

# SLH Schulman, Lopez & Hoffer LLP

Filed  
13 March 6 P2:37  
Amalia Rodriguez-Mendoza  
District Clerk  
Travis District  
D-1-GN-11-003130

517 SOLEDAD STREET  
SAN ANTONIO, TEXAS 78205-1508  
TELEPHONE: (210) 538-5385 FAX: (210) 538-5384  
WWW.SLH-LAW.COM & WWW.K12LAW.COM

CYNTHIA A. PACHECO  
PARALEGAL  
E-MAIL: CPACHECO@SLH-LAW.COM

*ATTORNEYS AND COUNSELORS FOR TEXAS PUBLIC SCHOOLS AND LOCAL GOVERNMENT*

March 6, 2013

Clerk of the Court  
Travis County District Courts  
ATTN: Civil Filing Division  
P. O. Box 679003  
Austin, Texas 78767-9003

**RE: Cause No. D-1-GN-11-003130**  
**Texas Taxpayer & Student Fairness Coalition, et al. v.**  
**Michael Williams, et al.**  
**Consolidated Case: Mario Flores, et al v.**  
**Michael Williams, et al.**

Dear Sir or Madam:

Forwarded for filing is the second of four parts to Exhibit M (pages 58 through 115) to the **Notice of Filing and Affidavit of Robert A. Schulman** filed yesterday, along with attached Exhibits A through L.

Please include the attachment with the above-referenced Notice and Affidavit.

Thank you.

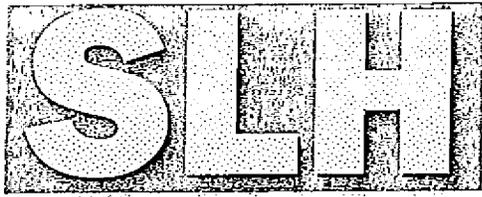
Cordially,

**SCHULMAN, LOPEZ & HOFFER, LLP**



Cynthia A. Pacheco  
Paralegal

Encls.

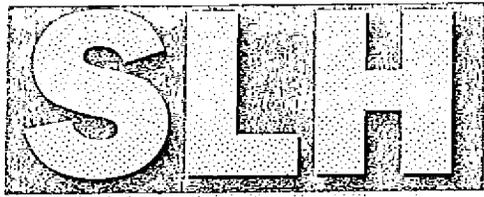


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	Scott deposition and FAST report issues and sharing of costs of obtaining necessary deposition transcripts and exhibits.	
9/23/12	(RS) Communiqué exchanges with Paralegal regarding availability of deposition transcripts not in Dropbox folder but on server; advise Paralegal of deposition sharing arrangement with TREEE Intervenors. (No charge)	0.1
9/23/12	(RS) Continue review of audio file of David Hinojosa testimony for FAST report references; review transcript of excerpt, Mark Hurley's deposition for review concerning FAST report references; direct staff regarding same.	0.8
9/24/12	(JH) Review revisions to discovery responses.	0.3
9/24/12	(BB) Prepare communiqué to Bob Schulman, Joe Hoffer and Allen Keller concerning finalization and transmission of discovery responses; review draft responses to request for disclosure; communiqué exchange with Mr. Keller concerning same; confer with Mr. Schulman and Mr. Keller regarding final discovery responses to State, Fairness Coalition, and Calhoun County Plaintiffs; confer with Mr. Schulman concerning upcoming depositions, deadlines, amendment of pleading, preparation of proposed findings of fact and conclusions of law, with trial exhibits and witness lists.	4.5
9/24/12	(AK) Finalize all discovery responses, incorporate Bob Schulman's revisions; finalize disclosures; investigate potential field witnesses.	7.7
9/24/12	(RS) Telephone conference with Dr. Anthony Rolle regarding PEIMS data missing from data banks as impacting report; prepare advisory to TCSA staff and litigation staff members regarding same.	0.4
9/24/12	(RS) Continue preparation of additions and revisions to responses discovery requests to Defendants and select Plaintiff ISDs; consider parent/plaintiff responses in doing same; revise Responses and Objections to Defendants' Discovery requests; forward same to litigation staff; communiqué exchange with Allen Keller regarding revisions made, research concerning associational standing issues and submission of responses to TCSA for review and recommendations; receive from TCSA requested identification of outlier funding disparities between charter schools and school districts as may be referred to in	1.4

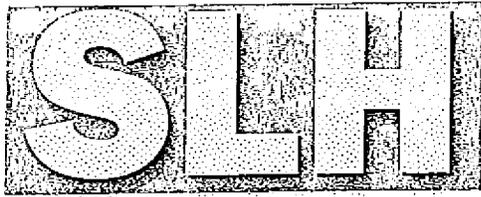


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

9/24/12	discovery responses; direct staff regarding same. (RS) Receive and review communiqué exchanges between Allen Keller and Mark DiBella, potential field expert witness; prepare communiqué to Mr. Keller and Joe Hoffer regarding same; prepare communiqué to Mr. DiBella requesting "bullet list" of his ideas/input relating to potential testimony; conduct telephone conference with Mr. DiBella; receive communiqué from Mr. DiBella memorializing discussion.	0.8
9/24/12	(RS) Telephone conference with Toni Hunter requesting extension of deadline to respond to discovery; prepare directive to Allen Keller regarding review of record and claims in consideration of same; receive and review advisory response form Mr. Keller; follow-up telephone conference to Ms. Hunter granting extension.	0.3
9/24/12	(RS) Receive and review most recent draft responses and objections to discovery; prepare additional revisions to Objections and Responses and forward same to Allen Keller for completion and service.	1
9/24/12	(RS) Receive and review notification from Stacy Rosen concerning availability of ID badges at court and related issues. (No charge)	0.1
9/24/12	(RS) Multiple communiqué exchanges with Joe Hoffer regarding identification of potential field experts/witnesses.	0.2
9/24/12	(RS) Prepare communiqué to David Dunn regarding high cost to obtain deposition transcripts and attempts to secure transcripts from counsel. (No charge)	0.1
9/24/12	(RS) Receive and review final of Responses and Objections to Discovery propounded by TTSFC Plaintiffs; prepare edits and approve same; prepare directive to Allen Keller regarding same.	0.4
9/24/12	(RS) Multiple communiqué exchanges with Denise Pierce regarding notary verifications required on discovery responses; direct staff regarding service of responses on parties.	0.7
9/24/12	(RS) Review expert Allan Odden CV and prepare communiqué to Betsy Bender forwarding same for review; prepare "to do" list to litigation staff; prepare internal memorandum concerning equal protection language contained in Original Petition; prepare directive to Paralegal to include transcript of Plea to the Jurisdiction proceeding in network folders and mini-presentation	0.9

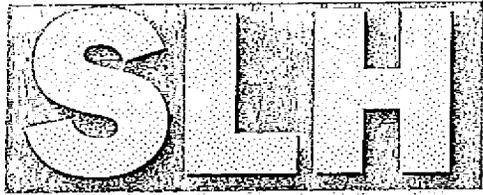


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	transcript within same.	
9/24/12	(RS) Confer with Betsy Bender regarding organization and assignment of tasks in preparation for trial; prepare internal memorandum outlining process for same, including document numbering following revision/review of drafts, forwarding of copies of all drafts to Paralegal, and assignment of remaining tasks to complete (witness preparation, calendar deadlines, amendment of pleadings, disclosures, etc.).	1.6
9/24/12	(RS) Communiqué exchange with Denise Pierce regarding parking spaces in TCSA's garage for use during trial. (No charge)	0.1
9/24/12	(RS) Receive and review Fort Bend Plaintiffs' Objections and Answers to Intervenors' Interrogatories, Objections and Responses to Intervenors' Request for Production and Index of documents in response; prepare communiqué to litigation staff forwarding same for review.	0.3
9/24/12	(RS) Receive and review, from Shelley Dahlberg, Master Dataset Excel file containing State financial expert, Lisa Dawn-Fisher's full version of information from which she compiled her report statistics; prepare communiqué to Wood and Rolle, Denise Pierce and Toni Templeton for review with regard to charter/district comparisons.	1.1
9/25/12	(BB) Review communiqués from Bob Schulman and Toni Templeton concerning trial strategy; review Lisa Dawn-Fisher report; review communiqué from Allen Keller concerning same; review Comptroller's amended discovery responses; review upcoming trial deadlines; research amendment of TCSA petition.	1.8
9/25/12	(AK) Review scheduling orders, Rule 11 agreements, and TRCP; create deadlines for remaining tasks.	1.5
9/25/12	(RS) Receive and review notice from Lacy Lawrence regarding exhibit numbering range for upcoming depositions (Day, Coleman and Frost); direct staff concerning same. (No charge)	0.1
9/25/12	(RS) Receive and review communiqué from Shelley Dahlberg's Legal Assistant with Lisa Dawn-Fisher's report, second Master Dataset Excel file and resume with dates for scheduling her deposition; forward same to Toni Templeton and Dr. Anthony Rolle for review.	0.2



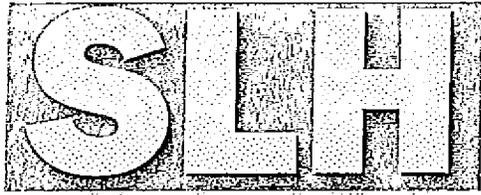
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

9/25/12	(RS) Prepare communiqué to Dr. Anthony Rolle requesting his review of discovery requests and inquiring as to whether necessity to conduct same will affect or delay his and Dr. Craig Wood's report; receive response from Dr. Rolle.	0.2
9/25/12	(RS) Direct Paralegal to provide current deposition schedule to TCSA administrators; prepare request to Denise Pierce and Toni Templeton for identification of depositions for which Ms. Templeton will review CVs and reports and related matters.	0.2
9/26/12	(RS) Prepare communiqué to Joe Hoffer forwarding link to Dr. Craig Wood publication (Improving Adequacy Concepts in Education Finance) for review with summary of conclusion outlined in same and potential for use at same at Dr. Wood's deposition; prepare follow-up communiqué to Mr. Hoffer concerning same.	0.4
9/26/12	(RS) Receive and review communiqué from Paralegal regarding non-availability of deposition transcript, to TCSA staff and litigation staff, with current deposition schedule. (No charge)	0.1
9/26/12	(RS) Receive and review communiqué from Paralegal to counsel of record and attached correspondence concerning dates of availability for deposition of Charter Plaintiffs' experts. (No charge)	0.1
9/26/12	(RS) Receive and review request from Paralegal regarding follow-up with Shelley Dahlberg concerning scheduling of depositions of state witnesses; direct her to submit follow-up written request to Ms. Dahlberg.	0.2
9/26/12	(RS) Receive and review revised report prepared by Dr. Albert Cortez, Edgewood ISD Plaintiffs' expert; forward same to Allen Keller and Betsy Bender for further review.	0.5
9/26/12	(RS) Receive and review Edgewood ISD Plaintiffs' Objections and Responses to Defendants' discovery requests; direct Allen Keller for review of same and possible supplementation of Charter Plaintiffs' discovery responses.	0.2
9/26/12	(RS) Receive and review Edgewood ISD Plaintiffs' Responses to Intervenor's Interrogatories; receive and review communiqué from Lacy Lawrence with current list of exhibit numbers for upcoming depositions (Cortez, Odden, Schroeder and Ray) (No charge).	0.2
9/27/12	(BB) Review and reply to communiqué from Allen Keller	1.7

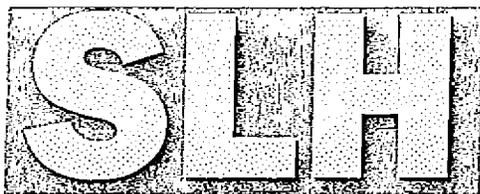


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	concerning Edgewood ISD discovery responses; prepare draft of First Amended Original Petition; communiqué exchange with Bob Schulman, Joe Hoffer and Mr. Keller concerning same.	
9/27/12	(AK) Review EISD's discovery responses and objections; prepare draft summary for Bob Schulman and Betsy Hall Bender.	0.9
9/27/12	(RS) Receive and review summary of Edgewood Plaintiffs' discovery responses and objections drafted by Allen Keller; receive and review internal memorandum prepared by Mr. Keller regarding review of Edgewood ISD Plaintiffs' discovery responses and objections and potential for incorporation of same within supplemental Charter Plaintiffs' discovery responses; direct Mr. Keller in further review of same.	0.6
9/27/12	(RS) Receive and review communiqué from Dr. Anthony Rolle confirming availability for teleconference today. (No charge)	0.1
9/27/12	(RS) Receive and review communiqué from Denise Pierce with attached critique prepared by Toni Templeton concerning review of defense experts' reports; review Ms. Templeton's assessment; prepare response to Ms. Pierce; forward document to litigation staff for review.	0.3
9/27/12	(RS) Direct Paralegal to include Toni Templeton's critique with related reports in network file for access in preparation for expert depositions. (No charge)	0.1
9/27/12	(RS) Receive communiqué from Betsy Bender with revised draft Amended Petition attached; begin review of Petition and prepare revisions and additions to same.	0.8
9/28/12	(RM) Review communiqué from Joe Hoffer regarding proposed TEA staff for depositions; prepare response to Mr. Hoffer regarding same.	0.5
9/28/12	(RS) Prepare directive to Allen Keller for preparation of list of upcoming deposition experts identified in Toni Templeton's expert report critique; receive and review response from Mr. Keller with dates; prepare communiqué to Mr. Keller, Joe Hoffer and Betsy Bender with list of dates for which attendance is recommended; prepare follow-up request to litigation staff requesting preparation of questions for such depositions; prepare request to Mr. Keller to include Moak deposition date on same; receive and review response from Mr. Keller advising deposition is scheduled on 10/05/12.	0.7



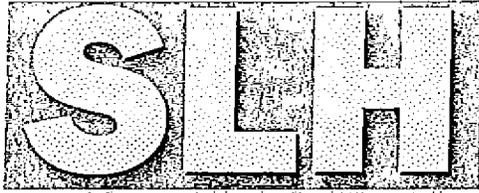
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

9/28/12	(RS) Receive and review communiqué from Paralegal advising all depositions are current on calendar. (No charge)	0.1
9/28/12	(RS) Receive and review communiqué from Toni Hunter advising she no longer requires extension of discovery response deadline for TTSCF Plaintiffs. (No charge)	0.1
9/28/12	(RS) Receive and review communiqué from Denise Pierce with contact information for potential field expert, [REDACTED] [REDACTED], for consideration; prepare communiqué to Joe Hoffer with Excel file listing districts with largest funding disparities attached and information on [REDACTED]. [REDACTED] for review; direct staff regarding same.	0.3
9/28/12	(RS) Status conference with TCSA administrators and experts Wood and Rolle.	1.1
9/28/12	(RS) Draft detailed summary/memorandum of teleconference with TCSA administrators and experts for submission to litigation staff.	0.2
9/28/12	(RS) Receive and review communiqué from Toni Templeton with Picus Wyoming study referenced in Defendants' experts' reports; review same.	0.4
9/28/12	(RS) Receive and review communiqué from Linda Halpern, AG's office, with supplemented report of Dr. Michael Podgursky, same includes new section on TAKS and Campus Spending Per Student which includes FAST results for 2010-2011; receive follow-up communiqué from Ms. Halpern advising Dr. Podgursky's report is contained in FERPA folder on FTP site.	0.2
9/28/12	(RS) Receive and review communiqué from Shelley Dahlberg to all counsel regarding depositions requested by Charter Plaintiffs of defense witnesses and Ms. Dahlberg's recommendations identifying parties to depose in lieu of those requested; receive and review Joe Hoffer's request to Ramon Medina to review list provided by Ms. Dahlberg and confirm information provided therein; receive and review response from Mr. Medina concerning same with summary of information known to each listed witness; confer with Mr. Medina regarding same.	0.8
9/28/12	(RS) Receive and review communiqué from Mary Sisler, Legal Assistant, AG's office, with Defendants' First Supplemental Responses to Intervenors' Requests for Production; review same.	0.2

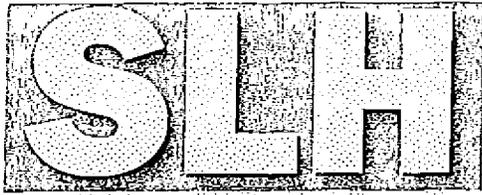


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	knowledgeable about charter school operations, legal requirements and state funding; prepare response to Mr. Schulman concerning same.	
9/29/12	(RS) Review calendar regarding upcoming depositions (No charge); conduct cursory review of bios and reports for experts to be deposed; prepare communiqué to Dr. Craig Wood concerning Podgursky deposition; draft questions for Podgursky's deposition.	2.1
9/29/12	(RS) Prepare request to Ramon Medina for identification of TEA management and staff knowledgeable about charter school operations, legal requirements and state funding; receive and review response from Mr. Medina responding to request; direct staff regarding same.	0.4
9/30/12	(RS) Prepare directive to office staff regarding current goals relating to upcoming depositions to be taken of defense witnesses; receive response from Ramon Medina with additional information regarding TEA staff identified in his prior communiqué for deposition.	0.3
9/30/12	(RS) Read reports of defense experts Podgursky, Duncombe and Moak.	1.6
9/30/12	(RS) Receive and review communiqué from Lacy Lawrence with exhibit numbering information for Podgursky deposition scheduled on 10/01/12. (No charge)	0.1
9/30/12	(RS) Receive and review further communiqué from Ramon Medina with identification of TEA employees who are knowledgeable about policy decision making due to their involvement with same.	0.1
10/1/12	(MZ) Review expert report of Dr. Bruce Baker for conclusions regarding charter school findings and general diffusion of knowledge as compared to that of school districts.	2.2
10/1/12	(JH) Review and revise Amended Petition.	0.8
10/1/12	(RM) Confer with Bob Schulman regarding assistance during preparation for court case. (No charge)	0.2
10/1/12	(RM) Confer with Bob Schulman regarding deposition of TEA management and staff and probative value of deponents. (No charge)	0.5

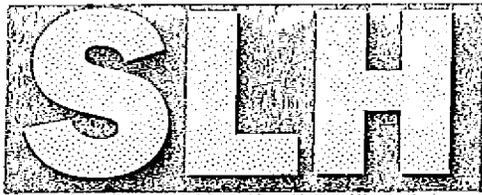


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

10/1/12	(RS) Confer with Ramon Medina regarding deposition of TEA management and staff.	0.5
10/1/12	(RS) Review report and draft inquiries for Dr. Michael Podgursky deposition.	0.8
10/1/12	(RS) Prepare correspondence to Shelley Dahlberg in response to her recommendations to Paralegal for scheduling depositions of defense witnesses; forward same to Paralegal for submission to Ms. Dahlberg.	0.3
10/1/12	(RS) Prepare communiqué to Dr. Craig Wood forwarding supplemented report of Dr. Michael Podursky for review; prepare communiqué to Betsy Bender concerning same, and upcoming Dr. Bruce Baker deposition; receive and review communiqué from Chris Diamond regarding intention to attend Podursky deposition; prepare response to Mr. Diamond concerning same. (No charge)	0.2
10/1/12	(RS) Confer with litigation staff regarding preparation for Baker and Parker depositions; telephone conference with Betsy Bender concerning same.	0.2
10/1/12	(BHB) Telephone conference with Bob Schulman regarding Baker and Parker depositions. (No charge)	0.1
10/1/12	(RS) Receive and review quorum report e-mail from Tracy Young, dated 09/25/12. (No charge)	0.1
10/1/12	(RS) Receive and review communiqué from Holly McIntush with attached Moak supplemental reports, Casey amended report and Attachment A to Moak-Casey contract; direct staff regarding same.	0.2
10/1/12	(RS) Receive and review communiqué from David Hinojosa to Shelley Dahlberg requesting production of documentation/data not produced in support of report prepared by defense expert Ayala; forward same to Betsy Bender for review. (No charge)	0.1
10/1/12	(RS) Prepare communiqué to Betsy Bender regarding upcoming deposition of Allen Parker and brief background concerning deponent; receive response from Ms. Bender regarding Parker deposition. (No charge)	0.2
10/1/12	(RS) Review and revise First Amended Petition to be filed on behalf of Charter Plaintiffs; prepare communiqué to Joe Hoffer forwarding same for his review.	1
10/1/12	(RS) Receive and review e-mail exchanges between TCSA	0.3

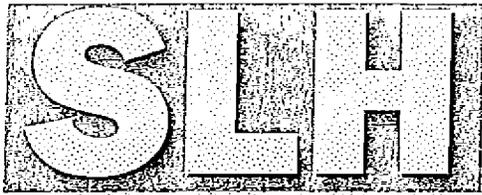


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	administrators regarding upcoming deposition of Bruce Baker and report's comments concerning charters; prepare communiqué to Denise Pierce and Toni Templeton advising of attendance at Baker deposition, with request to Ms. Templeton to review Baker data; receive and review response from Ms. Templeton regarding same.	
10/1/12	(RS) Prepare communiqué to Toni Templeton regarding reference to Simpson's Paradox in Robert Scott deposition and comparison of system-wide average rubric applied by Dr. Lisa Dawn-Fisher to charter specific data.	0.4
10/1/12	(RS) Travel to Austin for Podgursky deposition.	1.5
10/1/12	(RS) Attend Podgursky deposition.	8
10/1/12	(RS) Return travel to San Antonio following deposition. (No charge)	1.5
10/2/12	(MZ) Continue review of expert report by Dr. Bruce Baker for conclusions regarding charter school finding and general diffusion of knowledge compared to school districts.	2.5
10/2/12	(JH) Travel to TCSA Town Hall concerning litigation.	1.5
10/2/12	(JH) Attend Town Hall meeting regarding litigation issues with participants.	1
10/2/12	(JH) Return travel to San Antonio. (No Charge)	1.5
10/2/12	(RS) Forward current draft of Amended Petition to Joe Hoffer and Paralegal for review and edits with directives regarding same. (No charge)	0.1
10/2/12	(RS) Prepare internal memorandum to Joe Hoffer regarding upcoming Duncombe and Casey depositions, anticipated testimony, and arrangements for attendance at same. (No charge)	0.1
10/2/12	(RS) Receive and review reminder from Court Operations Officer regarding upcoming IT training session, courtroom practice and set up for trial. (No charge)	0.1
10/2/12	(RS) Travel to Austin to attend deposition. (1/2 charge)	0.7
10/2/12	(RS) Attend Dr. Allen Parker deposition.	4.8
10/2/12	(RS) Return travel to San Antonio following deposition. (1/2 charge) (No charge)	0.7
10/2/12	(RS) Prepare summary of Parker deposition.	0.5
10/2/12	(RS) Prepare directive to Paralegal for review of state policy timelines contained in Moak expert materials/report.	0.2



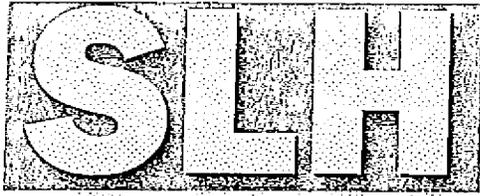
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

10/2/12	(RS) Communiqué exchange with Toni Templeton and Denise Pierce regarding scheduling of teleconference to discuss Baker report and data prior to his deposition; forward documentation to Ms. Templeton with attached computation data prepared by Baker for review.	0.2
10/2/12	(RS) Direct Paralegal to include Gary Marek on list of requested defense depositions. (No charge)	0.1
10/2/12	(RS) Communiqué exchange with David Thompson regarding sharing of cost for deposition transcripts already obtained; communiqué exchange with Chris Diamond concerning same. (No charge)	0.1
10/2/12	(RS) Conduct communiqué exchanges with all counsel regarding extension of deadline for Plaintiffs' production of trial exhibits. (No charge)	0.1
10/2/12	(RS) Direct Paralegal in further review of Moak report and cull charter school funding events contained therein for upcoming deposition. (No charge)	0.1
10/3/12	(CAP) Telephone conferences with Robin Sanders, Assistant AG, regarding pretrial issues, discovery responses, witness disclosure and scheduling of depositions; communiqué exchanges with experts Wood and Rolle to determine their availability for depositions on 10/30 and 11/01 and pre-deposition preparation on 10/29 and 10/31; communiqué exchanges with Bob Schulman concerning all such matters and scheduled teleconference with Ms. Pearson (No charge); prepare communiqué to Denise Pierce and Toni Templeton requesting accommodation for pre-deposition conferences; prepare communiqué to David Dunn and Ms. Pierce requesting dates for scheduling their depositions.	0.8
10/3/12	(CAP) Prepare Notice of Shirley Beaulieu deposition.	0.2
10/3/12	(MZ) Prepare memorandum summarizing findings from Dr. Bruce Baker's expert report.	1
10/3/12	(RS) Confer with David Thompson concerning release of copies of depositions at a reduced cost; communiqué exchange with Chris Diamond regarding discussion with Mr. Thompson and identification of transcripts to be requested; receive and review communiqué from Denae Dorris with schedule of fees for services to be rendered for facility needs testimony in connection	0.5

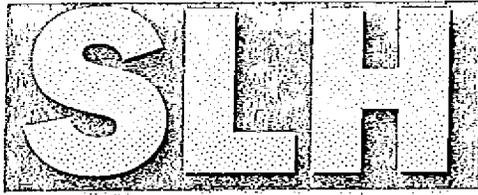


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	with school finance litigation; forward same to Joe Hoffer for review.	
10/3/12	(RS) Travel to Austin for Dr. Daniel Casey deposition.	2
10/3/12	(RS) Attend Dr. Daniel Casey deposition; prepare summary of key points from Casey deposition for file.	9
10/3/12	(RS) Attend conference with Betsy Bender regarding addition of equal protection arguments to pleadings. (No charge)	0.4
10/3/12	(BHB) Attend conference with Bob Schulman regarding addition of equal protection argument to pleadings. (No charge)	0.4
10/3/12	(RS) Return travel to San Antonio following deposition. (No charge)	1.5
10/3/12	(RS) Receive and review communiqué from Paralegal with copy of letter to defense attorneys concerning requested depositions; prepare directive to staffs for inclusion of Gary Marek and Al McKenzie. (No charge)	0.1
10/3/12	(RS) Receive and review Paralegal's analysis memorandum of Bruce Baker report and data in support; forward same to Chris Diamond for review; direct Paralegal for further analysis of Baker data.	0.1
10/3/12	(RS) Communiqué exchange with staff regarding request by Robin Sanders for contact; direct Joe Hoffer to call Ms. Sanders concerning her request relating to discovery issues; direct Paralegal to contact Ms. Sanders to schedule a teleconference regarding same; receive response from Paralegal advising Ms. Sanders requests scheduling of Wood and Rolle deposition, identification of "will call" from "may call" trial witnesses, and date for presentation of case in chief for Charter Plaintiffs; prepare response and directive to Paralegal concerning same; direct Bryan Dahlberg in research into [REDACTED] and discovery request for [REDACTED] and documents.	0.6
10/3/12	(BD) Conduct legal research and draft memorandum regarding requirements for [REDACTED]	3.7
10/3/12	(RS) Receive and review Bryan Dahlberg's memorandum regarding [REDACTED]; review communiqué exchange between Mr. Dahlberg and Joe Hoffer concerning same; direct Mr. Dahlberg for authority in support of his findings.	0.3
10/3/12	(RS) Receive and review communiqué exchanges between	0.2

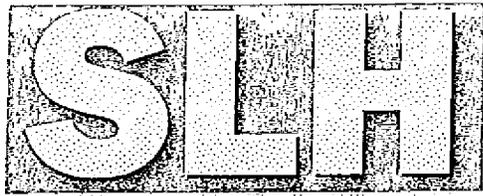


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	Paralegal and experts Wood and Rolle requesting availability to schedule their depositions; direct Paralegal to determine availability of firm litigation attorney to coordinate same; receive response from Paralegal advising of experts' availability; communiqué exchange with Paralegal and Joe Hoffer regarding court reporter to use for upcoming Beaulieu deposition. (No charge)	
10/3/12	(RS) Receive and review corrected third supplemental report by Lynn Moak; direct submission of same to Toni Templeton. (No charge).	0.3
10/3/12	(RS) Prepare communiqué to Chris Diamond regarding inquiry during Casey deposition to determine if his data considers charters.	0.1
10/3/12	(RS) Communiqué exchange with Paralegal concerning date of Beaulieu deposition and conflict with continuation of Izquiero deposition; review and approve notice of deposition drafted by Paralegal. (No charge)	0.1
10/3/12	(RS) Direct Paralegal to locate and forward documentation/presentations concerning history of charter school financing; receive and review same. (No charge)	0.1
10/3/12	(RS) Review communiqué exchanges between Chris Diamond and AG's office regarding extension of deadline for production of trial exhibits. (No charge)	0.1
10/4/12	(MZ) Research background and biographies of expert witnesses.	0.5
10/4/12	(MZ) Research and compile further charter school funding legislative history and intent.	1.5
10/4/12	(BD) Attorney conference with Bob Schulman regarding <del>_____</del> issues (No charge); revise and edit memorandum as directed.	0.9
10/4/12	(RS) Direct Allen Keller to compile list of depositions relative to Charter Plaintiffs' claims; receive and review same; prepare further directives to Mr. Keller concerning same; conduct extended teleconference with Robin Sanders regarding discovery and scheduling; prepare file memorandum concerning multiple issues discussed; direct Paralegal in preparation of correspondence to TCSA regarding production of information to be provided to Defendants and availability of witnesses for depositions requested by Ms. Sanders; prepare follow-up	0.8



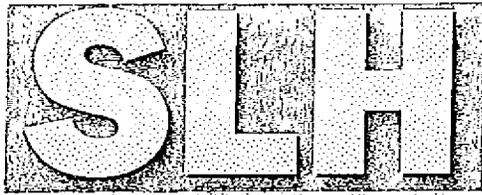
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

directive to Paralegal recapping discussion, matters to be addressed and discovery information to be disclosed, deposition meetings with experts and location for same; conduct telephone conference and engage in communiqué exchange with Denise Pierce and David Dunn regarding consideration of deposition of Lizette Reynolds.

10/4/12	(AK) Compile list of expert depositions completed to date, as requested by Bob Schulman. (No charge)	0.2
10/4/12	(RS) Receive and review notes prepared by Toni Templeton concerning review of Baker report; receive and review Paralegal's assessment regarding same; multiple communiqué exchanges with Shelley Dahlberg regarding extension of deadline for production of trial exhibits by Charter Plaintiffs in light of discovery responses due from Defendants, Co-Plaintiffs and Intervenor after current deadline and requested extended due date; extended teleconference with David Dunn regarding AG's request for his deposition and issues relating to Lizette Reynolds deposition; conduct weekly case status phone conference with TCSA administrators; receive and review communiqué from Joe Hoffer with revised Amended Petition; communiqué exchanges with and directives to Paralegal reviewing excerpts from Baker expert report data relating to charter schools; review data compiled by Paralegal; receive and review Defendants' FERPA, protected Supplemental Responses to Edgewood USD Plaintiffs' Request for Production.	3.3
10/5/12	(MZ) Prepare letters to Denise Pierce and Robin Sanders regarding Bob Schulman's telephone conference with Ms. Sanders concerning depositions and production requests.	1.2
10/5/12	(AK) Assist Bob Schulman in preparing for deposition of Bruce Baker. (No charge)	1
10/5/12	(RS) Review Moak and Kallison expert materials; prepare internal memorandum to litigation staff regarding attendance at depositions; draft communiqué to Dr. Craig Wood requesting review of Moak report; prepare extensive communiqué to Chris Diamond regarding Moak deposition attendance; engage in telephone conference with Robin Sanders concerning extension of deadline to produce trial exhibits and related issues; engage in communiqué exchanges with Ms. Sanders regarding same;	1.8



# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	prepare communiqué to all counsel concerning discussion with Ms. Sanders; receive and review response from Mr. Diamond regarding same; prepare response; engage in communiqué exchanges with Denise Pierce regarding TCSA membership list requested by Ms. Sanders; receive and review same; direct staff regarding submission of same to Ms. Sanders.	
10/5/12	(RS) Review and approve correspondence prepared by Paralegal to Robin Sanders; review and direct staff memorandum regarding scheduling date for Beaulieu deposition and notice; receive and review communiqué from AG's office regarding correspondence to MALDEF counsel addressing issues identified concerning Laura Ayala's expert report; prepare request to Chris Diamond regarding Intervenors' exhibits duplicated by Charter Plaintiffs; receive and review Lacy Lawrence's communiqué with exhibit numbering information (No charge); communiqué exchange with Mr. Diamond regarding Dr. Bruce Baker's blog post (Intellectual Pathologies of the Reformatory World); review post and file; schedule teleconference with Mr. Diamond concerning Baker deposition strategies and disclosure of outlier charter/district funding disparities in deposition.	1
10/5/12	(RS) Engage in multiple telephone conferences with Paralegal and Allen Keller; receive and review communiqué from Paralegal regarding live tech training and practice sessions in courtroom; receive follow-up communiqué from Paralegal with report from expert Grove, Whitehurst, data in support, and resume; review same to determine necessity for attending Whitehurst deposition; direct Mr. Keller regarding initial drafting of questions for Baker deposition.	0.9
10/5/12	(RS) Engage in multiple telephone conferences with Chris Diamond regarding exhibits for Baker deposition; prepare materials; confer with and review questions drafted by Allen Keller for Baker deposition; revise questions.	3.7
10/6/12	(RS) Travel to Austin for Dr. Bruce Baker deposition.	1.5
10/6/12	(RS) Attend Baker deposition; prepare file memorandum summarizing deposition testimony.	11
10/6/12	(RS) Return travel to San Antonio following deposition. (No charge)	1.5
10/6/12	(RS) Prepare request to Dr. Craig Wood for 2004 West Orange	0.1
	Matter: School Finance Litigation	



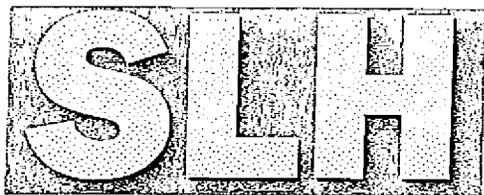
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

Cove II report prepared by Dr. Wood referenced by Dr. Bruce Baker in preparation of his expert report and data in support; prepare follow-up communiqué to Dr. Wood to disregard request; Baker included the report in his deposition as an exhibit (No charge).

10/6/12	(RS) Communiqué exchange with Joe Hoffer regarding Laura Taylor's retention by the state as a consultant, her attendance at Dr. Bruce Baker deposition and concerns relating to same.	0.1
10/7/12	(RS) Draft cross-examination questions for Dr. Bruce Baker's anticipated trial testimony.	0.5
10/8/12	(MZ) Revise letters to Denise Pierce and AG's office regarding outstanding discovery requests.	0.2
10/8/12	(AK) Continue organizing the State's discovery responses to all parties in the lawsuit.	0.5
10/8/12	(JH) Receive and review Defendants' objections and responses to discovery; confer with Bob Schulman regarding same; direct Allen Keller to contact Chris Diamond on documents produced as by intervenors responses.	0.9
10/8/12	(RM) Review and analyze Final Report issued by Lisa Dawn-Fisher.	1.7
10/8/12	(RM) Review communiqué and referenced article from Bob Schulman regarding Simpson's Paradox and its applicability to the public school finance rubric discussed by Dr. Lisa Dawn-Fisher; review communiqué and attachments from Mr. Schulman regarding Dr. Dawn-Fisher's report and funding analysis; review communiqué and attached file from Mr. Schulman regarding possible arguments for Rolle/Templeton's analytical approach to charter school facility funding issue; review communiqué and attachment from Mr. Schulman regarding charter school funding and facility funding witnesses.	1.5
10/8/12	(BD) Conduct legal research and revise memorandum on [REDACTED]	2.1
10/8/12	(RS) Receive notification from AG's office of cancellation of Dr. Steve Murdock deposition set for 10/10/12. (No charge)	0.1
10/9/12	(AK) Travel to Austin for technology presentation by Judge Dietz.	1.3
10/9/12	(AK) Attend technology presentation in Austin.	1
10/9/12	(AK) Return travel from Austin. (No charge)	1.3

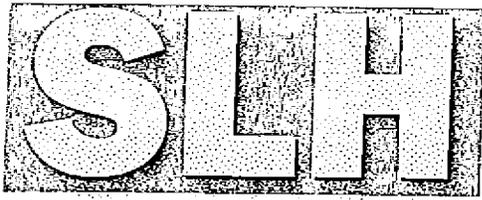


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

10/9/12	(LS) Attorney conference with Bob Schulman regarding case status and requesting review of Amended Petition and disclosures. (No charge)	0.2
10/9/12	(RS) Receive and began review of discovery documents provided by TCSA; receive and review request from Robin Sanders repeating request for TCSA membership list; prepare response to same; prepare directive to Paralegal regarding same; receive and approve Paralegal's communiqué to Ms. Sanders forwarding same; continue review of discovery documents provided by TCSA; direct Paralegal for submission of same to defense counsel.	0.9
10/9/12	(RS) Receive and review Calhoun County Plaintiffs' Objections and Responses to Charter Plaintiffs' Interrogatories; prepare communiqué to litigation staff forwarding same, direct compilation of data from links on sites referenced in Responses.	0.4
10/9/12	(RS) Prepare communiqué to Leonard Schwartz directing review of Charter Plaintiffs' Amended Petition and amendment of prior disclosures; direct Legal Assistant regarding same. (No charge)	0.2
10/9/12	(RS) Receive and peruse Edgewood ISD Plaintiffs' Objections and Answers to Charter Plaintiffs' Interrogatories; forward same to Joe Hoffer and Allen Keller. (No charge)	0.2
10/9/12	(RS) Prepare inquiries and exhibits for deposition of Dr. Lisa Dawn-Fisher.	2.4
10/9/12	(RS) Communiqué exchange with David Dunn regarding Senator Paul Sadler as potential fact witness.	0.2
10/9/12	(RS) Receive and review internal memorandum from Allen Keller regarding technology meeting for trial set up and presentations; direct staff regarding same. (No charge)	0.1
10/9/12	(RS) Communiqué exchanges with Dr. Anthony Rolle regarding review of Baker deposition and exhibit deadline.	0.2
10/9/12	(RS) Receive and review communiqué exchanges between staff and Denise Pierce regarding payment of expert witness Jimmy Strohmeyer invoice (No charge); prepare communiqué to Ms. Pierce regarding state's decision to not depose Mr. Strohmeyer; conduct telephone conference with Ms. Pierce regarding same and her request to receive and review discovery responses; direct staff to forward all discovery responses to Ms. Pierce.	0.3
10/10/12	(MZ) Research TEA's Foundation School Program financial	7.5

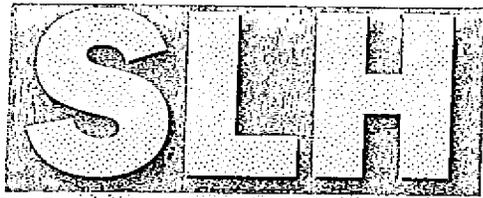


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	reports for charter schools identified as "outliers" and for the school districts in which they reside for school years 2006-2007 to the present; prepare spreadsheet comparing "per student" state funding for each.	
10/10/12	(AK) Work with Paralegal to gather information on outlier districts and calculate funding disparities between outlier districts and charter schools within the boundaries of these districts; review calculations with Bob Schulman in preparation for deposition of Dr. Lisa Dawn-Fisher.	3.4
10/10/12	(RM) Review Master Dataset With Charters report prepared by TEA for Final Report issued by Dr. Lisa Dawn-Fisher; telephone conference with Paralegal regarding preparation of data analysis requested by Bob Schulman; compare data in Excel file to Summary of Finances.	2.2
10/10/12	(RM) Telephone conference with Bob Schulman regarding review of Dr. Lisa Dawn-Fisher's report and supporting Excel workbook. (No charge)	0.2
10/10/12	(RM) Continue to review Dr. Lisa Dawn-Fisher's report (Master Dataset with Charters); prepare communiqué with analysis to Bob Schulman regarding same.	1
10/10/12	(RS) Receive and review communiqué from Tracy Young with discovery response link to article on charter school facilities; forward same to Paralegal for download and submission to Robin Sanders for review; receive and review additional documentation from TCSA staff for inclusion with discovery responses; forward same to Paralegal for distribution/amendment; receive and review, from Amanda Thomas, additional TCSA policy documents to be produced in supplement to Defendants' discovery requests.	0.6
10/10/12	(RS) Prepare communiqué to litigation staff regarding Calhoun County Plaintiffs' discovery responses referencing TEA website data and calculation of annual per pupil facility expenditures; prepare communiqué to Dr. Anthony Rolle regarding same with request for specific inquiries to address in preparation of experts' report and/or depositions; receive and review research advisory from Paralegal regarding site referenced in Calhoun County Plaintiffs' Response to Charter Plaintiffs' Interrogatories concerning reports for districts and charters with links to financial	0.5



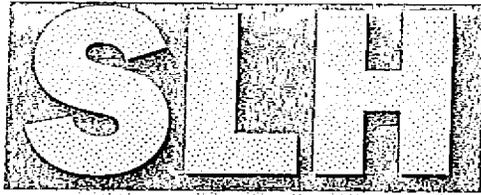
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

	reports; receive and review communiqué from Paralegal to Robin Sanders with TCSA membership list in Excel format (No charge).	
10/10/12	(RS) Receive and review communiqué exchanges between Paralegal and Allen Keller with list of experts compiled by Mr. Keller; receive and review communiqué from Paralegal to TCSA administrators with objections and answers to Charter Plaintiffs' Interrogatories by Fort Bend ISD Plaintiffs. (No charge)	0.3
10/10/12	(RS) Receive and review communiqué from Paralegal to all counsel with documents regarding Charter Plaintiffs' discovery supplement to Defendant. (No charge)	0.1
10/10/12	(RS) Prepare communiqué to Denise Pierce and Dr. Anthony Rolle with Calhoun County Plaintiffs' Answers to Charter Plaintiffs' Interrogatories; prepare follow-up advisory to Ms. Pierce regarding review of TEA websites identified in Answers, recommendations by Dr. Rolle concerning use of data compiled by Dr. Lisa Dawn-Fisher and information regarding outlier districts prepared by Toni Templeton, request contact by Ms. Templeton to discuss same; direct Paralegal for review of data provided by Ms. Templeton to compare to TEA database; prepare follow-up communiqué to Ms. Templeton concerning same, with request to identify source of funding information provided for use during Dawn-Fisher deposition; review response from Ms. Templeton with PIR submitted to TEA and charter summary of finances Excel file prepared with data obtained; telephone conference with Ms. Templeton regarding same; receive and review from Allen Keller with funding spreadsheet, attachment to Dawn-Fisher report; review same.	0.9
10/10/12	(RS) Communiqué exchange with Paralegal regarding data not provided by the Defendants in response to discovery requests from 1996 forward; review excerpt from Responses to Request for Production cited by Paralegal concerning request made for facility cost data and timeline referenced in Request for same. (No charge)	0.2
10/10/12	(RS) Prepare advisory to Dr. Anthony Rolle regarding review of TEA websites identified in discovery responses received and objection to responses due to inadequacy of same; request compilation by Dr. Rolle of specific inquiries for Dawn-Fisher deposition that may assist in preparation/finalization of expert	0.3

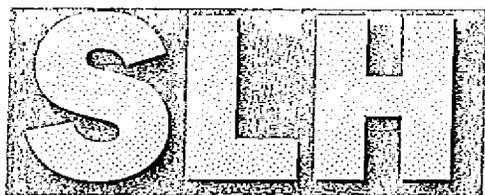


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	report.	
10/10/12	(RS) Communiqué exchange with Leonard Schwartz regarding Drs. Anthony Rolle and Craig Wood. (No charge)	0.1
10/10/12	(LS) Communiqué exchange with Bob Schulman regarding Drs. Anthony Rolle and Craig Wood. (No charge)	0.1
10/10/12	(RS) Extended telephone conference with Dr. Anthony Rolle in preparation for Dr. Lisa Dawn-Fisher deposition.	0.3
10/10/12	(RS) Receive and review TTSFC Plaintiffs' Answers to Charter Plaintiffs' Interrogatories and TTSFC's Response to Defendants' Request for Production. (No charge)	0.2
10/11/12	(MZ) Research PEIMS annual reports to determine facilities funding received by each Texas School District on a per student basis for the years 2006-2007 forward.	2
10/11/12	(RM) Travel to state office building for deposition of Dr. Lisa Dawn-Fisher.	0.7
10/11/12	(RM) Attend deposition of Dr. Lisa Dawn-Fisher.	8.5
10/11/12	(RM) Conference with Bob Schulman regarding testimony provided by Lisa Dawn-Fisher during deposition.	1.2
10/11/12	(RM) Return travel from deposition. (No charge)	0.7
10/11/12	(RS) Communiqué exchange with Dr. Anthony Rolle regarding deadline for experts' report; prepare request to Paralegal regarding Defendants' response to facility cost inquiries; prepare follow-up request concerning status of letter to Denise Pierce regarding discussion with Robin Sanders and information to be provided, pursuant to agreement with Ms. Sanders (No charge); receive and review communiqués from Paralegal with excerpts from discovery responses regarding same and inquiry concerning review of documents provided; receive and review notification from Court Clerk regarding availability of badge for Allen Keller (No charge); receive and review communiqué from Ms. Pierce with inquiry regarding analysis to be performed (by litigation staff or TCSA to determine school district expenditures.	0.7
10/11/12	(RS) Receive and review request from Chris Diamond requesting waiting list/TCSA analysis data; direct Allen Keller regarding same; receive and review Mr. Keller's communiqué from Mr. Keller to Mr. Diamond forwarding same (No charge); communiqué exchange with Mr. Diamond regarding questioning of expert, Dr. Bruce Baker, on charter school issues and report;	1.1



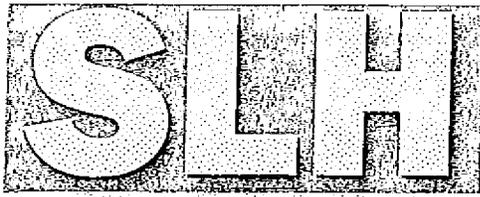
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

	receive and review communiqués from Ramon Medina with charts regarding alternate \$/WADA data prepared by Al McKenzie; review charts; review additional questions drafted by Mr. Medina for Dr. Lisa Dawn-Fisher deposition; final preparation of questions for Dawn-Fisher deposition.	
10/11/12	(RS) Receive and review Joint Motion for Leave to Amend Disclosures filed by TTSFC Plaintiffs, Charter Coalition Plaintiff and Calhoun County Plaintiffs. (No charge)	0.1
10/11/12	(RS) Receive and review communiqué from Shelley Dahlberg regarding request for agreement to exchange trial witness order in advance by 10/19/12. (No charge)	0.1
10/11/12	(RS) Receive request from Phil Fraissinet regarding opposition to call Joe Wisnoski at trial; communiqué exchange with Mr. Fraissinet regarding agreement to allow Wisnoski testimony and PowerPoint. (No charge)	0.2
10/11/12	(RS) Travel to Austin to attend Dr. Lisa Dawn-Fisher deposition.	2
10/11/12	(RS) Attend Dawn-Fisher deposition.	8.5
10/11/12	(RS) Return travel from Austin following deposition. (No charge)	1.5
10/12/12	(MZ) Research information concerning Shirley Beaulieu in preparation for upcoming deposition.	0.5
10/12/12	(AK) Review State's discovery responses and exhibit lists to determine if Dr. Lisa Dawn-Fisher's expert report or data sets created by Al McKenzie and used by Dr. Dawn-Fisher in formulating her report were produced in response to any plaintiff group's discovery requests.	1
10/12/12	(JH) Review and revise correspondence to Shelley Dahlberg regarding scheduling issues.	0.5
10/12/12	(RM) Review communiqué from Allen Keller regarding Requests for Production 4, 6, and 39; reply to Mr. Keller regarding proposal for Request for Production specific to Dr. Lisa Dawn-Fisher's report and underlying data analysis contained in the Master Dataset with Charters and Excel files.	0.2
10/12/12	(RM) Review communiqué exchange between Joe Hoffer and Allen Keller regarding review of existing Request for Production; review follow-up communiqué from Mr. Keller inquiring about Excel workbook provided by TEA; reply to Mr. Keller regarding same. (No charge)	0.1
10/12/12	(RM) Prepare communiqué to Bob Schulman proposing request	0.1

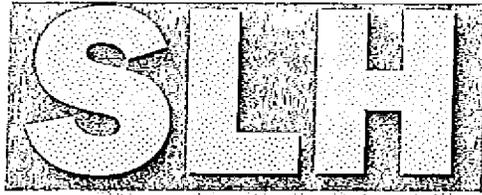


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	for production for workbook and other data referenced by Dr. Lisa Dawn-Fisher during her deposition. (No charge)	
10/12/12	(RS) Prepare communiqué to Paralegal and Joe Hoffer regarding Paralegal's inquiry concerning attendance at court practice session. (No charge)	0.1
10/12/12	(RS) Prepare correspondence to Shelley Dahlberg regarding trial and discovery issues.	0.3
10/12/12	(RS) Extended teleconference with Chris Diamond regarding Joe Wiskoski.	0.6
10/12/12	(RS) Receive and review Defendants' Supplement to Third Amended Response to Intervenors' and Defendants' Requests for Disclosure; direct staff regarding same. (No charge)	0.1
10/12/12	(RS) Confer with Paralegal regarding weekly status conference with TCSA principals. (No charge)	0.1
10/12/12	(RS) Receive and review communiqué from Ramon Medina regarding inquiry during Dawn-Fisher deposition concerning reference to "other workbook" and request for TEA to produce same; forward same to Allen Keller for review of case law regarding same; receive and review Mr. Keller's research response; review Mr. Medina's research input; receive and review communiqué exchanges between staff concerning same; direct staff regarding same.	0.2
10/13/12	(RS) Communiqué exchange with Joe Hoffer and Paralegal regarding teleconference with TCSA. (No charge)	0.1
10/13/12	(RS) Receive and review additional documents (confidence bands) prepared by expert witness Dr. Michael Podgursky in response to expert witness, Dr. William Duncombe's, supplemental report and deposition testimony.	0.3
10/15/12	(MZ) Search available online sources for Texas Comptroller's 2002 and 2005 studies on school facilities.	1
10/15/12	(AK) Compile list of expert witnesses, TCSA fact witnesses, and field experts, along with contact information for each witness; including contact information for administrators for each outlier school identified by Toni Templeton; work with Paralegal to finalize exhibit list; upload exhibit information onto AG's secure litigation site (No charge).	3.5
10/15/12	(RM) Prepare communiqué to Bob Schulman with potential questions for Shirley Beaulieu's deposition; research Internet for	0.7

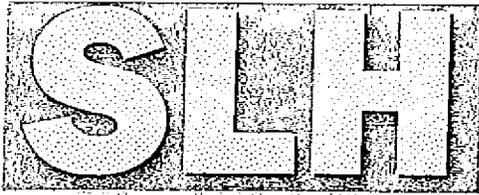


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	Texas Comptroller of Public Accounts article "Current and Future Facilities Needs of Texas Public School Districts" (Austin, Texas: Texas Comptroller of Public Accounts, October 2006).	
10/15/12	(RM) Review communiqué from Bob Schulman to Tom Sage regarding TEA e-mails concerning charter school facilities funding and potential inquiries of TEA despondent. (No charge)	0.2
10/15/12	(RM) Confer with Bob Schulman regarding preparation for deposition of Shirley Beaulieu, notification to Al McKenzie of date for deposition, and facility studies identified by Dr. Lisa Dawn-Fisher during deposition; research biographical information on Shirley Beaulieu; prepare communiqué to Mr. Schulman regarding same and potential questions for deposition.	0.7
10/15/12	(RM) Confer with Paralegal regarding charter school legislative history, Shirley Beaulieu deposition, facility studies conducted by Comptroller and Al McKenzie deposition. (No charge)	0.2
10/15/12	(RM) Prepare follow-up communiqué to Bob Schulman with additional potential question: for Shirley Beaulieu's deposition; confer with Joe Hoffer and Paralegal regarding deposition questions prepared for Mr. Schulman.	0.4
10/15/12	(RS) Direct Paralegal regarding expert report summary data file, compilation of TCSA documents in supplemental discovery responses; and identification of field experts and witnesses from outlier charter schools and TCSA; receive and review requested research from paralegal of charter school finance laws and formulas from 1995 to date; began analysis of same in support of finance claims.	0.5
10/15/12	(RS) Forward communiqué to Paralegal from TCSA regarding analysis to be performed to determine school district expenditures and case status; communiqué exchanges with and directives to Paralegal concerning status and deadline for completion and filing of expert reports; forward Intervenor's List of Trial Witnesses and Experts, Exhibits and Identification of Depositions to Paralegal for Charter Plaintiffs' disclosures; review communiqué between Paralegal and James Strohmeier regarding status of payment of his invoice (No charge); receive and review Defendants' Designation of Deposition Testimony, Master Exhibit and Witness List; receive and review TTSFC Plaintiffs' Trial Witness List; receive and review Fort Bend ISD	0.9



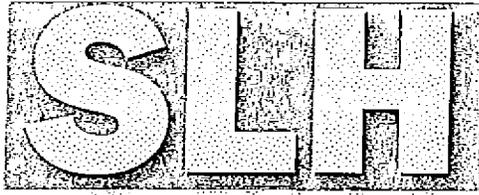
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

- Plaintiffs' Witness List, Exhibit List and Deposition Designation; receive and review Calhoun County ISD Plaintiffs' Proposed Witness List, Deposition Designations and Master Deposition Exhibit List.
- 10/15/12 (RS) Prepare communiqué to Paralegal regarding Strohmeyer expert report as a trial exhibit; receive response from Paralegal regarding same and status of Amended Petition; review and edit Amended Petition; forward to Paralegal for final review; communiqué exchange with Denise Pierce regarding Amended Petition; communiqué exchange with Shelley Dahlberg concerning timeliness of amendment; conduct telephone conference with Ms. Dahlberg regarding same; prepare advisory to Chris Diamond with cite to Chapter 12, TEC, in support of his Amended Petition and revised paragraph 15; receive response from Mr. Diamond advising of Intervenor's Exhibits upload to FTP site (No charge). 0.8
- 10/15/12 (RS) Receive and review memorandum from Ramon Medina regarding witness inquiries for Shirley Beaulieu deposition; receive and review inquiry from Denise Pierce concerning reports from experts Wood and Rolle; prepare response regarding same and advise her of anticipated deposition of Al McKenzie, identified as party who compiled advanced placement scores and related data; extended teleconference with Ms. Pierce regarding exhibits and legislation; review Paul Colbert Supplemental Report; forward same to Dr. Anthony Rolle for review; prepare communiqué to Dr. Craig Wood and Dr. Rolle regarding agreement to offer depositions during trial; prepare follow-up communiqué to Dr. Rolle concerning and attaching original Colbert report for preparation of inquiries for Dawn-Fisher deposition; receive response from Dr. Rolle regarding same and scheduling of teleconference; conduct extended teleconference with Dr. Rolle and Dr. Craig Wood concerning deposition preparation. 1.4
- 10/15/12 (RS) Prepare extensive correspondence to Shelley Dahlberg and Robin Sanders regarding information from the state required for preparation of exhibit list and supplemental data referenced in Dawn-Fisher deposition not available in PEIMS data, and designation of "will call" and "may call" witnesses; conduct two 1.3



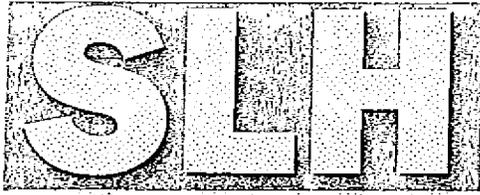
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

telephone conferences, one extended, with Tom Sage regarding bond review board, TCEP grants, costs for bonds for charters, school district tax levy for payment of debts, and related issues including report of bond programs for open-enrollment charter schools conducted and charter/ISD bond program and bond price comparison for inclusion with exhibits; communiqué exchanges with Mr. Sage concerning same in preparation for Beaulieu deposition.

- 10/15/12 (RS) Receive and review request from Denise Pierce regarding response to Defendants' discovery requests; prepare advisory to Ms. Pierce regarding TCSA production issues, requests 5 and 6 and additional information to be provided in response to same; receive and review communiqué from Ms. Pierce with recap of items to be researched by TCSA for supplementation to discovery documents to be produced on behalf of Charter Plaintiffs; receive and review multiple communiqués from TCSA with data/documentation; direct Paralegal in organization of same; conduct communiqué exchanges with Ms. Pierce regarding proposed funding legislation for charter schools; prepare follow-up communiqué to Ms. Pierce forwarding 1995 version of TEC 12.106 and 12.107 for review and as applicable to media talking points regarding equitable charter school funding. 0.6
- 10/15/12 (RS) Review communiqué from Allen Keller regarding Defendants' failure to disclose, in discovery responses, facility reports referenced in Dawn-Fisher deposition; direct Ramon Medina to confirm same; review Defendants' discovery responses referencing charter facilities; review report documents from Tom Sage; forward Defendants' discovery responses to Mr. Sage for review with proposed questions for Dawn-Fisher deposition; forward communiqué to Paralegal with open-enrollment charter school bond program list provided by Mr. Sage for inclusion with exhibits; receive and review updated disclosures filed by Edgewood ISD Plaintiffs; prepare inquiry to Paralegal concerning same (No charge); receive and review Edgewood ISD Plaintiffs' Witness List; receive and review Edgewood ISD Plaintiffs' exhibits 4220 and 4221 not previously provided; receive and review multiple communiqué exchanges 2.1

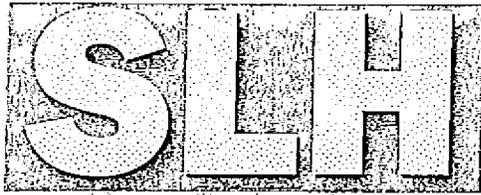


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	between counsel regarding witness identification and order of appearance at first week of trial.	
10/15/12	(RS) Revise multiple versions of Charter Plaintiffs' Designations of Witnesses and Experts, Exhibits and Deposition Excerpts; numerous communiqué exchanges with litigation staff concerning revisions to same; communiqué exchange with Shelley Dahlberg regarding delay in transmission of same; prepare communiqué to all counsel forwarding Charter Plaintiffs' Witness List, Exhibit List and Deposition Designations with reference to FTP site for download of same; receive request from Susan Jennings, Gray & Becker, regarding delivery of exhibits by TTSFC Plaintiffs; direct Paralegal to respond to Ms. Jennings regarding same (No charge); review First Amended Petition filed by TTSFC Plaintiffs; direct Ramon Medina for background search and historical information concerning Shirley Beaulieu deposition; review research memorandum from Mr. Medina with biographical information on Ms. Beaulieu and 47 draft inquiries for deposition; prepare revisions to same; direct Mr. Medina regarding same.	1.8
10/16/12	(MZ) Review reports of TEA expert witnesses to identify experts to testify to the accuracy and authority of online PEIMS reporting data.	1.5
10/16/12	(AK) Assist Paralegal in gathering and organizing documents requested by Bob Schulman in preparation for deposition of Shirley Beaulieu. (No charge)	1
10/16/12	(AK) Begin organizing and cataloging State's responses to TCSA's discovery requests, create master list of same identifying and describing each document disclosed.	3.5
10/16/12	(RM) Review communiqué from Bob Schulman regarding TEA FTE analysis; review TEA 2012-2013 LAR and 2014-2015 LAR and determine total number of FTEs assigned to TEA divisions as of 09/01/2010 and 09/06/2012; respond to Mr. Schulman regarding same.	0.2
10/16/12	(RM) Prepare response to Bob Schulman providing background information and supplemental questions for Beaulieu deposition. (No charge)	0.2
10/16/12	(RM) Conference call with Bob Schulman regarding Beaulieu deposition. (No charge)	0.2

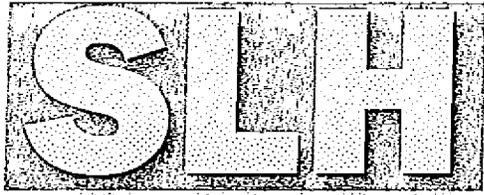


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

10/16/12	(RM) Review communiqué from Bob Schulman regarding preparation for deposition of Shirley Beaulieu; research TEA website for information regarding per pupil cost of public education provided by school districts, charter schools and system as a whole; review TEA Strategic Plan for information pertinent to the development of additional questions for Ms. Beaulieu's deposition; reply to Mr. Schulman provide supplemental questions for the Beaulieu deposition.	1.5
10/16/12	(RS) Prepare communiqué to Shelley Dahlberg and Robin Sanders regarding tender of supplement discovery responses from TCSA; receive and review reply from Ms. Dahlberg concerning same and Reiteration of objections to Amended Petition; prepare reply with additional arguments in response.	0.4
10/16/12	(RS) Receive and review request from AG's office for exhibit and deposition designations in Word format; direct Paralegal regarding same. (No charge)	0.1
10/16/12	(RS) Communiqué exchange with Gray & Becker Paralegal regarding overnight delivery of trial exhibit list of TTSFC Plaintiffs; direct staff regarding same. (No charge)	0.1
10/16/12	(RS) Receive and review Fort Bend ISD Plaintiffs' First Amended Deposition Designation; receive and review Corrected Defendants' Witness List and Defendants' Amended Master Exhibit List. (No charge)	0.1
10/16/12	(RS) Communiqué exchange with Ramon Medina regarding preparation and exhibits for Beaulieu deposition; direct Mr. Medina regarding deposition inquiries, review of expert reports received for relevant exhibits and related issues; review comprehensive report from Mr. Medina; provide direction for same, and exhibits to include TEA Strategic Plan and prior and current TEA organizational charts; receive and review current TEA organizational chart; review current TEA Strategic Plan; direct preparation of copies of Plan for distribution at deposition; receive and review second report and advisory from Mr. Medina anticipating deponent responses to inquiries; direct Mr. Medina to obtain TEA's 2011 budget summary and Full Time Employee (FTE) data as deposition exhibit; receive response from Mr. Medina concerning same; prepare revisions and additions to set of Beaulieu deposition inquiries; finalize same and forward to	8.1

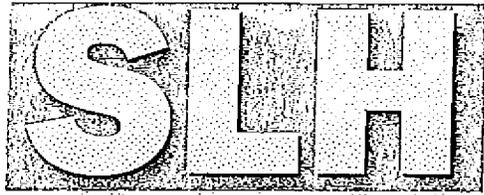


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	Paralegal to format for deposition; forward to Mr. Medina for review.	
10/16/12	(RS) Communiqué exchanges with David Hinojosa regarding extension of deadline to submit Charter Plaintiffs' exhibit list and related disclosures; direct Paralegal regarding same. (No charge)	0.1
10/17/12	(AK) Continue organizing and cataloging Defendant's responses to discovery requests, including gathering documents produced to other Plaintiff groups identified as responsive to charter Plaintiffs' discovery requests.	5.5
10/17/12	(RS) Conduct pre- and post-deposition conferences with Ramon Medina regarding Beaulieu deposition need for ensuing depositions and continued review of expert reports; conduct telephone conference with Paralegal regarding contact information for [REDACTED], as a potential witness; prepare communiqué to [REDACTED] regarding same.	1.5
10/17/12	(RM) Confer with Bob Schulman regarding deposition of Shirley Beaulieu; review deposition questions and exhibit; post-deposition conference with Mr. Schulman regarding witnesses deposition, review of Robert Scott deposition transcript, review of remaining depositions, results obtained from depositions to date, and how to proceed with preparation for presentation of case. (No charge)	1.5
10/17/12	(RM) Travel to office of AG for deposition of Shirley Beaulieu.	0.7
10/17/12	(RM) Attend deposition of Shirley Beaulieu. (No charge)	1.7
10/17/12	(RM) Return travel. (No charge)	0.7
10/17/12	(RS) Communiqué exchange with David Dunn regarding [REDACTED] [REDACTED] as potential fact witness concerning charter school funding formula policy as offered to the Legislative Budget Board.	0.1
10/17/12	(RS) Conduct teleconference with Robin Sanders regarding discovery schedules and acceptance of amended pleading; receive and review additional discovery responses from Defendants concerning survey of facilities and further discovery objections; prepare letter to AG in response to same.	0.5
10/17/12	(RS) Prepare communiqué to Chris Diamond attaching and addressing significance of TEA Strategic Plan and Shirley	0.4

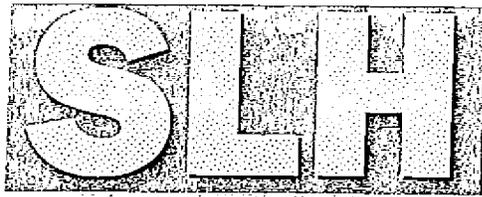


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	Beaulieu deposition testimony regarding same; prepare communiqué to school district counsel regarding Beaulieu deposition, providing and commenting on spreadsheet of appropriations from 2006-2013 introduced by state at deposition.	
10/17/12	(RS) Prepare communiqué to Denise Pierce regarding scheduling of in-office conference with TCSA administrators; receive and review response from Ms. Pierce confirming same. (No charge)	0.1
10/17/12	(RS) Prepare communiqué to Dr. Anthony Rolle regarding significance of and requested review of expert Bruce Baker report; forward transcript of Baker deposition to Dr. Rolle for review; receive and review communiqué from Paralegal to TCSA with attached Facility Survey (No charge); direct Paralegal regarding offer of same as trial exhibit and direct Paralegal regarding same.	0.3
10/17/12	(RS) Prepare communiqués to all counsel regarding Beaulieu deposition exhibits; prepare follow-up post-deposition correspondence to all counsel attaching relevant exhibits; conduct telephone conference with TCSA concerning same.	0.3
10/17/12	(RS) Receive and review Defendants' First Supplemental Response to Charter Plaintiffs' Request for Production No. 40 with attachment; direct staff regarding same.	0.2
10/17/12	(RS) Receive and review TTSFC Plaintiffs' Supplemental Master Exhibit List and attached exhibits; direct staff regarding same. (No charge)	0.1
10/17/12	(RS) Receive and review back-up data for Corrected Report of Expert Lynn Moak Supplement Three; receive expert Bruce Baker deposition transcript; review and analyze Charter Plaintiffs' cross-examination section; receive and review comparison of budgets provided by Paralegal.	0.6
10/17/12	(RS) Receive and review documentation from TCSA for supplemental production responses; direct Paralegal to submit same. (No charge)	0.2
10/17/12	(RS) Receive and review notice of Judge's directive for meeting with all counsel on 10/19/12; confirm attendance. (No charge)	0.1
10/17/12	(RS) Review Comptroller's FAST report; conduct telephone conference with David Dunn regarding charter schools identified with Five Star efficiency rating by Comptroller in same.	0.2



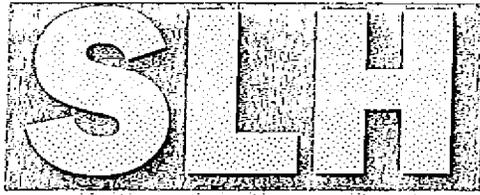
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

10/17/12	(RS) Telephone conference with Leonard Schwartz regarding security badge for trial. (No charge)	0.1
10/17/12	(RS) Travel to Austin to attend deposition; conduct telephone conference with Paralegal regarding Court Reporter's confusion concerning scheduled deposition and claims by AG's office that notice was not properly issued; conduct telephone conference with Shelley Dahlberg regarding same; direct staff regarding same.	1.5
10/17/12	(RS) Attend and conduct Beaulieu deposition.	2.3
10/17/12	(RS) Travel time for return from Austin following Beaulieu deposition. (No charge)	1.5
10/18/12	(MZ) Research available data regarding per pupil facilities funding for school districts.	0.5
10/18/12	(AK) Draft response to Defendant's objections to charter Plaintiffs' First Amended Petition; forward to Bob Schulman for review.	1
10/18/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	3
10/18/12	(JH) Travel to Austin. (No charge)	1.2
10/18/12	(AK) Travel to Austin to pick up court badges. (No charge)	1.2
10/18/12	(JH) Meeting with AG's office for issue with discovery production by AG; meeting with Sheriff's office for security checks required for trial. (No charge)	3
11/18/12	(AK) Receive court badges from Sheriffs's office at Travis County Courthouse. (No charge)	0.5
10/18/12	(AK) Return travel from Austin. (No charge)	1.2
10/18/12	(JH) Return travel to San Antonio. (No charge)	1.2
10/18/12	(RM) Telephone conference with Paralegal regarding Bates numbering of exhibits. (No charge)	0.1
10/18/12	(RS) Communiqué exchanges with Chris Diamond regarding anticipated trial transcript costs and cost sharing for same; receive and review Intervenors' Supplemental Deposition Excerpts and Exhibits provided by Mr. Diamond.	0.3
10/18/12	(RS) Communiqué exchanges with Denise Pierce regarding statutory approach for addressing facilities funding for charters; review TCSA memorandum, "Equitable Funding for Students Enrolled in Open Enrollment."	0.4
10/18/12	(RS) Prepare communiqué to [REDACTED]	0.4



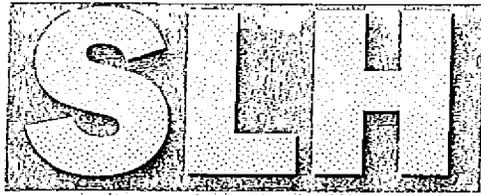
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

requesting approval of disclosure of details and costs of bond programs in deposition and/or trial testimony through trial and deposition testimony of Tom Sage; receive and review response from Harmony Public Schools regarding same; prepare advisory Mr. Sage regarding [REDACTED] agreement to offer details and costs of bond programs in deposition and/or trial testimony; request Mr. Sage's review of Texas Legislature Sunset Committee Report addressing TEA and performance regarding open-enrollment charter schools.

10/18/12	(RS) Receive and review communiqué exchange between Allen Keller and Michael Patterson regarding information being saved onto external hard drive for delivery by Shelley Dahlberg for upload onto SLH server. (No charge)	0.1
10/18/12	(RS) Receive and review Fourth and Fifth Amended Petitions and Request for Declaratory Judgment filed by TTSFC Plaintiffs.	0.3
10/18/12	(RS) Review and revise Allen Keller's response to objections by Defendants to Charter Plaintiffs' Amended Petition; forward same to Mr. Keller for edit; receive and review amended response to objections to Amended Petition from Mr. Keller; prepare final and direct staff regarding same.	0.4
10/18/12	(RS) Review draft Charter Plaintiffs' Supplemental Trial Exhibit List and attachments; receive and review communiqué from Paralegal forwarding same to all counsel. (No charge)	0.1
10/18/12	(RS) Receive and review correspondence from AG's office concerning supplemental responses to discovery propounded to Defendants by TTSFC, Fort Bend ISD Plaintiffs, and Edgewood ISD Plaintiffs; forward same to Allen Keller for review and preparation of summary of impact of same.	0.2
10/18/12	(RS) Receive and review request from Toni Hunter regarding sponsorship of Exhibit 6 and articles published by TCSA; receive and review Amended Deposition Designations and Deposition Excerpts filed by Edgewood ISD Plaintiffs; direct staff regarding same.	0.2
10/18/12	(RS) Receive and review request from TCSA to comment on proposed press release regarding pending finance trial; prepare directive to Joe Hoffer regarding same and TCSA newsletter in addition to press release concerning lawsuit addressing both the constitution and prior decisions addressing inadequate funding;	0.7



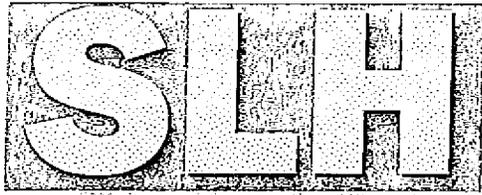
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

	communiqué exchanges with Mr. Hoffer regarding same; prepare advisory and proposed press release provisions. (No charge)	
10/18/12	(RS) Travel to Austin for meeting at AG's office and to obtain trial security badges.	1.5
10/18/12	(RS) Meet with AG's office concerning with discovery production by Defendants; meet with Sheriff's office for security checks required for trial.	3
10/18/12	(RS) Return travel from Austin. (No charge)	1.5
10/19/12	(AK) Review deposition list and provide Bob Schulman with information on whether depositions were scheduled for Gary Marek, Al McKenzie, and Joe Wisnoski; continue organizing documents produced by Defendants in response to Co-Plaintiffs' discovery requests also responsive to Charter Plaintiffs requests; summarizing same.	5.4
10/19/12	(JH) Travel to Austin for hearing ordered by Judge Dietz.	1.5
10/19/12	(JH) Prehearing conferences with co-Plaintiff counsel and AG; extended pretrial status conference with court; post-hearing technology brief and meetings with court reporter regarding real time and setting up real time.	2.8
10/19/12	(JH) Extended meeting with David Dunn and Denise Pierce on pretrial matters.	2
10/19/12	(JH) Return travel from Austin. (No charge)	1.5
10/19/12	(RM) Review and respond to communiqué from Paralegal regarding Bates numbering of exhibits; add Bates number to exhibits; prepare communiqués to Paralegal forwarding the results work.	0.7
10/19/12	(RS) Travel to Austin to attend in-court conference before Judge Dietz.	1.5
10/19/12	(RS) Attend in-court conferences with counsel, Judge and court reporter. (No charge)	2.8
10/19/12	(RS) Draft file memorandum of issues addressed during conference before Judge Dietz.	0.5
10/19/12	(RS) Receive and review Intervenors' Exhibits and Deposition Excerpts Objections; receive and review TTSFC Plaintiffs' Third Supplemental Response to All Parties' Request for Disclosures; direct staffs regarding same.	0.7
10/19/12	(RS) Attend conference with Joe Hoffer and TCSA	2



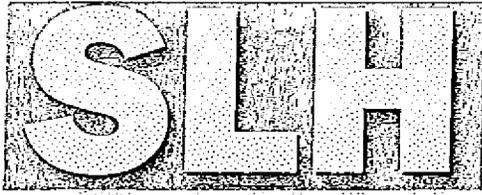
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

	administrators at TCSA office. (No charge)	
10/19/12	(RS) Travel time for return from Austin. (No charge)	1.5
10/19/12	(RS) Confer with and direct Allen Keller in preparation of final discovery responses to state; receive and review communiqué from Mr. Keller directing staff in preparation of final version of response to Shelley Dahlberg regarding Defendants' objections to Charter Plaintiffs' First Amended Petition.	0.6
10/19/12	(RS) Receive and review communiqué from Allen Keller regarding scheduling of defense depositions, and designation of Joe Wisnoski as potential witness and deponent. (No charge)	0.1
10/19/12	(RS) Receive and review advisory communiqué from Toni Templeton attaching May 2012 PIR for FSP information and TEA's response; receive and review Defendants' Second Amended Master Exhibit List; receive and review TTSFC Plaintiffs' replacement copies of Exhibits 6322-6327, corrected Murdock Supplemental Report and errata sheet with detailed corrections to Report; receive and review Fort Bend ISD Plaintiffs' Objections to Trial Exhibits and Deposition Designations; receive and review Edgewood ISD Plaintiffs' Exhibit Objections.	0.6
10/20/12	(RS) Prepare lengthy directive to Allen Keller and Leonard Schwartz in preparation of response to Defendants' objections to Charter Plaintiffs' trial exhibits.	0.7
10/20/12	(AK) Create list of objections to Charter Plaintiff's trial exhibits filed by all other parties to the litigation; forward to Bob Schulman and Leonard Schwartz for review.	2
10/20/12	(RS) Receive and review Efficiency Intervenors' Supplemental Objections to Exhibits and Depo Excerpts; direct staff regarding same.	0.2
10/20/12	(RS) Receive and review lengthy advisory from Richard Gray regarding TTSFC exhibits; receive and review communiqués from Mr. Gray to Shelley Dahlberg concerning same; receive communiqué from Rick Gray concerning PowerPoints to be exchanged and his discussion with Ms. Dahlberg regarding same.	0.2
10/20/12	(RS) Communiqué exchanges with TCSA administrators regarding suggested opening statement for Charter Plaintiffs' presentation; begin drafting opening statement.	2.2



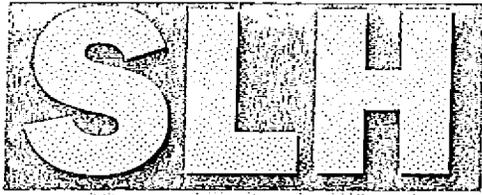
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

10/20/12	(RS) Receive and review communiqué from Allen Keller with chart listing objections to discovery filed to date; review chart.	0.3
10/20/12	(RS) Communiqué exchange with Chris Diamond regarding procurement of deposition transcripts. (No charge)	0.1
10/20/12	(RS) Prepare communiqué to Jim Ho with request for assistance in preparation for trial and preservation of the record for appeal; forward Defendants' Objections to Plaintiffs' and Intervenors' trial exhibits for review; outline specifics of issues to be addressed by him in response; receive response from Mr. Ho requesting additional input for review; direct litigation staff in finalization of Response to Defendants' Objections.	0.7
10/20/12	(RS) Receive and review communiqué from Dr. Anthony Rolle for request for rent/lease expenditure data for ISDs and charters for school years 2006-07 through 2010-11; prepare lengthy response to Dr. Rolle and Dr. Craig Wood concerning same with directive to litigation staff to provide requested data obtained from data banks referenced in Defendants' discovery responses.	0.9
10/21/12	(RS) Prepare request to litigation staff to determine if TEA surveys conducted were offered as exhibits. (No charge)	0.1
10/21/12	(RS) Review communiqué exchanges with counsel regarding submission of trial exhibits and agreement for pre-admission of exhibits to which objections have not been filed; review Murdock PowerPoint; communiqué exchange with Chris Diamond regarding whether Baker report and deposition were submitted as an exhibit.	0.3
10/21/12	(RS) Receive and review Express-News article from Tracy Young; forward same to Drs. Anthony Rolle and Craig Wood for review. (No charge)	0.2
10/21/12	(RS) Finalize opening statement.	1.2
10/21/12	(RS) Prepare lengthy correspondence to Robin Sanders regarding exhibits, witnesses, deposition dates, expert report, "will call" and "may call" witness list and related issues; prepare update to Ms. Sanders regarding submission of expert report, as early as 10/22/12, and Defendants' use of Laura Taylor as a trial witness; receive response from Ms. Sanders concerning same.	1.1
10/22/12	(MZ) Research validity data retrieved from PEIMS reports posted with TEA; review and revise spreadsheet prepared with same.	1.5
10/22/12	(AK) Telephone conference with Leonard Schwartz regarding	3.6



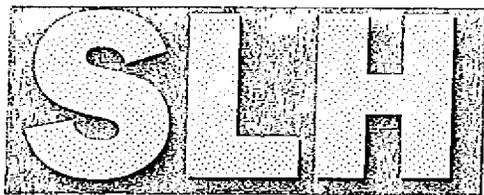
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

	objections to TCSA's trial exhibits (No charge); revise summary of objections to include brief summary of each exhibit offered for admission; continue reviewing and summarizing Defendant's discovery responses.	
10/22/12	(LS) Review Objections to Evidence; receive communiqué from Bob Schulman regarding same; telephone conference with Allen Keller regarding Response to Objections; prepare communiqué to Mr. Schulman regarding same; review communiqués regarding deposition of expert witness.	1.7
10/22/12	(RM) Review communiqué from Bob Schulman regarding review of report prepared by Anthony Rolle; review Dr. Rolle's report; prepare reply to Mr. Schulman regarding same.	0.3
10/22/12	(RM) Review communiqué from Paralegal to Bob Schulman regarding limitations of using Excel to conduct analysis of public school financial data; reply to Paralegal recommending use of Access for data analysis. (No charge)	0.2
10/22/12	(RM) Download Actget2011 file from TEA website; conduct analysis of financial data; research FASRG Module 1 for definition of function and object codes; prepare communiqué to Paralegal regarding results of data analysis.	0.7
10/22/12	(RM) Review communiqué from Dr. Anthony Rolle to Bob Schulman regarding data on rent/lease expenditures for school districts and charter schools for the 2006-2007 through 2010-2011 school years and reply from Mr. Schulman regarding same with directive to review data compiled; review reply from Paralegal regarding status of data compilation (No charge); review communiqué from Paralegal regarding facilities spreadsheet; telephone conference with Paralegal regarding source of data compiled; review financial and student data compiled in spreadsheet.	0.9
10/22/12	(RS) Travel to Austin for trial.	2
10/22/12	(RS) Attend trial.	7.5
10/22/12	(RS) Travel time for return from Austin. (No charge)	2
10/22/12	(RS) Receive and review Exhibit 10089 from defense counsel, substituted for same exhibit previously produced; receive and review TSI reports from Richard Gray. (No charge)	0.2
10/22/12	(RS) Receive and review TTSFC Plaintiffs' Trial Brief and direct staff regarding same and preparation of charter plaintiff trial brief.	0.2

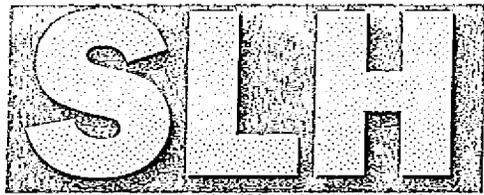


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	(No charge)	
10/22/12	(RS) Receive and review communiqué from Joe Hoffer regarding compilation of information for inclusion in experts' report relating to ISD expenditures; receive and review comments from Ramon Medina regarding access to charter school data through PEIMS report; direct Mr. Medina to provide assistance to experts in obtaining same for reports. (No charge)	0.2
10/22/12	(RS) Receive and review communiqué from Paralegal regarding preparation of Findings of Fact and Conclusions of Law (FOF and COL); direct litigation staff in preparation of same; communiqué exchange with Paralegal and litigation staff regarding preparation of FOF and COL; prepare further directives to Paralegal regarding same; prepare directives to staff regarding court order to parties for trial schedules and protocol. (No charge)	0.4
10/22/12	(RS) Receive and review facilities report from Dr. Anthony Rolle; prepare communiqué to expert, Wood and Rolle regarding same; forward report to Ramon Medina for review and comparison to available PEIMS data; receive communiqué from Dr. Rolle regarding scheduling and agenda for teleconference; direct staff regarding same; prepare communiqué to staff and TCSA forwarding and explaining trial transcript; prepare memorandum to Leonard Schwartz regarding same, burden of proof for Charter Plaintiffs and proposed evidence to support same; engage in communiqué exchanges with Mr. Schwartz regarding matters addressed in same; engage in communiqué exchanges with TCSA administrators and litigation staff regarding draft press release. (No charge)	0.7
10/22/12	(RS) Conduct extended telephone conference with Dr. Anthony Rolle regarding completion of report and deposition schedules.	0.3
10/22/12	(RS) Prepare advisory to Robin Sanders regarding discussion with experts concerning projected date for report completion and postponement of depositions pending receipt of completed report and pending depositions; receive and review communiqué from TCSA regarding availability of Denise Pierce and David Dunn for deposition; prepare follow-up communiqué to Ms. Sanders forwarding same.	0.3
10/22/12	(RS) Prepare file memorandum addressing expert report and	0.5



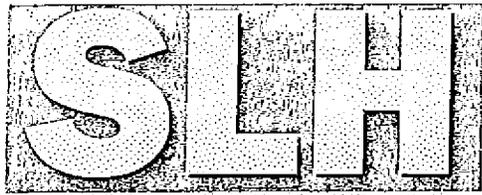
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

dataset from deposition of Dr. Lisa Dawn-Fisher, state announcement of intent to call for testimony of Dr. Laura Taylor concerning the necessity for charter school monitoring and sanctions, proposed deposition of Dr. Taylor and scheduling of deposition; forward same to staff; receive and review response from Leonard Schwartz regarding same; prepare reply and directives regarding same; engage in communiqué exchange with Mr. Schwartz regarding funding claims and other trial issues.

10/22/12	(RS) Receive and review communiqué from Allen Keller to Leonard Schwartz concerning identification of exhibits previously produced and preparation of response to defense objections to same; receive and review Mr. Schwartz's communiqué to Mr. Keller regarding same; direct Paralegal to provide litigation staff with statistical analysis of charter funding report received from Wood and Rolle; receive and review communiqué forwarding same to staff; receive and review witness Guy Sconzo PowerPoint presentation in support of testimony. (No charge)	0.3
10/23/12	(AK) Continue reviewing and summarizing Defendant's discovery responses.	4.5
10/23/12	(JH) Confer with Bob Schulman regarding Defendants' lawsuit issues; receive and review day's transcript and Twitter feeds; prepare status report to Charter Plaintiffs.	0.5
10/23/12	(LS) Attend court session; communiqué exchanges with Bob Schulman regarding same. (No charge)	5.5
10/23/12	(RM) Download average daily attendance (ADA) and weighted ADA reports from TEA website; create database for fiscal year 2011 (School year 2010-2011) containing financial, ADA and WADA data for school districts; analyze data for facilities acquisitions and construction expenditures; prepare report listing all school districts that reported same and calculated per pupil amounts; prepare communiqué to Bob Schulman regarding same and requesting clarification of data requirements.	2
10/23/12	(RM) Review data requirements for PEIMS financial data analysis requested by Bob Schulman; download PEIMS financial data from TEA website; prepare communiqué to Mr. Schulman requesting clarification of information needed.	0.5
10/23/12	(RS) Travel to Austin for trial.	2
10/23/12	(RS) Attend trial; confer with Leonard Schwartz regarding trial.	8.5

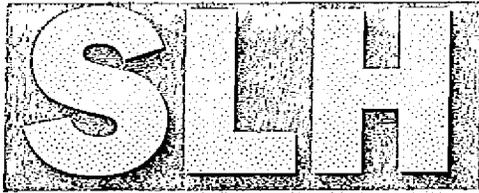


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

10/23/12	(RS) Travel time for return from Austin. (No charge)	2
10/23/12	(RS) Prepare lengthy advisory to Denise Pierce concerning testimony and reported items to be addressed by experts and possible involvement of Toni Templeton in reviewing same. (No charge)	0.3
10/23/12	(RS) Communiqué exchanges with Robin Sanders concerning production of documents and information by field witnesses for their respective schools and deposition dates; receive and review follow-up communiqué from Ms. Sanders requesting scheduling of Strohmeier deposition; prepare response to Mr. Sanders; direct Paralegal to provide Strohmeier report to Ms. Sanders. (No charge)	0.4
10/23/12	(RS) Receive and review Calhoun County Plaintiffs' exhibits 5335-5342; receive and review Calhoun County Plaintiffs' Supplemental Trial Exhibit List listing same; receive and review Calhoun County Plaintiffs' updated Master Exhibit List reflecting new exhibits and admitted exhibits; direct staff regarding same. (No charge)	0.1
10/23/12	(RS) Prepare advisory and inquiry to Joe Hoffer regarding proofs and production of trial evidence of charters as primary implementers of the public education system; receive and review advisory response from Mr. Hoffer regarding same; prepare advisory to TCSA administrators and litigation staff regarding witness examination to date; engage in communiqué exchanges with David Dunn and Denise Pierce concerning same; prepare communiqué to litigation staff and TCSA administrators with summary of Sconzo testimony; receive response from Leonard Schwartz concerning same; prepare directive to Mr. Schwartz to conduct case law research and provide "efficiency" definition and standards for attainment of "suitability" and attainment of General Diffusion of Knowledge; receive reply from Mr. Schwartz regarding same; prepare response and further directives to Mr. Schwartz with additional research directive relating to same. (No charge)	0.7
10/23/12	(RS) Forward trial transcript for 10/23/12 to Drs. Anthony Rolle and Craig Wood for review; receive request from Dr. Rolle for teleconference after trial this day; receive and review data and calculations for Report and Supplemental Reports of Paul	1.3

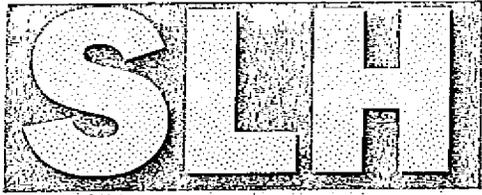


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	Colbert provided by Richard Gray; receive and review Waggoner PowerPoint (current version) from Lacy Lawrence for testimony to come; conduct extended teleconference with Dr. Anthony Rolle regarding cancellation of depositions and pre-deposition meeting and report issues; prepare letter report to David Dunn concerning same. (No charge)	
10/23/12	(RS) Receive PDF file from Ramon Medina with compilation of school district facilities acquisition and construction expenditures per pupil for 2010-11; forward same to Dr. Anthony Rolle for review and request for explanation of report category of "similar sized school districts" with inquiry to Dr. Rolle regarding adequacy of Mr. Medina's data compilation; receive response from Dr. Rolle regarding same; receive communiqué from David Dunn of TCSA concerning data analysis; prepare response to Mr. Dunn concerning discussion with Dr. Rolle regarding same and related issues; direct Allen Keller in research to locate reports addressing General Diffusion of Knowledge for Dr. Rolle. (No charge)	0.5
10/24/12	(AK) Continue reviewing and summarizing Defendant's discovery responses; perform review of all expert reports to identify all discussions of how effective the State has been at providing a general diffusion of knowledge to students.	5.5
10/24/12	(JH) Confer with Bob Schulman regarding San Benito ISD Superintendent testimony regarding IDEA; conference call with Tom Torkelson regarding IDEA and testimony of San Benito Superintendent; prepare rebuttal inquiries for Mr. Schulman.	0.6
10/24/12	(RS) Confer with Joe Hoffer regarding San Benito ISD Superintendent testimony regarding IDEA; receive and review rebuttal inquiries from Mr. Hoffer. (No charge)	0.3
10/24/12	(RS) Travel to Austin for trial.	2
10/24/12	(RS) Attend trial.	7.5
10/24/12	(RS) Direct Paralegal to provide trial presentation of San Benito ISD PowerPoint to three focus charter witnesses for review and input of comparable data for their respective schools; prepare communiqué/directive to Joe Hoffer regarding review by field experts concerning same; receive and review response to same.	0.2
10/24/12	(RS) Prepare communiqué to Dr. Anthony Rolle with data compilation of district facilities acquisition and construction	0.4



# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

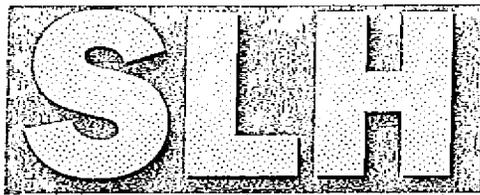
expenditures per pupil for 2010; request status of experts' report; prepare follow-up communiqué to Mr. Rolle with data on IDEA charter enrollment; review communiqué from Dr. Craig Wood regarding postponement of depositions; prepare response to Dr. Wood regarding same and recap additional data obtained for inclusion in expert report; refer Dr. Rolle to Ramon Medina for identification of applicable PEIMS coding for data retrieval; receive communiqué from Dr. Rolle regarding review of trial transcript to date; review Defendants' Amended Master Exhibit list, same includes addition of further exhibits; review TTSFC Plaintiffs' First Amended Master Exhibit List, withdrawing multiple exhibits; direct Allen Keller regarding expert report excerpts analyzing General Diffusion of Knowledge, and summary of expert reports prepared by Toni Templeton. (No charge)

10/24/12 (RS) Prepare correspondence to Robin Sanders regarding discussion with experts regarding cancellation of depositions and related deadlines, new expert deposition dates, dates for TCSA depositions, report received from experts (absent rent/lease cost comparisons), input by Dr. Lisa Dawn-Fisher concerning information from PEIMS data banks; deposition dates and deposition dates for state witnesses Marek and McKenzie; receive and review response to same. (No charge) 0.3

10/24/12 (RS) Prepare advisory to litigation staff regarding discussion with David Thompson concerning potential testimony by Joe Wisnoski regarding charter funding formula and Mr. Thompson's input relating to same. (No charge) 0.1

10/24/12 (RS) Prepare advisory to Joe Hoffer regarding testimony by San Benito ISD Superintendent regarding process utilized by IDEA in selecting students from the District; receive and review extensive response from Mr. Hoffer concerning same; communiqué exchange with TCSA administrators regarding "cherry picking" claim by San Benito ISD Superintendent; cross-examination tactics implemented and line of questioning used to refute same. (No charge) 0.1

10/24/12 (RS) Prepare directive to staff regarding preparation of FOF and COL and submission of same to Judge on or before 10/29/12; communiqué exchange with Paralegal confirming same is to be submitted only to the court; review request from Paralegal to



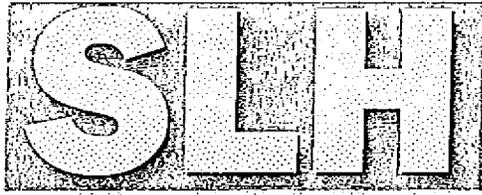
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

Jimmy Strohmeyer for dates of availability to schedule deposition; review Mr. Strohmeyer's response; prepare communiqué to Mr. Strohmeyer advising of necessity to schedule pre-deposition conference; receive reply from Mr. Strohmeyer with dates he is available; prepare communiqué to Robin Sanders with date for Strohmeyer deposition; receive follow-up communiqué from Mr. Strohmeyer advising of non availability; review revised Plaintiffs' Master Exhibit List with references newly admitted exhibits, withdrawn exhibits, added exhibits and exhibits to which objections have been made; review follow-up communiqué with three demonstratives for Waggoner trail testimony; review same. (No charge)

10/25/12	(AK) Continue reviewing all expert reports and supporting data sets for discussions of successful delivery of general diffusion of knowledge; expand review to include search for analysis of college and workforce readiness of public school students; prepare and forward summary of all reports to Bob Schulman for review.	5.9
10/25/12	(LS) Review transcripts of previous days' court hearing. (No charge)	1
10/25/12	(RM) Review communiqué from Bob Schulman regarding PEIMS account codes used to classify lease and repair expenses by open-enrollment charters; review FASRG Module 11 regarding same; prepare reply to Mr. Schulman regarding same.	0.2
10/25/12	(RS) Attend trial.	7.5
10/25/12	(RS) Prepare extensive advisory report to litigation staff regarding Toni Hunter's examination of Everman ISD Superintendent and recommendations for use of format in eliciting testimony by Charter operator/witnesses. (No charge)	0.3
10/25/12	(RS) Direct Ramon Medina to identify PEIMS codes required to obtain cost comparison data relating to facility rents and repairs; receive advisory memorandum from Mr. Medina concerning same; prepare communiqué to Dr. Anthony Rolle forwarding Mr. Medina's memorandum for review. (No charge)	0.3
10/25/12	(RS) Communiqué exchange with Denise Pierce regarding discussion with Dr. Anthony Rolle and scheduling of teleconference regarding experts' analysis, and PEIMS data or other data banks recording charter school and school district	0.2

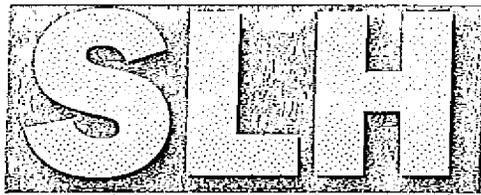


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	facility expenditures; conduct extended telephone conference with Ms. Pierce and Mr. Dunn regarding same. (No charge)	
10/25/12	(RS) Prepare communiqué to Robin Sanders regarding travel to San Antonio for Strohmeyer deposition and his unavailability on 11/09, date previously confirmed; receive and review response from Ms. Sanders regarding same; conduct follow-up exchanges with Ms. Sanders concerning same; prepare extensive advisory to litigation staff regarding finance suit in-court observations, preparation of our Charter witnesses for deposition and trial and issues relating to evidence in support of Charter Plaintiffs' case. (No charge)	0.7
10/25/12	(RS) Travel time for return from Austin. (No charge)	2
10/26/12	(AK) Review Charter Plaintiffs' First Amended Petition, and all Petitions from other Plaintiff groups in preparation for drafting FOF and COL; draft Findings and Conclusions, focus on proof that to offered at trial and legal conclusions supported by the proof, as well as concise history of charter school funding and consequences from lack of facilities funding; forward to Bob Schulman for review.	7.4
10/26/12	(AK) Continue review and summary of Defendants' discovery responses.	5
10/26/12	(RM) Review communiqué from Bob Schulman regarding draft communiqué to Dr. Anthony Rolle and Craig Wood and request to review a 2005 rider pertaining to charter funding; review Chapter 12, Subchapter D, Chapter 42 of Education Code and General Appropriations Act (2005) for rider in question; reply to Mr. Schulman requesting additional direction.	0.7
10/26/12	(RS) Confer with Allen Keller regarding status of assigned project for preparation of initial draft of proposed FOF and COL as directed by Court; prepare communiqué to Mr. Keller regarding correction to facts as per in court testimony regarding same; prepare advisory and directive to expert witnesses, Wood & Rolle, request review of specific expert reports and deposition testimony; prepare advisory and directives to Leonard Schwartz and Joe Hoffer regarding same; prepare extensive correspondence to Dr. Anthony Rolle regarding his report and case structure; prepare additional advisory to Denise Pierce regarding Rolle report and Bill rider; communiqué exchanges	2.7



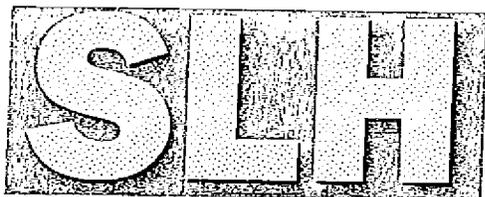
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

with Paralegal regarding status of contact with field experts; receive and review TTSFC Plaintiffs' Second Amended Master Exhibit; receive and review correspondence from defense counsel regarding supplemental responses to discovery requests of all parties.

10/27/12	(LS) Review court transcripts from previous week. (No charge)	2
10/27/12	(RS) Conduct telephone conference with defense counsel regarding Charter Plaintiff and Defendants' discovery responses and depositions to be scheduled of witnesses; prepare communiqué to Mark DiBella regarding records required by AG from charter school operators appearing in case prior to depositions.	0.5
10/27/12	(RS) Continue communiqué exchanges with and prepare additional directives to Allen Keller regarding first draft of proposed FOF and COL; review depositions, trial transcripts, pleadings, discovery and relevant case law; begin revisions and additions to same.	4.3
10/28/12	(RS) Receive revised version of Lynn Moak trial presentation; review same in preparation for trial testimony and possible cross-examination.	0.3
10/28/12	(RS) Receive and review Fort Bend ISD Plaintiffs' First Amended Witness List and Second Amended Deposition Designations, revised to include Dr. John Folks deposition and transcript; provide 10/24/12 transcript of trial to Paralegal with directive to distribute to TCSA administrators, charter witnesses, and experts; prepare advisory to field experts and experts regarding same; prepare directive to Allen Keller regarding financial expert, Dr. Lisa Dawn-Fisher report and its inclusion as Defendant trial exhibit; continue review, modifications and additions to FOF and COL and direct Mr. Keller in further review, revision of FOF and COL and organization of same for review by Joe Hoffer and Leonard Schwartz.	2.4
10/29/12	(AK) Continue review and summary of Defendants' discovery responses.	3.5
10/29/12	(AK) Review and incorporate Bob Schulman's revisions to draft FOF and COL, include citations to previous Texas Supreme Court decisions regarding school finance and relevant statutes; forward revised draft to Mr. Schulman for review.	3



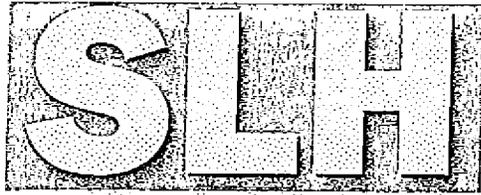
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

10/29/12	(LS) Attorney conference with Bob Schulman regarding court proceedings.	1
10/29/12	(RM) Review communiqué and attached file from Bob Schulman regarding definition of WADA; research TEA Statewide Summary of Finances and charter school summary of finances for the 2006-2007 and 2010-2011 school years; review TEC 42.302 and HB 3646 for definition of WADA; forward research results to Mr. Schulman.	1
10/29/12	(RM) Continue research Texas Legislature Online website for amendments to Bills passed during the 2005 Legislative Session; prepare communiqué to Bob Schulman providing requested information concerning charter school state funding.	0.7
10/29/12	(RM) Review communiqué from Bob Schulman regarding research of amendments to charter school funding law; research Texas Legislature Online for amendments to Bills enacted by the 2005 Legislative Session.	0.5
10/29/12	(RS) Review requests from Denise Pierce requesting copies of proposed FOF and COL and contact with appellate counsel James Ho; direct staff regarding same. (No charge)	0.1
10/29/12	(RS) Direct Ramon Medina in review and analysis of Bill Rider sections addressing charter school financing formula changes as per statute amendment, per prior e-mails from Denise Pierce; receive and review research summary prepared by Mr. Medina regarding same; prepare response to Mr. Medina, forward 2011 TEA School Finance/Revenues Handbook with request for further commentary; forward research (history of charter funding) summary drafted by Mr. Medina to Drs. Anthony Rolle and Craig Wood for review. (No charge)	0.4
10/29/12	(RS) Receive and review communiqué from Denise Pierce with link to Moak Casey article; prepare reply to Ms. Pierce; prepare communiqué to Ms. Pierce and David Dunn regarding Moak's testimony concerning ISD revenue shortages and whether comparable data for charters exists. (No charge)	0.4
10/29/12	(RS) Review communiqué from Denise Pierce to between TCSA administrators regarding status of facility report data to be received from the Colorado League and Colbert report; conduct telephone conference with Ms. Pierce regarding same. (No charge)	0.2

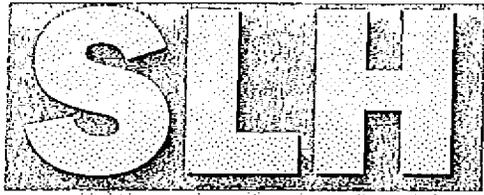


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

10/29/12	(RS) Extended teleconference with Dr. Anthony Rolle regarding content of report and availability of facility funding data; prepare detailed communiqué to Drs. Rolle and Craig Wood, Denise Pierce, Toni Templeton and litigation staff regarding Moak testimony exhibits offered to date and to be offered; prepare internal memorandum of Moak testimony with references to pertinent General Diffusion of Knowledge statutes as identified in testimony and trial exhibits; prepare advisory to Drs. Rolle and Wood identifying excerpts from West Orange-Cove II decision related to and governing charter plaintiff proofs; receive and review response from Dr. Rolle regarding facility rent/lease expenditure survey conducted by TCSA and use of same in expert report; prepare response to Dr. Rolle regarding same, further commentary on Colbert expert report regarding General Diffusion of Knowledge data and school district facility expenditures.	1.8
10/29/12	(RS) Receive and review recommendation from Dr. Anthony Rolle concerning procurement and review of rent/lease expenditure survey recently conducted by TEA; communiqué exchange with Dr. Rolle regarding review of Colbert report, and its reference to data as indicators of attainment of constitutionally required General Diffusion of Knowledge, along with school district facility expenditures and deadline for completion of Wood&Rolle expert finance report; prepare follow-up communiqué to Drs. Wood and Rolle regarding absence of charter data from Colbert Report, and inclusion of limited data in Moak report; review data accompanying Moak report for same; continue preparation of Findings of Fact and Conclusions of Law; forward same to Allen Keller for review/revisions; prepare communiqué with additional Finding of Fact for incorporation in current draft; receive and review Defendants' Fourth Amended Master Exhibit List. (No charge)	2.3
10/29/12	(RS) Attend finance trial and post trial conference with court.	8.5
10/29/12	(RS) Confer with and direct Leonard Schwartz in preparation of his appearance at trial. (No Charge)	1
10/30/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	6.5
10/30/12	(RM) Review communiqués and attached files from Bob	0.5

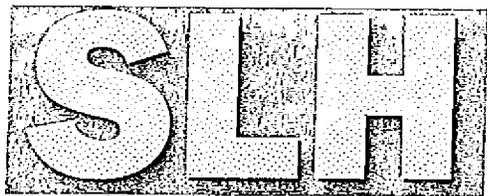


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	Schulman regarding Lynn Moak trial testimony.	
10/30/12	(RM) Confer with Bob Schulman regarding review Shirley Beaulieu's deposition. (No charge)	1
10/30/12	(RM) Review communiqué from Bob Schulman directing review of Beaulieu depo transcript in response to Defendants' Supplementary Designation of Deposition Testimony. (No charge)	0.1
10/30/12	(RS) Prepare communiqué to Drs. Anthony Rolle and Craig Wood regarding trial transcript, forwarded for review. (No charge)	0.2
10/30/12	(RS) Receive and review communiqué from Dr. Anthony Rolle with link to publication on measuring school performance and efficiency, list of research monographs concerning efficiency issues; communiqué exchange with Dr. Rolle on issue of analysis and measurement for an efficient funding system. (No charge)	0.4
10/30/12	(RS) Attend finance trial.	8
10/30/12	(RS) Prepare communiqué to Dr. Craig Wood concerning unsuitability and inefficiency of current and past charter funding formulas, lack of charter school facility funding and averaged weights add to the inadequacies; request Dr. Wood to provide deposition transcript of trial testimony from WOC II; prepare staff directive regarding same. (No charge)	0.2
10/30/12	(RS) Prepare directive to Leonard Schwartz regarding review of draft FOF and COL; prepare communiqué to Mr. Schwartz regarding preparation for expert depositions. (No charge)	0.2
10/30/12	(RS) Receive and review communiqué from David Dunn regarding data requested from Colorado League used for analysis in preparation of Texas charter school facility survey; prepare reply to Mr. Dunn regarding same, request contact information for Colorado sponsor. (No charge)	0.1
10/30/12	(RS) Prepare communiqué to Dr. Craig Wood with Moak trial presentation dated 10/29/12 for review; prepare communiqué to Ramon Medina with Moak trial presentation; forward trial transcripts to Denise Pierce, Dr. Wood and Mr. Medina; communiqué exchange with experts Wood and Rolle and Leonard Schwartz regarding key points of Moak trial testimony and PowerPoint presentation. (No charge)	0.4



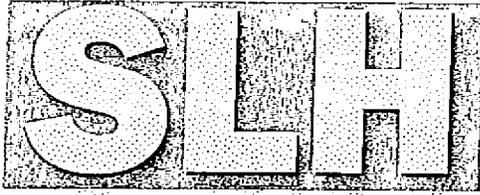
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

10/30/12	(RS) Prepare extensive research/analysis memorandum to Drs. Anthony Wood and Craig Wood, with copy to Leonard Schwartz, regarding efficiency under WOC II. (No charge)	1.1
10/30/12	(RS) Begin review and analysis of previously published school finance efficiency publications authored by Dr. Anthony Rolle.	1
10/31/12	(AK) Continue reviewing and summarizing Defendant's discovery responses; review expert reports by William Duncombe and Bruce Baker for references to charter schools and data sets involving charter school performance.	4
10/31/12	(CAP) Research FAST findings for 2010-2012; create document of five-star campuses for 2011 and 2012 from information downloaded from Comptroller's website; communiqué exchanges with Bob Schulman regarding additional information requested concerning three charter campuses within FAST reports (No charge); communiqué exchange with Comptroller's Data Analysis Division representative regarding FAST data not available in booklet form, Eden Park rating inquiry and related matters; conduct search of TEA database for AEIS information for Jubilee, YES and Wayside campuses; download same; forward folders to Mr. Schulman with AEIS information requested; forward FAST five-star campus information to Mr. Schulman for review.	3.1
10/31/12	(LS) Work on the meaning of efficiency; review article by Dr. Anthony Rolle on meaning of efficiency; communiqué exchanges with Bob Schulman regarding same.	3.5
10/31/12	(RM) Review communiqué from Bob Schulman regarding request for assistance determining likely testimony by Laura Taylor; review communiqués forwarded by Mr. Schulman from Robin Sanders regarding expert witness depositions and report (No charge); research School Finance Litigation files for exhibit lists to review; reply to Mr. Schulman provide observations regarding Laura Taylor's qualifications and possible testimony; review communiqué from Mr. Schulman regarding deposition of Dr. Anthony Rolle.	1.1
10/31/12	(RS) Prepare communiqué to David Dunn regarding his prior exchanges with Dr. Anthony Rolle and Dr. Rolle's decision to rely on Moak testimony to demonstrate non-attainment of General Diffusion of Knowledge. (No charge)	0.2



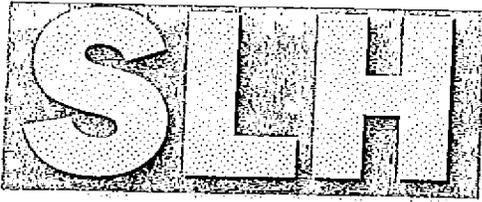
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

10/31/12	(RS) Attend conference with Robin Sanders regarding depositions, document exchanges and scheduling and proof issues.	1.1
10/31/12	(RS) Attend trial and post trial conference with court.	8.2
10/31/12	(RS) Direct Paralegal to download AEIS report data for field experts' respective charters; communiqué exchange with Paralegal regarding current FAST report issued in September 2012; receive and review same. (No charge)	0.2
10/31/12	(RS) Communiqué exchange with Denise Pierce regarding procurement of additional court reporter transcripts for review by Taxpayers Plaintiffs and potential for shared cost for transcripts with Chris Diamond. (No charge)	0.1
10/31/12	(RS) Receive and review communiqué from David Dunn with e-mail from Jessica Johnson, Colorado League, with multiple files regarding Texas Facility Survey and data in support; forward same to Dr. Anthony Rolle for review; prepare communiqué to Robin Sanders advising of receipt of same, proposed dates for Dunn and Pierce deposition and scheduling of depositions of TEA principals, Laura Taylor and Al McKenzie; communiqué exchanges with Dr. Rolle and Dr. Craig Wood concerning dates for their depositions. (No charge)	0.2
10/31/12	(RS) Engage in communiqué exchanges with Leonard Schwartz regarding FOF and COL; incorporate same into edits and additions to same. (No charge)	0.9
10/31/12	(RS) Receive and review from Leonard Schwartz legal memorandum of Texas Supreme Court pronouncements defining school finance "efficiency"; prepare response to Mr. Schwartz regarding development of proof for same. (No charge)	0.5
10/31/12	(RS) Direct Allen Keller in review of Baker and Duncombe reports, status of supplementation, review of supplement, if available, and determination whether data in same includes charter information; receive research memorandum from Mr. Keller regarding same; request copy of Baker report and supplement for review. (No charge)	0.3
10/31/12	(RS) Prepare directive to litigation staff regarding information requested by Robin Sanders from field experts and compilation of same; communiqué exchange with staff concerning same and contact with field experts. (No charge)	0.1



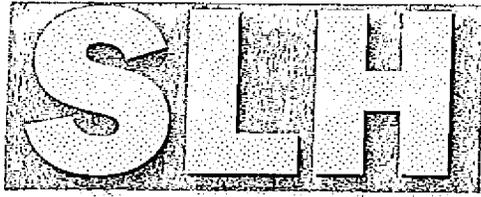
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

11/1/12	(CP) Communiqué exchange with Bob Schulman regarding potential depositions of witnesses Strohmeyer and Sage (No charge); telephone conference with Mr. Strohmeyer, notify him we do not anticipate taking his deposition.	0.1
11/1/12	(CP) Edit and update draft Findings of Fact and Conclusions of Law (FOF and COL), as requested by Bob Schulman.	0.3
11/1/12	(CP) Complete review of FAST reports; conduct communiqué exchange with CPA representative, Josh Haney, regarding which FAST report to utilize to determine ratings (five-star district) for compilation of information for Bob Schulman; review FAST reports for 2010, 2011 and 2012; prepare memorandum to Mr. Schulman with data requested concerning Wayside Academy, YES Preparatory Academy and Jubilee Academic Center; prepare communiqué to Mr. Schulman forwarding same (No charge).	1
11/1/12	(JH) Prepare advisory and request for information to charter school field experts.	0.3
11/1/12	(CP) Discussion with Joe Hoffer regarding three charter field witnesses and efforts to contact them (No charge); prepare draft e-mail for Mr. Hoffer to forward to field witnesses with attached PDF file for review, list of items required for witnesses to compile and request for availability for pre-deposition conferences and depositions on 11/16/12.	0.1
11/1/12	(AK) Continue summarizing Defendants' discovery responses; document production for State of Texas; creation of document summary and index of important documents as directed by Bob Schulman for preparation of Case in Chief.	2.2
11/1/12	(RM) Review and respond to follow-up communiqué from Bob Schulman regarding testimony from Wayne Pierce concerning funding threshold for general diffusion of knowledge.	0.2
11/1/12	(RM) Review communiqué from Bob Schulman forwarding communiqué exchange between Mr. Schulman, Denise Pierce and David Dunn concerning facilities funding for open-enrollment charters. (No charge)	0.2
11/1/12	(RM) Review communiqué from Bob Schulman forwarding communiqué exchange with Robin Sanders concerning scheduling of depositions for Al McKenzie and Gary Marek (No charge); reply to Mr. Schulman regarding same.	0.2



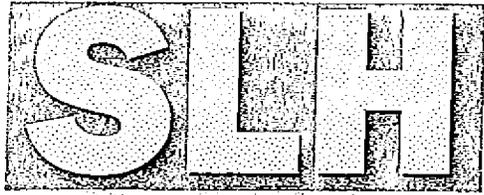
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

11/1/12	(RM) Review follow-up communiqué from Bob Schulman regarding stipulation by Defendants concerning consideration of facility funding for open-enrollment charters and possible testimony by Gary Marek and Joe Wisnoski; research Senate Bill 4, 80th Regular Legislative Session, regarding proposed statute granting facility funding to open-enrollment charters; prepare reply to Mr. Schulman regarding same.	0.5
11/1/12	(RM) Review communiqué from Bob Schulman regarding testimony by Wayne Pierce concerning threshold to achieve general diffusion of knowledge; prepare reply to Mr. Schulman requesting clarification of Dr. Pierce's threshold; review Master Dataset With Charters (10-02-12).xlsx file provided by Dr. Lisa Dawn-Fisher as the basis for her report for information pertinent to Mr. Schulman's inquiry; reply to Mr. Schulman with analysis regarding same.	0.5
11/1/12	(LS) Attend trial; review and respond to communiqués from Bob Schulman regarding trial.	4.6
11/1/12	(RS) Draft advisory to Leonard Schwartz regarding deposition inquiries to and potential testimony anticipated from Dr. Laura Taylor; receive notice from David Dunn regarding deposition dates.	0.2
11/1/12	(RS) Attend trial.	7.5
11/1/12	(RS) Engage in series of communiqué exchanges with Robin Sanders regarding scheduling of depositions of charter operators/CFOs; multiple exchanges with Paralegal concerning preparation of and status of documentation previously requested from such witnesses; direct Paralegal regarding notification to expert witnesses Tom Sage and Jimmy Strohmeier for deposition scheduling; receive and review current Master Exhibit List for and exhibits added; notify Paralegal of admission of same. (No charge)	0.4
11/1/12	(RS) Communiqué exchange with Leonard Schwartz and Paralegal regarding notification to court and parties of Mr. Schwartz's appearance as counsel on the case; engage in communiqué exchange with Robin Sanders concerning scheduling of deposition of state's witness, Gary McKenzie, in lieu of deposition of Al Marek; direct Ramon Medina regarding same; receive response from Mr. Medina concerning application	1.2



# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

of discovery to preparation of deposition inquiries; review request from Rebecca Couto regarding proposed exhibits; review proposed exhibits; direct Paralegal concerning same. (No charge)

11/1/12 (RS) Communiqué exchange with TCSA administrators regarding TEA's Financial Solvency Reviews Final Determination report and recommended responses to inquiries by reporters concerning high number of charters on the list; forward same to Ramon Medina for review; direct Paralegal to obtain FAST information for three campuses for charter operator witnesses; receive memorandum drafted by Paralegal with documentation; review same. (No charge) 0.8

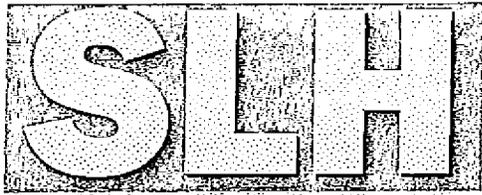
11/1/12 (RS) Prepare internal memorandum regarding exhibits admitted, witness testimony and Court commentaries; prepare file memorandum/synopsis of trial testimony of Dr. Wayne Pierce; forward same to Ramon Medina, Joe Hoffer and Leonard Schwartz for review with directive to Mr. Medina for comparison of same to state's financial reports; receive and review Mr. Medina's analysis. (No charge) 0.7

11/1/12 (RS) Prepare follow-up directive to Ramon Medina regarding state's stipulation concerning consideration of facility funding for open-enrollment charters and potential testimony by Gary Marek and Joe Wisnoski; receive and review Mr. Medina's research summary regarding proposed statute granting charter facility funding. (No charge) 0.5

11/1/12 (RS) Receive and review request from Joe Hoffer to charter operators outlining information to be provided to the Attorney General prior to their depositions. (No charge) 0.1

11/2/12 (CP) Discussion with Bob Schulman regarding location for David Dunn and Denise Pierce depositions, receive directive to contact Mary Sisler, Legal Assistant at AG's office, to change location of same (No charge); prepare request to Ms. Sisler for contact to discuss change in location; telephone call to Ms. Sisler to discuss same (No charge); prepare communiqué to Robin Sanders with copy to Ms. Sisler and Bob Schulman, request location change and written confirmation of same. 0.1

11/2/12 (CP) Communiqué exchange with Robin Sanders regarding location for Dunn and Pierce depositions; receive and review 0.1

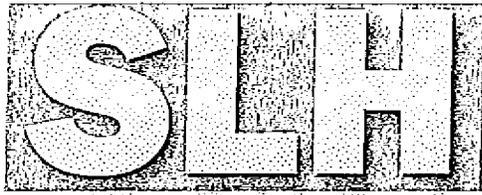


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	second amended notice from Ms. Sanders' office (No charge); forward amended notice to Denise Pierce and David Dunn.	
11/2/12	(CP) Proofread and edit draft FOF and COL.	0.4
11/2/12	(AK) Continue summarizing Defendants' discovery responses.	5.1
11/2/12	(RS) Engage in communiqué exchange with Toni Templeton, TCSA, regarding responses to media inquiries regarding the number of charter schools listed on FIRST financial reports.	0.1
11/2/12	(RS) Engage in communiqué exchanges with Robin Sanders regarding scheduling of Dunn and Pierce depositions, Shelley Dahlberg's request to schedule without regard to dates of availability; review communiqué exchange between Paralegal and Ms. Sanders regarding change of location for Dunn and Pierce depositions (No charge); receive and review Notices of Denise Pierce and David Dunn depositions; prepare advisory to Mr. Dunn and Ms. Pierce concerning deposition date, scheduling for preparation for deposition, and expert report deadline; receive Amended Notices of Dunn and Pierce depositions changing location; direct Mr. Schwartz regarding court appearance on 11/08 and 11/09/12; conduct telephone conference with Mr. Dunn regarding availability of Mr. Dunn and Ms. Pierce for deposition.	0.6
11/2/12	(RS) Receive and review communiqué from Denise Pierce regarding TEA discussions of Charter Plaintiffs' claims arguing against current charter cap based on prior Supreme Court decision regarding maximized efficiency; direct Paralegal in research regarding same and rational basis for equal protection argument; prepare advisory response to Ms. Pierce regarding same; engage in follow-up communiqué exchanges with Ms. Pierce regarding assistance from appellate attorney, James Ho.	0.2
11/2/12	(RS) Confer with ██████████ requesting assistance in preparation of PBM/PBMAS system challenges for Dr. Laura Taylor deposition; engage in communiqué exchanges with ██████████ concerning same and arrangements to travel to Austin to prepare for deposition; prepare lengthy advisory to ██████████ regarding deposition preparation and compilation of exhibits required for same; prepare advisory to David Dunn and Denise Pierce concerning designation by Defendants of Dr. Taylor as defense witness, and anticipated critical testimony.	0.7



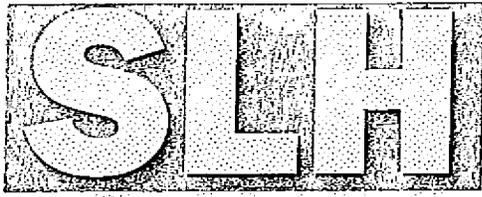
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

11/2/12	(RS) Receive and review "Statement of Interest of the City of Austin" submitted to Judge Dietz with attached resolution; receive communiqué from Toni Templeton regarding results of Financial Solvency Review published on TEA website and inquiries by reporters concerning charter schools listed and responses to same; prepare advisory to Ms. Templeton regarding same.	0.4
11/2/12	(RS) Continue drafting FOF and COL; forward same to Paralegal for edit; receive revised draft from Paralegal with highlight and request for input; revise same; prepare communiqué to Drs. Anthony Rolle and Craig Wood requesting input for additions to FOF and COL; telephone call to Drs. Rolle and Wood, left detailed voice message regarding report deadline (No charge); prepare follow-up communiqué to experts reiterating request for report on or before 11/05/12 and dates for scheduling their depositions; multiple exchanges with Leonard Schwartz regarding potential arguments in support of Charter Plaintiffs' claims and additions to FOF and COL to address same.	2.4
11/2/12	(RS) Review TTSFC's Fourth Amended Master Exhibit List and attached Exhibits; receive and review Defendants' Sixth Amended Master Exhibit List with attachments:	0.1
11/3/12	(CP) Receive directive from Bob Schulman for additions to FOF and COL (No charge); review West Orange Cove final FOF and COL entered of record; reformat proposed FOF and COL; forward same to Mr. Schulman for review.	1
11/3/12	(RS) Review current draft FOF and COL received from Paralegal; direct Paralegal regarding same and review of FOF and COL from WOC II case; engage in multiple communiqué exchanges with and direct Paralegal concerning same; receive and review most recent draft FOF and COL; conduct case research; review pleading; review discovery responses from state; review prior research and research memorandum; prepare revisions and additions to same; forward same to Paralegal for additional formatting changes.	4.60
11/3/12	(RS) Prepare communiqué to Denise Pierce and David Dunn regarding development of PBMAS in preparation for Dr. Laura Taylor deposition.	0.1
11/3/12	(RS) Prepare lengthy advisory correspondence to Denise Pierce, Matter: School Finance Litigation	0.5



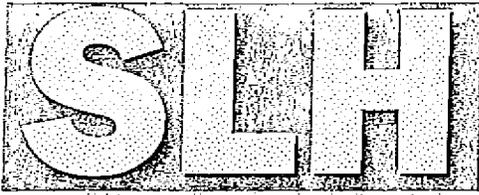
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

David Dunn and litigation staff regarding Dr. Laura Taylor as state witness to recant history of charter, sanctions and interventions.

11/3/12	(RS) Engage in follow-up communiqué exchanges with ██████ regarding assistance in preparing for deposition of Dr. Laura Taylor, identifying data for review in preparation for same; prepare lengthy directive and advisory to ██████ concerning same, with directives to ██████ for locating and analyzing exhibits required for same.	0.7
11/3/12	(RS) Return travel from Austin. (No charge)	1.2
11/4/12	(CP) Receive and review additional directive from Bob Schulman for review of FOF and COL; revise same; return to Mr. Schulman for final approval/input. (No charge)	0.1
11/4/12	(RS) Receive and review revised FOF and COL from Paralegal; direct Paralegal to revise FOF and COL to restore paragraphs to order in earlier version; receive and review restored version of same; communiqué exchanges with Paralegal and Leonard Schwartz regarding Mr. Schwartz's review of FOF and COL; review notification from Dr. Anthony Rolle that articles pertinent to the case will be provided by 11/09/12; prepare response to Dr. Rolle requesting access on line; forward FOF and COL to Drs. Rolle and Craig Wood for review of same; prepare recommendation to Drs. Rolle and Wood for change in order of sections of their report to lead with adequacy and GDK and follow with demonstration of inadequate funding and disparities; request teleconference to discuss same; prepare directive to Joe Hoffer and Mr. Schwartz for review of communiqué exchanges with experts, focusing on concerns relating to experts' report and information contained in same.	3.3
11/4/12	(RS) Travel to Austin.	1.2
11/4/12	(RS) Receive and review WR&A report and Data Table Summary; prepare communiqué to Drs. Craig Wood and Anthony Rolle concerning same; extended telephone conferences with Drs. Wood and Rolle; prepare communiqués to Denise Pierce and David Pierce regarding draft report and information missing from same, forward report to Ms. Pierce and Mr. Dunn for review; forward same to Joe Hoffer for review.	2.1
11/4/12	(RS) Receive and review STAAR v. TAKS summary PowerPoint	0.3

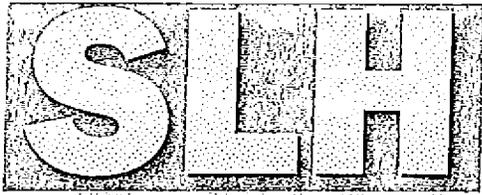


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	from John Turner; receive and review updated Master Exhibit List from Lacy Lawrence in preparation for trial testimony.	
11/5/12	(CP) Final proof of FOF and COL received from Joe Hoffer with his recommended additions; forward same to Bob Schulman, Leonard Schwartz and Mr. Hoffer. (No charge)	0.2
11/5/12	(CP) Draft Notice of Withdrawal by Betsy Bender as Co-Counsel; draft Notice of Appearance by Leonard Schwartz as Co-Counsel.	0.3
11/5/12	(MZ) Search archived files and e-mails for PBMAS materials from 2009 charter coalition presentation to TEA.	0.8
11/5/12	(JH) Review and revise draft proposed FOF and COL.	0.7
11/5/12	(AK) Continue summarizing Defendants's discovery responses, focusing on responses to RFP 34.	3
11/5/12	(LS) Attend trial; meet with Bob Schulman regarding case and FOF and COL; communiqué exchange with Paralegal and Mr. Schulman regarding FOF and COL and discovery.	4.3
11/5/12	(RS) Continue revising FOF and COL; engage in communiqué exchange with Denise Pierce regarding meeting at TCSA to discuss pending data requests, deposition preparation and related issues, and immediate review by TCSA staff of expert report prior to deadline.	1.1
11/5/12	(RS) Receive and review Joe Hoffer's recommended revisions and additions to FOF and COL; prepare directives to staff regarding same.	0.2
11/5/12	(RS) Receive and review request from Rebecca Couto regarding substitution of Exhibits for submission to the Court on 11/06/12; prepare response to Ms. Couto regarding same; engage in communiqué exchange with Denise Pierce and David Dunn regarding input to expert report; receive final version of FOF and COL from Paralegal; forward same to Elizabeth Medina for submission to Judge Dietz (for the court's eyes only). (No charge)	0.4
11/5/12	(RS) Confer with Robin Sanders regarding discussion on 11/04 with experts concerning status of their supplemental report; Ms. Sanders recommends contacting Shelley Dahlberg with projected time of receipt of same; receive and review Notice of Appearance prepared and filed by Paralegal including Leonard Schwartz as counsel for Charter Plaintiffs; receive and review	0.4

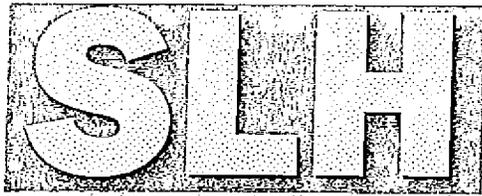


# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

	Notice prepared and filed by Paralegal withdrawing Betsy Bender as counsel for Charter Plaintiffs. (No charge)	
11/5/12	(RS) Receive and review communiqué from Dr. Anthony Rolle with analysis concerning funding distinctions within the Foundation School Program Formula Funding for addition to expert report; prepare response to Dr. Rolle regarding same; draft file memorandum of "finance case random thoughts." (No charge)	0.3
11/5/12	(RS) Receive and review PBMAS Member Briefing from ██████████, inquire as to authorship of same; engage in communiqué exchange with ██████████ regarding expansion denial by TEA based on PBMAS in preparation for Dr. Laura Taylor's deposition; direct Paralegal to access PBMAS presentations and white papers; receive and review same; forward same to ██████████ for review. (No charge)	0.9
11/5/12	(RS) Direct Leonard Schwartz for in-court appearance at trial on 11/06/12. (No charge)	0.1
11/5/12	(RS) Prepare communiqué to Denise Pierce and litigation staff regarding testimony by Dan Casey that public ed funding studies required under TEC have not been performed since 2000, with directive to review Section 12.118 TEC in preparation for deposition to demonstrate TEA failure to conduct charter evaluations; prepare communiqué to Drs. Craig Wood and Anthony Rolle regarding Dr. Casey's testimony and Judge Dietz's response addressing lack of funding for school districts; prepare follow-up inquiry to Drs. Wood and Rolle regarding charter funding formula inefficiencies; receive and review memorandum from Dr. Rolle concerning same; prepare response regarding same requesting additional input concerning report conclusions on charter funding issues; communiqué exchanges with Robin Sanders concerning Dunn, Pierce and Taylor depositions and Ms. Pierce's attendance during Dunn deposition, as TCSA in-house counsel, and potential for scheduling Strohmeyer and Sage depositions. (No charge)	1.2
11/5/12	(RS) Receive and review draft of Wood and Rolle final expert report; confer with David Dunn, Denise Pierce and Toni Templeton regarding same; conduct conference with Ms. Pierce regarding same.	1.3



# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

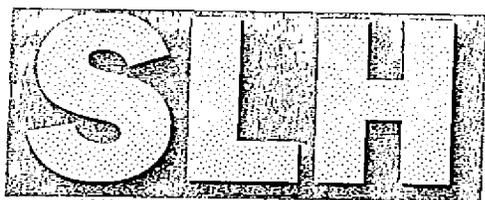
Phone: 210-538-5385

Fax: 210-538-5384

11/5/12	(RS) Prepare request to Drs. Craig Wood and Anthony Rolle regarding report and data table and addition to same addressing formula inefficiencies; conduct extended teleconference with Drs. Wood and Rolle concerning same.	1
11/5/12	(RS) Prepare advisory to Dr. Craig Wood concerning preparation of data set by Toni Templeton for inclusion in final report for review by Drs. Wood and Rolle and deadline (midnight) for submission of same to the state; review communique from Paralegal to charter operators advising no response has been received to Joe Hoffer's request for documentation (dated 11/01) and request for dates for scheduling their depositions (No charge); review response from Matt Abbott to Paralegal requesting clarification of request made and timeline; prepare response to Mr. Abbott's request; prepare request to Ms. Templeton for immediate contact.	0.7
11/5/12	(RS) Receive and review revised final report from WRA; forward report to Toni Templeton, advise that 12th table was added, but narrative remains unchanged; ask Ms. Templeton if she discussed such change with Dr. Anthony Rolle; telephone conference with David Dunn regarding expert report.	0.6
11/5/12	(RS) Review Casey and Rieke trial presentations; forward Casey presentation to Denise Pierce, David Dunn, Leonard Schwartz and Joe Hoffer for review of historical perspective on school district funding.	0.4
11/5/12	(RS) Receive and review Wiggins slides from Haynes & Boone, to be presented during examination on 11/06/12; receive and review updated list of exhibits and Barnett PowerPoint to be moved into evidence on 11/06 by Edgewood Plaintiffs; receive and review updated Master Exhibit List from Haynes & Boone.	0.6
11/6/12	(AK) Continue summarizing Defendants' discovery responses; continue review of documents disclosed in response to Request for Production #34.	1.5
11/6/12	(RM) Review communique and attached file from Bob Schulman regarding signed errata sheet for Dr. Lisa Dawn-Fisher; compare Dr. Dawn-Fisher's errata to transcript of oral deposition dated 10/11/2012; reply to Mr. Schulman, provide observations and comments regarding the errata.	0.7
11/6/12	(RS) Prepare request to experts requesting inefficient formula	0.7

Matter: School Finance Litigation

Page 113



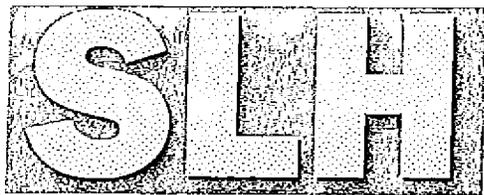
# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

section of report referenced in addendum drafted by Dr. Craig Wood; prepare request to Dr. Anthony Rolle for re-submission of supplement to report prepared by Dr. Wood; receive notification from Dr. Rolle regarding content of data report and associated narrative; communiqué exchange with Denise Pierce regarding Tables 9 and 10 remaining in report, and follow-up discussion with Dr. Rolle concerning same.

11/6/12	(RS) Attend trial.	7.5
11/6/12	(RS) Communiqué exchange with Paralegal regarding 11/16 date scheduled for charter operators and availability of witnesses; prepare directive to Paralegal, Joe Hoffer and Leonard Schwartz regarding deposition scheduling in December; communiqué exchange with Mr. Schwartz concerning availability for in-court attendance; review letters received from Denise Pierce forwarded by TCSA to policymakers including legislators, Department of Education officials and SBOE members, as discovery responses; request media article referenced in letter; review research results and prepare advisory to Ms. Pierce regarding charter finance history for her review and possible testimony; prepare communiqué to Richard Gray IV concerning Dr. Anthony Rolle's expert qualifications, with links to publications concerning efficiency. (No charge)	0.8
11/6/12	(RS) Draft questions to propound in cross-examination to Fort Bend ISD fact witness; prepare communiqué to Denise Pierce regarding preparation for Dr. Laura Taylor deposition; prepare follow-up communiqué to Ms. Pierce with link to Charter Resource Center publication "Apples to Apples" for review and possible testimony; forward third communiqué to Ms. Pierce with House Bill 6 cite regarding charter school funding formula for review and possible testimony; direct Ramon Medina regarding revisions to expert financial report of Dr. Lisa Dawn-Fisher; receive reply from Mr. Medina regarding same; receive and review bullet points of information prepared by ██████████ concerning deposition of Dr. Taylor. (No charge)	1.3
11/6/12	(RS) Receive and review Defendants' Seventh Amended Master Exhibit List and accompanying zip file with new exhibits; receive notification from Paralegal concerning Mark DiBella's availability for deposition and inquiry regarding location for scheduling of	1.5



# Schulman, Lopez & Hoffer LLP

517 Soledad Street  
San Antonio, TX 78205

Phone: 210-538-5385  
Fax: 210-538-5384

same; receive and review staff communiqué to Mr. DiBella indicating deposition will take place in SLH San Antonio office regarding same; Receive and review Defendants' Second Supplemental Response to Edgewood Plaintiffs' First Request for Production. (No charge)

11/6/12 (RS) Receive notification from Paralegal of current TEA organizational chart and use as a potential exhibit for trial; direct Paralegal to save same in Dropbox for access. (No charge) 0.1

11/6/12 (RS) Communiqué exchange with ~~XXXXXXXXXX~~ concerning potential for linking charters in PBMAS interventions to least funded schools; receive notification from Paralegal regarding documentation compiled by Matt Abbott for submission to the Attorney General; direct Paralegal regarding review and release of same. 0.4

11/6/12 (RS) Receive and review John Turner's notice to Shelley Dahlberg and Linda Halpern regarding witness scheduling problems and recommended start times for witness testimony to coordinate same (No charge); receive daily transcript from court reporter; forward same to Paralegal with directive to review same for Wayne Pierce testimony and submission to charter operators; receive Duncombe trial presentation from Holly McIntush; review same in preparation for testimony; review updated Master Exhibit List from Lacy Lawrence with explanation of revisions to same. 0.4

11/7/12 (CP) Communiqué exchange with Robin Sanders regarding location (room number) at TEA for McKenzie deposition; prepare Notice of Deposition; prepare communiqué to all interested parties forwarding same (No charge); communiqué exchange with court reporting firm requesting guarantee of placement on deposition schedule; receive confirmation. 0.2

11/7/12 (CP) Telephone conference with Maria Sigua regarding documents she has printed for Denise Pierce and David Dunn to review and confusion concerning same; prepare communiqué to Joe Hoffer and Bob Schulman regarding discussion with Ms. Sigua, request that Mr. Schulman notify her and TCSA administrators of recommended documents to review, if possible. 0.1

11/7/12 (CP) Communiqué exchanges with Bob Schulman regarding scheduling of field expert depositions (No charge); prepare request to Robin Sanders to advise of time for scheduling same, 0.5