Filed
13 March 6 P2:44
Amalia Rodriguez-Mendoza
District Clerk
Travis District
D-1-GN-11-003130

Schulman, Lopez & Hoffer LLP

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 third of four parts to Exhibit M (pages 116 through 173) 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.

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	with recommendation to start with Mark DiBella at 930 AM; telephone conference with Mr. Schulman concerning deposition of Rene Gallegos, and not Tom Koger, as previously understood (No charge); telephone conference with Mr. Gallegos, confirm his availability on 11/16/12 to meet with Joe Hoffer for deposition preparation, with deposition scheduled in the afternoon; prepare communiqué to Mr. Gallegos and Mr. Koger regarding same.	
11/7/12	(CP) Telephone conference with Rene Gallegos regarding information requested by the AG, compilation of same and format; inquiry with regard to teacher qualification and other issues; prepare communiqué to Mr. Gallegos with copies of sample forms received from Matt Abbott for use as a guideline.	0.2
11/7/12	(CP) Telephone conference with Mark DiBella, coordinate his deposition, travel and pre-deposition conference.	0.1
11/7/12	(AK) Continue summarizing Defendants' discovery responses.	7
11/7/12	(LS) Prepare communiqué to Bob Schulman regarding testimony to be given by witness on 11/8/2012.	0.2
11/7/12	(RM) Telephone conference with Bob Schulman regarding his request to meet to discuss case and expert witness testimony; review communiqué from Mr. Schulman regarding withdrawal of Wayside Schools as a plaintiff in the case, deposition of Dr. Laura Taylor and Al McKenzie; cursory review of deposition transcript for Dr. Lisa Dawn-Fisher and Shirley Beaulieu to identify possible questions for Mr. McKenzie deposition.	0.5
11/7/12	(RM) Confer with Bob Schulman regarding scheduled deposition of Al McKenzie.	1.2
11/7/12	(RS) Attend trial.	3.5
11/7/12	(RS) Receive and review communiqué from Paralegal with dates Mark DiBella is available for deposition and potential for pre-depo conference by Skype; recommend Joe Hoffer or Leonard Schwartz conduct preparation via Skype. (No charge)	0.1
11/7/12	(RS) Prepare advisory to experts and TCSA administrators regarding Judge Dietz's directive for parties to use 2011-12 data from TEA as later data is unreliable and requires supplementation of same if previously used as an exhibit and/or in support of expert reports; receive request from Toni Templeton for clarification of Court's directive and whether it applies to both financial and performance data. (No charge)	0.5

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

11/7/12	(RS) Prepare directive to Ramon Medina for additional information for Dr. Laura Taylor deposition; receive communiqué from Denise Pierce requesting meeting with Ms. Templeton on 11/08; receive request from Maria-Theresa Sigua requesting assistance for preparation of TCSA conference room for Dunn and Pierce depositions; prepare response to Ms. Sigua advising of same; conduct multiple exchanges with Robin Sanders confirming depositions of two charter operators on 11/16 and location for same; receive notification from Paralegal of Wisnoski deposition scheduled on 11/16; review original and Amended Notices of Wisnoski deposition; draft list of questions for Duncombe; receive notification from Paralegal regarding her discussion with Ms. Sigua and concerns that TCSA administrators are printing off unnecessary documents to prepare for deposition; notify Paralegal of information needed for review. (No charge)	0.8
11/7/12	(RS) Communiqué exchange with Denise Pierce regarding FOF and COL; direct Paralegal to forward final version to Ms. Pierce; advise Ms. Pierce same is not for distribution as it was not filed and not open for public review; forward CP's 2006 state study to Jimmy Strohmeyer for review, request he provide dates for scheduling his deposition; forward study to Ramon Medina for inclusion as an exhibit at upcoming McKenzie deposition; receive additional financial data from Toni Templeton; prepare request to Ms. Templeton for input concerning such data; confer with Robin Sanders regarding information received from charter operators, disclosure of same and dates for depositions; Ms. Sanders advises 11/16 may not work due to scheduling of Hammond deposition on that day. (No charge)	0.5
11/7/12	(RS) Confer with Ramon Medina in preparation of inquiries for Al McKenzie deposition.	1
11/7/12	(RS) Communiqué exchange with Chris Diamond regarding Al McKenzie, TEA duties and scheduling of charter operator depositions; receive advisory from Paralegal concerning Mark DiBella deposition arrangements; receive communiqué from paralegal concerning Rene Gallegos' deposition and scheduling of DiBella's deposition; prepare response to paralegal regarding same; receive MALDEF notices regarding scheduling of Bast	0.6

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	and Trotter depositions, receive and David Hinojosa's communiqué regarding potential Intervenor and state witnesses. (No charge)	
11/7/12	(RS) Attend trial; confer with court clerk regarding trial calendar.	3
11/7/12	(RS) Attend post-trial conference with Robin Sanders regarding scheduling of state and charter school depositions, document exchanges, discovery calendar and trial calendar.	0.8
11/7/12	(RS) Forward Duncombe presentation to Leonard Schwartz for review.	0.1
11/7/12	(RS) Review Edgewood Plaintiffs' exhibits to be entered into evidence on 11/08, received from Rebecca Couto.	0.2
11/7/12	(RS) Receive and review End of Course testing data for 2011-12 from Toni Templeton with communiqué regarding analysis of same, included with Dr. Anthony Rolle's tables; forward same to Dr. Rolle for review; receive and review updated Master Exhibit List from Lacy Lawrence.	0.3
11/8/12	(CP) Prepare communiqué to Matt Abbott, Rene Gallegos and Mark DiBella regarding reset of deposition scheduled on 11/16/12, request their availability on 12/07 and 12/14; prepare communiqué to Isabel Longoria at MALDEF concerning reissuance/amendment of deposition notices, not done yet (No charge).	0.1
11/8/12	(JH) Conference call with Rene Gallegos regarding field expert documents.	0.2
11/8/12	(AK) Continue summarizing Defendants' discovery responses.	1.2
11/8/12	(LS) Attend trial; attend post-trial meeting with Judge Dietz and counsel regarding calendar and Judge's view of the record; attorney conference with Bob Schulman regarding the day's witnesses; communiqué exchange with Mr. Schulman regarding future presentation of facts and authorities; conduct research on issue of when do you judge rational basis for statute and how to judge rational basis; communiqué exchange with Mr. Schulman regarding research.	9
11/8/12	(RS) Review Rene Gallegos' reports and documentations for Jubilee Academic Center in response to prior requests for same to be provided for submission to AG; prepare notification to Drs. Craig Wood and Anthony Rolle regarding request for their deposition schedules on 11/29 and 11/30; confer with and direct	1.7

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Unofficial Copy Travis Co. District Clerk Velva L. Price

	Paralegal concerning rescheduling of charter operator depositions, direct her to obtain dates of availability to include 12/07 and 12/04; prepare advisory to Tom Sage regarding trial schedule, presentation of Charter Plaintiffs' case in January and request by the AG for description of his testimony, provide summary of potential testimony related to AG's office; requesting preparation of report and that Mr. Sage prepare a report and recommend scheduling of teleconference; review Amended Motion to Appear Pro Hac Vice, Affidavit in Support and proposed Order filed by MALDEF counsel; review request by Chris Diamond to MALDEF for rescheduling of Bast deposition from 11/30 to 12/04 and location for setting Hammond, Venable, Bast and Moe depositions; engage in communiqué exchanges with Leonard Schwartz proposing cross-examination of Dr. Diane Schanzenbach; review charter enrollment numbers for 1999 through 2012 provided by Toni Templeton; forward same to Allen Keller with request to draft additional FOF concerning charter growth mirroring finding addressing public school student population growth.	
11/8/12	(RS) Review PBM "discussion" update received from [redacted] with dates of her availability to confer regarding same; recommend scheduling of teleconference to discuss same in preparation for Dr. Laura Taylor deposition.	0.2
11/8/12	(RS) Review corrected deposition notices for Hammond and Venable depositions; review notification from Chris Diamond to MALDEF advising Robyn Wolters will be presented for deposition on 12/10 and location for same; communiqué exchange with Robin Sanders regarding scheduling of Taylor deposition and confirmed date for one charter operator's deposition.	0.3
11/8/12	(RS) Prepare internal memorandum to Leonard Schwartz regarding equal protection argument; receive and review research memorandum from Leonard Schwartz concerning rational basis test issue; receive and review current version of Master Exhibit List and notification from Lacy Lawrence regarding exhibit sequence for depositions on 11/09 (No charge).	0.3
11/8/12	(RS) Meet Attend conference with and prepare David Dunn and Denise Pierce for depositions.	3.9
11/9/12	(CP) Receive and review communiqué from Mark DiBella	0.1

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	advising he is not available for deposition on either 12/07 or 12/14; forward same to Bob Schulman and Joe Hoffer (No charge).	
11/9/12	(CP) Multiple communiqué exchanges with TSG Reporting scheduling department concerning confirmation of McKenzie deposition (No charge); telephone conference with Grace Chance, court reporter, regarding same.	0.1
11/9/12	(AK) Continue summarizing Defendants' discovery responses, focus on responses to Request for Production #34.	4
11/9/12	(RM) Review transcript Dr. Lisa Dawn-Fisher deposition for references to work performed by Al McKenzie to prepare her report; review legal requirements and guidelines for existing debt allotment, instructional facility allotment, and new instructional facility allotment; review Dr. Dawn-Fisher's report; prepare possible questions to be used during McKenize deposition; prepare communiqué to Bob Schulman forwarding results of research.	2.2
11/9/12	(RS) Communiqué exchange with Leonard Schwartz regarding equal protection claim as plead to date for CP claim and embellishments to same, extending same to finance formula claims; receive Chris Diamond's notification regarding attendance at Dunn and Pierce depositions and possible inquiries to be made; prepare response to Mr. Diamond regarding same; receive updated FOF and COL from Allen Keller with addition of reference to charter growth calculation.	0.3
11/9/12	(RS) Communiqué exchange with Paralegal regarding scheduling confirmations and notices; receive communiqué from David Dunn concerning deposition testimony on charter school application standards.	0.1
11/9/12	(RS) Attend and defend David Dunn deposition.	8
11/9/12	(RS) Receive and review Fort Bend Plaintiffs' Supplemental Exhibit List; receive and review TTSFC Plaintiffs' Fifth Amended Master Exhibit List withdrawing Exhibits 3189 A-C, adding Exhibit 3189 D.	0.3
11/9/12	(RS) Return travel from Austin. (No charge)	1.2
11/10/12	(RS) Prepare communiqué to Denise Pierce regarding David Dunn deposition and instruction of A&M report in her testimony in deposition or trial; receive and review proposed inquiries to Al	0.9

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Unofficial copy Travis Co. District Clerk Velva L. Price

	McKenize; prepare communiqué to Ramon Medina regarding same, request his attendance at deposition and scheduling pre-deposition conference.	
11/11/12	(RM) Review communiqué from Bob Schulman regarding preparation for McKenzie deposition; prepare exhibits for same; research Comptroller of Public Accounts website for 2005 report concerning survey of public school facilities.	1
11/11/12	(RM) Telephone conference with Bob Schulman regarding preparation for McKenzie deposition.	0.2
11/11/12	(RS) Telephone conference with Ramon Medina regarding preparation for McKenzie deposition.	0.2
11/11/12	(RS) Conduct communiqué exchanges with Robin Sanders regarding TEC provision on student admissions, scheduling of Dr. Laura Taylor deposition and additional deposition schedules to be further refined in discussion at McKenzie deposition.	0.2
11/11/12	(RS) Travel to Austin.	1.2
11/12/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	2.8
11/12/12	(RM) Confer with Bob Schulman regarding questions for McKenzie deposition and preparation of exhibits; prepare additional questions for deposition; use Dr. Lisa Dawn-Fisher's report and Master Dataset With Charters Excel file, prepare exhibits for deposition.	2.2
11/12/12	(RM) Review communiqué from Bob Schulman regarding McKenzie deposition. (No charge)	0.2
11/12/12	(RM) Confer with Bob Schulman regarding deposition of Al McKenzie and ongoing School Finance litigation.	0.5
11/12/12	(RM) Travel to TCSA for deposition of Al McKenzie. (No charge)	0.5
11/12/12	(RS) Receive communiqué from Robin Sanders regarding scheduling of depositions subsequent to Thanksgiving break; prepare advisory reply to same. (No charge)	0.1
11/12/12	(RS) Engage in communiqué exchange with Paralegal regarding deposition transcripts storage on Dropbox; receive notification for beginning exhibit numbers for McKenzie deposition; engage in communiqué exchange with Denise Pierce concerning McKenzie deposition; conduct further communiqué exchanges with Toni Templeton regarding calculation of WADA paid to charter schools to be addressed at McKenzie deposition.	0.4

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

11/12/12	(RS) Review deposition transcript and expert report of Dr. Lisa Dawn-Fisher in preparation for McKenzie deposition; continue preparation of inquries for McKenzie deposition.	3.1
11/12/12	(RM) Attend and assist Bob Schulman at McKenzie deposition.	3
11/12/12	(RS) Attend conference with Ramon Medina in further preparation for McKenzie deposition.	0.5
11/12/12	(RS) Attend and conduct McKenzie deposition.	3
11/12/12	(RS) Receive and review Defendants' exhibits for next trial day; receive and review updated Master Exhibit List; receive and review Edgewood Plaintiffs' PowerPoint presentations to be used in direct examinations of MALDEF witnesses Pompa and Izquierdo.	0.5
11/12/12	(RS) Prepare correspondence to Dr. Anthony Rolle citing Dr. Lisa Dawn-Fisher deposition excerpts regarding state's charter school funding formulas.	0.3
11/13/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	4.3
11/13/12	(LS) Review and respond to multiple communiqués from Bob Schulman regarding case.	0.5
11/13/12	(RS) Attend trial.	7.5
11/13/12	(RS) Direct Paralegal concerning request previously made concerning copy of November 1st trial transcript; review Paralegal's response to same; direct Paralegal regarding same. (No charge)	0.3
11/13/12	(RS) Receive and review communiqué from Toni Templeton regarding McKenzie deposition and Dr. Lisa Dawn-Fisher's data set, gap in funding, calculation of WADA and ADA for charters and districts, and related issues; prepare response to each issue. (No charge)	0.5
11/13/12	(RS) Communiqué exchange with Paralegal regarding date for scheduling of Mark DiBella's deposition previously agreed to; receive and review response to same and deposition schedule for Matt Abbott and Rene Gallegos; direct Paralegal regarding new dates for DiBella deposition; prepare notification to Assistant Attorney General regarding same. (No charge)	0.3
11/13/12	(RS) Conduct communiqué exchanges with Paralegal regarding scheduling of pre-deposition conference with experts Drs. Wood and Rolle and deposition date confirmation; conduct	0.3

Unofficial copy Travis Co. District Clerk velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	communiqué exchange with Tom Sage concerning scheduling of teleconference. (No charge)	
11/13/12	(RS) Review communiqué from court reporter, forwarded by Paralegal, regarding charges for preparation of rough draft of November 1st transcript; advise Paralegal regarding party agreement to share trial transcript costs and to cancel request for rough draft; confer with and direct Leonard Schwartz regarding attendance at trial the week of November 29th and on December 4th. (No charge)	0.4
11/13/12	(RS) Multiple communiqué exchanges with Robin Sanders regarding scheduling of Dr. Laura Taylor deposition and Wood and Rolle deposition. (No charge)	0.4
11/13/12	(RS) Receive communiqué from Paralegal regarding scheduling of DiBella deposition; prepare response regarding same and location of same.	0.1
11/13/12	(RS) Engage in communiqué exchange with Robin Sanders regarding availability of Rene Gallegos and Matt Abbott for depositions and location for same; receive and review updated Master Trial Exhibit List; receive and review Edgewood's Exhibit 4232, La Feria ISD PowerPoint for next trial day.	0.5
11/14/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	6.1
11/14/12	(RM) Review communiqué from Bob Schulman regarding Figure 6 in Dr. Lisa Dawn-Fisher's report and Al McKenzie's testimony regarding same; review Figure 6; reply to Mr. Schulman regarding same.	0.2
11/14/12	(RS) Attend trial and TCSA conference regarding trial.	8.5
11/14/12	(RS) Communiqué exchange with Paralegal regarding scheduling Dr. Laura Taylor deposition; review current trial calendar; communiqué exchanges with Denise Pierce concerning request by Kent Grusendorf for copies of trial transcripts; communiqué exchanges with Robin Sanders regarding scheduling of depositions in San Antonio and reconfirmation of deposition dates for charter school witnesses. (No charge)	0.3
11/14/12	(RS) Direct experts in review of Dr. Bruce Baker deposition testimony transcript in preparation for depositions; confer with Chris Diamond concerning cross-examination of Dr Baker on	0.4

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	charter school issues at trial; direct Allen Keller in review of exhibits to determine submission of Dr. Baker's report, supplemental data or other documentation as an exhibit; receive and review reply from Mr. Keller; direct Mr. Keller regarding same; receive and review Mr. Keller's response to same. (No charge)	
11/14/12	(RS) Receive and review exhibits provided by Defendants pursuant to Judge Dietz's request to expand into 2011-1012 and 2012-2013 data; receive and review business record affidavit supporting same; forward same to TCSA administrators; prepare communiqué to Denise Pierce regarding updated data sets fro experts requested by the Court and possibility of Toni Templeton preparing same supported by business record affidavit from Ms. Pierce or David Dunn through deposition or trial testimony; receive and review response from Ms. Pierce concerning same. (No charge)	0.6
11/14/12	(RS) Receive and review communiqué exchanges between Paralegal and court reporter concerning status of final transcript for November 1st; direct Paralegal regarding same (No charge)	0.1
11/14/12	(RS) Receive and review communiqué from Dr. Anthony Rolle regarding dates for depositions of Dr. Rolle and Dr. Craig Wood; forward same to TCSA correcting dates. (No charge)	0.2
11/14/12	(RS) Engage in communiqué exchange with Robin Sanders regarding Court's request to "hear from parents" and possible testimony by charter school plaintiff/parents. (No charge)	0.2
11/14/12	(RS) Communiqué exchanges with Toni Templeton regarding her review of information from Dr. Lisa Dawn-Fisher's report entitled "Unequalized FSP M&O Revenue" and Al McKenzie's testimony concerning same; forward same to Ramon Medina with request for review of Tier I funds not recaptured; receive and review response from Mr. Medina; receive follow-up communiqué from Ms. Templeton with link to TEA report for use in lieu of TCSA data for Dr. Bruce Baker testimony. (No charge)	0.7
11/14/12	(RS) Attend conference with Toni Templeton at TCSA regarding e-mail with data tables provided by Dr. Anthony Rolle; prepare request to Dr. Rolle concerning same and scheduling of teleconference to discuss same. (No charge)	1
11/14/12	(RS) Draft request to Drs. Anthony Rolle and Craig Wood	0.2

Unofficial copy Travis Co. District Clerk Velva L. Price

517 Soledad Street
San Antonio, TX 78205

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

	concerning correct dates for depositions; request telephone conference to discuss tables created by Toni Templeton and the state's explanation of funding formula mechanics to date. (No charge)	
11/14/12	(RS) Conduct extended telephone conference with Dr. Anthony Rolle regarding Templeton tables, expert report updates reviewed and preparation for deposition testimony.	0.5
11/14/12	(RS) Receive and review updated Kallison Equity Report, Appendix documents and Kallison's current resume; review current version of Master Trial Exhibit List with attached exhibits filed by Calhoun County Plaintiffs.	0.2
11/15/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	1.8
11/15/12	(RM) Research TEA and Region XIII ESC website for school finance template; prepare communiqué to Bob Schulman forwarding school finance template for review.	0.2
11/15/12	(RM) Review voice mail message from Bob Schulman and Toni Templeton regarding use of AFIS data for Figures 18, 19 and 20 of Dr. Lisa Dawn-Fisher's 09/20/2012 report; telephone call to Mr. Schulman regarding same; left voice mail message. (No charge)	0.2
11/15/12	(RM) Telephone conference with Bob Schulman regarding Toni Templeton's analysis of Dr. Lisa Dawn-Fisher's of school finance data, deposition of Joe Wisnoski and state funding template referenced by Al McKenzie during his deposition.	0.5
11/15/12	(RM) Compare Dr. Lisa Dawn-Fisher report to Master Dataset With Charters; review supporting graphs, summary and detailed schedules and underlying calculations and data in Excel file for errors; compare data in Excel file to data disclosed on TEA Summary of Finances, TEA PEIMS Student Enrollment Reports, and TEA PEIMS Actual Financial Data Reports to identify data discrepancies; prepare communiqué to Bob Schulman with findings and observations.	2.5
11/15/12	(RM) Review and respond to follow-up communiqué from Bob Schulman regarding compilation of data for use by plaintiffs and defendants for analysis of public school finances; review communiqué from Mr. Schulman to David Thompson regarding Al McKenzie's deposition testimony regarding the compilation	0.2

Unofficial Copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Unofficial copy Travis Co. District Clerk Velva L. Price

	and use of school finance data for Dr. Lisa Dawn-Fishers analysis supporting her report and an agreed-upon stipulation to use a common set of data.	
11/15/12	(RM) Review communiqué from Bob Schulman regarding inquiries concerning Dr. Lisa Dawn-Fisher's data analysis supporting report; review notes for Al McKenzie's deposition; review Master Dataset with Charters Excel file to ascertain viability of analysis requested by Mr. Schulman; reply to Mr. Schulman concerning same.	0.7
11/15/12	(RM) Review request from Bob Schulman regarding deposition of Joe Wisnoski and how testimony may address questions concerning data compiled and prepared by Al McKenzie and used by Dr. Lisa Dawn-Fisher in analysis and preparation of her report; reply to Mr. Schulman provide comments and responses to his inquiries.	0.5
11/15/12	(RS) Attend trial.	7.5
11/15/12	(RS) Direct Paralegal to locate and forward Trotter and Hammond expert reports; receive and review same; communiqué exchange with Denise Pierce requesting review of same; provide Ms. Pierce with date of Trotter deposition; communiqué exchanges with David Thompson regarding data sets used by Dr. Lisa Dawn-Fisher and McKenzie's testimony with regard to same; receive communiqué from Ramon Medina regarding same (No charge)	0.8
11/15/12	(RS) Receive and review Defendants' Ninth Amended Master Exhibit List; direct staff regarding same. (No charge)	0.1
11/15/12	(RS) Receive and review staff communiqué confirming dates for depositions of charter school operators and consideration of location for Matt Abbott deposition; forward same to Robin Sanders; receive and review response from Ms. Sanders regarding attendance at San Antonio deposition site by Eric Vinson; review follow-up notice from Paralegal advising of arrangements made by experts for flight into Austin, deposition preparation, deposition and location for taking their depositions (TCSA). (No charge)	0.6
11/15/12	(RS) Receive and review amended notices of Wood and Rolle depositions; review Joint Motion to Supplement Duncombe Expert Report and Exhibit in support filed by Ft. Bend ISD; direct	0.3

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Paralegal to notify court reporter of sections of Dr. Bruce Baker deposition to be entered as an exhibit. (No charge)	
11/15/12	(RS) Prepare advisory to experts forwarding Dr. Bruce Baker transcript for review in preparation for depositions. (No charge)	0.2
11/15/12	(RS) Receive and review request to offer and enter Kallison updated report, Appendix and resume; review same; prepare response to same.	0.1
11/15/12	(RS) Review Ramon Medina's summary of review of Dr. Lisa Dawn-Fisher report to Master Dataset With Charters file with analysis of observations regarding same; direct Mr. Medina in review of Wisnoski slide concerning Tier I Formula Funding to determine cost of adjustment for charter funding; receive Mr. Medina's memorandum regarding Cost of Education Index analysis; direct Mr. Medina in further review concerning transportation allotment and compressed rate; receive and review Mr. Medina's research analysis concerning same; prepare communiqué to Toni Templeton concerning Mr. Medina's use of AEIS and determination by Mr. Medina that AEISD data did not match but PEIMS numbers do.	0.8
11/15/12	(RS) Conduct extended teleconference with Ramon Medina regarding Toni Templeton's analysis of data, from state financial expert, deposition of Joe Wisnoski and state funding template referenced by Al McKenzie in deposition.	0.5
11/15/12	(RS) Review current version of Master Exhibit List for Calhoun County Plaintiffs; receive and review numbering sequence for Wisnoski and Hammond depositions. (No charge)	0.2
11/16/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	1.8
11/16/12	(RM) Review and respond to communiqué from Bob Schulman regarding compressed rate adjustment; review summary of finances for a sample of school districts; review and respond to follow-up communiqué from Mr. Schulman regarding small and mid-size district adjustment; review and respond to follow-up communiqué from Mr. Schulman regarding compressed rate adjustment and its effect on charter school funding.	1
11/16/12	(RM) Review and respond to communiqué and attached file from Bob Schulman regarding Joe Wisnoski slide concerning Tier I Formula Funding; review communiqué from Mr. Schulman	1

Unofficial copy Travis Co. District Clerk velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	regarding application of state average to compressed rate and cost of education adjustment for state funding of charter schools; review TEC 12.106 and TEC 42 regarding same; reply to Mr. Schulman regarding same; review and respond to communiqué from Mr. Schulman regarding Cost of Education Index; review and respond to communiqué from Mr. Schulman regarding Small and Mid-Size District Adjustment, compressed rate; review 19 TAC 100 regarding same; prepare advisory to Mr. Schulman regarding same.	
11/16/12	(RS) Review Joe Wisnoski PowerPoint presentation in preparation for deposition; prepare comments and inquiries on charter school funding section with references to expert report of Dr. Lisa Dawn-Fisher; direct Ramon Medina to review TEC sections regarding application of state average to compressed rate and cost of adjustment for charter school funding; forward CEI Distribution of Values slide from Mr. Wisnoski PowerPoint to Mr. Medina for review; review Mr. Medina's research findings; direct Mr. Medina to research regarding application of state average to compressed rate and cost of education adjustment for state funding of charters; receive research memorandum from Mr. Medina concerning same; forward Tier I Special Program Formula funding slide to Mr. Medina for review; continue preparation for Wisnoski deposition; attend Wisnoski deposition; confer with Calhoun County and FBISD Plaintiffs' counsel to arrange for private discussion with Mr. Wisnoski.	8.6
11/16/12	(RS) Receive and review supplement to Odden report; receive and review supplemental responses filed by Defendants to Calhoun County Plaintiffs' First Request for Production.	0.2
11/16/12	(RS) Return travel from Austin. (No charge)	1.2
11/18/12	(LS) Review numerous communiqués from Bob Schulman regarding case status and pertinent issues; attorney conference Mr. Schulman regarding (11/18/2012) witness.	0.7
11/18/12	(RS) Receive and review supplemental Odden materials to be offered into evidence on 11/19; receive staff report regarding Mark DiBella's preparation of documents requested by the state; review communiqué exchanges between counsel regarding deposition proffers and submission of summaries for review.	0.2
11/18/12	(RS) Travel to Austin.	1.2

Unofficial Copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

11/19/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	3.3
11/19/12	(RM) Confer with Bob Schulman regarding review of plaintiff charter school data.	0.2
11/19/12	(RS) Receive and review request from Court to all counsel for designation of lead counsel for cross-examination of state's witnesses; receive and review Joint Motion for Leave to Offer Supplemental Expert Report and to re-Call Dr. William Duncombe; receive and review Defendants' Response (original and corrected) to same; review proposed Order granting such motion; review N. Cortez' updated PowerPoint; review Odden presentation (Estimating the Cost of an Adequate Education for Texas School Districts Using the Evidence-Based Approach) to be used in trial this day.	0.6
11/19/12	(RS) Attend trial.	7.5
11/19/12	(RS) Review Fort Bend ISD Plaintiffs' Exhibits submitted for admission 11/20/12; prepare communiqué to experts Wood and Rolle with attached Odden slide presentation and Cortez PowerPoint for review; direct Paralegal to obtain transcript of Odden's trial testimony for submission to experts; review response from Dr. Wood with recommendation to inquire as to whether Odden considered charters or facilities in measuring adequacy, determine where his numbers came from, and additional issues; exchanges with litigation staff regarding directive to pull statutes from the record, copying of same for admission as exhibits; prepare reply to Dr. Wood concerning same. (No charge)	0.9
11/19/12	(RS) Review Abilene ISD trial presentation to be offered on 11/20 of FBISD Plaintiffs; review current version of Master Exhibit List by Texas Coalition Plaintiffs; receive and review request from David Hinojosa regarding supplemental reports of Wood and Rolle; direct litigation staff to submit same to all counsel.	0.3
11/19/12	(RS) Receive and review communiqué from Melody Chalkley with link to TEA summary of proposed amendment to 19 TAC 9, PBMAS in preparation for Dr. Laura Taylor deposition; direct staff regarding same.	0.2
11/19/12	(RS) Engage in communiqué exchange with Toni Templeton regarding Odden testimony (good for the inadequacy of state	0.3

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	revenues) and exclusion of charters in determination of data calculations; request new report with additional data, to include charter schools; direct staff regarding materials to be provided to potential parent and charter school operator witnesses.	
11/20/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	4.7
11/20/12	(RS) Attend trial.	7.5
11/20/12	(RS) Review communiqué from Denise Pierce with Austin American Statesman article concerning Judge Dietz's failing to allow correction by Duncombe of data errors; prepare response to Ms. Pierce regarding same; communiqué exchanges with Toni Templeton regarding additional information compiled to supplement Odden data. (No charge)	0.1
11/20/12	(RS) Return travel from Austin. (No charge)	1.2
11/21/12	(CP) Prepare communiqué to all counsel forwarding information concerning Wood and Rolle supplemental reports; upload same to Dropbox; forward links to all counsel for access to same. (No charge)	0.3
11/21/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	3
11/21/12	(RS) Direct Leonard Schwartz regarding required court appearances for finance trial; extended telephone conference with Denise Pierce concerning errors in Dr. Anthony Rolle's calculations and need for charter AEA operators as trial witnesses.	0.3
11/21/12	(RS) Receive notification from Paralegal of availability of Dr. Laura Taylor for deposition on 12/04, issuance of Notice for same, and request by Robin Sanders for dates to schedule administrator depositions; receive advisory from Paralegal that Abbott and Gallegos are confirmed on the 7th and 14th of December, respectively; direct Paralegal to firm up date for DiBella deposition; receive inquiry from Allen Keller concerning upload of expert reports to FTP site; prepare response; receive notification from Paralegal of upload and submission (by Dropbox) of experts' supplemental report documentation; review TTSFC Plaintiffs' Sixth Amended Master Exhibit List; review Notice of Taylor deposition.	0.7
11/21/12	(RS) Receive and review Denise Pierce's advisory to TCSA	0.8

Unofficial copy Travis Co. District Clerk Velva L. Price

517 Soledad Street
San Antonio, TX 78205

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

	litigation team regarding Rolle tables and account for recapture, AEA charter school testimony, and follow-up conference scheduled with Joe Wisnoski receive and review communiqué from Toni Templeton attaching communiqué to Dr. Anthony Rolle concerning data tables; prepare response to Ms. Templeton regarding same; review communiqué exchange between David Hinojosa and Shelley Dahlberg concerning Dr. Laura Taylor deposition, conflict with Bast deposition already scheduled and request for trial list of witnesses for the state defendants; prepare response to Mr. Hinojosa concerning scheduling of Dr. Taylor deposition; direct staff regarding same.	
11/23/12	(RS) Prepare notes to file concerning introduction of witness offering testimony on impact of facilities on teaching; review Exhibits 4233 (supplemental deposition designations) and 4234-4236 (supplemental expert report) submitted by Edgewood Plaintiffs.	0.8
11/24/12	(RS) Begin review of Rolle's publications for his deposition preparation, prepare summary analysis in report to legal team; prepare extensive trial status and trial strategy report to TCSA; receive and review brief reply from David Dunn regarding charter school bonding issues; prepare response to same referring to anticipated testimony from expert witness, Tom Sage, and analysis of publications as compared to state's expert reports in support of Rolle/Wood deposition preparation.	4.1
11/25/12	(LS) Review and prepare for Court; telephone conference with Bob Schulman to obtain instructions for court appearance.	1.5
11/25/12	(RS) Continue reading, review and analysis of Dr. Anthony Rolle's publications to prepare for deposition defense.	5
11/25/12	(RS) Prepare advisory communiqué to charter school financial experts with attached July 2008 article "Strengthening the Link Between Effective School Expenditures and State Funding Mechanisms" for review with regards to methods listed in article for cross-checks and regression checks for funding analysis with request for Dr. Anthony Rolle to respond to prior requests, including those from Toni Templeton, concerning absence of recapture in the M&O data reported; review deposition transcripts in connection with Calhoun County Plaintiffs' summary of superintendent testimony.	0.4

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

11/25/12	(RS) Receive and review proposed exhibit list from Plaintiffs; direct staff regarding review of Robert Scott deposition excerpts to be offered into evidence for determination of charter school references within.	0.2
11/25/12	(RS) Forward Master Data Excel file from Dr. Lisa Dawn-Fisher expert report to Toni Templeton for review with request for confirmation of $850 average charter student WADA deficiency found in Dr. Dawn-Fisher's report; prepare request to Paralegal to obtain transcript of Dr. Craig Wood's testimony in WOC II case; receive response from Paralegal concerning same; direct Ramon Medina in review of information provided by charter operators; communiqué exchange with Mr. Medina regarding specific information required and to be determined in review of same.	0.7
11/25/12	(RS) Draft correspondence to three charter operators forwarding Rolle 2008 article for review in preparation for their depositions; forward same to Joe Hoffer and Leonard Schwartz for review and input; conduct exchanges with litigation staff regarding same and references to charter operators as field experts, and attorney-client communication issues in connection with such connotation.	0.7
11/25/12	(RS) Travel to Austin	1.2
11/26/12	(MZ) Research available online court documents for trial transcript of West-Orange Cove II case and deposition of Dr. Craig Wood; multiple communiqué exchanges with District Court and Supreme Court regarding same.	2
11/26/12	(CP) Review Scott deposition transcripts and highlight entries referencing "charters"; compare same to page and line references from Scott deposition to be used by Texas School Coalition Plaintiffs; prepare communiqué to Bob Schulman, Joe Hoffer and Leonard Schwartz regarding same (No charge); prepare communiqué to charter operator "field experts" and parent plaintiffs forwarding Brownwood ISD PowerPoint for review, as directed by Mr. Schulman, request notification of receipt and review of same.	1
11/26/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	1.3
11/26/12	(LS) Attend trial; communiqué exchanges with Bob Schulman	8

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	regarding trial; post-trial telephone conference with Mr. Schulman regarding trial.	
11/26/12	(RM) Review communiqué from Bob Schulman regarding review of charter school data to be provided to AG; reply to Mr. Schulman regarding same and requesting clarification of work to be performed; prepare communiqué to Paralegal regarding charter school data.	0.2
11/26/12	(RM) Review and respond to communiqué from Bob Schulman regarding review of charter operator data; review communiqué from Mr. Schulman regarding review of deposition and testimony of Craig Wood during West Orange-Cove II school finance case.	0.2
11/26/12	(RM) Review communiqué from Paralegal regarding Dr. Craig Wood's deposition and testimony during the West Orange-Cove ISD II case; review communiqué from Paralegal regarding charter school data to be submitted to AFI; review AEIS reports submitted by Jubilee Academic Center for the 2009-2010, 2008-2009, 2007-2008, 2006-2007 and 2005-2006 school years; prepare communiqué to Bob Schulman forwarding results of work; prepare communiqué to Paralegal forwarding replacement files for 2005-2006, 2006-2007 and 2007-2008 school years.	3.7
11/26/12	(RS) Continue review of Dr. Anthony Rolle publications regarding assessment of equity and efficiency in public school funding.	1
11/26/12	(RS) Confer with Joe Hoffer and Leonard Schwartz regarding submission of attorney-client privileged communication to charter operators; receive staff memorandum and report regarding review of deposition excerpts from Commissioner Scott's deposition; review AISD trial presentation; direct staff for distribution to charter operators for review; draft advisory to Mr. Schwartz concerning same and school district charter school partnership for cross-examination of witness; review and respond to notification from Denise Pierce regarding deposition scheduling; communiqué to Toni Templeton with 1995 TEC section 12 statutes and amendments for review; review Joe Wisnoski report to prepare for conference on history of charter school funding statutes and formulas; attend private conference with Mr. Wisnoski regarding same; attend conference with TCSA administrators/litigation staff prior to teleconference with Dr. Anthony Rolle; teleconference with Dr. Rolle; debrief with TCSA	3.9

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	administrators.	
11/26/12	(RS) Receive notification from Leonard Schwartz regarding cross-examination of Dr. Merla Carstarpehen; direct Paralegal to forward Brownwood presentation to Charter Plaintiff parents for review; receive notice from Mr. Schwartz advising entire deposition testimony of Robert Scott was introduced during trial; review PowerPoint provided by TTSFC Plaintiffs from Quinlan ISD for use during Micheal French testimony on 11/27; communiqué exchange with David Hinojosa regarding rescheduling of Taylor deposition; review Kallison and Harris presentations for use during their testimony on behalf of Calhoun County Plaintiffs; forward same to Mr. Schwartz with note to inquire as to whether Kallison's college ready data includes charters; forward Kallison presentation to experts concerning same, advise Toni Templeton is working on charter graphs on ASATAR points comparable to those in Kallison presentation regarding school districts.	3.4
11/27/12	(MZ) Further communiqué exchanges with Texas Supreme Court Personnel regarding District Court transcript of West-Orange Cove II case.	1
11/27/12	(LS) Attend trial; communiqué exchanges with Bob Schulman regarding trial; post trial telephone conference with Mr. Schulman regarding trial.	8
11/27/12	(RM) Review communiqué from Paralegal regarding data provided by YES Preparatory; reply to Paralegal regarding same; request clarification on deadline for completion of review/analysis; review files from Paralegal regarding dropout data provided by YES Preparatory; review notice from Paralegal of deadline for completion of review/analysis; review communiqué from Bob Schulman regarding review of other data submissions by charter holders, and deposition and testimony by Dr. Craig Wood; review follow-up communiqué from Paralegal regarding same; continue to analyze data provided by YES Preparatory; obtain 2010-2011 AEIS report; compare general (central) administration expenses to comparably/similarly sized school districts; prepare communiqué to Mr. Schulman summarizing observations.	1.7
11/27/12	(RM) Review communiqué and attached files from Bob	1.5

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Schulman regarding data provided by YES Preparatory; review and analyze same.	
11/27/12	(RM) Review communiqué from Bob Schulman regarding possible testimony to inquiries from the Defendant concerning above average expenses for general administration; reply to Mr. Schulman with viable counter argument; review communiqué from Mr. Schulman regarding applicability of cost efficiency arguments and additional compensation to teachers for an exemplary rated school; reply to Mr. Schulman with counter argument to reasoning.	0.7
11/27/12	(RM) Review follow-up communiqué from Bob Schulman regarding analysis of YES Preparatory financial data; review 2010-2011 AEIS reports for YES Preparatory and comparably/similarly sized school districts; reply to Mr. Schulman regarding cost efficiency argument; review communiqué exchange between Paralegal and Rene Gallegos regarding AEIS reports submitted by Mr. Gallegos for Jubilee Academic Center; review communiqué exchange with Mr. Schulman and Joe Hoffer regarding review and analysis of AEIS reports submitted by JAC; review communiqué from Mr. Schulman outlining, in part, legal arguments on behalf of charter schools; review and respond to follow-up communiqué from Mr. Schulman regarding possible use of "extra" funds from cost savings for cutting general administration expenses.	0.5
11/27/12	(RS) Review research from Leonard Schwartz regarding state constitution equal protection argument; respond to communiqué exchanges between all counsel concerning January trial schedule; receive communiqué from Paralegal regarding scheduling Mark DiBella for a deposition in December; receive request for briefing from Mario Flores, Charter Plaintiff; prepare detailed status report to Mr. Flores; direct Paralegal to share same with all Charter School Plaintiffs; communiqué exchanges with Robin Sanders regarding offer by state of Dr. Sally Partridge in lieu of Dr. Laura Taylor for deposition and agreement for scheduling Partridge deposition on 12/13; review communiqué from Ms. Sanders announcing that Dr. Taylor will not be presented by the state as a witness; prepare communiqué to David Hinojosa advising of scheduling of Partridge in lieu of	1.6

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Taylor; review Mr. Hinojosa's reply; prepare follow-up communiqué to Ms. Sanders regarding Hinojosa and scheduling	
11/27/12	(RS) Receive, review and analyze advisory communiqué from Toni Templeton with Excel file containing charts reflecting Local I&S Revenue per ADA and Local I&S Revenue per WADA with explanation of same; prepare response to Ms. Templeton regarding consideration of local revenues in state's charter school averaged WADA tables in Dr. Lisa Dawn-Fisher's data with request for additional input from Ms. Templeton concerning same; receive Edgewood Exhibit/Cervante PowerPoint to be presented with testimony for admission into evidence; forward same to Leonard Schwartz for review; review current version of Charter Coalition Plaintiffs' Master Exhibit List; conduct cursory review of court reporter's 10/30 trial transcripts, direct Paralegal for distribution of same to appropriate parties and inclusion with network files; receive PDF file with Dunn deposition transcript, forward same to experts Wood and Rolle for review; prepare communiqué to David Hinojosa regarding Dr. Sally Partridge's deposition.	1.5
11/27/12	(RS) Review procedure for obtaining Wood trial transcript; direct Leonard Schwartz to confer with Judge in obtaining same; prepare communiqué to experts, Wood and Rolle, concerning Joe Wisknoski's explanation regarding the Dr. Lisa Dawn-Fisher data tables previously provided; review Ramon Medina's advisory regarding Jubilee Academic Center AIES report data provided and observations; forward same to Joe Hoffer for review; communiqué with Paralegal regarding scheduling of pre-deposition conferences for charter operators; communiqué exchange with Tom Sage regarding preparation of report in lieu of deposition, conduct cursory review of 10/31/12 trial transcripts, direct Paralegal for distribution of same; receive trial testimony (09/14/04) of Dr. Craig Wood's West Orange Cove II testimony from court reporter; review advisory from MALDEF counsel concerning exhibit proffer prior to Dr. Cervantez testimony and slides to be used during same, including slides previously admitted into evidence.	2.2
11/28/12	(CP) Telephone conferences with Matt Abbott regarding scheduling of his pre-deposition conference and deposition,	0.1

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Unofficial copy Travis Co. District Clerk Velva L. Price

	location for same and confirmation of time for his deposition on 12/07/12 (not yet confirmed); prepare communiqué to Mr. Abbott confirming deposition preparation conference.	
11/28/12	(CP) Communiqué exchange with Robin Sanders regarding dates for scheduling depositions of field "experts."	0.1
11/28/12	(CP) Telephone conference with Rene Gallegos regarding information provided relating to AEIS reports, campus vs. district; discuss and schedule pre-deposition conference with Joe Hoffer on 12/13 with Mr. Gallegos.	0.1
11/28/12	(LS) Attend trial; communiqué exchanges with Bob Schulman regarding trial; post-trial telephone conference with Mr. Schulman regarding trial and cross-examination of Kallison.	8.5
11/28/12	(RM) Review and respond to communiqué from Paralegal regarding AEIS reports submitted by Jubilee Academic Center; review and respond to follow-up communiqué from Paralegal requesting clarification of AEIS reports submitted.	0.2
11/28/12	(RM) Review and respond to communiqué from Bob Schulman regarding rebuttal to possible cost efficiency argument by the Defendants for Mark DiBella; review follow-up communiqué from Mr. Schulman regarding challenges faced by YES Preparatory in providing quality instruction; prepare reply to Mr. Schulman by articulating refinement to argument presented.	0.7
11/28/12	(RS) Prepare Drs. Craig Wood and Anthony Rolle for deposition; confer with Toni Templeton regarding recapture issues; communiqué exchange with Paralegal regarding cancellation of Taylor deposition (No charge); direct Paralegal to upload documentation received from charter operators as "Field Witness Documentation" for access to all counsel; receive and review Paralegal's communiqué to all counsel advising of access to same; review Ramon Medina's summary of data reviewed, as submitted by Mark DiBella; confer with Mr. Medina regarding same and potential questioning of DiBella during his deposition in light of information contained within same; forward communiqué to experts with definition of Efficiency memorandum; forward same to Ms. Templeton.	7.5
11/28/12	(RS) Prepare advisory to litigation staff concerning Dr. Craig Wood's non-availability on 01/26/13 (No charge); review communiqué from Paralegal to Matt Abbott confirming	4.2

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	pre-deposition conference on 12/06/12; review communiqué from Paralegal to Rene Gallegos confirming pre-deposition conference on 12/13/12; review communiqué from David Dunn regarding testimony by Dr. Reece Blincoe and related matters; direct litigation staff to retain same for use in closing arguments/briefs; review communiqué exchanges between Assistant AGs and Paralegal regarding scheduling of DiBella deposition; prepare file notes for upcoming depositions regarding two types of Efficiency and related issues; review Charter Coalition Plaintiffs' current version of Master Exhibit List; conduct multiple communiqué exchanges with Ramon Medina in preparation for potential line of questioning by defense counsel to DiBella; prepare communiqué to experts Wood and Rolle with excerpts from WOC II summary for review.	
11/29/12	(RS) Continue deposition preparation of Dr. Anthony Rolle.	4
11/29/12	(RS) Attend and defend deposition of Dr. Anthony Rolle.	7.9
11/29/12	(RS) Conduct strategy conference with TCSA litigation team in preparation for Dr. Craig Wood deposition.	1.6
11/29/12	(RS) Receive and review communiqué from Leonard Schwartz regarding cross examination of school district witness (Schroder) by Assistant AG and reaction of Court to same; communiqué exchanges with litigation staff concerning analysis of equal protection argument in Charter Plaintiffs' pleadings; forward communiqué to Dr. Craig Wood with link to blog (Broadening Access to Higher Education: A Story From a Texas Charter School Pilot) for review; receive communiqué from Mr. Schwartz regarding in-court testimony by school district teacher on importance of contractual due process rights; review Venable expert report; review communiqué exchanges between counsel regarding access to same; engage in multiple communiqué exchanges with litigation staff regarding equal protection amendment to Charter Plaintiffs' Petition as and refinement of Findings of Fact and Conclusions of Law; communiqué exchanges with Denise Pierce regarding Dr. Anthony Rolle's deposition, Dr. Craig Wood's pending deposition and additional data analysis to be provided by Toni Templeton review prior to same.	1.1
11/29/12	(RS) Prepare advisory to Denise Pierce and Toni Templeton	0.2

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	concerning experts' testimony on Tier I funding, ADA payments in LEAs, WADA calculations and related issues.	
11/29/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	0.2
11/30/12	(AK) Continue reviewing and summarizing Defendants' discovery responses.	3.5
11/30/12	(RS) Prepare communiqué to Assistant Attorney General, Robin Sanders, regarding scheduling of Partridge and, DiBella deposition, and offer of parents/Plaintiff (Flores and Flemister) for deposition; receive and review communiqué from Toni Templeton regarding Tier I funding and research/inquiry to be performed by Ms. Templeton regarding same. Pierce regarding Wood deposition, attend and defend deposition of Dr. Craig Wood.	0.2
11/30/12	(RS) Review FBISD's Fifth Amended Petition including Kerrville ISD as a party plaintiff, as authorized by Judge Dietz; receive and review Defendants' Tenth Amended Master Exhibit List; receive and review FBISD's Third Amended Response to Defendants' Request for Disclosure, including Kerrville ISD officials and Joe Wiskoski as persons with knowledge; receive court reporter's trial transcript for 11/01/12; direct staff regarding same; receive and review Defendants' Supplemental Responses to Edgewood Plaintiffs' and Interveners' Request for Production; prepare advisory to Rebecca Couto regarding substitution of Dr. Sally Partridge for Dr. Laura Taylor and reasons therefor.	0.5
11/30/12	(RS) Receive and review communiqué from Toni Templeton to experts with Excel file (tables using Net Local Revenue) for review and request for discussion concerning same; review Excel file. (No charge)	0.3
11/30/12	(RS) Return travel from Austin. (No charge)	1.2
12/1/12	(RS) Receive and review communiqué from Chris Diamond regarding attendance at Bast deposition; direct Paralegal to locate and provide Bast expert report for review. (No charge)	0.1
12/2/12	(LS) Telephone conference with Bob Schulman regarding progression of case, review prior week's court sessions and possible equal protection argument; forward communiqué to Mr. Schulman with trial schedule for the following week.	4.6
12/2/12	(RS) Receive and review communiqué from Chris Diamond	0.8

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	rescheduling Bast deposition or conclusion by 3 PM; receive and review response from MALDEF counsel regarding same; receive and review reply from Mr. Diamond concerning same; receive and review current Master Exhibit List; receive and review trial presentation slides for testimony of Dr. Jacob Vigdor; receive and review communiqué from MALDEF attorney requesting confirmation of scheduling for deposition of Dr. Sally Partridge; prepare advisory response to same.	
12/2/12	(RS) Receive and review Toni Templeton's comments to shortchanged facility report; prepare responses to same; forward same to Denise Pierce; direct Paralegal regarding Errata sheets for McKenzie deposition; review communiqué exchanges between David Hinojosa and Shelley Dahlberg concerning anticipated testimony of Dr. Laura Taylor considering her departure from the TEA and deposition scheduling for Dr. Taylor.	0.4
12/2/12	(RS) Prepare status advisory to Dr. Craig Wood concerning anticipated trial testimony of Joe Wisnoski and Dr. Whitehurst; communiqué exchange with Leonard Schwartz regarding trial calendar, direct his attendance at trial on 12/04 and 12/05.	0.7
12/2/12	(RS) Travel to Austin	1.5
12/3/12	(RM) Review and reply to communiqué from Bob Schulman regarding testimony by Dr. Sally Partridge and Dr. Lisa Dawn-Fisher; review and reply to follow-up communiqué from Mr. Schulman regarding preparation of Public Information Request (PIR); review and reply to follow-up communiqué from Mr. Schulman requesting clarification of comments concerning Dr. Partridge and Dr. Dawn-Fisher; prepare PIR to TEA; prepare follow-up communiqué to Mr. Schulman requesting clarification for PIR; review reply from Mr. Schulman regarding same; review communiqué from Mr. Schulman regarding arguments and questions concerning costs to the State for not providing state funding; research news reports concerning drop outs; reply to Mr. Schulman providing information requested.	1.7
12/3/12	(RM) Confer with Bob Schulman regarding formulas used by TEA to calculate state funding to charter schools. (No charge)	0.2
12/3/12	(LS) Attorney conference with Bob Schulman regarding court appearance; review of previous communiqués in preparation for court. (No charge)	1.2

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

12/3/12	(RS) Receive e-mail from Mark DiBella provided by Paralegal regarding availability for his deposition; contact AG's office concerning scheduling of same; receive notification from Shelley Dahlberg canceling Dr. Laura Taylor deposition, scheduled for 12/04/12; conduct additional communiqué exchanges with Paralegal regarding dates for Gallegos and DiBella deposition, pre-deposition preparation session for each deponent, and staff assignments regarding same; engage in communiqué exchanges with Paralegal and Robin Sanders concerning scheduling of Dr. Sally Partridge deposition and appearance by Eric Vinson in lieu of Ms. Sanders; prepare communiqué to MALDEF counsel regarding Partridge deposition; conduct communiqué exchanges with Ms. Dahlberg regarding scope of Partridge testimony at trial.	0.9
12/3/12	(RS) Receive and review communiqué from Paralegal regarding Intervenors' request concerning Bast deposition; review communiqué from Chris Diamond regarding Bast's anticipated testimony; receive and review Notices from the AG's office scheduling Abbott and Gallegos depositions; forward same to Paralegal with directive for submission to deponents; communiqué exchange with Paralegal regarding non-receipt of Pierce deposition transcript due to the fact that her deposition was not taken (No charge); review notification from MALDEF Paralegal confirming cancellation of Bast deposition; review communiqué exchange between Mr. Diamond and David Hinojosa concerning Bast's future availability for deposition; receive and review Second Amended Petition filed by Edgewood Plaintiffs; conduct research on Dr. Sally Partridge, download Minutes of TEA Title I Committee of Practitioners meeting in which Dr. Partridge participated regarding SES providers, forward same to Joe Hoffer for review.	1.1
12/3/12	(RS) Review communiqué exchanges between counsel regarding TTSFC Plaintiffs' proposed proffers for expert witnesses Bonnie Leslie and Paul Colbert, and objection by defense counsel regarding same; receive and review current Master Exhibit List; review Excel file prepared by Mark DiBella entitled "YES Prep Student Achievement Data by Subpopulation"; receive communiqué from Mr. DiBella	0.8

Unofficial copy Travis Co. District Clerk Velva L. Price

517 Soledad Street
San Antonio, TX 78205

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

	concerning his availability for deposition; prepare response to Mr. DiBella regarding deposition preparation and scheduling for same; direct staff concerning same; review Los Fresnos ISD PowerPoint for Salazar trial testimony.	
12/3/12	(RS) Attend trial.	4
12/3/12	(RS) Prepare memorandum to Drs. Craig Wood and Anthony Rolle concerning attached revised IDRA supplemental report for Dr. Albert Cortez with request for input from Dr. Wood relating to same, and as found in Dr. Cortez's in-court testimony; receive and review Paralegal's communiqué to Matt Abbott regarding pre-deposition conference scheduling; prepare internal memorandum to Drs. Wood and Rolle with copy to TCSA litigation team regarding significant section of Kallison report.	0.8
12/3/12	(RS) Review Ramon Medina's research memorandum on charter claims and background research on Dr. Sally Partridge; prepare communiqué to Mr. Medina directing additional research relating to costs to the state for school district funding. (No charge)	0.3
12/4/12	(CP) Multiple communiqué exchanges with Court Reporter regarding PDF files of Wood and Rolle depositions and exhibits; confer with Bob Schulman concerning same and location for preparation of Matt Abbott for deposition (No charge); communiqué exchanges with Mr. Abbott regarding location for meeting with Mr. Schulman for deposition preparation; telephone conference with Mr. Abbott concerning documents for review prior to meeting with Mr. Schulman; discuss Mr. Abbott's concerns with Mr. Schulman (No charge); notify Mr. Abbott that Mr. Schulman will call him to discuss his concerns.	0.5
12/4/12	(LS) Attend trial.	6.9
12/4/12	(RS) Review and analyze advisory memorandum from Dr. Craig Wood entitled "[redacted] conduct communiqué exchanges with Paralegal regarding scheduling of pre-deposition preparation conferences with Mark DiBella and Rene Gallegos; confer with Paralegal concerning Excel spreadsheet drafted by Mr. DiBella and relevance of same in response to the list of items required to be produced prior to deposition; analyze spreadsheet; receive and review TTSFC Plaintiffs' Seventh Amended Master Exhibit List; review confirmation of rescheduled Bast deposition; receive and review	1.3

Unofficial copy Travis Co. District Clerk Velva L. Price

517 Soledad Street
San Antonio, TX 78205

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

	correspondence from defense counsel regarding submission of Defendants' Supplemental Response to Edgewood and Intervenors' Requests for Production; receive and review Notice of Partridge deposition; receive and review communiqué Amended Notice of Partridge deposition; receive and review Northside ISD/Dr. John Folks trial presentation received from Holly McIntush, counsel for Fort Bend Plaintiffs.	
12/4/12	(RS) Receive and review advisory from Lacy Lawrence regarding multiple exhibits offered for admission into evidence; receive and review attachments; review follow-up advisory from Ms. Lawrence attaching FIRST rating exhibits for admission as trial evidence; receive and review summary of Joe Wisnoski deposition proffer, Wisnoski spreadsheet and explanation by Wisnoski of data contained in Edgewood Plaintiffs' exhibit 4242, received from David Hinojosa; review additional Edgewood exhibits (numbers 4238 and 4239) from Marissa Bono; review final Edgewood exhibit (number 4243-Scott deposition testimony summary), received from Mr. Hinojosa; receive and review	0.7
12/4/12	(RS) Prepare communiqué to Matt Abbott regarding pre-deposition conference and documentation for review prior to same; direct Paralegal regarding provision to Mr. Abbott of excerpts from Dr. Craig Wood deposition; review communiqué from Paralegal regarding anticipated receipt of rough copy of Wood deposition transcript; review advisory from Holly McIntush regarding Fort Bend Plaintiffs' exhibits to be admitted; review major education legislation referenced in Moak PowerPoint, provided by Ms. McIntush; receive and review follow-up notice from Ms. McIntush concerning additional trial exhibits; engage in communiqué exchanges with defense counsel regarding the state's trial calendar for December 2012, forward same with directive to Leonard Schwartz; review Mr. Schwartz's communiqué regarding court request update of proposed Findings of Fact and Conclusions of Law with record citations.	0.9
12/5/12	(LS) Attend trial; conduct research on Whitehurst background and validity of the National Assessment of Educational Progress (NAEP) (both in Math and English); review submissions of Whitehurst (Report and PowerPoint).	8.7
12/5/12	(RS) Receive notification from Paralegal regarding errors in	0.4

Unofficial copy Travis Co. District Clerk Velva L. Price

517 Soledad Street
San Antonio, TX 78205

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

	deposition notice received from state regarding site of deposition; receive and review Notice of Gallegos deposition; engage in multiple communiqué exchanges with Robin Sanders, regarding same; receive and review request from Eric Vinson to schedule Gallegos deposition at 930 AM in firm's San Antonio office; prepare response to Mr. Vinson confirming same.	
12/5/12	(RS) Receive request from Matt Abbott for resubmission of documentation to be reviewed prior to pre-deposition conference; direct Paralegal regarding same; conduct multiple communiqué exchanges with Paralegal concerning same; prepare advisory to Mr. Abbott regarding same, confirm time and location of pre-deposition conference; review revised exhibit (#4240-summary of Joe Wisnoski deposition testimony) to be offered by Edgewood Plaintiffs for admission, received from David Hinojosa; prepare advisory to Leonard Schwartz regarding review of slide in Defendants' PowerPoint addressing Simpson's Paradox, in preparation for Whitehurst cross-examination; receive and review communiqué from Mr. Schwartz concerning same.	0.5
12/5/12	(RS) Receive and review Notice of Bast deposition; review communiqué from Paralegal to Matt Abbott confirming location and time for pre-deposition conference (No charge); review Amended Notice of Gallegos deposition (location incorrect) (No charge); receive and review Paralegal's notification to Mary Sisler, Paralegal for the AG, advising Gallegos deposition is to be conducted at SLH San Antonio office; review Second Amended Notice of Gallegos deposition (incorrectly identified as First Amended Notice); receive notification from Leonard Schwartz of state's presentation of Whitehurst; conduct teleconference with Paralegal regarding Court Reporter's response to request for PDF copy of Wood and Rolle depositions needed for review by charter CFOs.	0.3
12/5/12	(RS) Receive and review communiqué from Shelley Dahlberg to counsel concerning proffers to be made after testimony of last witness (No charge); review Dr. Albert Cortez's presentation (exhibit 4244) to be offered by David Hinojosa into evidence; review communiqué and exhibits (#s 6450-6460) from Holly McIntush to be offered for admission (2011-12 AEIS reports for	0.7

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	focus districts) on behalf of Fort Bend Plaintiffs; receive follow-up communiqué from Ms. McIntush with attached Plaintiffs' Exhibits to be Admitted – December 5, 2012 document attached, review same; receive and review communiqué from Mark Trachtenberg with attached table of Intervenors' proposed exhibits (#s 5641-5646); receive and conduct cursory review of "draft" of selected sections of trial transcript relevant to charter CFO testimony; prepare communiqué to Matt Abbott forwarding draft of trial transcript with recommendation concerning additional specific sections to review prior to deposition.	
12/5/12	(RS) Review Leonard Schwartz's internal memo regarding MALDEF's use of sections of Robert Scott deposition testimony to defend against charter school claimants; prepare advisory response to Mr. Schwartz regarding same; review Paralegal's communiqué to Drs. Craig Wood and Anthony Rolle requesting delivery address for original depositions (No charge); receive and review current version of Master Exhibit List; receive request from Paralegal for confirmation of date for DiBella deposition and scheduling of pre-deposition conferences with DiBella and Gallegos; review Whitehurst expert report, prepare list of trial inquiries for cross-examination; communiqué exchange with Paralegal concerning exhibits to Wood and Rolle depositions; prepare communiqué to Mr. Schwartz with attached Whitehurst report and summary of the report, along with list of proposed questions directed to Whitehurst.	1.8
12/6/12	(AK) Locate and provide Exhibit 5644 to Bob Schulman. (No charge)	0.2
12/6/12	(RS) Confer with Ramon Medina and Matt Abbott concerning Mr. Abbott's deposition.	0.2
12/6/12	(RM) Confer with Matt Abbott and Bob Schulman regarding Mr. Abbott's deposition and distinction between fund balance and net assets and differing basis of accounting for traditional school districts and charter schools (No charge); review 2012 annual audit report for information pertinent to Mr. Abbot's deposition.	0.2
12/6/12	(RS) Confer with Ramon Medina concerning possible deposition testimony by Dr. Sally Partridge.	0.1
12/6/12	(RM) Confer with Bob Schulman regarding possible deposition testimony by Dr. Sally Partridge and statute governing recovery	0.5

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	of certified debts (No charge); research TEC 42.258; prepare PDF file for use by Mr. Schulman during Dr. Partridge's deposition; prepare follow-up communiqué to Toni Templeton regarding public information request to TEA requesting copy of certified debt submitted to the Comptroller of Public Accounts; prepare communiqué to Mr. Schulman forwarding PDF copy of TEC 42.258.	
12/6/12	(RM) Prepare communiqué with attachment to Matt Abbott forwarding latest amended petition.	0.2
12/6/12	(LS) Continue research on Whitehurst background as directed by Bob Schulman and validity of the NAEP; attend trial; attorney conference with Bob Schulman regarding possible cross-examination of Whitehurst (No charge); prepare communiqué to Bob Schulman regarding questions for cross-examination and day's proceedings in court.	7
12/6/12	(RS) Receive notification of submission of signature page and Errata sheet by Joe Wisnoski for his deposition (No charge); review Ramon Medina's inquiry to Toni Templeton for copy of TEA's response to PIR; communiqué exchange with Mr. Medina directing him to prepare [redacted]	0.4
12/6/12	(RS) Continue preparation for Whitehurst cross-examination.	1.4
12/6/12	(RS) Confer with Leonard Schwartz regarding cross-examination of Grover Whitehurst; receive and review notebook prepared by Mr. Schwartz in preparation for same.	0.5
12/6/12	(RS) Confer with and prepare Matt Abbott for deposition on 12/07/12.	4.5
12/6/12	(RS) Attend afternoon court session.	4.3
12/6/12	(RS) Communiqué exchange with Allen Keller regarding Charter Plaintiffs' Response to Calhoun County Plaintiffs' Request for Disclosure referenced in list of exhibits provided by Mark Trachtenberg to be offered into evidence and defense counsel's objection to admission of Disclosures; receive and review request from Denise Pierce regarding Matt Abbott's anticipated deposition testimony and possibility of attendance at Abbott deposition by David Dunn; prepare response to Ms. Pierce concerning same; receive reply from Lindsey Jones regarding	1.3

Unofficial Copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	her attendance at Abbott deposition; prepare outline for opening statement; prepare communiqué to Toni Templeton requesting data calculations in preparation for opening statement. (No charge)	
12/6/12	(RS) Communiqué exchanges with Della Sawvel, Court Reporter, regarding draft of trial transcript; prepare communiqué to Toni Templeton requesting comparison of school district funding under school district and under charter school formula. (No charge)	0.1
12/7/12	(AK) Continue summarizing Defendants' discovery responses.	5.8
12/7/12	(RM) Prepare public information requests for [redacted] as directed by Bob Schulman.	1.7
12/7/12	(RM) Review communiqué from Bob Schulman regarding charter school and school district enrollment data; conduct research of TEA website for charter school and school district enrollment data; analyze student enrollment data and prepare summary report for Mr. Schulman; prepare communiqué to Mr. Schulman forwarding requested data and information.	1.7
12/7/12	(LS) Review materials received from Bob Schulman in preparation for court appearance; review numerous communiqués from Mr. Schulman regarding objections to discovery responses; review communiqué regarding Whitehurst and Tom Sage testimony; review new proposed trial calendar.	0.8
12/7/12	(RS) Attend and defend deposition of Matt Abbott, Charter Plaintiffs' witness.	7
12/7/12	(RS) Prepare memorandum to Leonard Schwartz concerning Whitehurst line of inquiry; communiqué exchange with Ramon Medina regarding PIR to TEA; prepare advisory to Tom Sage regarding Matt Abbott's deposition testimony, request by the AG for scheduling Mr. Sage's deposition, and dates for same, provide Mr. Sage with link to "rundown" of school district financing options with request for comparable list to be made for charters; prepare and forward communiqué to Denise Pierce with link provided to Mr. Sage; receive and review communiqué from Michael Patterson with Defendants' Eleventh Amended Master Exhibit List and additional exhibits, conduct cursory review of exhibits.	1.1

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

12/7/12	(RS) Return travel to San Antonio. (No charge)	1.5
12/8/12	(LS) Review "[redacted] from Bob Schulman; review communiqué from Mr. Schulman regarding 11/1/12 testimony; review testimony summary. (No charge)	0.4
12/8/12	(RS) Communiqué exchanges with TCSA administrators concerning workday schedule; prepare communiqué to David Dunn with December and January 2013 trial witness schedule provided by Shelley Dahlberg; prepare communiqué to Leonard Schwartz with notes from testimony of Dr. Wayne Pierce; prepare follow-up communiqué to Mr. Schwartz concerning Rick Grey's prior equal protection claim in TTSFC Plaintiffs' Petition to be withdrawn; receive and review errata to Podgursky report and related documents provided by Linda Halpern; receive and review Philip Fraissinet's request for clarification to Ms. Halpern; forward all to Mr. Schwartz for review; communiqué exchange with Ms. Dahlberg and Eric Vinson, regarding Partridge deposition and description of anticipated testimony.	0.4
12/9/12	(LS) Review communiqué from Shelley Dahlberg and attached trial preparations for Zyskowski and Givens; prepare for possible cross examination of Zyskowski.	2.4
12/9/12	(RS) Receive and review state witnesses (Givens and Zyskowski) PowerPoint trial presentations from Shelley Dahlberg to be introduced into evidence; forward same to Leonard Schwartz for review; receive and review current version of Master Exhibit List provided by Lacy Lawrence; receive and review David Hinojosa's communiqué to defense counsel regarding significant number of exhibits added by the state.	0.3
12/9/12	(RS) Travel to Austin.	1.5
12/10/12	(CP) Multiple telephone conferences and communiqué exchanges with Mark DiBella and Rene Gallegos regarding scheduling of pre-deposition conference for 12/11, reset to 12/12, arrangements for Mr. DiBella's flight into San Antonio; confer with Eric Vinson's Paralegal to determine start time and confirm location (San Antonio office) for DiBella deposition; multiple communiqué exchanges with Bob Schulman concerning above issues (No charge); two telephone conferences with Ramon Medina regarding assistance to Mr. Schulman in video conferencing with DiBella and Gallegos.	1

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

12/10/12	(AK) Continue summarizing Defendants' discovery responses.	4.6
12/10/12	(LS) Prepare for and attend trial.	4.5
12/10/12	(RS) Receive and review communiqué from John Turner with Exhibit 5678 for admission into evidence (Whitehurst demonstratives), review exhibit; receive and review communiqué from Della Sawvel with 11/05/12 trial transcript; review attached transcript; communiqué exchange with Paralegal regarding confirmation of pre-deposition preparation of witnesses Mark DiBella and Rene Gallegos in San Antonio; prepare communiqué to Shelley Dahlberg repeating request for summary of anticipated testimony of Dr. Sally Partridge.	0.6
12/10/12	(RS) Communiqué exchange with Tom Sage regarding his deposition scheduling; conduct multiple communiqué exchanges with Paralegal concerning travel arrangements for Mark DiBella to attend his deposition (No charge); receive and review Amended Notice scheduling DiBella deposition (moved to San Antonio); communiqué exchange with Paralegal directing procurement of expedited transcript of Abbott deposition for review by Mr. DiBella and Rene Gallegos and rescheduling of DiBella and Gallegos pre-deposition conference; receive and review Paralegal's notice to DiBella and Gallegos regarding same and notification for set up of Skype on laptop to conduct conference from SLH Austin office.	0.4
12/10/12	(RS) Receive report to 83rd Legislature concerning STAAR readiness provided by Legal Assistant; receive and review current Master Exhibit List provided by Lacy Lawrence; receive and review Givens PowerPoint from Shelley Dahlberg for Givens' trial testimony; prepare lengthy advisory to David Dunn and Denise Pierce concerning testimony by state's witness regarding STAAR achievement issues.	0.8
12/10/12	(RS) Receive and review communiqué from Paralegal to David Dunn regarding deposition signature. (No charge)	0.1
12/10/12	(RS) Attend trial.	3.5
12/11/12	(AK) Continue summarizing Defendants' discovery responses.	4.7
12/11/12	(RM) Review communiqué from Bob Schulman regarding deposition of Dr. Sally Partridge anticipated testimony and participation in the trial; reply to Mr. Schulman regarding filing of public information requests and possible submission of	0.5

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	certification of debt into evidence.	
12/11/12	(RS) Attend trial.	7.5
12/11/12	(RS) Communiqué exchanges with Robin Sanders regarding scheduling of depositions of charter Plaintiff/Parents and Denise Pierce; notify Ms. Pierce of request by Ms. Sanders to schedule deposition; communiqué exchanges with Chris Diamond and Paralegal regarding trial transcripts; notify Paralegal to issue notice of cancellation of Partridge deposition on 12/13. (No charge)	0.3
12/11/12	(RS) Review Matt Abbott deposition transcription in preparation for witness preparation session with Rene Gallegos and Mark DiBella.	1.5
12/11/12	(RS) Receive and review Notice of James Jones deposition; review communiqué exchanges between Shelley Dahlberg and David Hinojosa regarding Mr. Hinojosa's inquiry concerning expected testimony by Dr. Sally Partridge (No charge).	0.1
12/12/12	(AK) Continue summarizing Defendants' discovery responses.	0.4
12/12/12	(JH) Conduct case law and TRE research on cross-examination issues pertaining to state witness Housson.	0.5
12/12/12	(JH) Communiqué exchange with Rene Gallegos and Mark DiBella regarding deposition preparation.	0.7
12/12/12	(RS) Confer with Ramon Medina concerning preparation of Rene Gallegos and Mark DiBella depositions.	0.05
12/12/12	(RM) Confer with and assist Bob Schulman concerning preparation of Rene Gallegos and Mark DiBella for depositions and formulas used by TEA to fund charter schools. (No charge)	0.5
12/12/12	(RM) Review communiqué and attached file from Paralegal with transcript of Matt Abbott deposition; prepare communiqué to Bob Schulman with suggestions for Rene Gallegos and Mark DiBella deposition.	1
12/12/12	(LS) Prepare for and attend trial; attend trial; communiqué exchanges during trial to Bob Schulman regarding status of witnesses (No charge); telephone conference post-trial with Mr. Schulman to advise of current status and discuss potential cross-examination of witness.	8
12/12/12	(RS) Prepare advisory to Mark DiBella and Rene Gallegos with list of topics for pre-deposition conference and trial excerpt for review; prepare follow-up communiqués to Mr. DiBella and Mr.	1.6

Unofficial copy Travis Co. District Clerk Velva L. Price

517 Soledad Street
San Antonio, TX 78205

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

	Gallegos with PowerPoint on case status for review; provide Mr. DiBella and Mr. Gallegos with copy of David Dunn deposition; engage in communiqué exchange with and directive to Leonard Schwartz regarding instructions for court appearance today forward Podgursky trial slides to be used by state in direct examination; forward to Mr. Schwartz e-mail exchanges between counsel concerning potential objection to Podgursky report; provide Mr. Schwartz with Podgursky's supplemental report.	
12/12/12	(RS) Receive request from Leonard Schwartz for current exhibit list provided by Della Sawvel; prepare response to Mr. Schwartz with same, along with current version of Master Trial Exhibit List; review Ramon Medina's memorandum recommendations for Gallegos and DiBella depositions and commentary concerning Abbott deposition transcript; communiqué exchange with Mr. Schwartz regarding Podgursky testimony during trial (No charge).	0.3
12/12/12	(RS) Prepare for and conduct in-office deposition preparation conference with Rene Gallegos and Skype conference with Mark DiBella, both in preparation for their upcoming depositions; communiqué exchanges with Mr. DiBella following same; and possible teleconference on 12/14/12 to discuss Gallegos's deposition testimony in further preparation for Mr. DiBella's deposition.	4.4
12/12/12	(RS) Receive and review Shannon Housson direct examination presentation (PDF and Excel files) provided by Michael Patterson; prepare communiqué forwarding same to TCSA litigation team; multiple communiqué exchanges with TCSA team regarding Toni Templeton's "Pocket Edition" Excel file and break down of data within same for clarification and possible use as a PowerPoint for cross-examination.	0.7
12/12/12	(RS) communiqué exchanges with Eric Vinson regarding agreement and scheduling of date and time for deposition of Dr. Sally Partridge and schedule for Mark DiBella deposition; request Mr. Vinson to provide summary of Dr. Partridge's anticipated testimony, previously requested from Shelley Dahlberg.	0.4
12/13/12	(CP) Confer with Mark DiBella, confirm arrangements for his travel to San Antonio on 12/17; prepare correspondence to Matt Abbott, forward original of his deposition for review and return.	0.1

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	(No charge)	
12/13/12	(AK) Continue summarizing Defendants' discovery responses.	1.7
12/13/12	(RM) Review communiqué from Echo Medina responsive to public information request for employment records pertaining to Dr. Lisa Dawn-Fisher and Sally Partridge; download requested information from secured website; review PDF copies to ensure completeness and integrity of PDF files; prepare communiqué to Bob Schulman and Paralegal forwarding the requested information.	0.5
12/13/12	(LS) Numerous communiqué exchanges with Bob Schulman regarding depositions and trial scheduling. (No charge)	0.5
12/13/12	(RS) Receive list of topics to be addressed by Dr. Sally Partridge in deposition, provided by Eric Vinson; receive and review amended presentation for Shannon Housson to be used on direct examination by the state during trial today; prepare lengthy communiqué to Toni Templeton regarding cross-examination of Housson and receive edits from Ms. Templeton concerning same; communiqué exchanges with Ms. Templeton regarding TPM "Student Progress Measures What's New for 2011" document provided and reviewed; and preparation of presentation for Housson cross-exam.	1.1
12/13/12	(RS) Attend trial.	3
12/13/12	(RS) Communiqué exchange with Paralegal regarding Gallegos deposition Notice; communiqué exchanges with Toni Templeton concerning her data compilation and issues concerning same; request break out of charts and tables provided in Excel file previously prepared; prepare communiqué to David Hinojosa and Rebecca Couto regarding potential trial testimony concerning teacher effectiveness; receive and conduct cursory review of 11/06/12 trial transcript; communiqué exchange with Denise Pierce concerning "daily roughs" of transcripts and cost-sharing agreement relating to same; communiqué exchange with Paralegal confirming Partridge deposition on 12/20, advise time is not confirmed, direct she arrange same to start at 930 AM; conduct communiqué exchange with Denise Pierce for assistance in print out of Charter Plaintiffs' trial calendar. (No charge)	1.6
12/13/12	(RS) Confer with Toni Templeton in preparation for witness	1.3

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	cross-examination.	
12/13/12	(RS) Receive and review First Amended Notice of DiBella deposition; communiqué exchange with Paralegal regarding Charter Plaintiffs' proposed trial calendar and order for presentation of witnesses for same; review notification from Michael Patterson with Podgursky presentation attached excluding slides objected to on 12/12, and revised per the Court's order. (No charge)	0.5
12/13/12	(RS) Attend trial, afternoon session.	2.5
12/13/12	(RS) Attend meeting with Toni Templeton and conduct extended telephone conference with David Dunn and Ms. Templeton regarding trial data.	0.8
12/13/12	(RS) Receive and conduct brief review of 12/13/12 trial transcript; receive list of admitted exhibits from Della Sawvel; review same; communiqué exchanges with David Dunn regarding potential cost sharing with of trial transcripts; review documentation received from Ramon Medina in response to his PIR for employment information concerning Drs. Lisa Dawn-Fisher and Sally Partridge; communiqué exchange with Ms. Sawvel regarding date(s) final transcripts will be ready and submission of the Findings of Fact and Conclusions of Law.	0.7
12/13/12	(RS) Communiqué exchanges with David Hinojosa regarding anticipated deposition testimony from Mark DiBella relative to traditional public schools.	0.3
12/13/12	(RS) Return travel to San Antonio. (No charge)	1.5
12/14/12	(AK) Continue summarizing Defendants' discovery responses.	3.7
12/14/12	(MZ) Research TEA reports and guidance regarding school district per student spending for facilities.	1
12/14/12	(RS) Receive and review communiqué from Denise Pierce with report obtained from the National Center for the Study of Privatization in Education on issue of whether charters impose excess costs on traditional school districts; review report; communiqué exchange with Ms. Pierce, David Dunn and Paralegal regarding article entitled "Treasury, IRS Urged to Allow Texas PSF Guarantee for Charter School Bonds"; review article.	0.3
12/14/12	(RS) Communiqué exchange with Paralegal regarding inquiry by Della Sawvel for exhibit number for Baker deposition submitted by Calhoun County Plaintiffs; receive notification from Lacy	0.6

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Lawrence concerning start number for exhibits for today's depositions (Trotter and Gallegos); receive and review communiqué from Eric Vinson outlining potential topics to address during Partridge deposition to TCSA litigation staff for review with request to schedule conference to discuss same; review and approve Paralegal's notification to all counsel of submission of Errata sheet for Dunn deposition and return of original to court reporter; engage in communiqué exchange with Paralegal concerning order for real time rough drafts of trial transcripts and timeline for procurement of same.	
12/14/12	(RS) Draft internal memorandum and directives concerning cross-examination of Shannon Housson; prepare communiqué to Mark DiBella and Rene Gallegos regarding their review of rough draft of Gallegos deposition.	0.3
12/14/12	(RS) Appear for and defend Rene Gallegos deposition.	5
12/14/12	(RS) Conduct communiqué exchanges with Rebecca Couto of MALDEF regarding scheduling of teleconference to discuss DiBella's potential testimony on 12/17 concerning ISDs; communiqué exchange with Robin Sanders regarding availability of parent witnesses (Flores and Flemister) for deposition and date for same; direct Paralegal regarding scheduling of parent deposition; review communiqué from Ms. Sanders requesting deposition scheduling update; receive and review staff communiqué regarding preparation conferences with Flores and Flemister.	0.3
12/14/12	(RS) Direct staff regarding submission of proposed trial calendar for Charter Plaintiffs; review and approve same; prepare communiqué to all counsel forwarding Partridge deposition notice; receive and review staff communiqué to Denise Pierce regarding deposition location and scheduling. (No charge)	0.1
12/15/12	(RS) Communiqué exchange with Mark DiBella regarding non-receipt of Gallegos deposition transcript; prepare inquiry to Paralegal regarding same. (No charge)	0.1
12/15/12	(RS) Review line of Edgewood cases; began review of trial transcript and analysis of same in terms of support of pleading and Findings of Fact and Conclusions of Law; review and prepare notes and commentary on first day opening statements of all parties and court commentary to same.	3.3

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

12/16/12	(RS) Receive, review and analyze Rene Gallegos deposition transcript; prepare communiqué to Mark DiBella forwarding copy for his review; conduct extended telephone conference with Mr. DiBella regarding same in preparation for his deposition.	2.7
12/16/12	(RS) Receive notification from Lacy Lawrence with start number for exhibits for DiBella deposition (No charge); forward e-mail string with MALDEF to Mark DiBella evidencing their concerns relating to his testimony for his review; receive and review response from Mr. DiBella regarding same.	0.2
12/16/12	(RS) Continue trial transcript review, continuing the first day opening statements and continuing through second day testimony of Murdoch regarding changing demographics prepare comments and analysis as applicable to Charter claims.	2.4
12/17/12	(CP) Communiqué exchanges with Mary Sisler, AG's Office, regarding confirmation of date and times for depositions of Denise Pierce, Mario Flores and Brooks Flemister; communiqué exchanges with Ms. Pierce, Mr. Flores and Mr. Flemister concerning same and pre-deposition conference with Bob Schulman to prepare for same.	0.3
12/17/12	(CP) Communiqué exchanges with Matt Abbott regarding his deposition transcript and non-receipt of same; telephone conference with Mr. Abbott concerning same.	0.2
12/17/12	(CP) Confer with court reporting firm regarding Matt Abbott's deposition transcript, not yet received. (No charge)	0.1
12/17/12	(CP) Receive directive from Bob Schulman for information required in preparation for Dr. Sally Partridge deposition; conduct file review and search for requested documentation and download same, including Kallison PowerPoint, e-mail exchanges between Mr. Schulman and Ramon Medina concerning student population attending charter schools, and Defendants' trial exhibits referring to charters; confer with Allen Keller regarding data compilation he has created in review of Defendants' documents disclosed in response to Charter Plaintiffs' discovery requests (No charge).	1
12/17/12	(AK) Prepare summary of documents for Bob Schulman's preparation for Dr. Sally Partridge deposition.	4.5
12/17/12	(MZ) Review trial testimony of expert witness Dan Casey for questions regarding purpose of his testimony; prepare sample	0.7

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	opening script for cross-examination of witnesses using same.	
12/17/12	(MZ) Continue research of TEA reports and guidance regarding school district per student spending for facilities; research historical regulations for school funding provisions.	1
12/17/12	(RM) Confer with Bob Schulman regarding $850 amount purportedly paid to open-enrollment charter schools accounting for the difference in facilities funding not received by charter schools. (No charge)	0.2
12/17/12	(RM) Confer with Paralegal regarding $850 amount purportedly paid to open-enrollment charter schools accounting for the difference in facilities funding not received by charter schools; research litigation files for same.	1
12/17/12	(RS) Receive and review, from Shelley Dahlberg testimony, to be offered by Dr. Sally Partridge; communiqué exchange with David Hinojosa regarding same; prepare request to Ms. Dahlberg regarding scope of Partridge testimony; receive response from Ms. Dahlberg regarding same; draft examination inquiries for Partridge deposition; receive and review notice from MALDEF scheduling deposition of Representative Rob Eissler; prepare communiqué to Mr. Hinojosa regarding intentions to pose charter related questions to Representative Eissler.	1.6
12/17/12	(RS) Attend and defend deposition of Mark DiBella	6.5
12/17/12	(RS) Receive request from Denise Pierce requesting attendance at meeting prior to Partridge deposition, assistance with witness preparation by Lindsey Jones and related issues; prepare response to Ms. Pierce concerning same, and scheduling of teleconference. (No charge)	0.2
12/17/12	(RS) Prepare lengthy directive to litigation staff for compilation of documentation of data and research in preparation for Partridge deposition.	0.6
12/18/12	(CP) Complete compilation of documentation/data for Bob Schulman in preparation for Partridge deposition, including PowerPoints on 501(c)(3) issues and charters versus districts; charter school revocation data; charter school demographics data; charter school performance, funding and statutory cap documentation; organize all potential exhibits and data for Mr. Schulman's review.	2
12/18/12	(AK) Research and prepare documents for Bob Schulman	4.6

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	regarding Partridge depositions.	
12/18/12	(MZ) Prepare current and historical school funding statutes as exhibits for expert witness deposition.	2.5
12/18/12	(RM) Review communiqué from Paralegal regarding request for information concerning School FIRST for use during deposition of Dr. Sally Partridge; reply to Paralegal, forward attachments responsive to request and by providing various questions regarding School FIRST that Bob Schulman may consider for Partridge deposition.	0.7
12/18/12	(RS) Review communiqué exchange between Paralegal and Denise Pierce regarding preparation for Partridge deposition; receive request from Ms. Pierce for updated trial calendar; prepare response to Ms. Pierce concerning same; receive 11/07 final trial transcript from Della Sawyer and direct staff. (No charge)	0.1
12/18/12	(RS) Review deposition outline prepared by Ramon Medina for Partridge deposition; prepare additions and modifications to same; direct staff regarding exhibits to be produced through witness; receive and review notice filed by TTSFC Plaintiffs regarding de-designation of Jim Knight as an expert witness; receive and review list of Defendants' exhibits relating to charters prepared by Allen Keller.	0.9
12/18/12	(RS) Continue review and analysis of days, three and four of trial transcript, witness presentations, relevant exhibits and depositions in preparation for trial presentation.	3.8
12/19/12	(CP) Receive request from Court Reporting firm for status of Partridge deposition; advise Matt Abbott still has not received his deposition transcript (as of 12/18); provide Mr. Abbott's alternate address for FedEx delivery of same. (No charge)	0.1
12/19/12	(CP) Confer with and review information to be utilized by Bob Schulman at Partridge deposition; compile multiple documents and organize same for Mr. Schulman's review in preparation for Partridge deposition. (No charge)	3
12/19/12	(AK) Deposition preparation with Bob Schulman for Dr. Sally Partridge deposition. (No charge)	3.1
12/19/12	(MZ) Revise sample opening script for cross-examination of witnesses.	0.8
12/19/12	(RM) Review communiqué from Paralegal regarding reference to	0.1

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Unofficial copy Travis Co. District Clerk Velva L. Price

	$850 amount identified in a report and used in Dr. Lisa Dawn-Fisher's report; reply to Paralegal regarding same. (No charge)	
12/19/12	(RS) Confer with Allen Keller and Paralegal in preparation for Dr. Sally Partridge deposition; receive, review and analyze documentation compiled by both for use as potential exhibits for same; continue preparation for Partridge deposition.	4.1
12/19/12	(RS) Extended telephone conference with TCSA litigation staff regarding case status.	0.5
12/19/12	(RS) Confer with Chris Diamond regarding status of trial transcripts and cost sharing arrangement; direct Paralegal regarding same; conduct telephone conference with Della Sawvel regarding same; receive and review Toni Templeton's communiqué to experts, Drs. Anthony Rolle and Craig Wood, regarding review of data provided by Dr. Lisa Dawn-Fisher and [redacted] by Dr. Dawn-Fisher and experts; prepare advisory communiqué to Denise Pierce with PBMAS Member Briefing PowerPoint for review in preparation for her deposition.	0.4
12/20/12	(AK) Continue summarizing Defendants' discovery responses.	4.2
12/20/12	(RM) Review communiqué from Bob Schulman to Denise Pierce regarding preparation of Drs. Anthony Rolle and Craig Wood for trial testimony; review follow-up communiqué from Mr. Schulman regarding agenda for School Finance Work Session; reply to Mr. Schulman regarding same; review follow-up communiqués from Ms. Pierce regarding adjustments to School Finance Work Session agenda.	0.1
12/20/12	(RS) Prepare request to Lacy Lawrence regarding exhibits to be introduced during Partridge deposition, receive and review Ms. Lawrence's response (No charge); receive and review communiqués from Della Sawvel with 11/8/12 final trial transcript and updated list of admitted exhibits; review attachments; confer with Paralegal regarding Denise Pierce deposition. (No charge)	0.1
12/20/12	(RS) Prepare deposition exhibits; complete deposition outline; conduct deposition of Dr. Sally Partridge.	6.5
12/21/12	(RS) Receive and review Defendants' Twelfth Amended Exhibit List; receive and review Edgewood Plaintiffs' First Amended Exhibit List.	0.3

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

12/22/12	(RS) Direct Paralegal in review of exhibits filed by Defendants with Twelfth Amended Exhibit List for charter-related materials. (No charge)	0.1
12/22/12	(RS) Continue review and analysis of trial transcripts, trial exhibits, depositions, deposition exhibits and preparation of comments to same continuing with days five and six of Lynn Moak's testimony through.	5.6
12/23/12	(RS) Prepare lengthy advisory to TCSA administrators and firm's litigation staff regarding results of Partridge deposition and discussion with AG concerning the state's position relating to charters; receive and review response from David Dunn (No charge).	0.6
12/23/12	(RS) Continue review of trial transcripts, trial exhibits and relevant depositions and exhibits through day seven of testimony of school district superintendents and beginning of day eight testimony by Dr. Wayne Pierce of the Equity Center and preparation of comments and analysis of same.	5.2
12/24/12	(RS) Receive and review communiqué from Della Sawvel with PDF of 11/08 trial transcript. (No charge)	0.1
12/26/12	(CP) Review Defendants' current (12th Amended) Exhibit List for references to charters; determine one new Exhibit (1243) is listed; prepare request to Michael Patterson and Amy Penn, Assistant AGs, for copy of such Exhibit as same is not available in disclosures previously received; prepare request to Mary Sisler, Paralegal with the AG's office, for copy of same due to non-response from Patterson and Penn.	0.3
12/26/12	(CP) Prepare communiqué to Dr. Anthony Rolle requesting status of his original deposition, due today (No charge); prepare correspondence to TSG Court Reporters forwarding original of Dr. Craig Wood's deposition; prepare communiqué to all counsel forwarding Errata sheet from Dr. Wood's deposition. (No charge)	0.1
12/26/12	(RS) Continue review of trial transcripts (through day twenty-four of trial), trial exhibits and relevant depositions and exhibits through testimony of school district teacher, parent and superintendents; prepare comments and analysis regarding same; perform in depth analysis of current charter school funding laws and formulas, dissecting and deconstructing Texas Education Code section 12.106 former and current versions and	7.9

Unofficial copy Travis Co. District Clerk Velva L. Price

517 Soledad Street
San Antonio, TX 78205

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

	references to former and current versions of charter 42 financing laws.	
12/27/12	(RS) Receive and review communiqué from Paralegal regarding her review of Defendants' Twelfth Amended Master Exhibit List and exhibit added (number 1243) relating to charters; receive and review request from Joe Hoffer inquiring as to status of amendment of Petition to clarify equal protection argument drafted by Leonard Schwartz; review Paralegal's communiqué to all counsel forwarding Wood Errata sheet for deposition.	0.7
12/27/12	(RS) Continue review of trial transcript, day twenty-four; prepare summary of pertinent testimony by Charles Dupre, Pflugerville Superintendent; review and analyze day twenty-five trial transcript of Dr. Grover Whitehurst testimony; trial and deposition exhibits; prepare extensive commentary regarding same relating to Dr. Whitehurst's testimony on cross-examination concerning charters.	7.2
12/28/12	(CP) Multiple communiqué exchanges with Della Sawvel to obtain copies of trial transcripts in real time format; receive and forward same to Bob Schulman for submission to Chris Diamond. (No charge)	0.2
12/28/12	(CP) Receive and review request from Chris Diamond for copies of trial transcripts (previously provided, he cannot locate); forward same with attached invoice for Court Reporter's fees in connection with same. (No charge)	0.1
12/28/12	(RS) Receive and review notification from Della Sawvel provided by Paralegal regarding status of final trial transcripts. (No charge)	0.1
12/28/12	(RS) Continue review and analysis of trial transcript, day twenty-six, Dr. Gloria Zyskowski testimony; review trial exhibits regarding same; review deposition of Dr. Zykoswski and deposition exhibits; prepare commentary concerning same; return to review of charter school funding formulas comparing, statutes, to Dr. Dawn-Fisher deposition testimony and report to Joe Wiskoski presentation to court.	4.6
12/29/12	(RS) Direct Paralegal regarding trial transcripts from Della Sawvel to be forwarded to Chris Diamond; prepare communiqué to David Dunn with Casey testimony excerpts for review in preparation for Mr. Dunn's deposition; prepare follow-up communiqué to Mr. Dunn with copy to Denise Pierce and Toni	0.8

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Templeton, with additional Casey testimony excerpts for review.	
12/29/12	(RS) Review trial transcript, day twenty-seven, Dr. Laurie Davis testimony and exhibits; analyze same; review record of trial transcript for Court pronouncements and directives throughout trial; Prepare extensive advisory communiqué to Drs. Anthony Rolle and Craig Wood with trial testimony excerpts (Dr. Nabor Cortez) regarding WADA Averaging v. ADA; prepare lengthy correspondence to be submitted to charter CFO/witnesses with excerpt from questions by Judge Dietz propounded to Amarillo ISD; forward same to Paralegal for submission to CFOs; receive and review final of correspondence forwarded by Paralegal to CFOs (No charge).	5.3
12/30/12	(RS) Prepare communiqué to Toni Templeton with inquiry concerning efficiency and suitability of funding formulas; prepare follow-up communiqué to Ms. Templeton regarding calculation of average funding on ADA of 756, as referenced in Wisnoski presentation with request for Ms. Templeton to calculate a per WADA comparison.	0.9
12/30/12	(RS) Review and analyze days twenty-eight and twenty-nine trial transcripts of Dr. Michael Podgursky testimony, including deposition and trial exhibits; prepare commentary, including Podgursky testimony on inability to determine efficiencies not considered and/or included in his report; review trial testimony by Shannon Housson, day twenty-nine of trial; prepare analysis of Housson's AYP testimony and exhibits accompanying same.	7.4
1/1/13	(RS) Prepare directive to staff regarding identification and forwarding of transcript of testimony of school district taxpayer parents to charter parent plaintiffs preparing for depositions. (No charge)	0.1
1/2/13	(RM) Review communiqué from Bob Schulman regarding School Finance Work Session; review communiqués from Denise Pierce regarding revised agenda for same; research Lori Taylor's academic research on Texas school finance issues; review TEA website and TEC 41 for recapture requirements; review TEA's Master Dataset with Charters file used to prepare Dr. Lisa Dawn-Fisher's 09/20/2012 report to ascertain use of recapture amounts; prepare research advisory to Mr. Schulman conveying	1.8

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	observations.	
1/2/13	(RM) Telephone conference with Bob Schulman regarding scheduled deposition of Mario Flores and Brooks Flemister; confer with Bridgett Foster regarding conference room availability. (No charge)	0.2
1/2/13	(CP) Line-by-line review of Bob Schulman's trial transcript summary; prepare revisions and additions to same; forward same to Mr. Schulman for final edit.	1.5
1/2/13	(RS) Travel to Austin.	1.5
1/2/13	(RS) Receive and review communiqué from Ramon Medina regarding recapture in Dr. Lisa Dawn-Fisher analysis consistent with state law and published state funding methodology; prepare response and directive to Mr. Medina; prepare communiqués to parent Mario Flores and Leonard Schwartz regarding attached trial transcript.	0.2
1/2/13	(RS) Receive and review data requested from Toni Templeton concerning WADA computation comparison; review and consult Joe Wisknoski slides regarding charter school funding; prepare response to Ms. Templeton, David Dunn and Denise Pierce regarding same and computation of WADA.	0.4
1/2/13	(RS) Receive and review work session notification from Dr. Anthony Rolle regarding attendance at meeting; prepare response to Dr. Rolle. (No charge)	0.1
1/2/13	(RS) Receive and review communiqué from MALDEF attorney, David Hinojosa, regarding Denise Pierce's anticipated deposition testimony; prepare response to Mr. Hinojosa regarding same.	0.2
1/2/13	(RS) Review school district parent/taxpayer trial testimony to date; prepare outline of anticipated deposition inquires; conduct deposition preparation conference with Mario Flores; prepare outline of anticipated deposition inquires; conduct deposition preparation conference with Brooks Flemister.	7.3
1/2/13	(RS) Prepare communiqué to TCSA staff attaching draft of relevant trial transcript analysis/summary requesting review of same.	0.3
1/3/13	(AK) Continue summarizing Defendants' discovery responses. (No charge)	1.5
1/3/13	(RS) Prepare directive to Ramon Medina to [redacted]	0.9

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	[redacted]s; receive and review response from Mr. Medina regarding same; prepare reply and directive to Mr. Medina concerning same; receive and review Mr. Medina's draft Public Information Request; forward draft request to Toni Templeton for submission; receive and review request from Assistant Attorney General, Eric Vinson, regarding scheduling of three charter school witness depositions, requesting status of expert witness, Tom Sage report and deposition date for expert witness, Jimmy Strohmeyer; prepare response to Mr. Vinson; prepare directive to Paralegal regarding same.	
1/3/13	(RM) Prepare TPIA request for [redacted] directed by Bob Schulman. (No charge)	0.2
1/3/13	(RM) Participate in School Finance Work Session. (No charge)	4.2
1/3/13	(RM) Review communiqué from Bob Schulman regarding Dr. Anthony Rolle's data analysis and assertion concerning impact of recapture; calculate impact of recapture on Dr. Lisa Dawn-Fisher's data analysis using Master Dataset with Charters file provided by TEA; prepare reply to Mr. Schulman regarding same.	0.7
1/3/13	(RM) Review communiqué from Bob Schulman regarding TPIA request submitted to TEA; prepare reply to Mr. Schulman regarding same. (No charge)	0.2
1/3/13	(RS) Receive and review communiqué from Denise Pierce regarding Dr. Anthony Rolle's Skype participation in meeting; prepare response to TCSA staff, prepare advisory to Ms. Pierce regarding deposition preparation; prepare communiqué to Chris Diamond forwarding 11/13/12 final trial transcript. (No charge)	0.1
1/3/13	(RS) Attend preparation conference at TCSA with Denise Pierce Toni Templeton, Dr. Craig Wood and Dr. Anthony Rolle (by video conferencing), reviewing expert report and preparing for trial testimony, including [redacted]	4.2

Unofficial Copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	[redacted]; attend follow-up conference with Dr. Wood.	
1/3/13	(RS) Receive and review communiqué from Toni Templeton with Excel file entitled "charters v. ISDs"; review file; receive and review second communiqué from Ms. Templeton with Excel file concerning "Non Chapter 41 vs. Charters."	0.4
1/3/13	(RS) Receive and review deposition notices for Denise Pierce, Mario Flores and Brooks Flemister. (No charge)	0.1
1/4/13	(AK) Continue summarizing Defendants' discovery responses.	3.1
1/4/13	(CP) Receive and review communiqué from Tom Sage with dates for scheduling his deposition; forward same to Bob Schulman for review (No charge); prepare follow-up request to Mr. Sage to determine if he is available on 01/18/13; telephone call to Jimmy Strohmeyer, left detailed message for his availability for deposition on 01/11 or 01/18 (No charge); telephone call to Mr. Sage, left detailed message requesting his availability on 01/18 (No charge).	0.1
1/4/13	(CP) Prepare request to Tom Sage and Jimmy Strohmeyer for dates in January to schedule their depositions.	0.1
1/4/13	(CP) Telephone conference with Jimmy Strohmeyer regarding dates for his deposition; he is open on 01/11 and 01/18; notify Bob Schulman.	0.1
1/4/13	(CP) Prepare communiqué to Jimmy Strohmeyer confirming his deposition on 01/11 and requesting he contact me to schedule travel arrangements.	0.1
1/4/13	(RS) Final witness preparation; attend and defend Mario Flores deposition.	2.4
1/4/13	(RS) Prepare communiqué to Toni Templeton regarding charter/district comparisons; receive and review request from Denise Pierce for copy of current live pleading; direct Paralegal to provide same; prepare communiqué to Ms. Pierce reiterating AEIS is undependable finance data; confer with Ms. Pierce (by e-mail) concerning her upcoming deposition testimony and potential areas of questioning during same; prepare request to	0.3

Unofficial Copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Ms. Pierce for input regarding TEA data indicating charter receive approximately $1200 less in total revenue per pupil than traditional ISDs; receive response from Ms. Pierce indicating it is from Dr. Anthony Rolle's 2011 report; prepare reply with copy to Dr. Rolle requesting his input. (No charge)	
1/4/13	(RS) Final witness preparation; attend and defend Brooks Flemister deposition.	2.5
1/4/13	(RS) Receive and review conformation from Tom Sage concerning his availability for scheduling his deposition; direct Paralegal for scheduling of Sage deposition; receive and review communiqué from Paralegal regarding date for Strohmeyer deposition; receive and review second communiqué from Paralegal regarding same; prepare communiqué to Eric Vinson concerning same; receive and review follow-up communiqué from Paralegal regarding same day scheduling of Strohmeyer and Sage depositions; prepare response; prepare follow-up communiqué to Mr. Vinson regarding same. (No charge)	0.8
1/4/13	(RS) Attend and defend Denise Pierce deposition.	3.5
1/4/13	(RS) Receive and review communiqué from Assistant Attorney General, Robin Sanders, regarding Tom Sage deposition and report prior to same, prepare response to Ms. Sanders, regarding same; prepare communiqué to Mr. Sage regarding same; receive and review response from Mr. Sage concerning same; direct Allen Keller regarding preparation of Mr. Sage's expert report; prepare reply to Mr. Sage regarding same; prepare proposed report outline; forward same to Mr. Keller; receive and review notice of Strohmeyer deposition; receive and review communiqué from Paralegal to Mr. Strohmeyer confirming deposition, scheduling and scheduling of pre-deposition conference,; prepare communiqué to Mr. Strohmeyer, regarding same. (No charge)	1.1
1/4/13	(RS) Return travel to San Antonio. (No charge)	1.5
1/5/13	(RS) Prepare lengthy directive to litigation staff and advisory to TCSA staff regarding significance of testimony of parent/taxpayer witnesses in depositions inconsistent with charter claims; direct litigation staff research on multiple issues described; prepare for cross-examination of state's financial expert with directive to Ramon Medina for review and analysis of funding gaps in state	3.3

Unofficial Copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	financial expert's tables data tables provided in report to those included in data sets not found in report; identify relevant sections of Dr. Lisa Dawn-Fisher deposition regarding same; prepare follow-up directive to Mr. Medina, with deposition excerpts from Dawn-Fisher deposition testimony on charter fund averages; prepare staff research directives regarding Tier I funding calculations appearing in report; request review from TCSA staff in preparation for meeting with [redacted].	
1/6/13	(RS) Prepare arguments regarding small charter school district comparisons; direct Ramon Medina in review of TEA I&S data runs from Dr. Lisa Dawn-Fisher's deposition testimony and report; review presentations for Rob Coleman and Shirley Beaulieu trial testimony; prepare communiqué to TCSA staff requesting review of same; receive response from David Dunn regarding same; prepare advisory reply; review depositions of Coleman and Beaulieu; prepare cross-examination questions; confer with Leonard Schwartz regarding court appearance on 01/08; communiqué exchanges with Mr. Schwartz regarding Beaulieu presentation; prepare communiqué to Toni Templeton concerning Dr. Dawn-Fisher's testimony regarding equalization of I&S funds; prepare communiqué to Mr. Schwartz forwarding Beaulieu deposition for review; prepare communiqué to Ms. Templeton and Denise Pierce with copy to Ramon Medina, forwarding links to FAST Executive Summary data regarding budgets for facilities and related issues.	2.3
1/6/13	(RS) Receive and review communiqué from Toni Templeton proposing slide sets for Dawn-Fisher cross-examination and commentary regarding same; review and analyze same; prepare advisory response to Ms. Templeton requesting additional information on each slide; forward same to Ramon Medina for review; receive and review response from Ms. Templeton with additional data; prepare reply to Ms. Templeton relating to [redacted]	1.4
1/6/13	(RS) Receive and review revised list of admitted exhibits from Della Sawvel, Court Reporter; receive and review communiqué from Toni Hunter to Ms. Sawvel regarding exhibits admitted missing from updated list; receive and review follow-up	0.5

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	communiqué from Ms. Hunter with list of additional exhibits offered for admission; review same; receive and review communiqué from Holly McIntush with additional exhibits for admission; review same.	
1/6/13	(RS) Travel to Austin.	1.5
1/7/13	(CP) Telephone call to Dr. Anthony Rolle, left detailed message regarding notarized signature page for his deposition not yet received; communiqué exchange with Robin Sanders concerning scheduling of Tom Sage deposition and location; prepare request to Bob Schulman to explain why San Antonio is his choice for taking Sage's deposition (inconvenient for defense counsel to travel to San Antonio. (No charge)	0.1
1/7/13	(CP) Confirm Tom Sage's availability on 01/18 for deposition; confer with Allen Keller and Bob Schulman regarding same; prepare request to Eric Vinson and Robin Sanders for relocation of Mr. Sage's deposition to San Antonio and anticipated start and end time for same in order to make Mr. Sage's travel arrangements. (No charge)	0.1
1/7/13	(CP) Telephone conference with Jimmy Strohmeyer regarding travel to Austin for his deposition on 01/11; he will drive. (No charge)	0.1
1/7/13	(RM) Review communiqué from Bob Schulman regarding use of FAST report data to identify public school expenditures for facilities; prepare reply to Mr. Schulman regarding same.	0.1
1/7/13	(RM) Review communiqué from Bob Schulman regarding charter school funding calculations; review TEA Estimate of State Aid Templates, TEA School Finance website, and TEC 12.106 for pertinent information; prepare reply to Mr. Schulman regarding same.	1.2
1/7/13	(RM) Review communiqué and attachment from Bob Schulman regarding omitted figures from Dr. Lisa Dawn-Fisher's report as compared to Master Dataset With Charters file; compare attachment provided by Mr. Schulman to report; prepare PDF copies of omitted figures pertinent to Mr. Schulman's inquiry; prepare reply to Mr. Schulman forward PDF files of omitted figures and list other relevant information.	1
1/7/13	(RM) Continue to research TEA organizational charts for information regarding witnesses; continue to prepare follow-up	0.2

Unofficial copy Travis Co. District Clerk Velva L. Price

517 Soledad Street
San Antonio, TX 78205

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

	communiqué to Bob Schulman regarding likely involvement of TEA staff in TEC 12.101 limit.	
1/7/13	(RM) Review communiqué from Bob Schulman regarding Dr. Lisa Dawn-Fisher's deposition statements on how charter school state funding is calculated; prepare reply to Mr. Schulman regarding same.	0.2
1/7/13	(RM) Review communiqué from Bob Schulman regarding state defense to charter school cap claim; search litigation case file for list of state witnesses; prepare communiqué to Paralegal regarding same; receive and review Paralegal's reply; research TEA organizational charts and TEC 12, Subchapter D for pertinent information; prepare reply to Mr. Schulman regarding state witnesses; continue to research TEA organizational charts for information regarding witnesses; prepare follow-up communiqué to Mr. Schulman regarding likely involvement of TEA staff in TEC 12.101 limit.	1.7
1/7/13	(AK) Extended telephone conference with Tom Sage to gather information needed to assist expert report.	0.7
1/7/13	(LS) Conference with David Dunn, Toni Templeton, Denise Pierce and Bob Schulman at TCSA concerning strategy for direct testimony or cross-examination of Dr. Lisa Dawn-Fisher; confer with Bob Schulman concerning 1/8/13 testimony by Dr. Dawn-Fisher and potential cross; review Dr. Dawn-Fisher's PowerPoint and deposition.	4.8
1/7/13	(RS) Receive and review communiqué from Amy Penn clarifying exhibits for Coleman and Beaulieu trial testimony, as they were incorrectly labeled; continue preparation for Dawn-Fisher cross-examination.	2.5
1/7/13	(RS) Attend trial (morning session).	3
1/7/13	(RS) Prepare notification to TCSA staff of change in trial calendar, Dr. Lisa Dawn-Fisher will testify on 01/08, need to finalize exhibits for cross-exam; receive and review response from Toni Templeton confirming her availability to meet and review exhibits for Dr. Dawn-Fisher cross-exam; receive and review advisory from Ramon Medina concerning his personal knowledge and research regarding state's witnesses, Beaulieu, Dawn-Fisher, Housson and Partridge; receive follow-up communiqué/advisory from Mr. Medina regarding background	0.2

Unofficial copy Travis Co. District Clerk velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Unofficial copy Travis Co. District Clerk Velva L. Price

	data on state's witnesses Coultress, Day, Givens, Lopez, Roska and Zyskowski; direct Mr. Medina to review witness depositions to determine relevance to charter claims. (No charge)	
1/7/13	(RS) Confer with Toni Templeton and Denise Pierce in preparation for Dr. Lisa Dawn-Fisher cross-examination.	1
1/7/13	(RS) Extended telephone conference with Dr. Anthony Rolle regarding anticipated trial testimony of Dr. Lisa Dawn-Fisher and comparison of funding disparities identified in her report and his report.	0.6
1/7/13	(RS) Receive and review communiqué from Dr. Anthony Rolle regarding charter school/school district funding disparities; conduct review of expert report regarding same, locate relevant information in Moak Casey report (2006); prepare communiqué to Dr. Rolle and provide link to same; continue of review Dawn-Fisher deposition in preparation of cross-examination; locate testimony concerning charter funding; provide excerpt regarding same to Denise Pierce for review; prepare communiqué to Leonard Schwartz concerning meeting at TCSA today; receive communiqué from Ms. Pierce regarding proposed meeting with Omar Garcia and Toni Templeton; prepare response to same. (No charge)	0.9
1/7/13	(RS) Prepare communiqué to Toni Templeton concerning data to be used in Dawn-Fisher cross-exam regarding charter funding formulas; receive response from Ms. Templeton requesting further discussion of Tiers and WADA; receive and review request from Paralegal concerning scheduling of Sage deposition; prepare response; establish report submission deadlines in communiqués with Assistant Attorney General; direct staff regarding and determining party availability for deposition; direct staff to upload trial witness slides to be offered as trial exhibits; receive and review communiqué from Jimmy Strohmeyer concerning pre-deposition preparation by Skype; schedule same. (No charge)	0.8
1/7/13	(RS) Attend trial (afternoon session).	2.5
1/7/13	(RS) Prepare communiqués to Ramon Medina with Dawn-Fisher deposition and trial testimony excerpts for review/analysis concerning questioning by Rick Gray and Dr. Dawn-Fisher's testimony on calculation of WADA; receive and review response	0.9

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	from Mr. Medina regarding his recollection of TEA's funding calculations for charters; continue review of Dawn-Fisher deposition, prepare internal memorandum to Leonard Schwartz with pertinent excerpts from deposition for his review.	
1/7/13	(RS) Receive and review communiqué from Ramon Medina regarding [redacted]; prepare response to Mr. Medina with copy to TCSA staff concerning same; direct Mr. Medina in preparation of additional dataset slides on charter/district average disparity.	0.7
1/7/13	(RS) Receive and review TCSA's public comments documentation from Denise Pierce, requested by defense counsel and MALDEF's counsel during her deposition; prepare communiqué to counsel forwarding copies of same; receive and review communiqué from Toni Templeton with link to charter school aid estimation template, review same; prepare response to Ms. Templeton concerning same.	0.4
1/8/13	(CP) Locate and upload exhibits to Partridge deposition for Allen Keller's review in preparation of Sage report. (No charge)	0.3
1/8/13	(CP) Telephone conference with Tom Sage, confirm date, time and location for his deposition; he will contact me to determine his travel arrangements.	0.1
1/8/13	(CP) Receive and review request from Tom Sage concerning travel arrangements; prepare response to Mr. Sage with information regarding available flights to accommodate his schedule; receive reply from Mr. Sage advising he will drive instead. (No charge)	0.1
1/8/13	(CP) Telephone conference with Bob Schulman regarding Sage deposition date and reasons for scheduling same in San Antonio (No charge); communiqué exchange with Robin Sanders, confirm date, time and location for Sage deposition.	0.1
1/8/13	(CP) Receive notification from Dr. Anthony Rolle advising he will execute signature page for his deposition, have it notarized and return same (No charge); telephone conference with Tom Sage regarding his travel arrangements for 01/18/13.	0.1
1/8/13	(RM) Review communiqué from Bob Schulman regarding revisions to PPTX file for presentation during trial; revise	0.5

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	requested PowerPoint presentation; prepare reply to Mr. Schulman forwarding requested file.	
1/8/13	(RM) Review communiqué from Bob Schulman requesting slides of alternate figures for Figures 17 through 21 of Dr. Lisa Dawn-Fisher's report and trial presentation; using Master Dataset with Charters file, prepare requested slides; prepare reply to Mr. Schulman forwarding PDF copy of requested slides.	1
1/8/13	(RM) Review communiqué from Bob Schulman regarding Dr. Lisa Dawn-Fisher's deposition testimony regarding charter school funding; review House Bill 6 (77th Legislative Session - Regular), House Bill 3646 (81st Legislative Session - Regular) and Senate Bill 1 (82nd Legislative Session - 1st Called Session) for pertinent legal requirements; prepare reply to Mr. Schulman responsive to inquiry; review response from Mr. Schulman regarding 1995 version of TEC 12.106; research Texas Legislature Online for pertinent information; prepare reply to Mr. Schulman; review communiqué and attachments from Mr. Schulman regarding presentations by Shirley Beaulieu and Rob Coleman; prepare reply to Mr. Schulman; review communiqué from Mr. Schulman regarding Dr. Dawn-Fisher's testimony concerning inclusion of interest and sinking fund tax collections in state funding calculations; prepare reply to Mr. Schulman regarding same.	2
1/8/13	(RM) Telephone conference with Bob Schulman regarding Dr. Lisa Dawn-Fisher's presentation and the review of the data and analysis for Figures 20 and 21. (No charge)	0.2
1/8/13	(RM) Review communiqué from Bob Schulman regarding direction and guidance concerning Dr. Lisa Dawn-Fisher's data analysis captioned: Formula History; prepare reply to Mr. Schulman requesting clarification of request. (No charge)	0.2
1/8/13	(RM) Review communiqué from Bob Schulman with directive on preparation of PowerPoint presentation; prepare same; review follow-up communiqués from Mr. Schulman with additional direction and guidance; telephone conference with Mr. Schulman regarding same; prepare reply to Mr. Schulman, forward requested PPTX file.	1
1/8/13	(RM) Review communiqué from Bob Schulman regarding preparation of PDF slide for TEC 12.106 in effect for 1995	0.5

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	through 2001; conduct online research regarding same; prepare requested PDF slide; prepare reply to Mr. Schulman forwarding requested slide.	
1/8/13	(RM) Review follow-up communiqué from Bob Schulman regarding I&S tax collection reporting by Chapter 41 and non-Chapter 41 districts; prepare reply to Mr. Schulman regarding same; review communiqué from Mr. Schulman forwarding results of data analysis by Toni Templeton; prepare reply to Mr. Schulman with observations; review communiqué from Mr. Schulman regarding use of 6600 expenditure data to determine facility costs for school districts; review communiqué from Mr. Schulman regarding preparation of graph depicting disparity in charter school vs. school district funding; using Master Dataset with Charters file, prepare requested graphic; forward same to Mr. Schulman; review communiqué and attachment from Mr. Schulman regarding Dr. Lisa Dawn-Fisher's presentation; review communiqués from Dr. Anthony Rolle, David Dunn and Mr. Schulman regarding same; prepare reply to Mr. Schulman regarding same.	1.7
1/8/13	(AK) Continue reviewing Defendants' responses to TCSA's discovery requests; add description and summary of individual documents to 200-page summary of discovery responses.	2.7
1/8/13	(AK) Draft memorandum for Bob Schulman summarizing lengthy telephone conference with Tom Sage.	1
1/8/13	(LS) Confer with David Dunn, Toni Templeton and Omar Garcia; attend court for part of Dr. Lisa Dawn-Fisher testimony; confer with Bob Schulman regarding morning meeting and Dr. Dawn-Fisher testimony.	5
1/8/13	(RS) Continue preparation for Dawn-Fisher cross-examination; review slides sets prepare by Toni Templeton; direct Ramon Medina in research of prior version of charter funding statutes and Chapter 42 and 46 reference; receive and review results; direct Mr. Medina regarding preparation of slides for cross-examination; receive and review further analysis and recommendations for inclusions of Toni Templeton's slide sets; review re-worked slides and direct Mr. Medina to prepare further revisions and additional slides.	0.5
1/8/13	(RS) Prepare communiqué to TSCA staff regarding data from Dr.	0.1

Unofficial copy Travis Co. District Clerk Velva L. Price

Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Lisa Dawn-Fisher PPT "replication of calculations" within same and counter-points to explanation of ADA data; receive and review response from David Dunn concerning same and planned discussions with Omar Garcia.	
1/8/13	(RS) Attend trial.	7.9
1/8/13	(RS) Prepare reports on Dawn-Fisher in-court testimony; receive and review Toni Templeton's communiqué regarding results of discussion with Omar Garcia as impacting anticipated cross-examination; prepare further advisory to legal team regarding same. (No charge)	0.7
1/8/13	(RS) Direct Allen Keller in review of exhibit lists; receive and review response from Mr. Keller regarding same; direct Mr. Keller and Paralegal in identification of relevant deposition transcripts offered and/or admitted as exhibits; receive and review Mr. Keller's memorandum concerning preparation of Tom Sage biographical information and other data for expert report; direct Mr. Keller regarding preparation of report. (No charge)	0.6
1/8/13	(RS) Direct Ramon Medina in preparation of additional slide for Dawn-Fisher cross-examination; review $Gap in FSP Revenue per WADA PDF slides, forward same to Mr. Medina for inclusion in PowerPoint presentation for cross examination; prepare communiqué to Toni Templeton and David Dunn requesting Ms. Templeton's assistance in presentation of PowerPoint/slides; receive and review Defendants' Thirteenth Amended Master Exhibit List. (No charge)	0.5
1/8/13	(RS) Prepare outline of Dawn-Fisher cross examination; direct Ramon Medina in further preparation of slides for Dawn-Fisher cross examination with outline for same; request research from Toni Templeton regarding federal funding to charters and districts for calculation of federal funding percentages; receive and review Ms. Templeton's response; prepare communiqué to Ms. Templeton concerning additional testimony by Dr. Dawn-Fisher relating to facilities costs and court concerns regarding same; forward Real Time trial transcript to Ms. Templeton for review. (No charge)	0.9
1/8/13	(RS) Prepare communiqué to Ramon Medina requesting data from Dawn-Fisher expert report concerning ADA presentation and WADA presentations; prepare communiqués to Toni	0.1

Unofficial copy Travis Co. District Clerk Velva L. Price