.25
	4 review Calhoun County ISD Pl. First RFP	0.25
	5 review parties Rule 11 agreement	0.1
	6 interview expert Izquierdo	1
	review DH adequacy proof issues	0.5
	7 email to DH re: interview with expert Izquierdo	0.2
	review expert reports from West Orange Cove case	1
	9 confer w. DH re: expert	0.25
	10 review Fort Bend Plaintiffs' First RFP	0.25
	11 review drafts of pretrial scheduling agreements, confer w. co-counsel	1
	review letter from charter intervenors sent by court	0.25
	review and comment on draft of Edgewood First Discovery Requests	0.4
	12 confer w. DH re: expert Odden, successful schools study, prepare outline for bilingual experts	0.75
	13 review further drafts of scheduling agreements	0.75
	review expert Odden article on school finance adequacy	0.75
	17 email to DH re: state data to request	0.1
	19 communications w. DH re: plea to jurisdiction, special exceptions	0.25
	review and edit draft of motion to strike charter intervenors' plea in intervention	
	20 research writings of Mark Hurley, witness for Efficiency Intervenors	1.75
	confer w. DH re: expert LDH conference	0.25
	23 review Plaintiffs' RFD to the Efficiency Intervenors	0.25
	24 review final Edgewood Plaintiffs First Discovery Request to Defendant	0.5
	27 edit draft of Plea to Jurisdiction, confer w. co-counsel MPV	1.5
	30 complete draft of Plea and send to DH	1.25
May		
	1 review Fort Bend Plaintiffs' Second Request for Production	0.25
	2 meeting w. expert Levin and plaintiffs lawyers	0.5
	discussion w. DH re: status of experts	1
	review First Amended Plea in Intervention	0.25
	begin review of potential experts suggested by Dr. Levin	1.25
	3 edit draft of Special Exceptions, confer w. DH	0.75
	4 research Texas NCLB Title III performance report	1.75
	5 review TEA STAAR-EOC questions from TEA website, send to DH w. comments	0.5
	7 confer w. Stanford University potential experts on implementation of standards	0.5
	review Defendants' Reponse to Calhoun County ISD First RFP	0.25
	8 review research article on charter schools, KIPP efficacy, send to DH	0.5
	review Second Amended Plea in Intervention	0.25
	11 review CCISD Request for Disclosure to Intervenors	0.1
	14 review Defendants' Responses to Fort Bend ISD Pl. 1st RFP	1
	15 review contracts with experts DP, EI	0.25
	review memo from education law center re: experts in school finance cases	0.3
	16 review Defendants' data file information to all counsel	0.25
	19 email to and from DH re: expert Belfield conversation	0.2
	research Talent Search Program referred to by Belfield, send to DH	0.5
	21 conference call w. expert Goldenberg re: standards implementation proof;	0.75
	send information on STAAR and College Readiness to expert	
	21 conference call w. Stanford University educational experts	0.5
	22 confer w. DH	0.2

23 confer w. DH, expert Belfield	0.25
confer w. all plaintiffs' counsel re: data, experts	1
confer w. expert P. Lopez, STAAR/TAKS	0.5
compare Edgewood data request, AG proposed file, draft email to DH, confer w. MPV	1
23 draft email to expert Pompa re: data	0.25
24 confer w. expert Rumberger re: drop outs	0.75
confer w. J. Barra re: Austin charter school data	0.3
25 confer w. DH	0.5
confer w. expert Rumberger re: drop outs	0.5
draft communication to DH re: Rumberger conference	0.5
27 review research of Rumberger on dropouts and studies cited	2.5
29 confer w. D.H. re: expert testimony	0.75
review Edgewood ISD Pl. Response to Intervenors' Request for Disclosure	0.4
30 call expert Belfield	0.1
30 review Def. response to Edgewood RFA and RFP	2
confer w. experts Goldenburg, Saunders, Marceletti re: ramp up	0.75

June

1 begin research on cost of transition research suggested by Goldenburg et al	2
research Pioneer Institute, Fordham Institute Common Core cost studies	2
2 complete research on cost of transition studies, send to DH w. comments	1.5
begin review of Defendants' response to Edgewood RFP	2.5
3 continue review of Defendants' response to Edgewood RFP	3.5
4 review Defendants' Responses to Fort Bend ISD Pl. 2nd RFP	2
5 review agreed data set from TEA	0.25
continue review of Defendants' response to Edgewood RFP	3
6 review communications between plaintiffs' counsel re: testimony on attracting teachers, higher standards and ELLS	0.5
review Plaintiffs' RFP and First Set of Interrogatories to Defendants	0.5
7 review defendants' proposal re: scope of data sets	0.1
continue review of Defendants' response to Edgewood RFP	3
8 review recent STAAR EOC results, send to experts	0.5
continue review of Defendants' response to Edgewood RFP	3
9 review Texas based U.S. Dept. of Ed. grants for proof. development for ELLs and higher standards, email summary to DH	2
10 review data from CA experts on cost of whole school reform	0.5
continue review of Defendants' response to Edgewood RFP	3
11 email to and from DH re: state data set and ELLS	0.3
continue review of Defendants' response to Edgewood RFP	3
12 continue review of Defendants' response to Edgewood RFP	3
13 continue review of Defendants' response to Edgewood RFP	3
14 confer w. DH	0.5
continue review of Defendants' response to Edgewood RFP	3
15 confer w. DH	0.2
continue review of Defendants' response to Edgewood RFP	3
16 continue review of Defendants' response to Edgewood RFP	3
17 continue review of Defendants' response to Edgewood RFP	3
18 confer w. DH	0.2
call between plaintiffs' counsel and AG re: 'seminar for the judge'	0.3
continue review of Defendants' response to Edgewood RFP	3
19 continue review of Defendants' response to Edgewood RFP	3
20 review Defendants Response to Intervenors RFP	0.1
research and send to DH data on district stipends for bilingual, ELL teachers	0.5
continue review of Defendants' response to Edgewood RFP	3

21	review writings of expert Vigdor, review notes on Vigdor interview, email to DH re: writings on immigrants, culture	1.5
22	review latest draft of Plea to Jurisdiction from DH confer w. MALDEF re: problems accessing AG FTP files, incl. AG letter	0.75 0.5
23	continue review of Defendants' response to Edgewood RFP continue review of Defendants' response to Edgewood RFP	3 3
24	continue review of Defendants' response to Edgewood RFP	3
25	review Defendants Responses to Calhoun Cty, Fort Bend continue review of Defendants' response to Edgewood RFP	0.25 3
26	send DH topics for Commissioner deposition continue review of Defendants' response to Edgewood RFP	0.25 3
27	review expert Clotfelter, Ladd, Vigdor writings on teacher quality and costs and student achievement review expert witness vitaes Jacob, Figlio confer w. expert Clotfelter and DH	3 0.5 0.25
28	confer w. expert Vigdor, memo to counsel about expert continue review of Defendants' response to Edgewood RFP	1 3
29	review letter from court re: schedule review Defendants' First RFP to Plaintiffs review email from DH re: experts Klein and Linn projected testimony, respond continue review of Defendants' response to Edgewood RFP	0.25 0.25 0.25 3
30	review expert Belfield's report on economic value of education in Texas, email to DH re: missing data continue review of Defendants' response to Edgewood RFP	0.75 3
July		
1	continue review of Defendants' response to Edgewood RFP	3
2	conference call w. counsel and expert Vigdor review revised expert Belfield report review letters from counsel to the court	1 0.25 0.25
3	confer w. DH continue review of Defendants' response to Edgewood RFP	0.3 3
4	review experts Klein, Linn re: testing, STAAR, TAKS, confer w. DH on questions continue review of Defendants' response to Edgewood RFP	0.3 3
5	review defendants Supplemental responses to Ft. Bend 1st RFP continue review of Defendants' response to Edgewood RFP	0.25 3
6	continue review of Defendants' response to Edgewood RFP	3
7	continue review of Defendants' response to Edgewood RFP	3
8	continue review of Defendants' response to Edgewood RFP	3
9	review Defendants combined responses to RFP continue review of Defendants' response to Edgewood RFP	0.3 3
10	continue review of Defendants' response to Edgewood RFP	3
11	continue review of Defendants' response to Edgewood RFP	3
12	continue review of Defendants' response to Edgewood RFP	3
13	continue review of Defendants' response to Edgewood RFP	3
14	confer w. expert DP continue review of Defendants' response to Edgewood RFP	0.5 3
15	review Defendants' RFP first responses and compare with Edgewood requests	2
16	send DH memo showing pages of Def. responses for each request review Calhoun County ISD Pl. First Set of Interrogatories to Def.	0.75 0.25
17	confer w. DH, interns re: responses to Edgewood RFPs review Def. 4th Suppl. Response to Ft. Bend 1st RFP	0.5 0.25
18	review latest draft of brief re: Plea to Jurisdiction from DH continue review of Defendants' response to Edgewood RFP	0.5
19	complete review of Cortez report, comments to DH review Defendants Supp. Responses to RFP's for Texas Taxpayer and Edgewood ISD	1 1

20	review Def. document on LEPs in preschool, send memo to DH	1
	confer w. counsel re: depositions, scheduling, other matters	0.3
	email to DH re: above conference	0.1
	confer w. DH	0.2
21	email to and from expert Izquierdo and co-counsel MPV and DH re: site visits	1
	review study on ELL weights, send to DH	1.25
22	continue review of Defendants' response to Edgewood RFP	3
23	confer w. expert DP	1
	confer w. DH	0.1
24	continue review of Defendants' response to Edgewood RFP	3
25	review Def. responses to Edgewood RFPs for RFPs for which there is no reply	1
	email to and from expert Izquierdo and co-counsel MPV and DH re: completing expert reports	0.75
26	review expert DP report	1.5
27	review First Amended PTJ-MTD as to Intervenor's Second Am. Plea in Intervention	0.25
	review Annotated Summary of Finances for Judge Dietz	0.75
	email to and from counsel and experts re: extension for filing expert reports	0.5
28	review expert report of Izquierdo, comments to MPV, confer w DH	2
29	continue review of Defendants' response to Edgewood RFP	3
30	review Defendants Initial Disclosures to Texas Taxpayers	0.25
	review letter from Defs re: Supplemental Response to Edgewood RFP	0.25
	continue review of Defendants' response to Edgewood RFP	3
31	review counsel letter to Judge Dietz re: experts; Defs supplemental responses to FERPA protected RFPs	0.5
	continue review of Defendants' response to Edgewood RFP	3
<b>August</b>		
1	review Ft. Bend, Calhoun, Coalition Pls. Responses to State's First RFPs	1
	continue review of Defendants' response to Edgewood RFP	2.5
2	review, comment to MPV, DH re: expert Izquierdo report	1
	continue review of Defendants' response to Edgewood RFP	2.75
3	continue review of Defendants' response to Edgewood RFP	3
4	continue review of Defendants' response to Edgewood RFP	3
5	continue review of Defendants' response to Edgewood RFP	3
6	continue review of Defendants' response to Edgewood RFP	3
7	continue review of Defendants' response to Edgewood RFP	3
8	continue review of Defendants' response to Edgewood RFP	3
9	continue review of Defendants' response to Edgewood RFP	3
10	review Ft. Bend Pls. Fourth Amended Petition, TEA Response to Calhoun Cty 1st Interrogatory	0.25
	continue review of Defendants' response to Edgewood RFP	3
11	review Edgewood response to Def. 1st RFP	0.25
12	continue review of Defendants' response to Edgewood RFP	3
	continue review of Defendants' response to Edgewood RFP	3
13	review Wallace deposition	1.25
	review Edgewood discovery log	0.5
	review Defs supp response to Edgewood RFPs, Ft. Bend 1st and 2nd RFPs	0.4
14	review Duncombe cost study, confer w. DH	1
	continue review of Defendants' response to Edgewood RFP	2.5
15	research Duncombe cost studies in other states	1
	review Defs discovery response to Edgewood re: additional requests needed	1
	review Izquierdo draft report, confer w. MPV, DH	1.5
16	email to DH re: bilingual funding information in Def. Int. response to Texas Taxpayers	0.5
	review draft of expert Vigdor report, comment to DH	1.5
	draft comment to Turner re: Vigdor draft	0.25

review depositions of Davis, Gaertner, Supt. Garza	3
17 draft further comments to DH and counsel re: Vigdor, Duncombe	0.75
review deposition of Supt. Witte	1.75
review expert Baker's report, email to and from DH	1
18 continue review of Defendants' response to Edgewood RFP	3
19 draft expert designation for Pompa, review/edit designation for Izquierdo	1
review Izquierdo school visit findings, confer w. MPV, DH	2
20 review deposition of Supt. Patek	1
review deposition of Supt. Pfeifer	1
review Edgewood expert reports and designations	2
21 draft email re: Defs answers to Calhoun Cty and Edgewood Interrogs.	1.5
21 review deposition of Knight 126	1.25
22 review Defendants Interrogatories and RFP to Edgewood	1
review TEA supp. Response to Ft. Bend 1st RPP No 5	0.1
23 continue review of Defendants' response to Edgewood RFP	3
24 review Ft. Bend Pls. Second Interrogs and Fourth RFP to Def.	0.25
review Murdock expert report	2.75
25 continue review of Defendants' response to Edgewood RFP	3
26 review Moak expert report	1.75
27 review deposition of Supt. Dupree	1
review deposition of Supt. Chambers	1.1
review expert deposition schedule	0.1
28 review deposition of Supt. French	0.75
review briefs of the parties on law of the case	1.5
29 review Lesley expert report	2
30 review deposition of Supt. Reedy	1
draft analysis of McAdams, Efficiency expert, send to DH	1
review Pierce and Colbert expert reports	2
31 draft analysis of Calhoun Cty expert Harris, send to DH	1.25
review Casey, Klein and Schanzenbach expert reports	1.5
<b>Sept</b>	
1 review deposition of Supt. Reedy	0.8
continue review of Defendants' response to Edgewood RFP	2.25
2 review TEA discovery response for references to Coultrass, Ayala	3
3 research TEA website for references to Coultrass, Ayala	2.5
4 review deposition of Supt. Sconzo	1.75
review draft of Edgewood response to Def. Interrog., edit comments to DH	1.25
review Edgewood districts summary logs	0.5
5 review deposition of Hanulek	1
review deposition of Supt. Gilcrease	1
6 review Harris raw data, draft comment to DH	1.25
draft comment to DH re: analysis of Odden report re: ELLs	0.5
research Odden reports on Washington State, Wyoming, national for ELL weights	2
7 review Def. Supp. Responses to Interveners, Edgewood, Calhoun ISD	0.25
8 continue review of Defendants' response to Edgewood RFP	3
9 research TEA documents authored by Coultrass or Ayala	2.5
10 continue research of TEA Coultrass or Ayala documents, comment to DH	1.5
review TEA Comprehensive Annual Report re: LEP data	1.75
11 review deposition schedule, draft analysis of Duncombe, Colbert reports and and prior writings re: ELLs and send to DH	2
12 review expert Cortez documents re: bilingual costs	1.5
research bilingual ed best practices from TEA responses to discovery	1.25
research data on SSI and LEPS and LEP preschool from TEA responses, summarize to DH	1.5
review TEA responses for 2010-2011 financial data, send information to DH	0.5

13	review deposition of Supt. Salazar	1.5
	confer w. expert DP	0.4
	prepare for Givens deposition	1.5
14	attend deposition of Anita Givens	3.7
	confer w. DH re: TELPAS data from TEA website, Givens deposition	0.5
15	continue review of Defendants' response to Edgewood RFP	3
16	review expert reports for Barnett	2.5
17	review deposition of Belfield	1.5
	review deposition of Supt. Cain	1.25
	review deposition of Supt. Ponce	2
18	review deposition of Supt. Burns	1.5
	review deposition of Supt. Kincannon	1
	begin review of Ayala report	1.5
	email to and from MPV re: prep of Pompa, Izquierdo	0.5
19	review deposition of Harris	1
	review deposition of Supt. Hanks	1.1
	email to and from MPV re: Gandara report, Izquierdo underlying notes, and Ayala report	1
	review order on Edgewood Plea to Jurisdiction	0.25
20	review deposition of Lesley	0.5
	continue review of documents to Ayala report	2
21	review deposition of Supt. Hoke	2
	review TEA responses to Edgewood RFP	0.25
22	review defendants' expert Podgursky reports	2.75
23	draft prep questions for expert witness Vigdor	1
	review Cortez report	2.75
24	review deposition of Colbert	1
	confer w. DH	0.3
	conference call Vigdor prep	0.5
	review witness Kallison data, review discovery responses from plaintiffs	0.75
25	review deposition of Supt. Cervantes	2.25
	review Odden reports and draft notes to LF	2.5
26	review deposition of Supt. Blincoe	1.25
	review deposition of Givens	1.5
	prepare for Odden deposition	1.5
	review Edgewood response to Def. discovery	0.5
27	review deposition of Barnett	1.25
27	Odden deposition	5.5
28	confer w. DH re: Izquierdo notes, further deposition	0.5
	confer w. MPV re: further Izquierdo deposition	0.25
	review Baker report	2.75
29	review supplemental Vigdor, draft notes to DH	1
	review expert reports for Duncombe, Parker	3.5
30	email to Amy Pederson re: Ayala data and Coultriss dep. Prep	0.5
	review expert report for Hill	2.5
Oct		
1	send list of data needed for Ayala deposition to DH	0.75
	review TELPAS data on TEA Pearson website	1.25
	confer w. MPV re: Izquierdo data	0.5
	review revised Vigdor report	0.25
2	review deposition of Miles	1.2
	send Duncombe research to Bono	0.25
	send DH analysis of Ayala report and data on long term ELLs	2
3	review deposition of Pompa	2
	review deposition of Supt. Waggoner	1

review deposition of Pierce	1
4 review deposition of Klein	1
review TEA supplemental responses to Edgewood, confer w. MPV re: ELL experts	0.75
continue Ayala data analysis	2
confer w. DH	0.4
5 review deposition of Vigdor	1.75
review deposition of Roska	1
research prior Ayala case testimony and send to DH	1
review Defendants letter re: missing Ayala data, confer w. MPV	0.5
6 research TEA preschool data and send to DH, review response	0.75
review cost of common core implementation research, send to DH and counsel	0.5
continue Ayala analysis	2.5
7 review defendants' expert Whitehurst report	2.75
continue Ayala data analysis	1.5
8 draft Edgewood FOFs on ELLs and TELPAS	2
review deposition of Lopez	1
review deposition of Supt. Youngblood	1
9 continue drafting FOFs on ELLs, send to MPV	1.5
review Edgewood response to charter school plaintiffs discovery	0.3
analyze Ayala back up data re: testing of former ELLs	1
review deposition of Supt. Ponce	2
confer w. DH	0.1
10 prepare additional Edgewood bilingual exhibit lists, send to DH	2.5
research and send DH prior Guthrie school finance work in NY	0.75
confer w. DH	1
11 review deposition of Podgursky	1.8
prepare additional exhibits, confer w. Izquierdo re: exhibit	1
12 prepare bilingual FOFs and exhibits	2.5
13 continue preparation of bilingual FOFs and exhibits	2
review defendants' expert Guthrie report	2.5
14 review deposition of Parker	1
review deposition of Scott	1.5
review exhibits from Cortez report, confer w. DH	1.75
review updated draft exhibit list, send comments, additional exhibits to DH	1.5
15 review deposition of Casey	1
review deposition of Odden	2
review deposition of Cortez	2.15
16 confer w. DH	0.5
draft bilingual FOFs, send to DH	2.75
17 review deposition of Kalison	1
draft to DH additional FOFs on bilingual statutory, regulatory requirements	2
confer w. MPV re: Izquierdo deposition	0.5
18 review and calculate ELL retention rate data	1
review Edgewood proposed FOF-COL draft, edit to DH	1.75
19 review Edgewood amended exhibit list, comment to DH	1
prepare Pompa direct testimony outline and send to MPV	1.5
20 review report on school funding by expert Baker	0.5
compile Coultrass deposition cites and send to DH	1
review deposition of Ayala	2.5
confer w. DH	0.75
21 confer w. expert DP	0.25
review Edgewood FOF draft, comment to Maribel Rivera	1
review deposition of Schroeder	1.5
22 review TTSFC Trial Brief	0.2
review depositions of Supts. Roy, Frost	2.75

23	review deposition of Baker	1.8
	review deposition of Moak	1
24	review deposition of Hill	1.25
	review deposition of Whitehurst	1.3
	send DH analysis of Ayala deposition	1
25	review deposition of Guthrie	1.8
29	review deposition of Izquierdo	1
	review deposition of Schanzenbach	2
30	review deposition of Supt. Bamberg	1.25
31	confer w. MPV re: factual basis for Pompa, Izquierdo testimony	1
<b>November</b>		
1	review deposition of defendants expert Coultriss	1.75
	review deposition of Day	1
	review deposition of Coleman	1
3	review MPV outline of experts direct testimony, comment	1
4	review exhibits to be admitted from Pompa, Izquierdo reports w. MPV	0.5
5	review outline of bilingual experts testimony w. MPV, edit	1
6	review expert Barnett's powerpoint testimony	0.5
	review exhibits to be admitted on ELL retention and dropouts, send to MPV	0.75
7	review Defendants 2nd supplemental response to Edgewood plaintiffs	0.25
8	review Pompa and Izquierdo powerpoints, edit and comment, send to MPV	1.25
9	email co-counsel re: Carstarphen testimony and Edgewood exhibits objected to	0.25
11	confer w. expert DP	0.25
	review expert DP slides, confer w. MPV about slides 11-13, 21, missing testimony	0.8
	review Izquierdo powerpoint, final Pompa powerpoint, confer w. MPV	1
12	confer w. expert DP	0.2
13	confer w. DH	0.5
18	review supplements to Duncombe, Odden	1
19	review Edgewood supplemental deposition designations	1
	confer w. DH	0.2
20	confer w. DH	0.6
23	review supplemental Edgewood exhibits	1
24	review deposition of state expert Given	1.5
25	review deposition of state expert Rocka	1.25
27	review trial transcripts vol. 4, 5, 7	3
28	review trial transcript vol. 8	1.25
29	review trial transcript vol. 6	1.25
30	confer w. DH	0.6
	review trial transcript vol. 5	1
<b>December</b>		
1	review deposition of MacAdams	1
	review expert report for Bast	1.5
3	review Edgewood Second Amended Petition	0.1
4	research expert Whitehurst reference to charter schools, email DH	1
	review Defendants Supplemental response to Edgewood plaintiffs	0.2
5	review Defendants' expert Whitehurst powerpoint	0.3
6	review expert report, citations for expert Moe	3.75
10	review trial transcript vol. 10	1.5
	review admitted exhibits list	0.1
12	review deposition of Wood	1
	review deposition of Venable	2
13	review transcript vol. 11	1.25
	review updated expert Podgursky powerpoint	0.5
14	review expert report for Trotter	0.75
18	review trial transcript vol. 12	1.5

19	review deposition of Moe	2
	review deposition of Abbott	1
20	review deposition of Wolters	1
	review trial transcript vol. 13	1.5
21	review Edgewood First Amended Exhibit List	0.1
	confer w. DH re: ELL FOFs on bilingual expenditures, review FOFs, underlying data	0.75
31	review deposition of Gallegos	1.75
	review deposition of Dibella	0.5
2013		
January		
3	review deposition of Partridge	0.8
	review trial transcript vol. 14	1.25
7	review trial transcript vol. 15	1.25
8	review trial transcript vol. 16	1.25
10	review DH outline for cross of Coultriss, compare w. Coultriss deposition, draft additional questions for DH based on deposition cites	1.5
13	review Ayala trial presentation docs, research "years in US school" question for DH cross, email DH	2.5
14	review DH outline, edit, analyze Ayala attachments G, I, J, calculate former ELLs not tested, send data to DH for cross	2
16	review deposition of Flores	1
	review deposition of Flemister	1
	review deposition of Pierce	1
23	review trial transcript vol. 17	1.25
	review trial transcript vol. 18	1.25
24	review deposition of Strohmeyer	1
27	review draft of Edgewood FOF/COL	0.75
29	review trial transcript vol. 19	1.25
30	review trial transcript vol. 20	1.25
31	review deposition of Sage	0.75
	review Def new exhibits	0.25
February		
1	confer w. DH re: admission of Gandara exhibit by Defendants	0.5
	review list of Edgewood exhibits previously objected to by Defendants	0.1
2	review Edgewood Plea to Jurisdiction and Motion to Dismiss	0.25
3	review draft of Edgewood brief on efficiency	0.4
5	review trial transcript vol. 21	0.5
5	review court's remarks and ruling	0.3
13	review trial transcript vol. 22	1
14	review draft omnibus findings	0.4
15	confer w. DH re: draft omnibus findings and Edgewood findings	0.5
18	begin to draft bilingual FOFs	2
19	revise FOFs and begin review of rough transcripts for December, January	3.5
20	review rough transcripts and edit and revise FOFs	3.5
21	edit and revise FOFs	2
22	review MP draft FOFs, continue revising FOFs	2.5
23	finish draft bilingual FOFs and sent to MB, DH	2.5

**629.95**

Exhibit 2  
 Time Sheet for Miguel A. Pérez Vargas  
 Texas Taxpayer / Edgewood ISD v. Michael Williams

2011		
December		
1	Review MALDEF school finance info sheet, spreadsheet	1
11	Review Calhoun County ISD petition	0.5
	Review Edgewood 3rd Draft	1
12	Review Edgewood Final Draft	0.5
2012		
January		
24	Review Findings of Fact and conclusions of Law WOC case	1
	Review Dr. Milk and Delia Pompa reports for the WOC case	1
February		
13	Review email DH re: Scheduling Order all parties	0.5
22	Review RLR email re: Overview Edgewood V and comments	0.5
24	Review Efficiency Intervenors petition	1
27	Review Experts reports from WOC case	2
28	Review Cortez, Pompa and Milk depositions from WOC case	2.5
March		
6	Review RLR email re: Dr. Izquierdo website; review website and credentials	0.5
8	Review RLR notes on Conf call w/DH re: experts	0.5
27	Review Edgewood First Ammended Petition	0.5
30	review sample pleas to jurisdiction, discuss w. RLR	1
April		
4	Review proposed scheduling order all parties	0.25
5	Review proposed R.11	0.25
	Review Calhoun Conty ISD First request for Production	0.25
6	Review DH and RLR memo on Adequacy claims fo Experts conference	0.5
	Review RLR notes on Conf call re:Experts interview Dr. Izquierdo	0.5
10	Review Fort Bend ISD First Request for Production	0.25
	Review Defendants proposed scheduling Order	0.25
11	Review letter re: consolidation issue	0.25
12	Review Proposed scheduling order re: dispositive motions	0.25
	Review RLR memo: Expert Areas	0.25
17	Review DH memo and sample on Plea to the Jurisdiction	1
24	Review Edgewood request for production and admissions	1
	Research and draft Plea to the Jurisdiction	4
27	Confer w. co-counsel RLR re: Plea to the Jurisdiction	0.5
29	Review memo and email from RLR re: experts reports and testimony	0.5
May		
1	Review Fort Bend Plaintiffs' Second Request for Production	0.25
2	Review of Fir. Amended Plea in Intervention	1
7	Review TEA STAAR website	1
	Review Defendants responses to Calhoun first discovery	0.25
8	Review second amended Plea in Intervention	0.5
15	Review Expert Retainers Re; Pompa/Izquierdo	0.25
	Review Experts info from RLR	0.25
16	review Defendants' Responses to Fort Bend ISD Pl. 1st RFP	1
21	conference call w. Stanford University educational experts	0.5
23	Confer w/RLR re: responses from AG to Edgewood	0.5
24	Review : Notice of Supoena, Deposition Mark Hurley	0.25
30	Review Final response from Defendants to Edgewood	2
31	Review Pioneer Institute Common Core Cost Analysis	1

June

11 Review Fort Bend Second Amended Petition	0.5
Review emails from RLR re; STAAR end of course results	0.25
14 Review emails from DH, DR Izquierdo re: Site Visits	0.25
21 Review Draft to Plea to the Jurisdiction	0.5
26 Review Petition from Charter Schools Students	0.5
Review letter from DH re: Letter to clients	0.25
29 Review Judge Dietz letter	0.25

JULY

7 Conf Call Dr. Izquierdo re: Report and site visits	0.5
16 Review Edgewood Request for Productions responses from defendants	
RLR Memo re: Responses and documents	1
17 Continue reviewing Defendants responses/preparing info to experts	3
19 Review Supplemental responses from Defendants	2
20 Review emails RLR, Dr. Izquierdo site visits/ report	0.25
25 Review Pompa report	1
26 Review RLR notes on Pompa report	0.5
27 Review Izquierdo report	1.5
28 Review notes from RLR re: Izquierdo Report	1
Conf Call Dr. Izquierdo re: Report and site visits	2
30 Review email from Dr. Izquierdo re: site visits/report	0.25
31 Review letter to Judge Dietz re: experts	0.25
Review Rule 11 Scheduling Order	0.25

August

10 Review, comment to RLR, DH re: expert Izquierdo report	1
16 Review Izquierdo draft report , confer w. RLR, DH	1.5
19 Draft expert designation for Izquierdo, review designation for Pompa	1
20 Review Izquierdo school visit findings, confer w. Izquierdo, RLR, DH	3
21 review Edgewood expert reports and designation	2
22 Review Defendants Interrogatories and Requests for Production	1
28 Review Brief on Law of the case by Coalition Plaintiffs, Fort Bend, Defendants	1.5
30 Emails to coordinate depositions Pompa/Izquierdo	0.5

Sept

1 Review deposition schedule	0.25
2 Review Laura Ayala's powerpoints re: Telpas, Ell Assesment. TitleIII	2
3 Review Edgewood preliminary answers to Defendants interrogatories	1
Review emails from RLR and DH re: Edgewood responses	0.25
5 review Edgewood districts summary logs	0.5
6 Drafting MPV Pro Hac Vice Motions and sending to MALDEF	1
9 Review RLR comparison of FOFs	0.25
10 Review RLR notes on Laura Ayala's Powerpoints	1
Review of 2010 Comprehensive Annual Report on Texas Public Schools	2
12 Review RLR notes on Best Practices for Ells	0.5
16 Travel from Boston to Austin and San antonio	10
17 Meeting and Preparation w DR. Izquierdo, DH	3
Review Dr. Izquierdo underlying data and report references	4
Conference call w/RLR	0.5
Review Texas CPRules Re: discovery/depositions	0.5
18 Defend Dr. Izquierdo Deposition	4.5
Review Laura Ayala's Expert Report	2
19 Review RLR notes on Laura Ayala's Report	1
Review Exhibits from Izquierdo's deposition	2
Confer w/DH re: depositions/Pompa and Izquierdo	1
20 Review Ayalas Exhibits	2
Meeting and Preparation Delia Pompa	2

Review Pompa underlying data and report references	3
Confer w/ DH re: Pompa deposition	0.5
21 Defend Pompa's deposition	3.5
Review Ayala's Exhibits	2
Review letter from judge Dietz re: FOFs	0.25
26 Review RLR Odden notes	0.5
27 Review of Edgewoods Responses to Efficiency intervenors	0.5
Review of Edgewood Responses to Defendants	0.5
Review of Dr. Cortez Report	2
Review email from AG re: Continuation of DR. Izquierdo Deposition	0.25
28 Confer w. RLR re: further Izquierdo deposition	0.25

Oct

1 Review email RLR re: Ayala data and Coultrass dep. Prep	0.5
Review transcript of DR. Izquierdo's deposition	2
Email DR. Izquierdo Re; Continuation of deposition	0.25
2 review TELPAS data on TEA Pearson website	1.25
confer w. RLR re: Izquierdo data	0.5
Review RLR notes on Izquierdo Deposition	0.25
Conference Call w/DR. Izquierdo	0.25
Review RLR notes on Ayala's Report	0.5
3 Review Delia Pompa deposition transcript and exhibits	2
4 Review RLR email notes on Ayala's numbers	0.5
5 Review TEA supplemental responses to Edgewood, confer w. RLR re: ELL experts	0.75
6 Conf w/ RLR re: Ayala numbers/FOFs	0.5
7 Review Firs draft of FOFs by RLR	0.5
email DR Izquierdo re; Cost of credit course Bil ed	0.25
8 Review 2nd Draft of FOFs by RLR	0.5
Review Pompa and Izquierdo Reports and Exhibits to draft FOFs	2
Review Calhoun Responses to Charter group Interrogatories	0.5
9 Review Edgewood Additional exhibits By RLR	0.5
10 Review Ponce Deposition	2
Review Cervantes deposition	2
Draft and send RLR Experts Pompa/Izquierdo FOFs	3
11 Emails to Dr. Izquierdo re: Report Exhibit	0.25
13 Review 16 preliminary Exhibits from DH re: Izquierdo Exhibits	1
Review Delia Pompa exhibits	1
Receipt and review Master Deposition Exhibit List	0.5
Review Confidential Witness Line-up. Trial Calendar	0.5
16 Travel Orlando- Austin/Austin- Boston	6
Meeting Dr. Izquierdo re: Preparation for deposition	2
17 Defend Dr. Izquierdo's Deposition	1.5
Review Deposition Transcript Coultrass	1
Review Revised witness line-up	0.25
Review Billing on FOFs by RLR	0.5
18 Review Full draft FOFs by RLR	1
19 Review Supplemental report DR. Cortez and data	1
Confer w/RLR re: Izquierdo deposition	0.5
Review State's Master Exhibits List	0.5
20 Prepare Pompa direct Testimony draft send to RLR and check reviews	2
21 Review latest Edgewood's Proposed FOFs from Maribel Hernandez	1
22 Review TTSFC Trial Brief	0.25
23 Review Transcript of Ayala's Deposition	2
24 Review Limon PP	0.25
29 Check references Delia Pompa report	3
30 Review Dr. Izquierdo Deposition 10-17	1

	Review Final Preliminary FOFs	0.5
November		
	1 Review Stanford study 2006; check RLR notes	1
	Confer w/RLR factual basis of testimony Izquierdo/Pompa	1
	Review Pompa and Izquierdo data/ review outlines direct testimonies	3
	3 Finish direct examination outlines send to RLR	3
	4 Review Master Exhibit List re: outstanding objections	1
	Review exhibits for Pompa/Izquierdo	1
	Ammend outline direct examination	0.5
	6 Review Comments from RLR re: outlines; correct outlines; send outlines Pompa/Izquierdo; confer w/RLR	1.5
	7 Review expert testimony Exhibits Re: Retention and drop-outs	1
	8 Review first draft Pompa Powerpoint	0.5
	9 Review latest exhibits on retention and drop outs from RLR	0.5
	11 Travel Boston-Austin TX	6
	Confer DH,MB re: Review Outline and Exhibits for Expert Testimony	2
	Review Pompa Powerpoints; confer w/RLR re: Powerpoints/Exhibits	3
	Review Presentation on STAAR	0.5
	12 Preparation of Pompa for court testimony; review of exhibits and powerpoint	4
	Preparation of Izquierdo for court testimony; review of exhibits and Powerpoint	4
	13 Court Hearing Pompa/Izquierdo	6
	26 Review Dr. Cortez Supplemental Report	0.5
December		
	3 Review Edgewood Second Amended Petition	0.25
	10 Review Admitted Exhibits as 12/7/12	
	21 Review Edgewood First Amended Exhibit List	0.25
2013		
January		
	10 Review Hearing transcript 11-13-12 (Vol. 14)	2
	24 Review First Amm First Supp Depositions Designation	0.25
	28 Review Proposed Third AM FOF (redlined)	2
February		
	1 Review Gandara's Ex. Email, objections	0.5
	3 Review Edgwood Trial Brief on Efficiency	0.25
	11 Review RLR First Draft Edgewood Hours, compare w/MPV	1.5
	14 Review RLR first draft fee affidavit	0.5
	Review FOF First draft Omnibus Findings from DH	2
	Review DH attorneys fees aff	0.25
	15 Review Edgwood Second Amended Exhibit List	0.25
	Review latest FOF draft from RLR	2
	17 Review witness chart	0.25
	19 Finish first draft hours/fees	1.5
	Review Exhibit Master List , expert reports , Depositions and Trial Transcript re: FOF drafts	3
	Receive and review Trial transcripts for Bil references (12-3-12 to 1-24-13)	2
	22 Review FOFs draft from RLR, check references from Pompa/Izquierdo	3
	Conf w/ RLR re: FOFs references/Exhibit list	1
	23 Continue working with FOFs references, check AEIS reports for Plaintiffs w Master Exhibit List, send draft and Confer w RLR: Exhbits references	3.5
	25 Finish reviewing Bil FOFs references w/Trial transcripts/depositions/expert reports Pompa/Izquierdo and underlying data, send draft to RLR	3
	26 Draft attorneys fee aff and finish atts fees exhibit	2

**TOTAL**      **235.75**

Total Costs for Travel to Depositions and Trial:

\$4,408

16-Sep	\$1,708
16-Oct	\$1,065
11-Nov	\$1,635

Unofficial copy Travis Co. District Clerk Velda L. Price