

SLH Schulman, Lopez & Hoffer LLP

Filed
13 March 6 P2:56
Amalia Rodriguez-Mendoza
District Clerk
Travis District
D-1-GN-11-003130

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

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

ATTORNEYS AND COUNSELORS FOR TEXAS PUBLIC SCHOOLS AND LOCAL GOVERNMENT

March 6, 2013

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

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

Dear Sir or Madam:

Forwarded for filing is the final (fourth) of four parts to Exhibit M (pages 174 through 228) to the **Notice of Filing and Affidavit of Robert A. Schulman** filed yesterday, along with attached Exhibits A through L.

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

Thank you.

Cordially,

SCHULMAN, LOPEZ & HOFFER, LLP



Cynthia A. Pacheco
Paralegal

Encls.

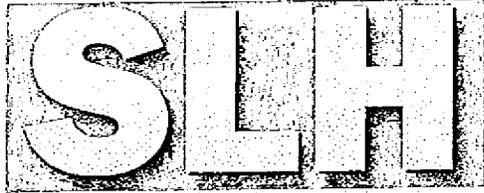


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Templeton forwarding "Alternate Slides" PowerPoint for review. (No charge)	
1/8/13	(RS) Attend conference at TCSA with Toni Templeton preparing cross-examination of Dr. Lisa Dawn-Fisher.	1.4
1/8/13	(RS) Prepare attorney notes for Dawn-Fisher cross-exam questioning; prepare communiqué to Toni Templeton with attached "LDF Cross" PowerPoint; prepare communiqué to Denise Pierce regarding PPT presentation for Dawn-Fisher cross-exam tomorrow and preparation of same with Ms. Templeton; receive response from Ms. Pierce following her review of PPT and funding history slide; prepare advisory reply to Ms. Pierce regarding same; prepare directive to litigation staff regarding compilation of laws, rules and public data on history of funding formulas for submission of Request for Judicial Notice of funding statutes.	1.3
1/8/13	(RS) Prepare communiqué to Toni Templeton regarding WADA usage reference in Dawn-Fisher report and later reference to Pierce's tables, not related to charters; receive and review FBISD Plaintiffs' Third Supplemental Trial Exhibit List; receive and review Gina Day presentation for direct examination on Defendants' behalf; receive and review presentation from Amy Penn, Assistant AG, for Tom Currah testimony.	0.7
1/9/13	(CP) Prepare request to Bob Schulman concerning Tom Sage's inquiry relating to his expert fees and expenses (No charge); teleconference with Gerald Bracht regarding Mr. Sage's retention as an expert and agreement with Mr. Sage concerning same, refer Mr. Bracht to Joe Hoffer for further discussion.	0.1
1/9/13	(JH) Receive and review cross-examination of Dr. Lisa Dawn-Fisher. (No charge)	0.5
1/9/13	(LS) Review trial testimony from 1/9/2013; prepare for 1/10/13 trial attendance; conduct legal research for cases that have been cited. (No charge)	4.5
1/9/13	(RS) Prepare communiqué to TCSA staff forwarding "Dawn-Fisher cross-examination slides and requesting missing WADA data; receive and review communiqué from Toni Templeton regarding same; prepare response to Ms. Templeton concerning same.	0.5
1/9/13	(RS) Continue preparation of slides and cross-examination for	1

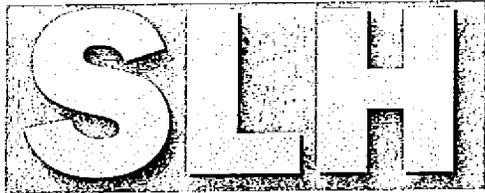


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Dr. Lisa Dawn-Fisher.	
1/9/13	(RS) Attend trial (morning session).	3
1/9/13	(RS) Confer with Denise Pierce and Toni Templeton in further preparation for cross-exam of Dr. Lisa Dawn-Fisher.	1
1/9/13	(RS) Draft additional questions for Dawn-Fisher cross-exam.	0.4
1/9/13	(RS) Attend trial (afternoon session).	3
1/9/13	(RS) Conduct multiple e-mail exchanges with Toni Templeton concerning Dawn-Fisher testimony on recapture data errors within same and court directive to revise data by 1/15/2013; conduct multiple communiqué exchanges with Denise Pierce regarding same. (No charge)	0.7
1/9/13	(RS) Receive and review communiqué/summary prepared by Toni Templeton of Dawn-Fisher in-court testimony and abatement of recalculation of data in light of Judge Dietz's request for the state to correct Dawn-Fisher data by 01/15.	0.2
1/9/13	(RS) Receive and review slides from Calhoun County Plaintiffs for cross-examination of Shirley Beaulieu; receive and review corrected version of Gina Day presentation provided by defense counsel; prepare communiqué to Denise Pierce and David Dunn forwarding Day presentation.	0.3
1/10/13	(CP) Prepare correspondence to Court Reporting firm forwarding original of Dr. Anthony Rolle deposition; prepare correspondence to Mario Flores and Brooks Flemister forwarding original depositions with directive for review, signature and return of same; telephone call to Mr. Flemister to obtain work mailing address, left message (No charge).	0.2
1/10/13	(CP) Communiqué exchange with Court's Reporter, Della Sawvel, regarding list of exhibits submitted by Charter Plaintiffs.	0.1
1/10/13	(RM) Review communiqué from Bob Schulman with direction and guidance regarding various facets of preparation for the presentation of our case in chief; as directed by Mr. Schulman, review trial calendar to identify witnesses and prepare trial file for each.	0.5
1/10/13	(RM) Review trial transcripts and exhibits and continue to prepare trial file for each witness.	0.2
1/10/13	(RM) Prepare communiqué to Paralegal regarding trial calendar and preparation of trial files for witnesses.	0.1
1/10/13	(AK) Receive directive from Bob Schulman to use notes from	6.7



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

telephone conference with Tom Sage to draft expert report regarding charter school financing; provide detailed descriptions of Mr. Sage's educational and professional background, provide summary of representative bond financing projects for school districts and charter schools, and describe barriers to charter school bond financing; conclude that vast majority of charter schools in Texas do not have viable access to bond financing market; forward report to Joe Hoffer and Mr. Schulman for review.

1/10/13	(LS) Attend trial.	7
1/10/13	(RS) Prepare lengthy memorandum/advisory to Drs. Anthony Rolle and Craig Wood regarding Dawn-Fisher testimony, cross-examination and impact on expert report revisions and testimony.	0.8
1/10/13	(RS) Prepare Project and Assignment List on: trial attendance preparation of Sage and Jimmy Strohmeyer for depositions: completion of Sage report; attend Sage and Strohmeyer depositions; revision to FCF and COL with record references and cites; analysis of testimony to date and identification of testimony supportive of proposed findings; identification of facts supporting WADA analysis conducted by state's expert; identification of state's testimony and reports on average per student facilities costs; consideration of factual evidence supporting defense to Sugar Creek jurisdictional defenses and analysis of same, distinguishing between public schools and members of the public school system; prepare testimony, slide shows and presentations of all charter school witnesses; locate and assemble depositions and reports in support of each.	1.9
1/10/13	(RS) Prepare Master Trial Proof Findings List; prepare list for each witness of needed proofs; prepare slides and scripts for each; rehearse witnesses on presentations and cross-examination; conduct multiple telephone conferences with attorneys and staff regarding assignments.	0.6
1/10/13	(RS) Prepare communiqué to Tom Sage requesting information concerning I&S secured bonds and charter bonds to support Strohmeyer report; receive response from Mr. Sage regarding same; prepare follow-up communiqué to Mr. Sage regarding scope of his required testimony in light of his designation as an	0.3

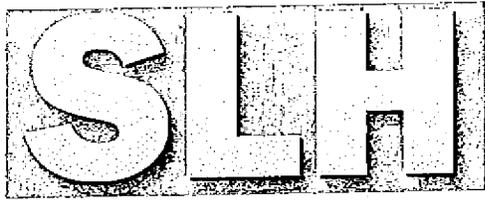


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	expert and potential for reduction of fee structure proposed by his firm. (No charge)	
1/10/13	(RS) Receive and review communiqué from Denise Pierce regarding Court's offer to subpoena Commissioner as a witness; prepare response to Ms. Pierce and David Dunn concerning same; receive and review communiqué from Ms. Pierce regarding charter school participation in early childhood grants and programs for Day cross-examination.	0.3
1/10/13	(RS) Draft materials in preparation for pre-deposition conference with Jimmy Strohmeyer; review expert report, resume and designation; prepare advisory correspondence to Mr. Strohmeyer; prepare second set of advisories; conduct extensive pre-deposition conference via Skype with Mr. Strohmeyer.	5.7
1/10/13	(RS) Prepare update to Mark DiBella concerning trial; receive, review and revise draft of Tom Sage report received from Allen Keller; prepare communiqué to Mr. Keller concerning same; prepare recommendations to and comments regarding report; prepare communiqué to Tom Sage regarding and attaching same; receive and review exhibits admitted during Podgursky and Currah cross-examinations; receive and review TTSFC	0.8
1/11/13	(RM) Review trial transcripts, exhibits and other trial documents for inclusion in witness trial files.	1.5
1/11/13	(AK) Incorporate Tom Sage's suggested revisions to expert report; forward to Bob Schulman for final review prior to submission to the court and counsel.	1
1/11/13	(PS) Review and prepare further comments regarding scope of Tom Sage expert report; prepare communiqué and directive to Allen Keller concerning same; prepare communiqué to Mr. Sage regarding same, request review of Strohmeyer report; receive and review communiqué exchanges between Mr. Keller and Mr. Sage concerning same; receive and review final version of Sage report; attend and defend Jimmy Strohmeyer deposition.	1
1/11/13	(RS) Direct Paralegal regarding preparation, delivery and review of trial transcript summary; receive and review PDF version of same; receive and review request from Denise Pierce for conference at TCSA on January 14th (early) regarding cap argument; prepare response; receive and review communiqué	1

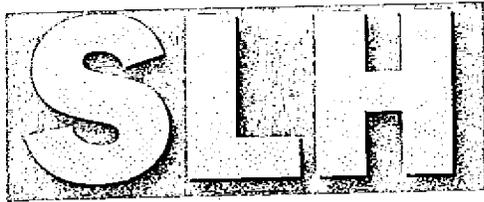


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	from Ms. Pierce regarding purpose of Tom Sage testimony; prepare advisory response with attached expert report.	
1/11/13	(RS) Return travel from Austin. (No charge)	1
1/12/13	(RM) Review trial transcripts, exhibits and other trial documents and prepare trial file for each witness.	0.6
1/13/13	(RS) Travel to Austin.	1
1/13/13	(RS) Prepare communiqué to Denise Pierce and David Dunn regarding [REDACTED], report deadline and deposition and scheduling of conference; receive and review response from Ms. Pierce regarding same; receive and review Laura Ayala's presentation to be offered in testimony by defense; review same for consideration of cross-examination inquiries.	1
1/13/13	(RS) Receive and review Linda Roska PPT presentation from defense counsel including exhibits reflecting recent SAT and ACT data; prepare communiqué to Denise Pierce forwarding same; analyze same for possible cross-examination.	1
1/14/13	(CP) Multiple communiqué exchanges with Tom Sage regarding his availability for pre-deposition conference with Bob Schulman and manner for conducting same; communiqué exchanges with Mr. Schulman concerning same, confirm for 01/17 at 6 PM by teleconference (No charge).	0.1
1/14/13	(CP) Edit and finalize Sage report in final for submission to counsel; prepare request to Tom Sage for his availability to schedule pre-deposition conference on 01/17.	0.3
1/14/13	(CP) Participate in trial strategy conference with litigation staff and Denise Pierce. (No charge)	0.8
1/14/13	(M/Z) Prepare slides for cross-examination of Linda Roska.	2.2
1/14/13	(RM) Review communiqué from Joe Hoffer responsive to my request for clarification of assignment; acknowledge receipt of Mr. Hoffer's direction and guidance. (No charge)	0.1
1/14/13	(RM) Participate in staff meeting to discuss conduct of and participation in presentation of case in chief for School Finance Litigation; prepare communiqué to Joe Hoffer requesting clarification of assignment. (No charge)	0.8
1/14/13	(AK) Telephone conference with office staff and Denise Pierce regarding trial preparation. (No charge)	0.8
1/14/13	(AK) Continue reviewing and summarizing Defendants'	1.6

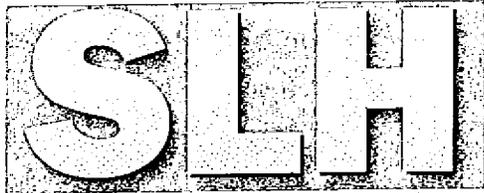


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	responses to TCSA's requests for production; compose description and summary of each individual document produced.	0.8
1/14/13	(LS) Telephone conference with firm staff and Denise Pierce regarding preparation for presentation at trial. (No charge)	
1/14/13	(RS) Conduct teleconference with TCSA staff regarding trial status, strategy, assignments and employment of experts; conduct telephone conference with Joe Hoffer, direct scheduling of meeting with staff to issue trial preparation assignments. (No charge)	0.3
1/14/13	(RS) Attend trial.	7.8
1/14/13	(RS) Direct staff in preparation of slides for Roska cross-examination; receive and review same; direct staff in preparation of additional slides; receive and review revised slides; direct staff in preparation of further revisions; receive and review final version; receive and review Toni Templeton's analysis following her review of Roska trial presentation; research and determine effective date of drop out reporting requirements with regard to same; receive and review additional data from staff concerning same; prepare advisory communiqué to litigation staff regarding Court's expectations for Charter Plaintiffs' presentation and completion of case; prepare follow-up communiqué regarding Court's announcement of intention to issue oral decision on last day of charter presentation; direct staff concerning notification of charter school witness of anticipated dates for testimony and scheduling for witness preparation. (No charge)	1.1
1/14/13	(RS) Receive and review communiqué from David Dunn to Tom Sage concerning fee proposal; receive and review Mr. Sage's approval of same; prepare communiqué to Paralegal forwarding final version of Sage report for submission to counsel and the Court; prepare communiqué to Chris Diamond regarding cross-examination on matters of mutual interest; receive and review response from Mr. Diamond with specific inquiries regarding same; prepare advisory response to Mr. Diamond regarding same. (No charge)	0.9
1/14/13	(RS) Confer with Paralegal regarding scheduling of preparation conference with Tom Sage for deposition; receive and review errata sheet for Sally Partridge deposition; prepare communiqué	0.6

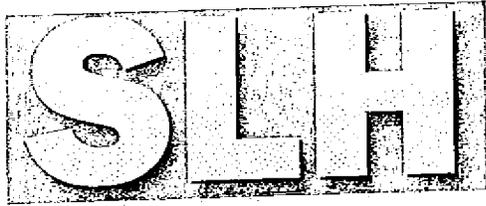


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	to Denise Pierce requesting presence and participation at staff assignment conference; prepare communiqué to Denise Pierce concerning Roska testimony; receive and review TTSFC Plaintiffs' exhibit, Urban County Tour of Texas presentation, offered in Dawn-Fisher cross-examination. (No charge)	
1/14/13	(RS) Conduct teleconference with litigation staff and Denise Pierce regarding assignments in preparation for trial.	0.8
1/14/13	(RS) Review communiqué from staff regarding current draft FOF and COL filed with the Court; review communiqué from Della Sawvel with identification (Exhibit number) for Roska presentation offered during trial; review communiqué from Amy Penn regarding proffer of Comptroller tax estimates versus actual receipts in lieu of recalling Rob Coleman; respond to Ms. Penn concerning same; prepare advisory communiqué to Denise Pierce and David Dunn forwarding Sally Partridge deposition for review; review communiqué from Mark Trachtenberg regarding Order Granting Agreed and Unopposed Motion to Consolidate and Judge's inquiry concerning same with request for stipulation of consolidation for all purposes; review communiqués from Philip Fraissinet, Chris Diamond, and MALDEF counsel agreeing to same; prepare inquiry to Mr. Diamond regarding Intervenors' intentions to seek separate findings and conclusions; prepare communiqué to Mr. Trachtenberg agreeing to stipulation.	0.8
1/15/13	(CP) Review Master Exhibit List to determine exhibit number assigned to Dawn-Fisher deposition; prepare communiqué to Bob Schulman regarding same; telephone call to Lacy Lawrence's Paralegal with inquiry on Excel spreadsheet of Master Exhibit List, left detailed message. (No charge)	0.1
1/15/13	(CP) Prepare notification to all Charter Plaintiff witnesses concerning dates for upcoming trial and their availability for same; receive and review responses from all except experts Wood and Rolle; prepare list of witnesses and their availability.	0.4
1/15/13	(CP) Telephone conference with Tom Sage regarding scheduling of his conference with Joe Hoffer on 01/17; discussion with Mr. Hoffer concerning same (No charge); moved conference to 01/16.	0.1
1/15/13	(CP) Confer with Joe Hoffer, he requests rescheduling of Sage pre-deposition conference due to conflict with emergency board	0.1

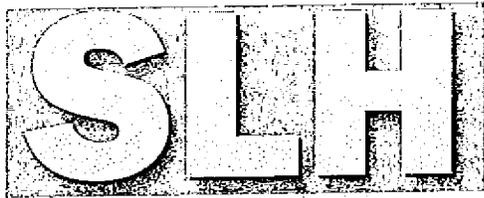


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

1/15/13	meeting attendance; telephone call to Tom Sage, left detailed message. (No charge)	0.1
1/15/13	(CP) Telephone conference with Brooks Flemister regarding status of his original deposition and return of same, also discussed dates for trial presentation by Charter Plaintiffs, telephone call to Mario Flores to discuss receipt and return of his deposition, left message. (No charge)	0.2
1/15/13	(JH) Conference call with Denise Pierce concerning Findings of Fact matrix; follow-up directives to Allen Keller regarding same. (No charge)	0.2
1/15/13	(RM) Review communiqué from Bob Schulman regarding conference to discuss ongoing trial testimony; prepare reply to Mr. Schulman regarding same. (No charge)	0.5
1/15/13	(RM) Continue to compare 11322 - master dataset with charters for report NF 2012 Jan 11 2013 file to Master Dataset With Charters (10-02-12) file to identify differences between datasets.	0.4
1/15/13	(RM) Confer with Bob Schulman regarding deposition by Dr. Sally Partridge, availability of AYP data, trial testimony by Dr. Lisa Dawn-Fisher and preparation of exhibits. (No charge)	0.6
1/15/13	(RM) Review communiqué and attachment from Bob Schulman regarding anticipated testimony by Dr. Sally Partridge.	0.3
1/15/13	(RM) Confer with Bob Schulman regarding request for source data and files supporting 11322 - master dataset with charters for report NF 2012 Jan 11 2013 file provided by Attorney General; compare 11322 - master dataset with charters for report NF 2012 Jan 11 2013 file to Master Dataset With Charters (10-02-12) file to identify changes to Dr. Lisa Dawn-Fisher's analysis and significance of changes to case in chief and Dr. Dawn-Fisher's testimony and report; confer with Mr. Schulman regarding same.	0.4
1/15/13	(RM) Confer with Bob Schulman regarding updated changes to the original data analysis prepared by Dr. Lisa Dawn-Fisher for the report and obtaining the list of public schools subject to TEC 39 sanctions; research TEA website SBOE minutes for 2012 for pertinent information; confer with Mr. Schulman regarding receipt of updated data analysis from the AG; review communiqué and attachment regarding 11322 - master dataset with charters for report NF 2012 Jan 11 2013 file provided by AG.	

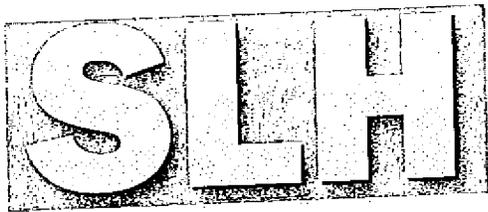


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

1/15/13	(RM) Research TEA website for information concerning public schools that failed to meet adequately yearly progress; review TEA Department of Assessment and Accountability Final 2012 AYP Results and identify the number of campuses failing to meet AYP and the number in the different states of PBM staging, review Dr. Sally Partridge deposition for comments regarding interventions of districts and charters; prepare communiqué to Mr. Schulman forwarding research findings/results.	1.3
1/15/13	(RM) Review deposition of Dr. Sally Partridge; prepare notes regarding pertinent data within same.	1.6
1/15/13	(AK) Begin creating matrix for all Findings of Fact and Conclusions of Law in preparation for presenting our case-in-chief as directed by Bob Schulman.	1.9
1/15/13	(AK) Continue summarizing Defendants' responses to TCOSA's requests for production.	0.8
1/15/13	(LS) Multiple communiqué exchanges with Bob Schulman regarding status of case and future preparations; receive and review case-related data forwarded by Paralegal.	1.1
1/15/13	(RS) Attend trial.	7.9
1/15/13	(RS) Review holdings in Edgewood IV and West Orange-Cove; prepare communiqué to Joe Hoffer regarding agreement for consolidated court findings and order, and deadline for Findings of Fact and Conclusions of Law; prepare attorney notes regarding trial tasks to be completed; direct staff in preparation of order of trial witnesses; receive and review communiqué from Denise Pierce to appellate counsel, Jim Ho, regarding pursuit of cap claim; receive and review Mr. Ho's response to same and other issues; prepare communiqué to Mr. Hoffer, advise him of Mr. Ho's pursuit of state's position on possible defense denial of constitutional protections to charter schools and parents; prepare communiqué to Ms. Pierce, regarding same and continued staff review of Dawn-Fisher data errors. (No charge)	1
1/15/13	(RS) Direct staff regarding revisions and additions to Findings of Fact and Conclusions of Law; receive and review communiqué to charter witnesses regarding dates and availability for trial; receive and review response from David Dunn concerning same; receive and review communiqué from Maria-Theresa Sigua regarding Mr. Dunn's availability; prepare response to Mr. Dunn	0.8

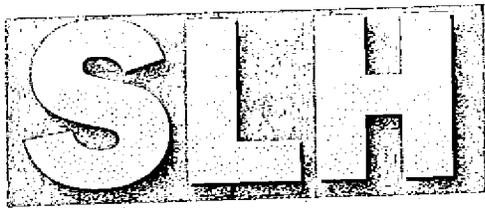


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/15/13 and Ms. Sigua concerning same; receive and review replies from Tom Sage, Jimmy Strohmeier, Mark DiBella, Matt Abbott, Rene Gallegos and Mario Flores regarding their availability; prepare response to Mr. Flores regarding accommodations to be arranged; receive and review requested report from Ramon Medina regarding school district campuses not attaining AYP in preparation for Partridge cross-examination. (No charge) 0.8
- 1/15/13 (RS) Direct Ramon Medina in review of Dawn-Fisher trial testimony; direct staff regarding submission of Dawn-Fisher deposition into evidence; review exhibits to McKenzie deposition referring to and attaching same; direct Mr. Medina to prepare demand to defendants for Dawn-Fisher data sets; receive and review same from Mr. Medina; direct Allen Keller in use of excerpted trial testimony summary in preparation of Findings of Fact; review case law and conduct legal research regarding constitutional efficiency; prepare legal memorandum concerning same. 0.8
- 1/15/13 (RS) Conduct communiqué exchange with MALDEF attorneys regarding demand for the state to produce back up data for revised FSP data; receive and review Defendants' updated FSP data from Assistant AG, Michael Patterson; receive and review communiqué from MALDEF counsel to Mr. Patterson regarding and requesting back up data sets; receive and review Mr. Patterson's response and offer of affidavit in lieu of recalling Dr. Lisa Dawn-Fisher; receive and review MALDEF agreement to accept affidavit; prepare communiqué to Mr. Hinojosa regarding same; receive and review response from Mr. Hinojosa; prepare reply and notice of Charter Plaintiffs' intent to submit revised expert reports based on same; prepare communiqué to Ramon Medina forwarding and directing review of updated FSP spreadsheet. 1.4
- 1/15/13 (RS) Prepare further directives to Allen Keller, Joe Hoffer and Leonard Schwartz proposing revisions and additions to Findings and Conclusions ~~and witness presentations~~ and witness presentations regarding same; prepare communiqué to TCSA staff concerning review of revised FSP changes and charts; receive and review response from David Dunn concerning same; prepare reply to Mr. Dunn regarding same and need for further Matter: School Finance Litigation 1.4

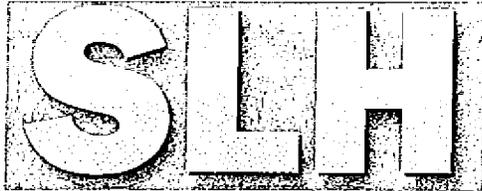


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	discussion with Dr. Anthony Rolle; conduct extended teleconference with Dr. Rolle regarding estimated date for completion of revised data and preparation of letter to TCSA explaining same; prepare communiqué to TCSA staff concerning same and review of revised data by Toni Templeton; receive and review Dr. Rolle's communiqué to Mr. Dunn regarding calendar to complete revised report.	0.1
1/16/13	(CP) Telephone conference with Matt Abbott regarding return of his original deposition to Court Reporter; he will forward to me for return and distribution of Errata and signature pages to counsel. (No charge)	
1/16/13	(JH) Prepare of Tom Sage for deposition; receive and review back-up supporting documents.	1.5
1/16/13	(JH) Prepare documents for production/release to Shelley Dahlberg from Tom Sage; receive Ms. Dahlberg's reply on relocating deposition; prepare response to same; confer with Bob Schulman regarding same.	0.7
1/16/13	(RM) Review communiqué and attachment from Denise Pierce regarding 2010-11 NIFA Preliminary Allotments; research TEA website for information regarding same; review Summary of Finances for school year 2010-2011 for each individual charter school identified by Ms. Pierce to corroborate NIFA information; reply to Ms. Pierce provide observations; review communiqué from Bob Schulman regarding consideration of changes to Dr. Lisa Dawn-Fisher's data analysis disclosed in 11322 - master dataset with charters for report NF 2012 Jan 11 2013 file.	0.5
1/16/13	(JM) Review communiqué from Denise Pierce regarding outline for expert witness testimony.	0.1
1/16/13	(AK) Continue preparing matrix of Findings of Fact and Conclusions of Law; review trial testimony of Drs. Moak and Murdock, as well as expert report from Wood Rolle & Associates, for statistics and demographic information to adopt for charter case.	3.6
1/16/13	(LS) Receive communiqués from various parties with filings for review; communiqué exchanges with Bob Schulman regarding preparation of case; review of filings, especially latest slides from Defendants and Intervenors.	0.4
1/16/13	(RS) Attend trial; confer with MALDEF counsel regarding revised Matter: School Finance Litigation	8.1

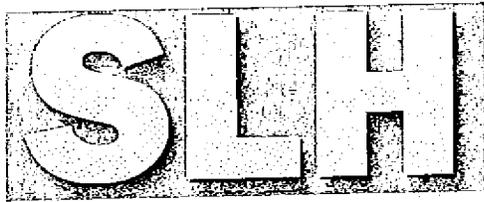


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

1/16/13	<p>data runs and responses to same; confer with Assistant AG regarding same and deposition scheduling and venue.</p> <p>(RS) Review final version of Tom Sage expert report; prepare internal memorandum notes for defense of Sage deposition; confer with Shelley Dahlberg regarding Sage backup documentation and FSP data revisions requiring update of WR&A report; prepare attorney notes summarizing significant points in Hanusek testimony; prepare communiqué to Drs. Wood and Rolle, litigation staff, and TCSA staff regarding discussions with and notification to defense counsel of pending revisions to Rolle FSP data tables; review communiqué from Denise Pierce concerning same; prepare response to Ms. Pierce regarding same; review request from Robin Sanders for Strohmeyer backup data; prepare request to Mr. Strohmeyer requesting same; review same; prepare communiqué to Ms. Sanders advising of and forwarding same, and request from TCSA list of schools receiving 2010-11 NIEA allotments for witness examination; review communiqué from Ms. Pierce with Excel file list. (No charge)</p>	1.4
1/16/13	<p>(RS) Prepare communiqué to David Hinojosa regarding charter experts' comments on FSP data and inquiry on representative for MALDEF at Sage deposition; receive and review response from Mr. Hinojosa concerning same; receive and review communiqué from Joe Hoffer with Sage backup data requested by Shelley Dahlberg; receive and review response from Ms. Dahlberg regarding same with attached amended notice to move site of Sage deposition to Austin; receive and review Mr. Hoffer's explanatory reply to Ms. Dahlberg; prepare further explanation to Ms. Dahlberg of materials provided; receive and review response from Ms. Dahlberg regarding same; prepare lengthy response to Ms. Dahlberg concerning Sage backup documentation. (No charge)</p>	0.6
1/17/13	<p>(CP) Prepare correspondence to Jimmy Strohmeyer forwarding his original deposition with instructions for review, execution and return.</p>	0.1
1/17/13	<p>(CP) Prepare correspondence to TSC Court Reporters forwarding original of Matt Abbott deposition transcript; prepare communiqué to all counsel forwarding Errata and signature</p>	0.2



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	pages for same; prepare communiqué to all counsel forwarding Sage expert report and accompanying documents; prepare communiqué to Mario Flores and Brooks Flemister requesting status of return of their original depositions.	
1/17/13	(CP) Prepare and forward communiqués to Charter Plaintiffs' witnesses regarding scheduling of a date and time to meet with Joe Hoffer for pre-trial preparation.	0.1
1/17/13	(CP) Prepare communiqué to Mark DiBella and Rene Gallegos regarding status of their original depositions and whether they retained copies; telephone conference with Mr. Gallegos, he has not returned his original, requires a notary signature.	0.1
1/17/13	(CP) Meet with Rene Gallegos, obtain his original signature on deposition; direct File Clerk for photocopy of same and comparison of exhibits in file to those in his deposition (No charge).	0.1
1/17/13	(CP) After-hours delivery of Abbott deposition for FedEx delivery.	0.1
1/17/13	(CP) Telephone conference with Court Reporting firm regarding copy of Pierce deposition, not received; telephone conference with Denise Pierce concerning same, she will forward a copy.	0.1
1/17/13	(RM) Review follow-up communiqué from Bob Schulman to Denise Pierce's communiqué outlining Dr. Anthony Rolle's testimony; review communiqués forwarded by Mr. Schulman regarding deposition of Tom Sage. (No charge)	0.2
1/17/13	(RM) Confer with Bob Schulman regarding request from Shelley Dahlberg for details of deficiencies in legend and data descriptors provided by Dr. Lisa Dawn-Fisher in her Master Dataset files.	0.2
1/17/13	(RM) Review communiqué and attachment from Paralegal regarding updated Charter Plaintiffs' calendar; review communiqué from Paralegal regarding transcripts for deposition of Denise Pierce, Matt Abbott and Jimmy Strohmeyer. (No charge)	0.1
1/17/13	(RM) Pursuant to Bob Schulman's instructions, review 11323 - Master Dataset with Charters for report NF 2012 Jan 11 2013 and prepare communiqué identifying areas requiring data definitions and descriptors; compare Dr. Dawn-Fisher's file contents to comparable data available on the TEA website;	1

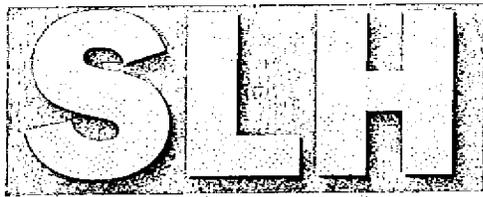


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	prepare response to Mr. Schulman regarding publicly available data for Dr. Dawn-Fisher's data.	
1/17/13	(AK) Continue reviewing trial testimony and expert reports for support for additional Findings of Fact and Conclusions of Law.	1.7
1/17/13	(AK) Receive directive from Bob Schulman, review trial transcripts and create list of evidentiary objections lodged and the Court's rulings on each objection.	1.3
1/17/13	(LS) Review communiqué exchange between Bob Schulman and Shelley Dahlberg regarding current trial calendar for case (No charge); review communiqué exchange between Mr. Schulman and Robin Sanders with attachments for review (No charge); analyze attachments.	0.8
1/17/13	(RS) Attend trial. 7	7
1/17/13	(RS) Receive and review communiqué from Shelley Dahlberg withdrawing amended Sage deposition notice and agreeing to original deposition site; receive and review Second Amended Notice of Sage Deposition from AG's office; receive and review follow-up communiqué from Ms. Dahlberg requesting Charter Plaintiffs' trial calendar; prepare advisory response to Ms. Dahlberg with anticipated calendar; communiqué exchange with staff regarding necessity to issue subpoena for Mario Flores; prepare communiqué and directives to litigation staff regarding order of witnesses to be presented, preparation of matrix describing testimony as related to proposed Fact Findings and Conclusions of Law and submission of Findings and Conclusions to the Court; receive and review staff responses regarding same. (No charge)	1.4
1/17/13	(RS) Direct staff to provide all charter witnesses with Hammond testimony from today, specifically with regard to MALDEF questioning and Exhibit 1783; prepare lengthy communiqué to Dr. Anthony Rolle regarding inability to obtain state's raw data without detailed description of same; prepare communiqué to Toni Templeton concerning same; receive and review response from Denise Pierce regarding same; receive and review communiqué from Jimmy Strohmeier with additional backup data requested by Robin Sanders; prepare communiqué to Ms. Sanders forwarding same; receive and review Ramon Medina's "legend and data definitions" advisory concerning Dawn-Fisher	1.5

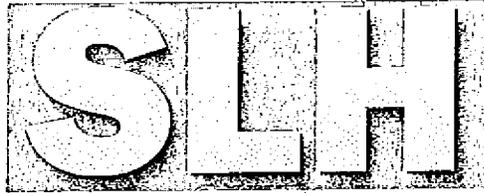


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	dataset; receive and review follow-up communiqué from Mr. Medina with data identified from Dawn-Fisher report on analysis of charters vs. districts; receive and review request from Ms. Sanders for copy of trial schedule provided to Shelley Dahlberg; prepare response and provide same. (No charge)	
1/17/13	(RS) Prepare directive to Leonard Schwartz regarding offer of new trial exhibits and responses, should parties object to same; receive and review communiqué from Tom Sage regarding deposition preparation; prepare response to Mr. Sage concerning same and anticipated deposition inquires; prepare follow-up response/lengthy directive to Mr. Sage concerning examining attorney; receive and review reply from Mr. Sage; prepare advisory communiqué to Mr. Sage regarding statistics on bond defaults in Texas and scope of his expert report.	1
1/17/13	(RS) Return travel from San Antonio. (No charge)	1.5
1/18/13	(CP) Communiqué exchange with Maria-Theresa Sigua inquiring as to whether David Dunn retained a copy of his deposition; telephone call to Ms. Sigua concerning same, left detailed message; telephone call to Mario Flores (second attempt) to determine status of his deposition and available for pre-trial preparation next week, left detailed message. (No charge)	0.1
1/18/13	(CP) Receive and review communiqués from Drs. Anthony Rolle and Craig Wood, Denise Pierce, Brooks Flemister and Mark DiBella regarding their availability for pre-deposition preparation; forward same to Joe Hoffer for review; communiqué exchange with Mr. DiBella concerning return of his original deposition. (No charge)	0.1
1/18/13	(CP) After-hours delivery of Gallegos deposition for FedEx delivery.	0.1
1/18/13	(CP) Prepare follow-up requests to Matt Abbott and Mario Flores requesting contact to schedule pre-trial preparation conference with Joe Hoffer.	0.1
1/18/13	(CP) Prepare table of trial witnesses and their availability for same.	0.2
1/18/13	(CP) Teleconference with Rene Gallegos, notify him per Bob Schulman, his appearance at trial is unnecessary; confer with Mr. Schulman and Joe Hoffer regarding availability of witnesses	0.1

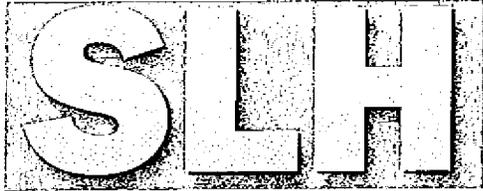


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	for trial and pre-trial preparation (No charge).	
1/18/13	(AK) Review depositions of Matt Abbott, Mark DiBella, David Dunn, Brooks Flemister, Mario Flores, Rene Gallegos, Denise Pierce, Dr. Anthony Rolle, Tom Sage, James Strohmeyer, and Dr. Craig Wood for information to include in findings of fact and conclusions of law.	4.8
1/18/13	(RS) Prepare for, attend and defend Tom Sage deposition.	3.3
1/18/13	(RS) Conduct debriefing conference with Tom Sage in preparation for trial testimony.	1.5
1/18/13	(CP) Confer with Bob Schulman post-deposition; ask Mr. Schulman if he discussed scheduling of pre-trial preparation with Tom Sage for next week; not discussed. (No charge)	0.1
1/18/13	(RS) Prepare directive to staff for preparation of proffer of all charter-related deposition testimony and TCSA disclosures of public policy documents; review Denise Pierce's executed deposition errata sheet and request for guidance concerning disclosure of membership information; prepare advisory reply; review communiqué from Chris Diamond regarding intent to call expert witness on first morning of Charter Plaintiffs' trial presentation; prepare response to Mr. Diamond; review confirmation from Mr. Diamond; prepare inquiries to Mr. Diamond regarding intended scope of expert testimony; review reply from Mr. Diamond concerning same; review staff notification to experts scheduling pre-trial preparation sessions; review response from Dr. Anthony Rolle regarding scheduling; forward same to TCSA staff; review responding communiqué from Denise Pierce; prepare further communiqué to Drs. Rolle and Wood concerning same; prepare advisory communiqué to Ms. Pierce outlining preparation topics.	1.8
1/18/13	(RS) Receive and review communiqué from MALDEF attorney, Rebecca Couto, regarding order of presentation of Charter Plaintiffs' witnesses; prepare advisory response to Ms. Couto regarding same; prepare outline for Denise Pierce's trial testimony; begin preparation of direct examination inquiries for Pierce and Dunn trial testimony; receive and review latest draft of Findings of Fact and Conclusions of Law from Allen Keller; begin preparation of revisions and additions to same.	2.6
1/19/13	(RS) Prepare lengthy communiqué to Denise Pierce concerning	4.4



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Dr. Lisa Dawn-Fisher's failure to provide raw data with reiteration of discussion with Toni Templeton of Findings and Conclusions, and [REDACTED] and other issues; draft outline of Ms. Pierce's testimony; prepare communiqué to Ms. Pierce forwarding same; prepare extensive additions, revisions, deletions and correction to matrix and Findings of Fact and Conclusions of Law.

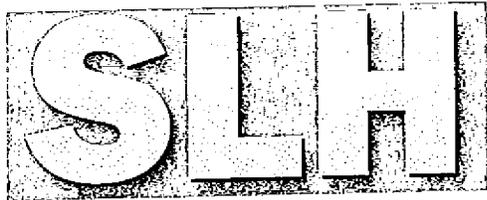
1/20/13 (RS) Continue review and preparation of revisions to matrix supporting Findings and Conclusions; continue review and preparation of revised Findings and Conclusions. 4.3

1/20/13 (RS) Conducted extended teleconference with Dr. Anthony Rolle; prepare advisory to Denise Pierce and Joe Hoffer regarding revisions to trial presentations; continue revising matrix, Findings and Conclusions; conduct research and prepare file notes of authorities for [REDACTED]

[REDACTED]; prepare communiqué to Allen Keller attaching updated Findings and Conclusions with directive to review depositions of charter CFOs and two parent/plaintiffs for potential information to include within same; receive and review response from Mr. Keller concerning same, and incorporation in matrix of results of review as to Abbott and DiBella depositions, prepare directive to Mr. Keller with guideline for deposition review and anticipated focus of DiBella's testimony; receive and review communiqué from Paralegal regarding status of parent deposition transcripts not completed.

1/20/13 (RS) Prepare staff directives regarding dates of last pleading amendments; receive and review response from Allen Keller regarding same; receive and review communiqué from Leonard Schwartz concerning same; prepare response to Mr. Schwartz regarding same; direct Mr. Keller to review and determine amendments filed by Edgewood Plaintiffs; prepare extensive communiqué to Joe Hoffer and Denise Pierce regarding facility cost findings and presentation at trial, offer of Strohmeyer's report and deposition testimony, and other issues related to trial presentation; receive and review communiqué from Dr. Anthony Rolle with initial data table concerning Dawn-Fisher methodology; review same. 1.9

1/21/13 (CP) Telephone conference with Mario Flores regarding return Matter: School Finance Litigation 0.1

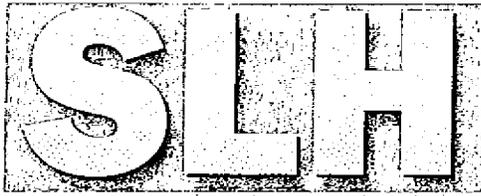


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	of his original deposition; telephone conference with Mr. Flores' Paralegal, she will return unsigned original by overnight delivery today. (No charge)	0.3
1/21/13	(CP) Prepare current list of exhibits offered into evidence by Charter Plaintiffs; receive communiqué from Jimmy Strohmeyer regarding availability of a conference room on 01/23 in Rockwall to meet with Joe Hoffer; prepare response to Mr. Strohmeyer advising he may not be called upon to testify at trial.	0.1
1/21/13	(CP) Receive and review request from Matt Abbott for resubmission of e-mail previously sent to him concerning his availability to meet with Joe Hoffer; respond to Mr. Abbott with copy to Mr. Hoffer regarding same.	1
1/21/13	(CP) Conduct review and search of all file documentation to cull out exhibits to Dunn deposition, not included with transcript on file.	0.1
1/21/13	(CP) Confer with Bob Schulman concerning update to list of required witnesses and notification to Jimmy Strohmeyer regarding same; TCSA will determine if Mr. Strohmeyer's appearance is required; telephone conference with Mr. Strohmeyer, advise him of same.	0.5
1/21/13	(CP) Draft Second Amended Exhibit List/Depositions Designation by TCSA Plaintiffs for Bob Schulman's review; receive Mr. Schulman's comments to same; prepare revisions.	0.3
1/21/13	(CP) Telephone conference with Jimmy Strohmeyer regarding scheduling of pre-trial conference with Joe Hoffer on 01/23 instead of 01/25; telephone call to Love Field Conference facility to schedule meeting room for meeting with Strohmeyer (out of business); telephone conferences with two hotel sales facility staff persons regarding meeting/conference room for meeting with Strohmeyer (confirmed); follow-up telephone conference with Mr. Strohmeyer, he is booked on 01/23 unless Mr. Hoffer can travel to Rockwall for meeting.	0.1
1/21/13	(CP) Confer with Lisa Richards, Wyndham Dallas and Patricia Morales, Park Inn by Radisson (Dallas); notify both of the meeting on 01/23 (with Strohmeyer) is cancelled and board/conference room reservation is no longer required. (No charge)	
1/21/13	(RL) Attorney conferences with Bob Schulman, Joe Hoffer, and	3



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Allen Keller regarding trial strategy and preparation; research into potential legal arguments related to ~~constitutional issues on~~
~~_____~~
~~_____~~; begin extended detailed review of proposed findings of fact and conclusions of law and matrix for witness presentations. (No charge)

1/21/13 (MZ) Research Legislative Budget Board publications and reports for most recent information regarding cost analysis of public education system. (No charge) 0.6

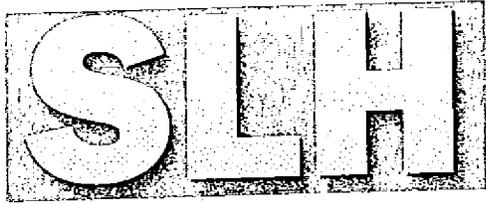
1/21/13 (JH) Extensive pre-trial work on exhibits, evidence and Findings of Fact and evidentiary issues. 1.7

1/21/13 (RM) Review communiqués and attachments from Toni Templeton and Bob Schulman regarding assignment of monitors and conservators and other interventions to open-enrollment charter schools. 0.2

1/21/13 (AK) Incorporate relevant information from deposition transcript review into matrix of Findings of fact and conclusions of Law; continue summarizing the Court's rulings on evidentiary objections at trial; attorney conference with Joe Hoffer and Rick Lopez regarding documents to use as exhibits during trial. 5.1

1/21/13 (LS) Receive and review numerous communiqués between Bob Schulman, Allen Keller & Joe Hoffer regarding pleadings and trial preparation. (No charge) 0.4

1/21/13 (RS) Review communiqué from Allen Keller with summary of EISD pleading amendments; direct Mr. Keller in additions to Findings and Conclusions; direct Mr. Keller in preparation ~~_____~~
~~_____~~; prepare directive to staff regarding same and Court-imposed deadline for submission of same; review ~~_____~~
~~_____~~ from Mr. Keller; analyze same and prepare request to Mr. Keller to review and conduct further research regarding ~~_____~~; prepare communiqué to Joe Hoffer, Leonard Schwartz and Rick Lopez forwarding ~~_____~~, Charter Plaintiffs' current exhibit list and master trial exhibit list; request input regarding same; direct Mr. Keller to prepare report identifying witnesses disclosed by Charter Plaintiffs to offer rebuttal



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/21/13 testimony; review report from Mr. Keller concerning same. (RS) Prepare communiqué to Lindsey Jones and Toni Templeton forwarding revised draft outline of Pierce trial testimony; prepare advisory communiqué to Ms. Templeton regarding offer of comparisons of district and charter funding, with emphasis on disparities, inefficiencies and arbitrariness of the charter funding formulas and data source/materials for inclusion in trial presentations; prepare communiqué to Shelley Dahlberg offering Strohmeier report and deposition in lieu of trial testimony in consideration of Intervenors' recapture of Monday morning presentation and of pending updated Wood and Rolle expert reports. 1.6
- 1/21/13 (RS) Receive and review list of inquiries from Dr. Anthony Rolle concerning state's amended dataset and state's failure to provide raw data; prepare reply to Dr. Rolle (copied to Ramon Medina and Toni Templeton) responding to each inquiry; request additional data compilation from Mr. Medina and Ms. Templeton concerning rent/lease expenditures by districts and charters not provided in expert report; direct staff to update list of exhibits, including depositions and deposition exhibits and to proffer same as trial exhibits; receive and review list; receive and review Joe Hoffer's notice of missing exhibit; direct staff and receive and review corrected list; prepare inquiry to Denise Pierce on status of Jim Ho's investigation of intentions in light of Motion to Dismiss by defense counsel; prepare advisory communiqué to Lindsey Jones, David Dunn and Ms. Templeton regarding same. 2.3
- 1/22/13 (CP) Organize all depositions to be submitted with First Supplemental Depositions Designation; combine 11 depositions with their respective exhibits; determine which exhibits are missing; rescan Flemister deposition (No charge); two telephone conferences with Tom Sage regarding scheduling of pre-trial conference with Joe Hoffer to prepare for trial; two telephone conferences with Mark DiBella concerning same; schedule meetings between Mr. Hoffer, Mr. Sage and Mr. DiBella. 6
- 1/22/13 (CP) Confer with Joe Hoffer regarding pre-trial preparation session with Matt Abbott on 01/24 at 10 AM; telephone call to Mark DiBella to determine his availability the same day after 12 PM, left detailed message. (No charge) 0.1

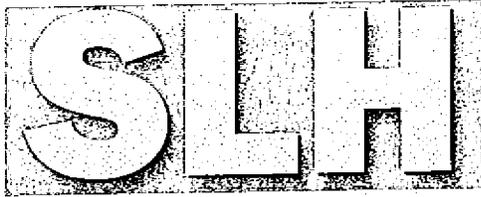


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

1/22/13	(CP) Telephone conference with Tom Sage regarding date for pre-trial conference with Joe Hoffer; discussion with Mr. Hoffer concerning same; telephone call to Mr. Sage to schedule for 01/25 at 2 PM, left detailed message. (No charge)	0.1
1/22/13	(RL) Complete review and revisions to Findings of Fact and Conclusions of Law; compare findings of fact with last live Petition to determine whether additional pleading amendment is necessary; attorney conferences with Joe Hoffer and Allen Keller regarding same. (No charge)	2.7
1/22/13	(JH) Trial preparation conference with Matt Abbott, outline testimony subjects, rough of trial presentation.	4.9
1/22/13	(AK) Review trial testimony of Drs. Moak and Cortez, adding [REDACTED] to findings of fact and conclusions of law matrix; begin preparing trial testimony outline for Mario Flores and Brooks Flemister; add citations to the record for findings of fact and conclusions of law.	5.3
1/22/13	(RM) Review communiqué from Bob Schulman to Dr. Anthony Rolle regarding inquiries concerning the data elements used by Dr. Lisa Dawn-Fisher in her revised data analysis; review follow-up communiqué from Mr. Schulman regarding same. (No charge)	0.2
1/22/13	(RM) Telephone conference with Bob Schulman regarding analysis of school district and charter school facility costs. (No charge)	0.2
1/22/13	(RM) Respond to communiqué from Bob Schulman regarding inquiries by Dr. Anthony Rolle concerning the data elements used by the Dr. Lisa Dawn-Fisher in her recently amended master dataset file. (No charge)	0.2
1/22/13	(RM) Review communiqués from Bob Schulman regarding preparation of trial presentations of Drs. Anthony Rolle and Craig Wood; prepare reply to Mr. Schulman regarding same; review response from Mr. Schulman regarding preparation of exhibit using MALDEF exhibit as basis; prepare reply to Mr. Schulman regarding same; continue to review litigation file for information pertinent to testimony by Drs. Rolle and Craig.	0.2
1/22/13	(RM) Review communiqué and attachment from Bob Schulman regarding exhibit introduced during deposition of Dr. Sally Partridge; review follow-up communiqué from David Dunn	0.6



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	regarding same and commenting upon number of charters consolidated as opposed to revoked; review follow-up communiqué from Toni Templeton providing summary table of returned, revoked, consolidated, etc. charters; review communiqué and attachment from Bob Schulman regarding MALDEF exhibit; reply to Mr. Schulman regarding same; prepare communiqué to Mr. Schulman regarding preparation of presentations and testimony for Drs. Anthony Rolle and Craig Woods; review litigation case file for information pertinent to Drs. Rolle's and Woods's testimony; review communiqué from Mr. Schulman regarding unique identification of consolidated charters in Dr. Partridge's exhibit; review and reply to communiqué from Mr. Schulman regarding operation of court's audio-visual equipment (No charge).	
1/22/13	(RS) Travel to Austin.	1.5
1/22/13	(RS) Attend trial (morning session).	3
1/22/13	(LS) Attend trial (afternoon session).	3
1/22/13	(RS) Receive and review communiqué from Dr. Anthony Rolle with reiteration of data required for completion of presentation; prepare advisory response to Drs. Rolle and Craig Wood concerning interpretation of state's data without further clarification and related issues; prepare communiqué to litigation staff concerning status of Findings and Conclusions due this date; receive and review staff advisory regarding status of supplemental exhibit list adding depositions and deposition exhibits; direct staff to expedite order for Sage deposition transcript; receive and review from Allen Keller summary of Moak/Pierce/Cortez deposition transcripts for final preparation of Findings and Conclusions; receive, review, revise and approve Findings and Conclusions and accompanying witness matrix. (No charge)	0.7
1/22/13	(RS) Confer with TCSA staff regarding trial and exhibit preparation; review Lindsey Jones's request for copy of Partridge deposition exhibits; direct staff regarding same; prepare trial status report and advisory to Dr. Craig Wood forwarding "Report on the Feasibility of Establishing Postsecondary-Readiness Standards for STAAR End-of-Course Science & Social Studies Assessments" report recently offered; confer with Robin Sanders	2.3



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/22/13 regarding requested back up data for Stroymeyer deposition and Report; prepare communiqué to Ms. Sanders with copy of backup data previously provided to her; review MALDEF exhibit update; receive updated list of admitted exhibits from Court Reporter; review same for completeness of Charter Plaintiffs' exhibits; review revisions and comments to Charter Plaintiffs' Findings and Conclusions from Rick Lopez; review same and compare to current pleading. (RS) Receive and review proposal from MALDEF to enter Stipulations in lieu of specific cross-examination inquiries of charter witnesses; prepare response to David Hinojosa with proposed charter Stipulations; request, receive and review, from Mr. Hinojosa, MALDEF's proposed Findings and Conclusions; prepare advisory communiqué to Allen Keller and Joe Hoffer regarding same. 1.5
- 1/22/13 (RS) Prepare for Sally Partridge cross-examination; prepare advisory communiqué to Denise Pierce attaching Executive Summary/Evaluation of Texas Charter Schools from 2010 TEA annual charter school evaluation report for possible reference in Partridge cross-exam; forwarding list of Charter Campuses Closed Within the Past Five Years from Partridge deposition to Lindsey Jones and Toni Templeton; request David Dunn's response to attached Comprehensive Annual Report on Texas Public Schools (2008) from Partridge deposition considered for cross-exam; receive and review staff communiqué forwarding Second Supplemental Exhibit List and First Supplemental Depositions Designation by Charter Plaintiffs; review document attached; finalize Findings and Conclusions; direct Paralegal in final edits, proof and submission to Court Clerk. 1.8
- 1/23/13 (CP) Multiple communiqué exchanges with all counsel and Paralegals regarding failure of upload of Charter Plaintiffs' exhibits identified on 01/22 to FTP server; compress same and upload to Adobe SendNow site for submission; troubleshoot multiple failures to upload onto Adobe SendNow site; confer with IT consultant regarding same; download and copy all exhibits onto USB drive for submission to Della Sawvel; prepare letter to Ms. Sawvel forwarding same; after-hours delivery of overnight package to Ms. Sawvel. 2



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

Keller regarding assignment of tasks (No charge); review communiqué from Mr. Schulman regarding preparation of exhibit based on MALDEF exhibit; compare MALDEF exhibit to Figure 3 in Dr. Lisa Dawn-Fisher's report; prepare communiqué to Paralegal regarding Exhibit 1188; review follow-up communiqué from Mr. Hoffer regarding Dr. Partridge's exhibit; prepare reply to Mr. Hoffer regarding same; prepare requested exhibit; prepare reply to Mr. Schulman providing draft of requested exhibit, request clarification of purpose for same.

1/23/13 (LS) Attend trial; conduct pre-trial preparation with Toni Templeton and Bob Schulman on cross-examination of Dr. Sally Partridge (No charge); receive communiqué from Ms. Templeton regarding Dr. Partridge's testimony; receive communiqué from Holly McIntush forwarding exhibits for review from Dan Casey's testimony; review exhibits. 9.8

1/23/13 (RS) Prepare advisory directive to Joe Hoffer for pre-trial witness preparation outlining anticipated proofs and testimony from charter operators; review Dunn deposition in preparation for pre-trial witness conference; prepare advisory communiqué to experts Wood and Rolle in preparation for trial in light of unanticipated data revisions; receive request from Leonard Schwartz to appear at courthouse to argue offer of rebuttal testimony by Mark Hurley, recall of witness Dan Casey opposed by counsel for Calhoun County Plaintiffs, and change in scheduling Partridge in-court testimony tomorrow; attend conference with court and all counsel and follow-up conference with all regarding same. 1.4

1/23/13 (RS) Forward directive to litigation staff attaching most current master trial exhibit list for preparation of Charter Plaintiffs' exhibits admitted, to be proffered and to be offered; receive and review communiqué from Mark DiBella regarding expectations for trial testimony; prepare advisory response to Mr. DiBella concerning same; receive and review Mr. DiBella's reply and confirmation of support. 0.4

1/23/13 (RS) Receive and review staff request for date for Mario Flores' trial appearance and pre-trial preparation conference; prepare advisory response to same; review Partridge's Charter Schools proposed PPT for cross-examination; prepare communiqués to 0.8



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	TCSA staff and litigation staff forwarding same for review; receive and review communiqués from Denise Pierce and David Dunn with comments regarding same; prepare response to TCSA and litigation staff concerning same; receive and review advisory from Ramon Medina concerning Partridge PPT recommending additional data for presentation and inquiry; direct Mr. Medina to prepare same with assistance of Toni Templeton.	
1/23/13	(RS) Review excerpts from David Dunn deposition; prepare advisory communiqué to Mr. Dunn regarding direct examination inquiries to include personal observations, facility needs of charter community and school district funding comparisons; receive and review communiqué from Chris Diamond with intended cross-examination of Charter Plaintiffs' witnesses.	0.7
1/23/13	(RS) Conduct conference with Toni Templeton and Leonard Schwarz preparing inquiries and exhibits for Partridge cross-examination.	1.3
1/23/13	(RS) Prepare additional revisions to Findings and Conclusions; forward same to Leonard Schwartz for review; prepare advisory communiqué to Mr. Schwartz with sections of Pierce deposition; confer with David Dunn regarding preparation of experts; prepare advisory communiqué to Dr. Anthony Rolle confirming dates of arrival; review outline of anticipated trial testimony and exhibits for Mario Flores from Allen Keller; review proposed outline as abstracted from deposition, direct Mr. Keller to look beyond deposition and deposition exhibits, to review of pleadings, witness matrix and proposed Findings; prepare additional topics to address through Flores testimony and trial preparation; review revised preparation outline and exhibits; prepare further advisory and directives to Mr. Keller; prepare request to TCSA and litigation staff for information on SER-Ninos charter schools funding comparison to resident school district; review proposed direct examination outline for Brooks Flemister.	1.9
1/23/13	(RS) Receive and review request from David Hinojosa for confirmation of trial calendar for the week of January 28th; prepare advisory response to Mr. Hinojosa informing him of non-appearance of Strohmeier and Rene Gallegos; receive and review communiqué from Holly McIntush making similar inquiry; prepare advisory response to Ms. McIntush; receive and review	1.1



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Ramon Medina's review of exhibits comparing charter schools and school district funding using charter school funding template, receive and review reports from Allen Keller and Mr. Medina concerning charter school vs. school district funding analysis; review proposed exhibits; prepare advisory response to Mr. Medina concerning same; receive and review reply from Mr. Medina regarding same.	
1/23/13	(RS) Review Edgewood Plaintiffs' Motion to Exclude Intervenors' Non-Retained Expert, Mark Hurley; direct Ramon Medina in preparation of exhibit referencing "Dawn-fisher summary of computation of districts paying recap and ADA WADA for 2012" PDF file; review staff communiqué to (i) Charter Plaintiff witnesses with trial transcript (Bill Hammond testimony) and exhibit for review; review notice of Dan Casey deposition setting; review communiqué from Holly McIntush advising of time change for Casey deposition; review amended notice of Casey deposition; review communiqué from Ms. McIntush with exhibits and link to report to be referenced/introduced during Casey deposition; review state exhibit presentation for Sally Partridge; revise and add cross-examination inquiries and exhibits; review revised Partridge cross-exam exhibits with Toni Templeton slides 2 through 15, review same with Ms. Templeton and Leonard Schwartz and prepare further cross-exam inquiries.	1.7
1/24/13	(CP) Prepare Second Supplemental Designation of Depositions to include errata sheets for two depositions offered as exhibits not previously included and addition to Denise Pierce's errata sheet (page 111d) also to be included with exhibits; multiple communiqué exchanges with Paralegals for litigation counsels regarding download of Adobe SendNow document, corrupt; upload all exhibits previously disclosed on 01/22 to Dropbox; authorize all counsel and Paralegals to access same.	1.6
1/24/13	(CP) Review depositions of Matt Abbott and Mark DiBella; begin preparation of PowerPoints for their trial testimony, as requested by Joe Hoffer.	1.2
1/24/13	(CP) Prepare communiqué to Della Sawvel regarding "draft" document sent to Bob Schulman which she disclosed to all counsel; discussion with Mr. Schulman concerning same; upload and e-file Supplement to Depositions; prepare communiqué to all	0.4

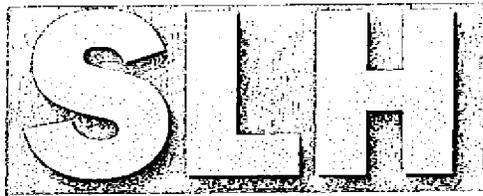


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	counsel, Paralegals and Ms. Sawvel forwarding copies.	
1/24/13	(JH) Travel to Austin for witness preparation.	1.5
1/24/13	(JH) Witness preparation with Matt Abbott for trial.	2.9
1/24/13	(JH) Prepare for work session with Mark DiBella.	3.3
1/24/13	(JH) Continue preparation of witness presentation for Matt Abbott.	4.7
1/24/13	(JH) Return travel to San Antonio. (No charge)	1.5
1/24/13	(AK) Receive directive from Joe Hoffer to gather charter reports from TEA website for Wayside Schools and YES Preparatory; use TEA reports to assemble demographic charts for Wayside Schools; review Mr. Hoffer's trial preparation outline for Matt Abbott; work with Mr. Hoffer to prepare presentations for field expert trial testimony.	3.9
1/24/13	(RM) Continue to review School FIRST indicators to prepare reply to Joe Hoffer responsive to his request concerning concerns with FIRST methodology as applied to charter schools; confer with Mario Flores regarding location of his preparation for trial testimony; research other financial performance measures for consideration in School FIRST methodology; issue results of work to Mr. Hoffer for review.	0.7
1/24/13	(RM) Review communiqué from Bob Schulman regarding district funding vs. charter funding analysis; prepare reply to Mr. Schulman regarding same; review communiqué from Mr. Schulman regarding status of amended report from Wood & Rolle; review communiqué from Mr. Schulman regarding deposition testimony by Brooks Flemister; prepare reply to Mr. Schulman regarding status of inquiry; review communiqué from Joe Hoffer regarding testimony by Matt Abbott and arguments against School FIRST; review School FIRST indicators; prepare reply to Mr. Hoffer regarding same; review follow-up communiqué from Mr. Schulman regarding district funding vs. charter funding analysis; reply to Mr. Schulman regarding same.	1.8
1/24/13	(RM) Telephone conference with Joe Hoffer regarding analysis of Wayside Schools finances and comparison to testimony by Dr. Lisa Dawn-Fisher and Matt Abbott and concerns regarding practical application of School FIRST indicators.	0.3
1/24/13	(RM) Review communiqué from Bob Schulman regarding merits of charter funding vs. district funding analysis; review	1.7



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

communiqué from Joe Hoffer regarding same; review communiqué from Mr. Hoffer regarding preparation of slides for Wayside Schools and YES Preparatory; using AEIS reports for 2012-2011, 2011-2010 and 2010-2009 school years, prepare student demographic slides for YES Preparatory; prepare reply to Mr. Hoffer forwarding results and requesting further direction on how to proceed; prepare financial slides for YES Preparatory; review follow-up communiqué from Mr. Hoffer regarding initial slide submission; revise slides consistent with Mr. Hoffer's instructions; forward revised slides to Mr. Hoffer; review 11323 - master dataset with charters for report Nr2012 Jan 11 2013 for financial data to use for slides; prepare communiqué to Mr. Hoffer forwarding financial slides.

1/24/13 (RM) Telephone conference with Joe Hoffer regarding preparation of exhibits, research of comparative financial data for Wayside Schools and YES Preparatory to prepare Matt Abbott and Mark DiBella for trial; charter funding vs. district funding analysis prepared by Toni Templeton and preparation for mock trial. 0.3

1/24/13 (RM) Analyze financial data for Wayside Schools as directed by Joe Hoffer; forward communiqué to Mr. Hoffer regarding YES Preparatory financial analysis; prepare follow-up communiqué to Mr. Hoffer summarizing observations concerning Wayside Schools' finances; review communiqué from Bob Schulman regarding presentation of witnesses; review response from Mr. Hoffer regarding assignment of witness preparations. 1.4

1/24/13 (LS) Receive communiqué from Bob Schulman regarding WRA Amended Report; begin preparation of Sage testimony; work with Mr. Schulman and Toni Templeton on cross-examination of Dr. Sally Partridge (No charge); consult TCSA staff on structure of cross and our direct case; receive communiqué from David Dunn regarding presentation of Dr. Partridge cross-exam; receive communiqué from Holly McIntush with Exhibits for Dan Casey's cross; receive and review communiqué from Mr. Schulman with summary of the charter case; receive communiqué from Susan Jennings with Plaintiffs' Seventh Amended Original Petition; review Denise Pierce deposition and prepare trial direct and possible cross-examination; finish first draft of Sage slides with 14

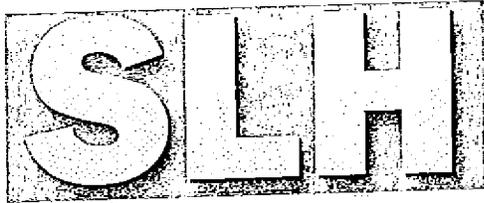


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Toni Templeton; distribute same to staff for review and comment.	
1/24/13	(RS) Attend trial.	7.9
1/24/13	(RS) Prepare communiqué to Leonard Schwartz regarding experts' amended report; confer with Mr. Schwartz and Toni Templeton in preparation for Sally Partridge cross-examination; prepare extensive summary of Charter Plaintiffs' case, forward same to Mr. Schwartz for review; prepare communiqué to Ramon Medina regarding status of amended report from Drs. Anthony Rolle and Craig Wood; prepare follow-up communiqué to Mr. Medina concerning Flemister deposition testimony; review response from Mr. Medina regarding same; prepare two communiqués to Mr. Medina concerning district funding vs. charter funding analysis; review responses from Mr. Medina regarding same; prepare communiqué to Mr. Medina concerning presentation of witnesses; review presentation by LBB staff from Senate Finance Committee hearing (Exhibit 6512) offered by FBISD Plaintiffs; review communiqué from Toni Templeton with PDF of Partridge cross-exam slides; prepare communiqué to Della Sawvel forwarding same. (No charge)	1.6
1/24/13	(RS) Receive and review communiqué from Denise Pierce requesting reasons for review of Hammond testimony provided by Paralegal; prepare response to Ms. Pierce concerning same; prepare communiqué to staff directing circulation of additional exhibits, to include depositions, to all counsel to determine if objection will be raised to same; receive and review exhibit status report from Paralegal; draft bullet point summary of the charter case, forward to Joe Hoffer for review/input; receive and review request from Toni Templeton for Sage deposition, transcript. (No charge)	1.7
1/24/13	(RS) Review staff communiqué regarding additional exhibits (errata sheet and signature pages for Dunn and DiBella depositions) to be offered for admission; review Second Supplemental Depositions Designation by TCSA Plaintiffs attached; approve same; prepare communiqué to and forward copy of same to Court Reporter; review report on status of Sage transcript and additional cost required for procurement of same; prepare directive regarding same; review response; review	0.8



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	to same; prepare advisory communiqué to Tom Sage regarding pre-trial preparation requirement; prepare follow-up communiqué to Mr. Sage concerning assignment of his testimony to Leonard Schwartz.	
1/24/13	(RS) Receive and review communiqué from Joe Hoffer regarding discussion with Ramon Medina concerning FSP funding comparisons; receive and review communiqué from Mr. Medina regarding same; prepare response to Mr. Medina; receive and review communiqué from Mr. Hoffer regarding funding proofs; prepare response to Mr. Hoffer concerning same; receive and review reply from Mr. Hoffer; prepare response; receive and review communiqué from Leonard Schwartz regarding numbering of Sage PowerPoint exhibits; prepare advisory response to Mr. Schwartz concerning same.	0.3
1/25/13	(CP) Telephone conference with Jimmy Strohmeyer; arrange for pick up and delivery of his original deposition; communiqué exchange with Mr. Strohmeyer regarding same and his submission of errata and signature pages by e-mail (received).	0.1
1/25/13	(CP) Draft Plaintiffs' Submission of Thomas Sage Deposition and Exhibits; e-file same; prepare communiqué to all counsel and Della Sawvel forwarding Submission; upload Submission and all exhibits to Dropbox; share same with all counsel.	0.2
1/25/13	(CP) Prepare communiqué to Matt DiBella confirming date he must be in court for trial testimony; prepare communiqué to Tom Sage forwarding his deposition for review.	0.1
1/25/13	(CP) Conduct search for memorandum of law prepared by Bryan Dahlberg regarding [REDACTED]; confer with Allen Keller concerning same; telephone conference with Mr. Dahlberg; receive preliminary and revised memorandum. (No charge)	0.6
1/25/13	(CP) Prepare correspondence to Della Sawvel forwarding Sage deposition and exhibits and Submission e-filed with the Court; confer with Joe Hoffer regarding delivery of same to Ms. Sawvel on 01/28 instead of incurring expense for overnight delivery (No charge).	0.1
1/25/13	(JH) Conduct witness preparation of Mark DiBella for trial.	2.2
1/25/13	(MZ) Revise Joe Hoffer's notes from Matt Abbott's witness preparation for trial use.	0.8

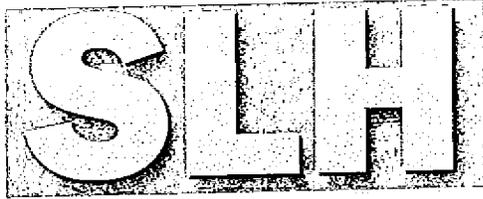


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/25/13 (RM) Continue to review 11323 - master dataset with charters for report NF2012 Jan 11 2013 for financial data to use for slides for DiBella's YES Preparatory testimony; prepare communiqué to Joe Hoffer forwarding same; review communiqué and attachments from Mr. Hoffer regarding Wayside Schools FAST data; review communiqué and attachments from Mr. Hoffer regarding YES Preparatory FAST data; review communiqué from Denise Pierce regarding her testimony outline; review follow-up communiqué from Bob Schulman regarding Ms. Pierce's testimony outline; review communiqué and attachment from Mr. Hoffer regarding Wayside Schools demographic data slide; prepare reply to Mr. Hoffer regarding same; review communiqué from Mr. Schulman regarding [REDACTED]; review communiqué from Mr. Hoffer regarding same; review communiqué and attachments from Mr. Hoffer regarding Wayside Schools demographic and financial data provided by Matt Abbott. 0.8
- 1/25/13 (RM) Review communiqué from Toni Templeton regarding request for meeting; prepare reply to Ms. Templeton regarding same; review communiqué and attachment from Paralegal regarding Defendant's Plea to the Jurisdiction; review follow-up communiqué from Leonard Schwarz regarding charter generation of plaintiffs; prepare reply to Mr. Schwartz regarding same; review communiqué from Joe Hoffer regarding Defendant's Plea to the Jurisdiction; prepare reply to Mr. Hoffer regarding charter applicants' ability to negotiate contract terms; review and prepare reply to communiqué from Ms. Templeton regarding [REDACTED]; review communiqué from Ms. Templeton requesting telephone conference. 0.4
- 1/25/13 (AK) Research [REDACTED] and draft accompanying Findings of Fact and Conclusions of Law; review Defendants' Plea to the Jurisdiction and authorities cited for [REDACTED]; incorporate Bob Schulman's revisions to Mario Flores trial preparation outline. 4.1
- 1/25/13 (RM) Review communiqué from Joe Hoffer regarding status of slide preparations for Wayside Schools and YES Preparatory; 0.7

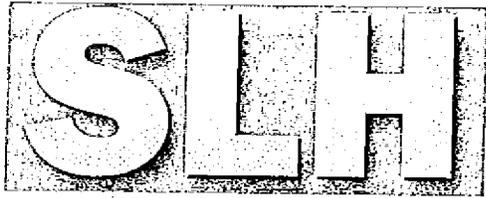


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	prepare reply to Mr. Hoffer regarding same; using annual audit report and AEIS data, prepare demographic and financial slides for Wayside Schools; prepare communiqué to Mr. Hoffer forwarding same; review communiqué from Bob Schulman regarding review of Lynn Moak's testimony.	
1/25/13	(RM) Research AEIS data to identify comparably sized district to compare with Wayside Schools; prepare slide regarding same; forward to Joe Hoffer for review.	0.9
1/25/13	(RM) Continue to research FASB, GASB and FASRG standards and requirements for criteria applicable to the recognition of revenues and expenditures/expenses for districts and charters as requested by Toni Templeton; prepare communiqué to Ms. Templeton forwarding research results.	0.4
1/25/13	(RM) Research FASB, GASB and FASRG standards and requirements for criteria applicable to the recognition of revenues and expenditures/expenses for districts and charters as requested by Toni Templeton.	0.7
1/25/13	(RM) Telephone conference with Toni Templeton regarding basis of accounting differences for districts and charters for revenue and expenditure/expense reporting.	0.2
1/25/13	(LS) Confer with Denise Pierce and Toni Templeton regarding direct testimony of Ms. Pierce; work with Ms. Templeton regarding revisions and additions to Sage testimony; numerous communiqué exchanges with Paralegal regarding exhibits; numerous conferences and communiqué exchanges with TCSA staff and Bob Schulman regarding trial presentations; conduct pre-trial witness preparation with Ms. Pierce.	8.3
1/25/13	(CP) Locate documentation produced by Defendants in response to request for information concerning statutory cap; upload same in Dropbox for review by Bob Schulman; prepare communiqué to Mr. Schulman, notify him same are uploaded for his review.	0.3
1/25/13	(CP) Conduct review of discovery responses from Defendants requesting information on statutory cap to determine if information was provided in response; locate Intervenor's similar inquiry referenced in Defendants' responses; prepare communiqué to Bob Schulman forwarding a copy of Defendants' response to Intervenor's Request for Production indicating	0.7

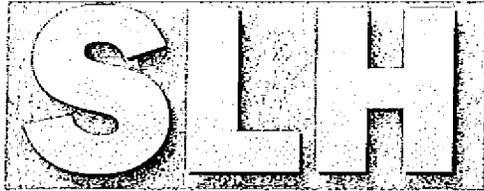


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/25/13 documentation was uploaded to FTP server.
- 1/25/13 (RS) Receive and review communiqué from Joe Hoffer with Abbott trial outline in preparation of trial; review and revise outline; prepare directive to Leonard Schwartz to obtain exhibit number for Sage trial presentation; receive and review Sage deposition transcript; conduct cursory review of deposition transcript and prepare directives to litigation staff concerning revisions and additions to Findings of Fact outlined in Excel file; receive and review updated witness matrix from Allen Keller; receive and review communiqué from Dr. Anthony Rolle concerning timeline for completion of revised report; receive and review proposed testimony outline from Denise Pierce; forward same to Mr. Schwartz; receive and review Mr. Hoffer's initial response to Defendants' Plea to the Jurisdiction; receive and review TCSA Plaintiffs' Submission of Sage Deposition and Exhibit. 2.2
- 1/25/13 (RS) Receive and review current draft of proposed Stipulations from David Hinojosa; prepare response to Mr. Hinojosa regarding same, forward same to TCSA staff; receive and review reply from Mr. Hinojosa; receive and review communiqué from Ramon Medina to Toni Templeton concerning GAAP standards and application of same to charters and ISDs; prepare reply to Ms. Templeton offering possible testimony on such issues by Denise Pierce; receive and review errata and signature pages from Flemister and DiBella depositions provided by Paralegal to all counsel; receive and review communiqué from Ms. Pierce to Paralegalis requesting memorandum on history of charter school funding; direct staff regarding same; receive and review response from Paralegal to Ms. Pierce concerning same; receive and review proposed Pierce exhibits; review Pierce presentation; prepare recommendations regarding same. 1.5
- 1/25/13 (RS) Direct Leonard Schwartz and Joe Hoffer to utilize witness matrix to identify Findings of Fact offered through each witness; receive response from Mr. Schwartz regarding anticipated Pierce trial testimony; review same; prepare communiqué to Allen Keller directing review of proposed MALDEF Stipulations, to be compared for accuracy against witness deposition testimony and Lynn Moak slides and funding testimony; receive, review and 1.6



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

revise Flores trial preparation, returning revisions of same to Mr. Keller for additional input.

1/25/13

(RS) Direct Allen Keller in review of file research regarding ██████████ ██████████ ██████████ in response to Plea to Jurisdiction; receive and review communiqué from Mr. Keller with research memorandum attached; review memorandum; receive and review follow-up communiqué from Mr. Keller with witness matrix including Findings ██████████ ██████████; prepare communiqué to Toni Templeton attaching Mr. Keller's research memorandum for review; prepare communiqué to Paralegal regarding status of notification to all counsel of intent to offer all depositions and exhibits attached in support; receive and review response from Paralegal confirming same and prior admission of McKenzie deposition; receive and review exhibits for Flemister direct exam from Ms. Templeton; review file; receive and review current list of exhibits.

1.7

1/25/13

(RS) Forward revisions and additions to Flores examination outline to Allen Keller; receive and review follow-up response from Mr. Keller with updated outline including questions on charter cap and efficiency/adequacy; prepare communiqué to Mr. Flores regarding same; direct staff to locate discovery responses received from Defendants addressing statutory cap; receive and review Response by Defendants to Intervenor's Request for Production; review Response (No. 15) (not attached); direct staff to determine location of attachments.

0.9

1/25/13

(RS) Receive and review "final" of WRA tables from Dr. Anthony Rolle; direct Allen Keller to review authorities cited in Defendants' Plea to the Jurisdiction and to consider preparation of Response to Plea; receive and review communiqué from Joe Hoffer regarding Abbott presentation outline; review, revise and add commentary to outline; forward same to Mr. Hoffer with advisory; prepare communiqué to Toni Templeton, David Dunn and Ramon Medina with revised WRA tables requesting further review of same; prepare response to Dr. Rolle, request brief explanation of revisions made to tables and reasons for same.

2.4

1/26/13

(CP) Prepare Submission of Sage Deposition Transcript and Exhibits; e-file same; prepare communiqué to all counsel forwarding same.

1.3

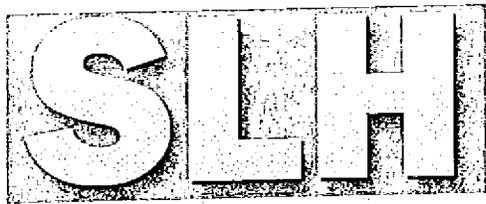


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

1/26/13	(CP) Prepare and e-file TCSA Plaintiffs' Third Supplemental Trial Exhibit List; organize, convert and label all exhibits; prepare communiqué to opposing counsel and Judge Dietz's staff forwarding copies of same; upload documentation in Dropbox for access by counsel.	5
1/26/13	(AK) Travel to Austin for trial preparation.	1.5
1/26/13	(JH) Travel to Austin for pre-trial preparation.	1.5
1/26/13	(JH) Extended pre-trial preparation activities; extended meeting and witness preparation of Mario Flores; drill with Mr. Flores; continue review and organization of exhibits and identify continuing errors in exhibits caused by Court Reporter errors previously identified; extended work with Paralegal and with Court Reporting firm on correction of bad-scans and mis-numbering of exhibits; continue preparation of trial presentations for witnesses; review list of Judge's favorite evidentiary issues and objections; work with Ramon Medina regarding [REDACTED]	15.6
1/26/13	(RM) Continue to assist with general trial preparations for presentation of case in chief; review communiqué from Allen Keller regarding review of Dr. Lynn Moak testimony and update to trial exhibits; confer with Joe Hoffer regarding status of work and review of School FIRST Indicator 14; review communiqué from Toni Templeton regarding revised Wood Rolle & Associates Statistical Analysis of Texas Charter School Facilities Funding Final Report; review follow-up communiqué from Bob Schulman regarding same; as instructed by Mr. Hoffer, review School FIRST Indicator 14 results for Wayside Schools, YES Prep Public Schools, IDEA Public Schools, KIPP, Inc., Shekinah Radiance Academy, Radiance Academy of Learning, Life School, and Trinity Basin Preparatory; prepare final draft of demographic and financial data presentation slides for Matt Abbott's direct testimony; perform other tasks as assigned and directed by Mr. Schulman and Mr. Hoffer.	7.9
1/26/13	(RM) Confer with Bob Schulman, Joe Hoffer and Allen Keller regarding trial preparation and outstanding work to be completed. (No charge)	1
1/26/13	(RM) Telephone conference with Joe Hoffer regarding trial	0.2

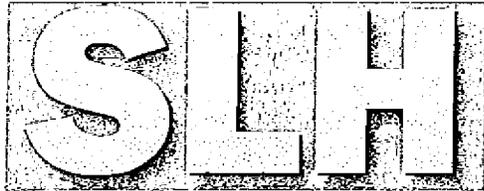


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/26/13 preparations. (No charge) 10.8
(AK) Trial preparation with Bob Schulman and Joe Hoffer; review Dr. Lynn Moak's testimony and presentation to cull out portions of testimony that are applicable to charter schools; organize matrix of Findings of Fact and Conclusions of Law to match those submitted to the Court; add Findings and Conclusions within Dr. Moak's testimony as identified by Mr. Schulman; review exhibits from Mark DiBella's deposition and organize those exhibits identified by Mr. Hoffer identified for trial.
- 1/26/13 (RM) Assist with general trial preparations for presentation of case in chief; consolidate slides and prepare final presentation for Wayside Schools and YES Prep Public Schools; review communiqué and attachment from Bob Schulman regarding revised Wood Rolle & Associates Statistical Analysis of Texas Charter School Facilities Funding Final Report; prepare reply to Mr. Schulman regarding same, assist with witness preparation of Mario Flores; review AEIS reports for Wayside Schools' Eden Park campus, Austin ISD Kocurek Elementary School, Wayside Schools and Austin ISD and compare demographic and financial data for Mr. Flores information and benefit; review communiqué and attachments from Mr. Schulman forwarding revised tables of data definitions; review communiqué from David Dunn regarding revised report and tables provided by Dr. Anthony Rolle. 3.3
- 1/26/13 (LS) Work with Toni Templeton regarding trial presentation slides and questions for Tom Sage; conduct additional pre-trial witness preparation with Denise Pierce and Ms. Templeton regarding the direct exam of Ms. Pierce and preparation of slides; prepare communiqué to Paralegal regarding exhibits for Pierce's testimony; prepare communiqué to Mr. Sage regarding trial testimony questions; prepare possible questions Mr. Sage may be asked on cross with suggested responses for consideration; prepare communiqué to Mr. Sage outline of anticipated cross-examination and possible responses; communiqué exchanges with Bob Schulman, Joe Hoffer, Ms. Pierce and Ms. Templeton regarding issues in case and areas to work on; conduct online research regarding admission of survey; telephone conference with Mr. Hoffer and Mr. Schulman regarding Exhibit problem and possible remedies (No charge); 11.4



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

miscellaneous other necessary tasks and preparations for trial.

1/26/13 (CP) Receive and review request from Bob Schulman for determination of which trial transcripts were provided, to date, to Chris Diamond; review e-mails sent to Mr. Diamond concerning same; prepare response to Mr. Schulman. (No charge) 0.1

1/26/13 (CP) Prepare communiqué to Bob Schulman and litigation staff with updated list of TCSA Plaintiff's exhibits and all submissions, designations, etc. filed to date with same. 0.1

1/26/13 (CP) Upload select deposition transcripts in Dropbox for access by Chris Diamond, as requested by Bob Schulman. (No charge) 0.6

1/26/13 (CP) Receive and review Toni Templeton's communiqué with inquiry regarding Exhibit 9007, Shortchanged Charters report forwarded by Bob Schulman; prepare response to Mr. Schulman and Leonard Schwartz with explanation that master exhibit list entry indicates it was offered (but does not indicate date) and objections were made by Defendants and Calhoun County Plaintiffs on basis of hearsay and relevance. 0.1

1/26/13 (CP) Confer with Bob Schulman regarding TCSA Plaintiffs' exhibits (complete); he requests sharing of same in Dropbox folder; set up Dropbox folder to share same. (Upload took over an hour and a half) (No charge) 1.6

1/26/13 (CP) Review CPA's discovery responses on cap inquiry; prepare communiqué to Bob Schulman forwarding same for his review in light of his prior recollection that Defendants indicated no documentation was available; only Comptroller indicated such. 0.2

1/26/13 (CP) Review communiqué from Bob Schulman to Allen Keller inquiring about documents produced by Defendants in response to discovery request for "statutory cap" documentation (No charge); prepare communiqué to Mr. Schulman, advise him documentation was uploaded in Dropbox for his review last night; receive and review response from Mr. Schulman acknowledging receipt. (No charge) 0.1

1/26/13 (CP) Review deposition transcripts, determine which depositions were scanned with exhibits attached (one complete file); separate transcripts from exhibits attached for those depositions that are currently one file; prepare communiqué to Bob Schulman and Joe Hoffer to advise this "break out" has 3



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/26/13 been accomplished.
 (RS) Receive notice from staff of discovery documents uploaded for review in Dropbox concerning statutory cap (No charge), review documents and prepare directive to litigation staff regarding same; prepare advisory to TCSA staff concerning cross-examination of state's witnesses on legislation proposed to remove cap; prepare directive to Allen Keller regarding same; receive and review advisory communiqué from Dr. Anthony Rolle describing and explaining need for revisions prepared to WRA report; prepare reply to same; continue review of Tom Sage deposition transcript in preparation of direct examination of Mr. Sage; provide pertinent excerpts with advisory communiqué to Leonard Schwartz and Toni Templeton for preparation of Sage trial presentation exhibits; prepare directives for review and distribution of revised WRA report; prepare staff directive regarding distribution of revised charter trial calendar to all parties. 2.8
- 1/26/13 (RS) Review MALDEF revisions and additions to proposed Stipulations; prepare charter revisions and additions to same; prepare advisory communiqué to MALDEF regarding same; continue preparation of trial task list and trial assignments; review communiqué and inquiry from David Dunn regarding Kent Grusendorf request for copies of witness depositions; prepare advisory to Mr. Dunn regarding same and prior cost sharing agreements with Intervenors; review Mr. Dunn's comments on revised WRA report; review Ramon Medina's advisory regarding same; review communiqué from Leonard Schwartz regarding Sage trial preparation and Sage's familiarity with Strohmeyer report; prepare advisory response and directive to Mr. Schwartz; review staff request for confirmation of trial calendar dates; confirm same; review updated Findings of Fact and Conclusions of Law matrix from Allen Keller; prepare communiqué to Joe Hoffer forwarding same. 2.6
- 1/26/13 (RS) Prepare communiqué to Mario Flores with revised trial preparation outline document for review; review communiqué from Allen Keller with Moak trial presentation and slides pertinent to trial presentation; prepare communiqué to TCSA staff, Wood and Rolle and litigation staff forwarding same with request to 1.3



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

review for exhibits superseded by revised expert report and/or to be provided with Dunn trial testimony; request review of slides for Dunn's testimony; review and respond to commentary from Toni Templeton regarding WRA data identifying additional matters for discussion with Dr. Anthony Rolle; review communiqué from Ms. Templeton to Dr. Rolle regarding revised data tables; review TCSA Plaintiffs' Third Supplemental Deposition Designation & First Supplement to Submission prepared and filed by Paralegal; review communiqué from Denise Pierce regarding additional slide to be included in trial presentation (Short-changed Charters); review communiqué from Ms. Pierce regarding proposed Stipulations.

1/26/13

(RS) Receive and review communiqué from Denise Pierce regarding additional costs post-trial (No charge); prepare response to Ms. Pierce concerning same (No charge); prepare inquiry to Drs. Anthony Rolle and Craig Wood regarding data revisions; receive and review request from Toni Templeton regarding exhibit offer and objections to same; prepare reply to Ms. Templeton concerning same; receive and review inquiry from Joe Hoffer regarding Sage trial presentation exhibits; prepare advisory response to Mr. Hoffer regarding same with recommendations for additional examination topics and exhibits; receive and review reply from Mr. Hoffer concerning same.

1.3

1/26/13

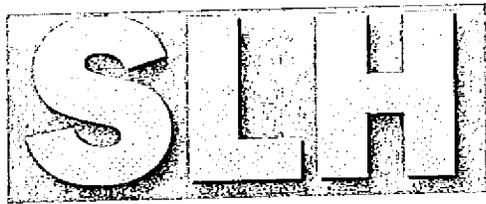
(RS) Prepare litigation staff advisory regarding Ramon Medina's observations concerning Dawn-Fisher spreadsheet and report; review Denise Pierce's draft trial testimony; review communiqué from Leonard Schwartz regarding same; receive and review lengthy observations by Joe Hoffer concerning funding comparison and related issues; receive and review PowerPoint files with data analysis for Wayside Schools and SER-Ninos Charter prepared by Mr. Medina; prepare communiqué to Brooks Flemister attaching and recommending SER-Ninos to HISD PPT funding comparison exhibit prepared by Mr. Medina for trial testimony.

3.4

1/26/13

(RS) Direct Allen Keller in review of Hanusek cross-exam and for summary of testimony pertaining to charters; review communiqué from Mr. Keller with outline of same; re-review and edit Brooks Flemister's proposed testimony outline; prepare

2.4



Schulman, Lopez & Hoffer LLP

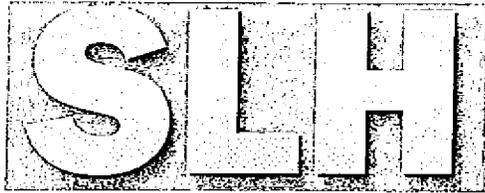
517 Soledad Street
San Antonio, TX 78205

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

communiqué to Mr. Flemister recommending teleconference to discuss funding comparison exhibits; review and respond to request from Leonard Schwartz for time allotted for Pierce testimony; prepare directive to litigation staff to prep all witnesses on comparative funding issue; review revised Findings of Fact and Conclusions Of Law matrix from Allen Keller; review communiqué from Dr. Anthony Rolle regarding Dr. Lynn Moak slides; prepare response to Dr. Rolle concerning same, identifying specific slides for review; prepare follow-up communiqué to Chris Diamond concerning request by Kent Grusendorf to share deposition transcripts and upload of same by Paralegal in Dropbox; review staff communiqué to all counsel and TCSA staff with current version of trial calendar.

1/26/13 (RS) Update trial task list; review communiqué from Denise Pierce with recommended revisions to MALDEF Stipulations; review revised Stipulations; prepare communiqué to MALDEF counsel forwarding revisions (tracked) with explanation of same; review communiqué from Joe Hoffer with updated Flores examination outline for use in revising Flemister outline; prepare directive to Paralegal regarding separation of deposition transcripts from exhibits attached to same for purposes of introduction into evidence as separate exhibits; prepare follow-up communiqué to Paralegal concerning same; review communiqué from Leonard Schwartz regarding same; review follow-up communiqué from Mr. Schwartz concerning trial calendar; prepare advisory response to Mr. Schwartz regarding same. 2.9

1/27/13 (LB) Extended pretrial preparation; extended review, organization and revisions to trial exhibits, potential motions and arguments concerning exhibits; continue preparation of theme and outline of Mark DiBella and Matt Abbott testimony; meeting with experts and continue review and analysis of data tables and analytical conclusions; coaching and drilling with Bob Schulman and Leonard Schwartz regarding lines of inquiry for direct examination and preparation of issues for likely cross examination; extended meeting with experts Drs. Craig Wood and Anthony Rolle reviewing and assessing their revised report; extended work with Toni Templeton and Ramon Medina on refining comparisons of funding sources between ISD and 16.7



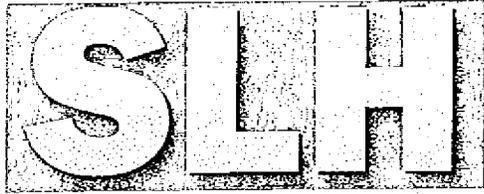
Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

1/27/13	charters and running sample school comparisons based on FSP comparisons; discuss analysis with experts; incorporate same into likely trial presentations of experts or of David Dunn. (CP) Final review, edit and conversion of PowerPoint presentation for Mark DiBella's trial testimony on 01/28; review Denise Pierce's presentation; relabel both as numbered exhibits for admission into evidence on 01/28; convert W&RA expert report, label same as an exhibit; forward copies of all exhibits to all counsel and Judge Dietz's staff; upload same on AG's FTP secure server.	0.7
1/27/13	(CP) Prepare and e-file TCSA Plaintiffs' Fourth Supplemental Designation of Depositions; organize depositions, separating exhibits for depositions into separate files; prepare communiqué to all counsel with Designation; upload all documents in Dropbox for access by counsel.	1.8
1/27/13	(CP) Continue review and organization of TCSA Plaintiffs' depositions previously designated as exhibits, already admitted and to be admitted; multiple telephone conferences with TSG Court Reporting to obtain exhibits labeled by individual Court Reporters attached to deposition transcripts; prepare Third Supplemental Trial Exhibit List; reorganize all deposition transcript folders, exhibits and filings in Dropbox for sharing with all counsel.	6.6
1/27/13	(AK) Continue trial preparation with Bob Schulman and Joe Hoffer; review exhibits from Matt Abbott's deposition and select those identified by Mr. Hoffer for trial; select additional trial exhibits for Wayside Schools and YES Prep from TEA's website; compare deposition exhibit number labels with numbers designated in deposition after discovering Court Reporter mis-labeled several exhibits; review Mr. Hoffer's draft trial outlines for Matt Abbott and Mark DiBella.	10
1/27/13	(RM) Assist with general preparation for trial and presentation of case in chief; confer with Joe Hoffer regarding preparation of analysis comparing revenues received by YES Prep Public Schools and Houston ISD; contact Toni Templeton regarding comparative analysis for SER-Ninos Charter School and Wayside Schools; telephone call to Ms. Templeton regarding same and agreement to discuss later (No charge); prepare	6.2



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

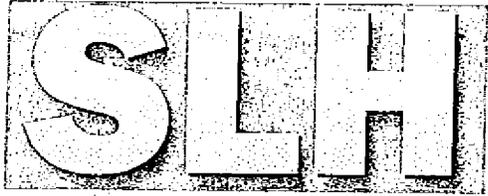
comparative revenue analysis between YES Prep Public Schools Houston ISD; confer with Mr. Hoffer and Bob Schulman regarding results of comparative analysis; confer with Mr. Hoffer on final preparation of presentation for Wayside Schools and YES Prep Public Schools; review communiqué from Paralegal regarding preparation of exhibits for witnesses; review communiqué from Mr. Schulman regarding use of other local revenues by Dr. Lisa Dawn-Fisher in analysis and report; perform other tasks as assigned and directed by Mr. Schulman and Mr. Hoffer.

1/27/13 (LS) Trial preparation; numerous communiques to Toni Templeton regarding changes and additions to Denise Pierce's direct testimony slides; receive and review updates from Bob Schulman; attorney conference with Mr. Schulman regarding ASATR in direct testimony; prepare communiqué to Ms. Templeton with final changes; review Ms. Pierce's Deposition making notes for possible cross-examination in order to prepare her for her testimony; review Tom Sage deposition and make notes. 16.3

1/27/13 (CP) Prepare request to Della Sawvel and Elizabeth Medina regarding deposition exhibits admitted by other parties and whether same were introduced separately or merged together with each deposition. (No charge) 0.1

1/27/13 (CP) Receive directive from Bob Schulman regarding status of McKenzie deposition; review master exhibit list to confirm it has not been offered as a renumbered exhibit in deposition testimony; prepare second request to Della Sawvel for assistance in determining if McKenzie deposition was offered previously; receive and review response from Ms. Sawvel advising it was not; prepare communiqué to Mr. Schulman concerning same. 0.3

1/27/13 (RS) Review advisory from Leonard Schwartz regarding case law and slide referencing Rules of Evidence for proffer of Charter Plaintiffs' exhibits subject to prior objections; prepare advisory response to Mr. Schwartz concerning same; conduct telephone conference with Dr. Anthony Rolle regarding sections of revised WRA report identified by Ramon Medina in review of Dawn-Fisher calculations; prepare lengthy advisory to TCSA and 2.7



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

litigation staff concerning same; direct staff in assignment of exhibit numbers to WRA revisions and trial exhibits; review most recent edits and additions to outline for Denise Pierce testimony; prepare lengthy directive to Mr. Schwartz with recommended additions/revisions to proposed slide presentation on [REDACTED]

1/27/13

(RS) Review and respond to communiqué from Toni Templeton regarding her discussion with Dr. Anthony Rolle addressing [REDACTED] and request to be provided with Wayside and SER-Ninos charter/district funding comparisons prepared by Ramon Medina; direct Mr. Medina regarding same; revise Brooks Flemister trial examination outline, telephone conference and prepare advisory communiqué to Mr. Flemister forwarding same; prepare communiqué to Joe Hoffer forwarding Flemister outline inviting comparison to Abbott's depo testimony; prepare additional revision to Flemister outline; prepare follow-up communiqué to Mr. Flemister with revised outline; prepare communiqué to Paralegal and Court Reporter, regarding completion of review of WRA report and tables, assignment of exhibit number for same and submission to all counsel; prepare third communiqué to Mr. Flemister with TEC, Chapter 25 excerpts for review concerning student transfer and tuition.

2.4

1/27/13

(RS) Prepare communiqué to Mr. Hoffer with YES Prep PPT, recommend his submission of same to Mark DiBella for review in preparation of trial testimony.

0.2

1/27/13

(RS) Review communiqué from Rebecca Couto, counsel for Edgewood Plaintiffs, with final edits and clean version of Stipulations with request to execute and circulate to all counsel; prepare response to Ms. Couto regarding same; review and revise Stipulations; prepare follow-up response to Ms. Couto and David Hinojosa, Edgewood co-counsel, with revised version for review and distribution; prepare communiqué to Leonard Schwartz regarding Wood and Rolle arrival and trial preparation; review current version of Stipulations from Mr. Hinojosa; prepare response to counsel for all parties participating in Stipulations, request approach by Rick Gray to all non-participant plaintiffs; review response from Mr. Hinojosa advising he forwarded Stipulations to FBISD and Calhoun County Plaintiffs' counsel for

3.3

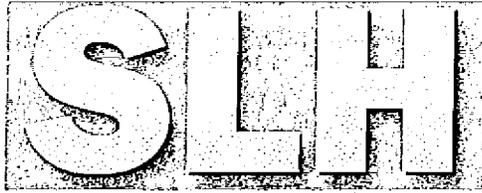


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	consideration; prepare directive to Paralegal regarding final version of Stipulations; provide Mr. Schwartz with current version of Stipulations.	
1/27/13	(RS) Receive and review communiqué from Leonard Schwartz with most recent version of testimony and exhibits for Denise Pierce; receive and review Toni Templeton's response to Mr. Schwartz concerning same; receive and review advisory from Mr. Schwartz to Ms. Pierce with guidelines for responding to possible objections to Shortchanged Report to be introduced during her testimony; prepare lengthy advisory to Mr. Schwartz with recommendations for direct examination of Ms. Pierce; receive and review communiqués from Mr. Schwartz to Ms. Templeton with additions to Pierce trial presentation; receive and review communiqué from David Hinojosa suggesting additional edits to Stipulations; prepare response to Mr. Hinojosa approving same.	3.8
1/27/13	(RS) Receive and review communiqué from Ramon Medina to Toni Templeton concerning data compilation for SER-Ninos and Wayside identifying sources for same; receive and review Fourth Supplemental Depositions Designation; receive and review Mr. Hoffer's communiqué to Paralegal with revisions to same; receive and review communiqué from Ms. Templeton with David Dunn's trial presentation; review PPT exhibits and prepare comments to same; receive and review proposed trial presentations for Mark DiBella and Denise Pierce from Joe Hoffer; direct submission of same to all counsel and the court.	2.8
1/27/13	(RS) Meet with Drs. Anthony Rolle and Craig Wood; confer with Ramon Medina, Toni Templeton and Joe Hoffer; begin preparation of Rolle trial presentation and exhibits based on WRA report revisions.	2.7
1/28/13	(JH) Pre-trial witness preparation of Matt Abbott; finalize Abbott's trial presentation; review and prepare outline of inquiries for interrogation of Mr. Abbott on direct examination; continue preparation of parent witnesses and other evidentiary needs for case in chief; assist in preparation of expert witnesses outlines, presentation, drilling of potential cross examination; review presentation of David Dunn.	9.2
1/28/13	(JH) Prepare for and attend trial; conduct direct examination of Mark DiBella.	7.8



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

1/28/13	(CP) Review and convert WR&A expert report; revise TCSA Plaintiffs' exhibit list; prepare Corrected Exhibit List and Gallegos Exhibits # Correction; prepare communiqué to all counsel and Judge Dietz's staff forwarding same; e-file Corrected List.	0.6
1/28/13	(AK) Work on Matt Abbott trial presentation outline; research timely filing of special exceptions; review Plaintiffs' First Amended Petition for constitutional claims; assist Mr. Hoffer in finalizing demographic charts for Abbott trial presentation.	6.5
1/28/13	(RM) Review communiqué from Bob Schulman regarding testimony by Denise Pierce to a school district comparison; review pertinent trial documents to ascertain source of reference; prepare reply to Mr. Schulman requesting clarification of information referenced.	0.3
1/28/13	(LS) Continue trial presentation preparation; work with Toni Templeton regarding Denise Pierce's direct testimony and presentation slides; prepare Ms. Pierce for cross-examination; attend trial and present testimony of Denise Pierce; continue to work with Ms. Templeton regarding Sage's testimony; work with Tom Sage on his direct and possible cross-examination testimony and changes to his presentation.	11.7
1/28/13	(BD) Telephone conference with Joe Hoffer and Allen Keller regarding potential research into sufficiency of pleadings.	0.2
1/28/13	(CP) Receive and review communiqué from Bob Schulman regarding trial presentations for Denise Pierce and Mark DiBella; counsel indicates they never received them; prepare response to Mr. Schulman, notify him they were uploaded and shared in Dropbox and all counsel was notified; prepare communiqué to all counsel re-forwarding presentations.	0.1
1/28/13	(RS) Final preparation of witnesses and exhibits for trial testimony; prepare and proffer multiple exhibits for admission into evidence; review source material, reports and exhibits and prepare trial memorandum comparing charter school and school district revenues prepare communiqué to participating counsel regarding final revisions to Stipulations; continue witness preparation.	1.3
1/28/13	(RS) Attend trial.	6.7
1/28/13	(RS) Review multiple TCSA Plaintiffs exhibit and presentation submissions; review advisory from David Hinojosa concerning	0.9



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

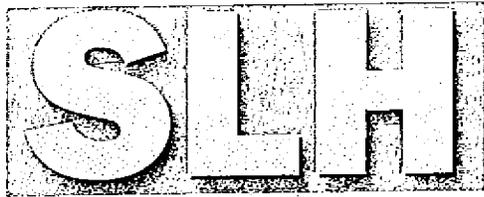
TPSD revenue and related issues; review follow-up communiqué from Mr. Hinojosa with final version of Stipulations to be read into the record; review communiqué from Rick Gray confirming participation in Stipulation agreement; prepare communiqué to David Dunn forwarding Stipulations for review in preparation for his trial testimony; review request from Denise Pierce for electronic version of her deposition; prepare directive to Allen Keller regarding same; prepare communiqué to Ramon Medina requesting comparative number of districts for student population addressed in Pierce testimony. (No charge)

1/28/13 (RS) Review communiqué from Allen Keller concerning Shortchanged Report exhibit direct staff to resubmit all trial presentations for this day's testifying witnesses; review inquiry from Chris Diamond concerning intended testimony from Mark DiBella; prepare advisory response to same; review final version of Stipulations agreement as Rule 11 agreement read into court records. (No charge) 0.7

1/28/13 (RS) Receive and review communiqué from Robin Sanders regarding revised WRA report; direct staff to submit revised report to all counsel; prepare communiqué to Drs. Craig Wood and Anthony Rolle regarding and attaching trial transcript excerpt from Dawn-Fisher testimony; confer with Toni Templeton, Ramon Medina and Drs. Wood and Rolle to prepare outline for Rolle trial testimony and anticipated cross-examination; review Wood and Rolle deposition testimony regarding same; forward SER-Ninos district/charter funding comparison charts prepared by Ramon Medina to David Dunn requesting review of same. 0.8

1/28/13 (RS) Provide David Dunn with Wayside Schools comparison prepared by Ramon Medina for review; present Mr. Dunn with YES Preparatory funding comparisons for review; receive and review communiqué from Toni Templeton concerning response to Plea to Jurisdiction; prepare advisory response; prepare advisory communiqué to Joe Hoffer, Leonard Schwartz, Allen Keller and Denise Pierce regarding facilities funding for charters under TEC Chapter 46, establishing one time charter school entitlement to facilities allotments. 0.9

1/28/13 (RS) Forward Dawn-Fisher trial examination to TCSA staff, Drs. 0.9



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	Anthony Rolle and Craig Wood, and SLH litigation counsel in preparation for Rolle trial testimony on ADA General and All Funds comparisons; request modified report entries from Dr. Rolle; prepare follow-up communiqué to Dr. Rolle regarding same; prepare directive to litigation staff regarding Chapter 46 facilities; provide Joe Hoffer with outline for Mario Flores trial testimony and trial exhibits.	
1/28/13	(RS) Receive communiqué from Joe Hoffer with attached presentation for Tom Sage for trial; review and revise presentation; direct Paralegal to forward Sage presentation to all parties and the court; confer with TCSA staff and litigation team and continue preparing Dr. Rolle for introductory trial presentations, report objectives and report methodologies for revenue comparisons to state approaches to revenue comparisons; rehearse testimony and prepare trial exhibits for same.	3.9
1/29/13	(JH) Continue preparation of expert witnesses; one-on-one preparation of Dr. Craig Wood; continue assisting in preparation of Dr. Anthony Rolle direct and potential cross examinations.	8.7
-1/29/13	(JH) Continue morning preparation for trial; review of direct examination outlines; attend trial; direct examination of Matt Abbott and Mario Flores.	7.7
1/29/13	(AK) Attend trial. (No charge)	6.3
1/29/13	(AK) Work with Craig Wood to prepare his trial presentation, create slideshow reflecting educational and professional background, as well as analytical slides describing conclusions from expert report.	5.1
1/29/13	(RM) Continue to assist Bob Schulman and Dr. Anthony Rolle prepare for Dr. Rolle's testimony and presentation; confer with Leonard Schwartz regarding Denise Pierce's testimony concerning differences in basis of accounting between districts and charters; prepare final draft of Dr. Rolle's presentation; prepare communiqué to Mr. Schulman forwarding PDF and PPTX copies of Dr. Rolle's presentation; review communiqué from Toni Templeton regarding Dr. Craig Wood's presentation; confer with Ms. Templeton regarding same; assist Mr. Schulman and Dr. Wood to prepare for Dr. Wood's testimony and presentation.	3.9

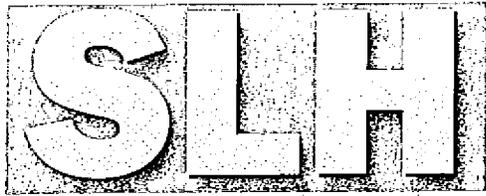


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

1/29/13	(RM) Confer with Bob Schulman regarding assistance preparing expert witnesses and review of David Dunn's testimony and presentation; review communiqué from Mr. Schulman regarding Mr. Dunn's outlined presentation and testimony; prepare communiqué to Paralegal regarding same; review reply communiqué from Paralegal regarding same; confer with Mr. Schulman and Toni Templeton regarding same; review communiqué and attachment from Mr. Schulman regarding same; as directed by Bob Schulman, prepare Mr. Dunn's presentation; review Texas Constitution Article 7 and Texas Education Code Chapter 11 to confirm legal references included in Mr. Dunn's presentation; review Mr. Dunn's deposition transcript and exhibits for pertinent information to include in Mr. Dunn's presentation; research TCSA and TEA website for pertinent information to include in Dunn presentation; assist Mr. Schulman and Dr. Anthony Rolle in preparation for Dr. Rolle's testimony and presentation.	7.6
1/29/13	(RM) Telephone conference with Bob Schulman regarding assisting with preparation of expert witnesses for testimony. (No charge)	0.1
1/29/13	(LS) Attend trial; conduct presentation of Tom Sage testimony; begin preparation of direct testimony of David Dunn with Toni Templeton; review Mr. Dunn's deposition transcript and make notes of areas where he might be examined on cross.	18.1
1/29/13	(BD) Receive communiqué from Bob Schulman regarding State's objection to lack of fair notice; review pleadings from the State and Plaintiffs' petition; telephone conference with Allen Keller regarding judge's ruling on State's objection.	0.7
1/29/13	(RS) Receive and review trial presentations and exhibits for Abbott testimony; receive and review corrected data provided by Dr. Albert Cortez (Exhibit 4251); from Edgewood Plaintiffs' counsel; confer with Dr. Rolle regarding presentation and presentation exhibits; forward Rolle bio to Ramon Medina for preparation of trial exhibit; review and edit Rolle trial presentation and slides; prepare follow-up communiqué to Dr. Rolle regarding and attaching revised trial presentation; prepare advisory to SLH litigation staff regarding Dunn's trial testimony; direct Leonard Schwartz to prepare and present Mr. Dunn.	1.9



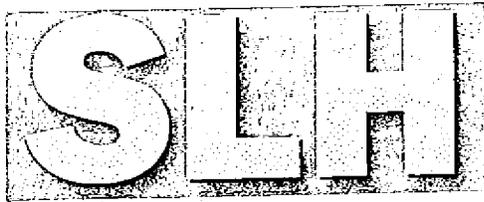
Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

Phone: 210-538-5385

Fax: 210-538-5384

1/29/13	(RS) Attend trial (morning session).	0.8
1/29/13	(RS) Continue preparation of Drs. Anthony Rolle and Craig Wood for trial; review, revise and forward edited trial presentation for David Dunn to Toni Templeton; prepare attorney notes comparing Dawn-Fisher to Rolle approach to calculation of average revenues; receive and review Defendants' Objection to Lack of Fair Notice of Charter Plaintiffs' Legal Claims; direct staff in review and research regarding same; prepare follow-up directive to staff with further explanation of the state's Objections; receive and review Attorney General's Notice of Withdrawal of Objections; confer with trial staff regarding same; receive and review slides for Dr. Rolle's trial testimony from Ms. Templeton; direct staff regarding submission of same to all counsel with notice that Judge Dietz has directed Dr. Rolle to begin testimony this afternoon.	2.3
1/29/13	(RS) Prepare communiqué to Toni Templeton and Leonard Schwartz with Findings and Conclusions matrix attached for incorporation of data within same in Dunn trial presentation; prepare follow-up communiqué to Ms. Templeton and Mr. Schwartz with additional data to include in Dunn trial presentation concerning monies received by small ISDs exceeding the monies received per student by small charters; prepare communiqué to Dr. Anthony Rolle requesting input in response to Dawn-Fisher ADA data; update outline for Rolle trial presentation; prepare communiqué to Drs. Rolle and Craig Wood attaching same for review; review David Dunn deposition for trial presentation; review Dunn deposition excerpts; draft summary of pertinent excerpts; prepare communiqué to Mr. Schwartz with depo excerpts document for review.	1.4
1/29/13	(RS) Attend afternoon trial session; present Dr. Anthony Rolle.	1.7
1/29/13	(RS) Review outline of Dr. Anthony Rolle data concerns and potential cross-examination issues regarding same; revise outline for remainder of Rolle trial testimony; prepare communiqué to Dr. Rolle forwarding same; review PPT and PDF files for PowerPoint drafted by Ramon Medina for Rolle's presentation; review communiqué from Mr. Hoffer with analytical questions for Dr. Craig Wood testimony; review communiqué from Toni Templeton to David Dunn with current version of slides	2.6

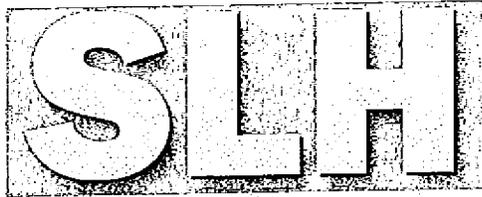


Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

	compiled by Ms. Templeton and Leonard Schwartz for Mr. Dunn's testimony.	
1/29/13	(RS) Review communiqué from Ramon Medina to Toni Templeton with additional slides on evidentiary issues for inclusion in Dunn presentation; review communiqué from Allen Keller to Paralegal with directive to distribute and file Rolle presentation in final; review response from Paralegal to Mr. Keller regarding exhibit numbers; direct staff regarding same; review Mr. Keller's reply with Wood presentation attached for distribution; review communiqué from Paralegal to all counsel and the court forwarding Rolle and Wood trial presentations; confer with Dr. Wood and Mr. Medina and prepare Wood trial testimony and exhibit.	3.4
1/30/13	(JH) Prepare for and attend trial. (No charge)	6.4
1/30/13	(CP) Receive directive from Bob Schulman for revisions to WR&A expert report and in-court presentations; review same; prepare revisions; forward copies to Drs. Craig Wood and Anthony Rolle for review and approval.	1.7
1/30/13	(AK) Attend trial. (No charge)	6
1/30/13	(RM) Attend trial and observe testimony of Dr. Craig Wood and David Dunn. (No charge)	2.7
1/30/13	(JH) Return travel from Austin. (No charge)	1.5
1/30/13	(AK) Return travel from Austin. (No charge)	1.5
1/30/13	(RM) Review communiqué from Bob Schulman regarding Drs. Anthony Rolle and Craig Wood's testimony; review communiqué from Mr. Schulman regarding Dr. Wood's presentation; reply to Mr. Schulman regarding same; review communiqué from Mr. Schulman regarding Dr. Rolle's deposition concerning small district comparison; review communiqué from Mr. Schulman regarding Dr. Rolle's deposition concerning teacher retention; prepare reply to Mr. Schulman regarding same; review communiqué from Mr. Schulman regarding Drs. Rolle and Woods' scope of work; review communiqué from Mr. Schulman regarding differences in accounting basis; prepare reply to Mr. Schulman regarding same.	0.4
1/30/13	(LS) Work with David Dunn and Toni Templeton regarding direct testimony of Mr. Dunn; work with Mr. Dunn on possible cross-examination; present presentation of Mr. Dunn at trial.	6.3



Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/30/13 (RS) Continue review of Wood and Rolle depositions; prepare communiqué to Drs. Craig Wood and Anthony Rolle, Joe Hoffer, Allen Keller and Ramon Medina regarding anticipated defense examination questions; finalize outline for experts' testimony including sources of data for ACT and TAKS test results demonstrating failure to reach GDK, source of data for the WRA report, anticipated objections to small district comparisons and other matters; prepare follow-up communiqué to Drs. Wood and Rolle for review of Dr. Rolle's deposition testimony regarding same; prepare communiqué to Drs. Wood citing relevant excerpts from deposition testimony; prepare follow-up advisory communiqué to Drs. Wood and Rolle regarding facility funding and analysis of teacher payrolls; prepare communiqué to Drs. Wood and Rolle with additional deposition inquiries expected to be repeated in cross-examinations. 2.1
- 1/30/13 (RS) Continue review of Wood and Rolle depositions; prepare communiqué to Joe Hoffer with request to obtain a hard copy of current live pleading for potential objections; prepare communiqué to Drs. Craig Wood and Anthony Rolle with excerpt from Wood deposition for review with commentary concerning Tier I funding for charters; prepare follow-up communiqués to Drs. Wood and Rolle with additional excerpt from Wood deposition on question regarding review of data addressing the degree to which compensation is (or is not) a primary concern to teachers and potential inquiries concerning charter school attendance as a voluntary choice. 1.1
- 1/30/13 (RS) Attend trial. 7.2
- 1/30/13 (RS) Direct staff in review and edit of WRA reports and presentations) to correct errors in tables; receive and conduct cursory review of trial brief filed by Calhoun County Plaintiffs; receive and review additional proposed defense exhibits; receive and review School District Plaintiff objections to same; join objections to same; receive and review final version of Dunn presentation for submission to all counsel and the court from Toni Templeton; receive and TTSFC Plaintiffs' advisory of prior admission of exhibit not reflected on court's admitted exhibit list; receive and review Amici Curiae filed in support of Intervenors' claims. (No charge) 0.7



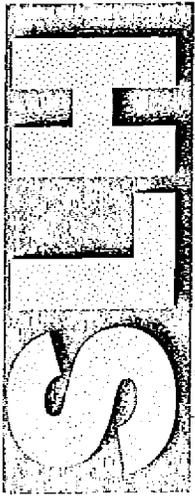
Schulman, Lopez & Hoffer LLP

517 Soledad Street
San Antonio, TX 78205

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

- 1/30/13 (RS) Receive and review three communiqués supplementing Defendants' exhibits list to be filed with the court on 01/31; conduct cursory review of exhibits referenced; receive Brief Regarding Adequacy and Suitability Standards filed by Calhoun County, TTSC and FBISD Plaintiffs; review Brief for possible adoption or adaptation to Charter Plaintiffs' claims; direct staff in preparation of revisions to exhibits provisionally admitted by the Court. 0.8
- 1/30/13 (RS) Return travel from Austin. (No charge) 1.5
- 1/31/13 (CP) Review PowerPoints for DiBella and Pierce in-court presentations, all of which were provisionally admitted as exhibits; finalize revisions; convert all PPTs to PDF format; prepare communiqué to all counsel and Judge Dietz's staff forwarding copies. 0.7
- 1/31/13 (LS) Review communiqué exchange between Joe Hoffer and Bob Schulman regarding brief on merits for court; telephone conference with Mr. Schulman regarding closing argument for trial; review filings by state defendants and group filings by plaintiffs (including Charter Schools). (No charge) 0.8
- 1/31/13 (RS) Receive and review communiqué from Dr. Anthony Rolle regarding data tables correction in report; receive and review follow-up communiqué from Dr. Rolle to Paralegal concerning revisions made by Paralegal to data table and his recommended addition to same; receive and review request from Leonard Schwartz on preparation of post-trial brief; prepare response to Mr. Schwartz concerning same; receive and review reply from Mr. Schwartz; receive and review communiqué from Joe Hoffer regarding possible post-trial brief; receive and review staff communiqué attaching edited versions of WRA report and trial presentations; receive and review communiqué from Edgewood Plaintiffs' counsel with worksheet for revised exhibit; receive and review communiqué from Michael Patterson with new exhibits and select exhibits offered for substitution with explanation of revisions to same; review exhibits. 1.3

2272



Schulman, Lopez & Hoffer LLP

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

517 Soledad Street
San Antonio, TX 78205

Name	Initial	Total Time	Charged	Not Charged	Rate	Charged	Not Charged
Robert Schulman	RS	1043.6	891.95	151.65	\$425	\$379,079	\$64,451
Leonard Schwartz	LS	193.6	176.4	17.2	\$400	\$70,560	\$6,880
Joe Hoffer	JH	249.3	212.9	36.4	\$300	\$63,870	\$10,920
Rick Lopez	RL	5.7	0	5.7	\$300	\$	\$1,710
Betsy Hall Bender	BB	38.4	37.9	0.5	\$300	\$11,370	\$150
Linsey B. Jones	LBJ	7.1	5.1	2	\$200	\$1,020	\$400
Allen Keller	AK	337.9	291.35	46.55	\$190	\$55,357	\$8,845
Bryan Dahlberg	BD	19.6	17.7	1.9	\$200	\$3,540	\$380
Russell Wilson	RW	0	0	0	\$240	\$	\$
Jim Thompson	JT	72.6	32.60	40.00	\$350	\$11,410	\$14,000
Ramon Medina	RM	148	126.6	21.4	\$150	\$18,990	\$3,210
Cynthia Pacheco	CP	67.7	52.4	15.3	\$90	\$4,716	\$1,377
Mary Zaiontz	MZ	84.8	79.2	5.6	\$90	\$7,128	\$504
Total Time		2268.3					
Total Charged		1924.1	Charged			\$627,039	
Total Not Charged		344.2	Not Charged			\$112,827	

Unofficial Copy Travis Co. District Clerk Velva L. Price