

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

THE TEXAS TAXPAYER & STUDENT
FAIRNESS COALITION, et al;
CALHOUN COUNTY ISD, et al;
EDGEWOOD ISD, et al;
FORT BEND ISD, et al.,
TEXAS CHARTER SCHOOL
ASSOCIATION, et al.

Plaintiffs,

JOYCE COLEMAN, et al.,

Intervenors,

vs.

MICHAEL WILLIAMS, COMMISSIONER
OF EDUCATION, IN HIS OFFICIAL
CAPACITY; SUSAN COMBS,
TEXAS COMPTROLLER OF PUBLIC
ACCOUNTS, IN HER OFFICIAL
CAPACITY; TEXAS STATE BOARD
OF EDUCATION,

Defendants.

IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

250th JUDICIAL DISTRICT

NOTICE OF FILING

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

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

DATED: March 12, 2013

Respectfully Submitted,

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

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By: /s/ David G. Hinojosa
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Attorneys for Edgewood ISD, *et al.*, Yolanda
Canales, Arturo Robles, Araceli Vasquez, and
Jessica Romero, Plaintiffs

CERTIFICATE OF SERVICE

By my signature below, I certify that on March 12, 2013, I served the foregoing document via electronic mail to all the other parties listed below:

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s/David G. Hinojosa
David G. Hinojosa

Unofficial copy Travis Co. District Clerk Velda L. Price

THE TEXAS TAXPAYER & STUDENT
FAIRNESS COALITION, et al;
CALHOUN COUNTY ISD, et al;
EDGEWOOD ISD, et al;
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TEXAS CHARTER SCHOOL
ASSOCIATION, et al.

Plaintiffs,

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MICHAEL WILLIAMS, COMMISSIONER
OF EDUCATION, IN HIS OFFICIAL
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OF EDUCATION,

Defendants.

IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

250th JUDICIAL DISTRICT

AMENDED AFFIDAVIT OF DAVID G. HINOJOSA

STATE OF TEXAS §
 §
COUNTY OF BEXAR §

NOW COMES David G. Hinojosa of the Mexican American Legal Defense and Educational Fund, counsel for Plaintiffs Edgewood ISD, *et al.*, in the above entitled matter and hereby declares the following:

1. My name is David G. Hinojosa. I am over the age of 18 and am fully competent to make this Affidavit. The facts stated in this Affidavit are within my personal knowledge and are true.

2. I graduated from the University of Texas at Austin School of Law in 2000 and was admitted to the practice of law in the State of Texas that same year. I am admitted to practice before the following additional courts: Supreme Court of the United States; U.S. Court of Appeals for the Fifth and Ninth Circuits; U.S. District Courts for the Southern, Western and Northern Districts of Texas. I have also been admitted to practice *pro hac vice* before the following courts: U.S. District Court for the Eastern District of Texas, U.S. District Court for the District of Arizona, Santa Fe County District Court of New Mexico, and the Colorado Supreme Court and state district courts.
3. Since 2003, I have been employed as an attorney by the Mexican American Legal Defense and Educational Fund, Inc., (MALDEF). Founded in 1968 in San Antonio, Texas, MALDEF specializes in civil rights impact litigation on behalf of Latinos in the areas of education, employment, political access and immigration civil rights. Since its founding, MALDEF has maintained an active pocket of civil rights litigation that has resulted in significant advances in the rights of Latinos in the United States. Among other important cases, MALDEF successfully litigated: *White v. Regester*, 412 U.S. 755 (1973) (for Latino voters) and helped establish minority vote dilution as a cognizable claim; *Plyler v. Doe*, 457 U.S. 202 (1982) which established the right of children to attend public school regardless of immigration status; and *Edgewood ISD v. Kirby*, 777 S.W.2d 391 (Tex. 1989), which transformed the Texas school finance system and created greater funding equity between high and low wealth school districts in the State. Because it is a non-profit organization, MALDEF conducts its large scale and complex litigation with relatively few attorneys assigned to each case.
4. I currently serve as a Regional Counsel in MALDEF's Southwest Regional Office in San Antonio, Texas.
5. At MALDEF, I have practiced law exclusively in the area of civil rights. My significant litigation experience includes but is not limited to serving as lead counsel in this case and serving or having served as lead counsel or co-lead counsel in: *Lobato/Ortega v. Colorado*, No. 2012SA25 (Colo.) (statewide adequacy funding case); *United States/LULAC and GI Forum v. Texas*, 601 F.3d 354, 372 (5th Cir. Tex. 2010) (statewide EEOA challenge); *West Orange-Cove Consol. Indep. Sch. Dist. v. Neeley*, 176 S.W.3d 746 (Tex. 2005) (equity and adequacy challenge to statewide school finance system); *Santamaria v. Dallas Indep. Sch. Dist.*, 2006 U.S. Dist. LEXIS 83417 (N.D. Tex., Nov. 16, 2006) (challenging segregation of Latino students within a public school); *Dominguez v. Texas* (W.D. Tex.) (Equal Protection, Supremacy Clause and Title VI challenge to veterans' tuition grant); *United States v. Ector County Indep. Sch. Dist.* (W.D. Tex.) (school desegregation and EEOA case); *Mendez v. Tucson USD No. 1*, No. CIV 74-204 TUC DCB (class action challenging segregation of Latino students in a public school district).
6. I have also submitted attorney's fee affidavits and briefs in support of fees in a number of cases including *Salazar v. Texas Dep't of Public Safety*, No. No. D-I-GN-09-000273 (Travis Co.) (UDJA/APA case); *Morales v. Shannon*, No. DR-70-CA-14

(W.D. Tex.) (school desegregation case); *Santamaria v. Dallas Indep. Sch. Dist.* (*supra*); and *United States v. Ector County Indep. Sch. Dist.* (*supra*).

7. Specifically with regard to applicable and reasonable hourly rates in the local market, in 2004 I was awarded a rate of \$225 per hour for my work on UDJA claims as co-lead counsel in the Texas state court case of *Neeley v. West Orange-Cove*, 228 S.W.3d 864 (Tex. App.-Austin 2007) rev. den. 2007 Tex. LEXIS 1108 (Tex. 2007). Since that award, my experience in civil rights cases, including educational civil rights cases, has substantially increased as evidenced by the cases noted in paragraph 5 of this Affidavit. Most recently, a federal court in the San Antonio Division of the Western District awarded fees to MALDEF at a rate of \$300 for my work as lead-counsel on a Motion to Compel in a school desegregation case, *Morales v. Shannon*, 2:70-cv-00014-OLG (April 21, 2011), Dkt. No. 179. The reasonable hourly rates in the local market of San Antonio are typically lower than the local market in Austin.
8. I make this affidavit in support of an award of costs and attorneys' fees under the Uniform Declaratory Judgment Act ("UDJA"), Tex. Civ. Prac. & Rem. Code § 37.009, with respect to Plaintiffs' claims for declaratory relief under the UDJA.
9. I will first give my opinion and the factual bases for my opinion that it is "equitable and just" to award UDJA costs and fees in this case.
10. I will then explain my opinion and the factual bases for my opinion that the "reasonable and necessary" amount of MALDEF's fees and costs, and the fees and costs of MALDEF's pro bono counsel, on the UDJA claims from September 16, 2011 through the March 5, 2013 submission deadline for post-trial Findings of Fact and Conclusions of Law is \$1,415,347.39. In addition, Roger Rice has submitted an affidavit detailing the reasonableness of the fee award due to Plaintiffs as a result of the work of attorneys at META, Inc. in the amount of \$345,605.75.
11. Finally, I will explain my opinion and the factual bases for my opinions that the reasonable and necessary amounts of costs and fees for Plaintiffs' UDJA briefing and argument (incurred by MALDEF and META, Inc. combined) on any appeal by Defendants in this case are as follows: (A) \$325,000 if the State Defendants seek and obtain direct review in the Texas Supreme Court, with post-judgment interest to accrue on said amount at the rate of five percent (5%), compounded annually, from the date the direct appeal is perfected in the Texas Supreme Court, with all such post-judgment interest to run until the judgment against the State Defendants is paid in full; or \$325,000 if the State Defendants perfect an appeal from this Final Judgment to the Court of Appeals, with post-judgment interest to accrue on said amount at the rate of five percent (5%), compounded annually, from the date of the notice of appeal in the Court of Appeals; plus (2) \$200,000 if the State Defendants seek review in the Texas Supreme Court, with post-judgment interest to accrue on said amount at the rate of five percent (5%), compounded annually, from the date a petition for review is filed with the Supreme Court of Texas; with all such post-judgment interest to run until the judgment against the State Defendants is paid in full.

12. I have personal knowledge of the case and the costs and legal services required with respect to the UDJA claims. I have been lead counsel in this case since MALDEF filed suit on December 13, 2011 seeking declaratory relief on various constitutional grounds.
13. The Edgewood ISD Plaintiffs include Edgewood ISD and four other property-poor independent school districts, in addition to the parents of low income and English language learner students who attend schools in Pasadena ISD and Amarillo ISD.
14. I called Roger Rice in October of 2011 to ask if META, Inc. would be willing to become co- counsel. After speaking with Mr. Rice in October and November of 2011, he indicated that he accepted. Since that time, Marisa Bono, a staff attorney in my office, and I have worked actively with Mr. Rice and Miguel Perez Vargas. Rebecca Couto, a former MALDEF attorney who withdrew from this case on February 8, 2013, and Luis Figueroa, a staff attorney in the Southwest Regional Office in San Antonio, also worked actively on the case. Jorge Sanchez, a MALDEF staff attorney in the Midwest Regional Office in Chicago, provided assistance during discovery, and Maribel Hernandez-Rivera and Jorge Castillo, associate attorneys at the law firm of Fried, Frank, Harris, Shriver & Jacobson LLP in New York, New York, provided assistance during discovery and trial.
15. Issues of whether it is “equitable and just” to award UDJA costs and fees “are addressed to the Court’s discretion.” *Bocquet v. Herring*, 972 S.W.2d 19, 21 (Tex. 1998). In my opinion, it would be equitable and just for this Court to award Plaintiffs their reasonable and necessary UDJA fees and costs based on the following five sets of facts.
16. First, questions regarding the constitutionality of the complex system of school finance in the State of Texas and potentially billions of dollars in school district funding were at issue in this case. The important matters involved, the potential dollars at stake, and the ultimate declarations by the Court more than justify the time spent and the fees incurred by the Edgewood ISD Plaintiffs in this case.
17. The novelty and difficulty of the questions involved in this case regarding school finance, coupled with the skill necessary to prosecute each of the Edgewood ISD Plaintiffs’ claims, required that I and others on the Edgewood litigation team expend the time identified here and identified in the Affidavit of Roger L. Rice, fully incorporated by reference. A description of the work performed is attached in the accompanying exhibits to each affidavit filed with the court and fully incorporated by reference.
18. Second, the Edgewood ISD plaintiff districts and individual plaintiffs like Ms. Canales cannot afford to pay lawyers to litigate cases like this one. These cases can be brought only if non-profit organizations like MALDEF and META, Inc. bring them. Funding of non-profit legal advocacy organizations like MALDEF and

resulting attorney resources are scarce resources. Fee awards contribute meaningfully to the ability of such organizations to represent such plaintiffs. The willingness of private law firms, which must operate in large part as businesses, to undertake *pro bono* litigation is also a scarce resource. Fee awards mitigate the economic disincentives to undertake such litigation, and the non-economic importance of judicial recognition of good work implicit in a fee award is considerable.

19. Third, awards of UDJA fees when otherwise appropriate provide important economic signals and incentives to defendants, including government defendants, to resolve cases without litigation and to narrow any litigation to the irreducible minimum.
20. The amount of attorneys' fees that is "reasonable and necessary" for purposes of UDJA attorneys' fees is a fact question, and the "factors prescribed by law which guide the determination" of reasonable and necessary fees are set out in *Arthur Andersen & Co. v. Perry Equipment Corp.*, 945 S.W.2d 812 (Tex. 1997). *Bosquet v. Herring*, 972 S.W.2d at 21.
21. "The first key *Arthur Andersen* factor is the time and labor involved.

(a) On Exhibit A, I have summarized all the hours worked by Marisa Bono, Rebecca Couto, Luis Figueroa, Jorge Sanchez, Maribel Hernández Rivera, Jorge Castillo and myself from September 16, 2011 through March 5, 2013 and in my opinion were reasonable and necessary to the UDJA jurisdiction and UDJA merits issues (but not UDJA fees).

(b) Exhibit A also includes a summary of costs in this case. These costs include the costs of depositions, costs of travel to and from depositions and court proceedings outside of San Antonio, Texas, postage and delivery, and court fees. These costs were arrived at by our accounting department and were collected through our consistent use, from the commencement of this litigation, of a unique four-digit identifier for expenditures related to the case.

(d) To prepare the summaries through March 3, 2013, I reviewed a billing memorandum reflecting all time and description reported daily by myself and by Ms. Bono, Ms. Couto, Mr. Figueroa, Mr. Sanchez, Mrs. Hernández Rivera, and Mr. Castillo and which totaled nearly 4,700 hours. This did not include compensable time for every email or conference conducted by and between counsel for Defendants and for daily conferences between MALDEF attorneys and co-counsel.

(e) I further eliminated all time that, in my judgment, was principally due to "learning curve" issues for the other attorneys in this case, as they are new to Texas school finance. In this case, I eliminated much more time than I normally would for that reason.

(f) Travel time was reduced to one-half of the rate and was not duplicated for the attorneys when traveling together, although such time would be compensable and at the full-rate when conferring on legal strategy related to the UDJA claims.

(g) The combined effect of these adjustments to the hours, together with the hourly rate adjustments discussed in the next paragraph, is to reduce the proposed MALDEF fee total several thousand dollars. In the exercise of billing judgment, I further deducted an additional 5% from the total fee and cost request, resulting in a decrease from \$ 1,489,839.36 to \$1,415,347.39 in fee and cost request, as the proposed MALDEF part of the UDJA fee award through March 5, 2013.

22. The second key *Arthur Andersen* factor is the hourly rate customarily charged in the locality, in this case Texas, particularly Travis County, for similar legal services, here declaratory judgment actions against the government. The billing rates proposed in this affidavit shows the billing rate that in my opinion meets this standard with respect to each timekeeper in light of his or her experience, ability and skill to perform the work reasonably required, as described below. I am familiar with such rates because I have been litigating similar civil rights cases in Austin and other locales in Texas against governmental entities since 2003 and have submitted a number of fee applications from which fee awards have been made.

23. Related *Arthur Andersen* factors are the experience and ability of the attorneys, and the skill required to perform the legal services properly. In my opinion the experience and ability of each lawyer as described above and below was appropriate to the work they did that is reflected in the hours for which the UDJA fee award is sought were reasonable and necessary and their hourly rates on Exhibit A are reasonable:

(a) Marisa Bono is a 2005 graduate of the University of Michigan Law School, where she was the Managing Editor of the Michigan Law Review and recipient of the prestigious Clarence Darrow Full Merit Scholarship. She has a B.A. in Political Science from Rice University and an M.P.P. from the University of Michigan Ford School of Public Policy. After graduating from law school, Ms. Bono clerked for the Honorable Jerry Buchmeyer of the Northern District of Texas. After clerking, she accepted a competitive Skadden Fellowship to work as a staff attorney for MALDEF in San Antonio, Texas for two years. While at MALDEF as a Skadden fellow, Ms. Bono practiced law exclusively in the area of civil rights. She served as co-lead counsel, co-second chair, or on the litigation team in: *United States/LULAC and GI Forum v. Texas*, 601 F.3d 354, 372 (5th Cir. Tex. 2010) (statewide EEOA challenge); *Dominguez v. Texas* (W.D. Tex.) (Equal Protection, Supremacy Clause and Title VI challenge to veterans' tuition grant); *United States v. Ector County Indep. Sch. Dist.* (W.D. Tex.) (school desegregation and EEOA case); *Vasquez v. City of Farmers Branch* (N.D. Tex.) (preemption challenge to immigrant restrictive housing ordinance); *Morales v. Barnett* (Dist. Ariz.) (vigilante rancher assault and battery); *Vicente v. Barnett* (vigilante rancher assault and battery) (U.S. Dist. Ariz.); *Gonzalez v. Brewer* (Equal Protection, First Amendment, VRA, and CRA challenges to State voter ID requirement).

(b) At the conclusion of her fellowship, Ms. Bono joined the law firm of Kustoff & Phipps, LLP, in 2008, where she litigated primarily DTPA, fraud, and personal injury cases in Bexar and surrounding counties. She returned to MALDEF as a staff attorney in December of 2010, where she served as co-counsel on *Salazar v. Texas* (Travis County Dist. Tex.) and *Lobato/Ortega v. Colorado* (Den. Dist. Colo.) (challenge to inadequacy of school funding for low income and English Language Learner students). She served as lead counsel on *Jornaleros de las Palmas v. League City* (S.D. Tex) (First and Fourteenth Amendment challenge to municipal policy targeting day laborers).

(c) Rebecca Couto graduated from the University of Michigan Law School, *magna cum laude*, in 2006. While in law school she served as an Executive Page Proofing Editor on the Michigan Law Review. She has a B.A. from Stanford University. After graduating from law school, Ms. Bono worked as an associate for Latham & Watkins LLP in Los Angeles, California for approximately four years in general litigation and joined MALDEF in 2011. While at MALDEF, Ms. Couto practiced law exclusively in the area of civil rights. She assisted in *Lobato/Ortega v. Colorado* (Den. Dist. Colo.) (challenge to inadequacy of school funding for low income and English Language Learner students); Ms. Couto also served as second chair in an intervention in *Texas v. United States*, (D.C. Dist.) (challenging preclearance of Texas's redistricting plans) and *Jornaleros de las Palmas v. League City* (S.D. Tex) (First and Fourteenth Amendment challenge to municipal policy targeting day laborers). Finally, Ms. Couto served as first chair in *Montaño v. D.M. Dep't of Motor Vehicles* (employment discrimination).

(d) True and correct copies of resumes for myself and for Ms. Bono, Ms. Couto, Mr. Figueroa, Mr. Sanchez, Ms. Hernández-Rivera, and Mr. Castillo, are attached as Exhibit B.

(e) I can attest to the same as to the affidavits submitted by META.

24. Another *Arthur Andersen* factor is the novelty and difficulty of the questions involved. This case presents complex issues of law, as well as extremely sensitive political concerns at the state level, and require close attention to the facts. The preparation of this case for trial involved, among other things, the review, analysis, and production of thousands of pages of client documents, the review and analysis of an extremely large volume of documents produced by the State defendants, numerous consultations with school district officials and expert witnesses, the review and analysis of many expert reports, and the depositions of more than 90 lay and expert witnesses. Given the speed at which this case progressed to trial, deadlines overlapped and depositions were multi-tracked. Multiple lawyers needed to be available to handle the tasks required.

The parties spent 45 days in trial – over 240 hours in the courtroom. Approximately 80 witnesses testified live during that time. More than 5,500 exhibits were offered at trial; most were admitted.

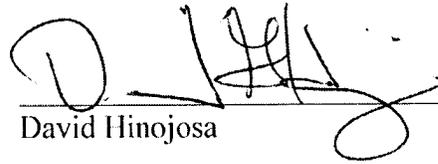
In my opinion, the hourly rates as set out here are reasonable and necessary in light of this degree of novelty, complexity, and difficulty.

25. The final *Arthur Andersen* factor is the amount in controversy and the benefits obtained. While declaratory and injunctive relief by its nature cannot be measured in dollars, the UDJA and related injunctive relief here is of enormous importance to Edgewood ISD plaintiffs, other similarly situated school districts and individuals, and the entire State. In my opinion, the total UDJA fees attributable to MALDEF as reflected on Exhibits A and B are reasonable in relation to these stakes and benefits.
26. Through March 5, 2012, MALDEF has also incurred \$158,808.11 in costs.
27. Considering all the *Arthur Andersen* factors, in my opinion, the reasonable and necessary UDJA fees and costs attributable to MALDEF through March 5, 2013 are, as summarized on Exhibit A and in the Affidavit of Roger Rice, \$ 345,605.75.
28. I estimate that an additional \$5,000.00 in recoverable fees will be incurred through March 12, 2013 in connection with finalizing the proposed findings and conclusions requested by the Court.
29. "Considering all of the same *Arthur Andersen* factors, in my opinion based on my experience in multiple appeals from UDJA declaratory judgments rendered by Travis County district courts, the reasonable and necessary amounts of costs and fees for the UDJA portion of briefing and argument (by MALDEF combined) on any appeal by Defendants are as follows: (A) \$325,000 if the State Defendants seek and obtain direct review in the Texas Supreme Court, with post-judgment interest to accrue on said amount at the rate of five percent (5%), compounded annually, from the date the direct appeal is perfected in the Texas Supreme Court, with all such post-judgment interest to run until the judgment against the State Defendants is paid in full; or \$325,000 if the State Defendants perfect an appeal from this Final Judgment to the Court of Appeals, with post-judgment interest to accrue on said amount at the rate of five percent (5%), compounded annually, from the date of the notice of appeal in the Court of Appeals; plus (2) \$200,000 if the State Defendants seek review in the Texas Supreme Court, with post-judgment interest to accrue on said amount at the rate of five percent (5%), compounded annually, from the date a petition for review is filed with the Supreme Court of Texas; with all such post-judgment interest to run until the judgment against the State Defendants is paid in full.
30. I believe that based upon the foregoing rates and evidence, my hourly rate in this case for similar work performed in Austin, Texas should be at least \$350, the rate of Ms. Bono \$275, the rate of Ms. Couto, Mr. Sanchez, and Mr. Figueroa \$225, and the rate of Ms. Hernandez-Rivera and Mr. Castillo \$200. The current rates represent the same rates previously awarded over the period from 2004 and are not fully reflective of increased costs over that time and the expertise we bring to this type of impact litigation.

31. The fees charged in this case are customarily charged in this area for the same or similar services for attorneys with our experience, reputation, and ability considering the type of controversy, the time limitations imposed, the results obtained, and the nature and length of our relationship with Plaintiffs.
32. I am aware of and have considered the Supreme Court decision in *Tony Gullo Motors I, L.P. v. Chapa*, 212 S.W.3d 299 (Tex. 2006) regarding segregation of fees. The Trial Court ruled in favor of the Edgewood ISD Plaintiffs on all claims asserted by this plaintiff group, so fees do not need to be segregated to account for time spent on unsuccessful claims. Moreover, it is my opinion that the time reflected on Exhibit A that pertains to the portion of the trial related to the claims of the “Efficiency” Interveners and Charter School Plaintiffs was both reasonable and necessary. The State Defendants frequently elicited testimony from witnesses for these parties that pertained to the claims brought by the Edgewood ISD Plaintiffs, and it was reasonable and necessary for attorneys for the Edgewood ISD Plaintiffs to be at trial in order to address issues that arose or that could have arisen during this portion of the trial, as well as to be prepared to participate in conferences and discussions with the Court about issues in the case. We also filed pleadings and cross-examined these witnesses to negate or limit their claims. As such, it is my opinion that segregation of fees related to this portion of the trial is not necessary, and the attorney’s fees reflected on Exhibit A pertaining to this portion of trial are both reasonable and necessary.

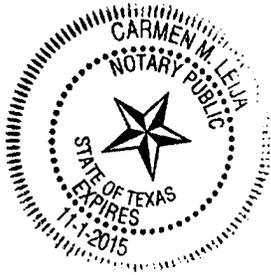
Unofficial copy Travis Co. District Clerk (Not for Filing)

Further Affiant sayeth not.


David Hinojosa

SWORN TO AND SUBSCRIBED by said David Hinojosa before me, the undersigned authority, on this 12th day of March, 2013.


Notary Public, State of Texas



Unofficial copy Travis Co. District Clerk Melva L. Price

Exhibit

A

Unofficial copy Travis Co. District Clerk Velda L. Price

Edgewood I.S.D., et al. v. Michael Williams, et al.
CAUSE NO. D-1-GN-11-003130
David Hinojosa

DATE	DESCRIPTION	TIME
2011		
SEPTEMBER		
9/16/2011	Phone call with MT	0.70
9/26/2011	Meeting with GB	2.00
9/27/2011	Correspondence to school districts	1.80
9/30/2011	Prep for Client Meeting	5.70
OCTOBER		
10/3/2011	Meeting with Client	2.10
10/11/2011	Conference call with McAllen	0.80
10/11/2011	Prep for Meeting	3.90
10/12/2011	Draft Petition	3.80
10/13/2011	Draft Petition	4.80
10/13/2011	Meeting with Staffers re School Finance	1.30
10/17/2011	Draft Petition	3.70
10/20/2011	Draft Petition	2.70
10/25/2011	Meeting with EISD	0.60
10/25/2011	Prep for Client Meeting	2.80
10/27/2011	Correspondence to school districts	0.70
NOVEMBER		
11/2/2011	Draft Petition	6.70
11/2/2011	Correspondence to school districts	0.60
11/4/2011	Draft School Finance Information Sheet	4.90
11/7/2011	Discuss w/R. Rice MALDEF school finance information sheet	0.40
11/7/2011	Draft School Finance Information Sheet	0.80
11/7/2011	Draft Petition	4.10
11/9/2011	Correspondence to school districts	0.30
11/30/2011	Meeting with experts on STAAR	1.90
11/30/2011	Meeting with Counsel	2.50
DECEMBER		
12/1/2011	Correspondence to school districts	1.00
12/7/2011	Draft Petition	3.30
12/9/2011	Correspondence to District re lawsuit	1.20
12/10/2011	Draft Petition	2.60
12/11/2011	Draft Petition	2.40
12/12/2011	Confer w/R. Rice re: Petition	0.60
12/12/2011	Draft Petition	3.60
12/12/2011	Review CC Petition	1.70
12/15/2011	Correspondence to clients regarding retainers	0.40
12/21/2011	Email with PS re STAAR	0.40
2012		
JANUARY		
1/3/2012	Review email R. Rice re plaintiff districts	0.10
1/3/2012	Correspondence to clerk regarding citations served	0.10
1/3/2012	Email to client	0.10
1/10/2012	Phone conference with expert re STAAR	1.60
1/10/2012	Email re client meeting	0.10

DATE	DESCRIPTION	TIME
1/12/2012	Meeting with counsel	1.70
1/13/2012	Travel to and from Austin	3.00
1/13/2012	Meeting w/potential experts	2.00
1/17/2012	Email from R. Rice re: review policy study on Texas ELL grad from potential expert	0.10
1/17/2012	Review Equity Data sheets	1.80
1/18/2012	Meeting w/counsel	2.30
1/18/2012	Travel to and from Austin	3.00
1/23/2012	Confer w/R. Rice re: strategy	0.75
1/25/2012	Prep for Client Meeting	1.60
1/30/2012	Prep for Client Meeting	5.60
1/31/2012	Travel to Amarillo (flight 2.5 hrs)	2.00
1/31/2012	Meeting w/clients	2.20
FEBRUARY		
2/1/2012	Travel to San Antonio (flight 2.5 hrs)	2.00
2/3/2012	Email from R. Rice re: co-counsel draft	0.25
2/3/2012	Meeting with expert re college Rdins	2.40
2/10/2012	Confer w/R. Rice re: using historical record	0.50
2/15/2012	Correspondence to clients regarding retainers	1.20
2/17/2012	Litigation call	1.30
2/21/2012	Conference Call with S. Barnett	0.70
2/29/2012	Meeting w/McAllen superintendent	1.50
MARCH		
3/1/2012	Travel to and from La Feria / Harlingen	4.00
3/1/2012	Meeting w/La Feria superintendent	2.00
3/1/2012	Meeting w/Harlingen superintendent	2.10
3/2/2012	Travel to and from Austin	3.00
3/2/2012	School Finance Meeting at AG's Office	1.50
3/8/2012	Confer w/R. Rice re: interviews w/plaintiff districts, experts, strategy	1.00
3/13/2012	Draft Discovery to Defendants	4.10
3/23/2012	Draft Discovery to Defendants	2.60
3/23/2012	Draft Amended Petition	0.80
3/26/2012	Confer w/R. Rice re: constitutional standard	0.10
3/26/2012	Correspondence to clients regarding 5th lawsuit	2.20
3/26/2012	Edgewood ISD's First Amended Petition draft	1.10
3/28/2012	Attend pre-trial conference	1.50
3/28/2012	Travel to and from Austin	3.00
3/29/2012	Confer w/R. Rice	1.20
3/29/2012	Meeting w/expert A. Cortez	2.00
APRIL		
4/3/2012	School Finance conference call	1.30
4/4/2012	Draft Discovery of Defendants	3.10
4/6/2012	Email to EISD	0.20
4/6/2012	Email to R. Rice re: adequacy claim	0.30
4/6/2012	Conference call w/expert E. Izquierdo	0.80
4/7/2012	Email to R. Rice re: interview w/Izquierdo	0.20
4/9/2012	Confer w/R. Rice re: expert	0.25
4/11/2012	Correspondence to Judge re: consolidation order by intervenors	1.30
4/12/2012	Confer w/R. Rice re: expert Odden, successful school study, prepare outline for bilingual expert	0.75

DATE	DESCRIPTION	TIME
4/13/2012	Conference call w/A. Odden	0.80
4/17/2012	Email to EISD	0.20
4/17/2012	Email from R. Rice re: state data to request	0.10
4/17/2012	Draft Discovery of Defendants	6.40
4/19/2012	Communication w/R. Rice re: PTJ, special exceptions	0.25
4/20/2012	Confer w/R. Rice re: expert LDH conference	0.25
4/20/2012	Conf. Call w/L. Darling-Hammond re: teacher qual	0.50
4/23/2012	Draft Discovery of Defendants	3.90
4/24/2012	Draft Discovery of Defendants	2.80
MAY		
5/2/2012	Conference Call w/H. Levin re: adequacy claims	0.50
5/2/2012	Discussion w/R. Rice re: status of experts	1.00
5/3/2012	Confer w/R. Rice re: special exceptions	0.75
5/3/2012	Draft PTJ/MTD	6.20
5/5/2012	Email from R. Rice re: review TEA, STAAR-EOC questions from TEA website	0.20
5/8/2012	Email from R. Rice re: review research article on charter schools, KIPP efficiency	0.10
5/15/2012	Conference Call w/Dr. Loeb re: teacher qual	0.40
5/15/2012	Conference Call re: school finance case & experts	1.20
5/16/2012	Conference Call w/J. Finn re: class size	0.80
5/18/2012	Conference Call w/C. Belfield	0.60
5/18/2012	Status Conference w/Judge	1.40
5/18/2012	Correspondence to school districts regarding individual clients' school records	1.30
5/19/2012	Email to and from R. Rice re: expert Belfield conversation	0.20
5/22/2012	Confer w/R. Rice	0.20
5/22/2012	Correspondence to client	0.30
5/22/2012	Draft Resp to RFD	5.80
5/23/2012	Confer w/R. Rice re: expert Belfield	0.25
5/23/2012	Confer w/all plaintiffs' counsel re: data, experts	1.00
5/23/2012	Conference Call w/C. Belfield	0.40
5/23/2012	Email from R. Rice re: compare Edgewood data request, AG proposed file	0.30
5/25/2012	Confer w/R. Rice	0.50
5/25/2012	Draft resp to RFD	6.20
5/26/2012	Response to RFD, Draft	3.40
5/29/2012	Meeting w/Toni Hunter & Rick Gray	1.80
5/29/2012	Confer w/R. Rice re: expert testimony	0.75
5/29/2012	Edgewood ISD Responses to RFD	0.20
JUNE		
6/2/2012	Email from R. Rice re: complete research on cost of transition studies	0.10
6/4/2012	Travel to McAllen ISD	4.00
6/4/2012	Meeting w/McAllen ISD	1.80
6/10/2012	Prep for Hurley Depo	6.50
6/11/2012	Email to and from R. Rice re: state data set and ELLS	0.30
6/11/2012	Prep for Hurley Depo	5.30
6/12/2012	Deposition of Mark Hurley	6.50
6/14/2012	Meeting w/Edgewood superintendent	2.20
6/14/2012	Confer w/R. Rice	0.50
6/14/2012	Email to EISD	0.40
6/15/2012	Confer w/R. Rice	0.20
6/16/2012	Email to EISD	0.20

DATE	DESCRIPTION	TIME
6/18/2012	Confer w/R. Rice	0.20
6/20/2012	Meeting w/San Benito superintendent	2.40
6/20/2012	Email from R. Rice re: research on district stipends for bilingual, ELL teachers	0.20
6/22/2012	Travel to and from Austin	3.00
6/22/2012	Status Conference	1.50
6/22/2012	Edgewood ISD's PTJ & MTD draft	2.30
6/26/2012	Preparation for Scott deposition	4.60
6/26/2012	Conference Call w/C. Belfield	0.50
6/26/2012	Email from R. Rice re: topics for commissioner deposition	0.20
6/27/2012	Conference Call with Schanzenbach	0.90
6/27/2012	Conference Call with Clotfelter	0.40
6/27/2012	Client letter regarding update	0.70
6/27/2012	Preparation for Scott deposition	8.90
6/27/2012	Phone conference with Schanzenbach	0.90
6/28/2012	Travel to Austin for Scott deposition	1.50
6/28/2012	Deposition of Robert Scott - Vol. 1	7.30
6/29/2012	Deposition of Robert Scott - Vol. 2	2.90
6/29/2012	Travel to San Antonio	1.50
6/30/2012	Email from R. Rice re: missing data from expert Beinfeld's report	0.10
JULY		
7/2/2012	Conference call w/counsel and expert Vigdor	1.00
7/3/2012	Confer w/R. Rice	0.30
7/3/2012	Deposition Preparation of Zyskowski	6.20
7/6/2012	Client letter regarding RFP & guidance	4.80
7/9/2012	Preparation for Zyskowski deposition	7.80
7/10/2012	Travel to and from Austin - Zyskowski deposition	3.00
7/10/2012	Deposition of Gloria Zyskowski	8.80
7/11/2012	Travel to and from Austin - mini-status conference	3.00
7/11/2012	Attend Mini-Status Conference	1.50
7/11/2012	Preparation for Twing deposition	2.80
7/12/2012	Deposition of Jon Twing	5.70
7/12/2012	Travel to and from Austin - deposition	3.00
7/13/2012	Litigation Conference Call	1.30
7/16/2012	Prep for Twing Deposition	4.60
7/16/2012	Review discovery from State	3.30
7/16/2012	Legal research on Harm and Intervenors	0.70
7/16/2012	Review expert contract	0.20
7/17/2012	Confer w/R. Rice & interns re: responses to Edgewood RFPs	0.50
7/17/2012	Preparation for Housson deposition	6.40
7/17/2012	Emails to Plaintiffs re NAEP	0.20
7/18/2012	Travel to and from Austin	3.00
7/18/2012	Deposition of Shannon Housson	5.00
7/19/2012	Edgewood ISD's Supplemental Brief in Support of PTJ/MTD draft	1.50
7/20/2012	Confer w/R. Rice	0.20
7/20/2012	Confer w/counsel re: deposition scheduling and other matters	0.30
7/20/2012	Review data from client	2.30
7/20/2012	Review expert report and comments	3.90
7/21/2012	Email from R. Rice re: study on ELL weights	0.10
7/21/2012	Email to R. Rice re expert	0.10

DATE	DESCRIPTION	TIME
7/23/2012	Confer w/R. Rice re expert report	0.90
7/23/2012	Confer with R. Rice re update	0.10
7/24/2012	Draft comments to expert report	1.10
7/24/2012	Phone call with expert re report	0.40
7/25/2012	Edgewood ISD's Notice of Intent to Comply w/FERPA Notice	0.60
7/25/2012	Edgewood ISD's 1st Amended PTJ/MTD draft	2.10
7/25/2012	Confer with co-counsels re expert report	0.70
7/25/2012	Legal Research on facial challenge for PTJ	1.60
7/26/2012	Edgewood ISD's 1st Amended PTJ/MTD draft	3.40
7/26/2012	Confer with expert Lopez re report	0.90
7/26/2012	Conference call with Plaintiffs re Discovery DLs	0.70
7/27/2012	Confer with RR re expert report	0.80
7/27/2012	Draft Discovery Responses	2.30
7/27/2012	Review annotated summary of finances	0.90
7/27/2012	Review Schanzenbach report	2.20
7/28/2012	Confer w/R. Rice re: expert report of Izquierdo	0.50
7/28/2012	Confer with RR re expert report	0.60
7/30/2012	RFP from clients/school districts draft	7.60
7/30/2012	Plaintiffs' Expert Designations draft	0.70
7/30/2012	Preparation for R. Knight deposition	1.70
7/30/2012	Email to Defendants re Discovery	0.10
7/30/2012	Confer with MPV re expert report	0.30
7/30/2012	Email to Plaintiffs re expert report	0.10
7/30/2012	Review Defendants Response to Discovery	2.10
7/30/2012	Phone Conference with Schanzenbach re report	0.30
7/31/2012	Travel to and from Austin	3.00
7/31/2012	Deposition of Roy Knight	7.00
7/31/2012	Letter to Judge re: experts	0.50
7/31/2012	Preparation for Wallis deposition	1.60
7/31/2012	Confer with MPV re expert report	0.50
AUGUST		
8/1/2012	Travel to and from Austin	3.00
8/1/2012	Deposition of Thomas Wallis	9.20
8/3/2012	Travel to and from Austin	3.00
8/3/2012	Status Conference	1.20
8/7/2012	Preparation for Patek deposition	2.30
8/7/2012	Draft HCISD Discovery Log	1.60
8/7/2012	Draft Discovery Responses	3.60
8/7/2012	Email to Plaintiffs re Hanushek Depo	0.10
8/7/2012	Review edits on expert report	0.60
8/7/2012	Email to Defendants re Depos	0.10
8/7/2012	Review Draft responses to Discovery	1.20
8/8/2012	Email to TH re Depo	0.20
8/8/2012	Travel to and from Austin	3.00
8/8/2012	Deposition of Joseph Patek	6.50
8/8/2012	Preparation for R. Knight deposition	1.50
8/9/2012	Travel to and from Austin	3.00
8/9/2012	Deposition of Jim Knight	7.70
8/9/2012	Review and Email to Defendants re R11 on Consoldn	0.30
8/9/2012	Draft Objections to Discovery	1.90

DATE	DESCRIPTION	TIME
8/10/2012	Draft Response/Objections to Discovery	9.40
8/13/2012	Letter to Defendants re: Edgewood ISD's RFP	0.20
8/13/2012	Preparation for Dupre deposition	1.60
8/13/2012	Email to IP re Depo prep	0.10
8/13/2012	Meeting with Plaintiffs	1.80
8/14/2012	Travel to and from Austin	3.00
8/14/2012	Email to RG re expert	0.20
8/14/2012	Deposition of Charles Dupre	2.00
8/14/2013	Preparation for Reedy deposition	2.90
8/15/2012	Travel to Dallas from San Antonio (flight time 1 hr)	1.00
8/15/2012	Emails to RG re Equity	0.10
8/15/2012	Emails to Defendants re Depos	0.10
8/15/2012	Deposition of Richard Reedy	5.90
8/16/2012	Travel to San Antonio from Dallas (flight time 1 hr)	1.00
8/16/2012	Email from R. Rice re: bilingual funding information in Defendants' interrogatories response to Texas Taxpayer's	0.40
8/16/2012	Email from R. Rice re: draft of expert Vigdor report	0.20
8/16/2012	Review discovery response from defendants	8.90
8/17/2012	Email from R. Rice re: draft, further comments of Vigdor and Duncombe	0.20
8/17/2012	Email from R. Rice re: expert Baker's report	0.10
8/17/2012	Emails to MT re Vigdor Report	0.20
8/18/2012	Edits to Report	0.80
8/19/2012	Email to RR re expert report	0.10
8/19/2012	Email to expert re report	0.20
8/19/2012	Email to expert re report	0.10
8/19/2012	Edits to expert report	0.70
8/19/2012	Edits to expert report	0.60
8/19/2012	Edits to expert report	0.50
8/20/2012	Designation of Experts draft	0.80
8/20/2012	Prep for Hanushek cross exam	3.80
8/20/2012	Draft depo Chart for experts	0.60
8/20/2012	Emails with experts re reports and edits	3.50
8/21/2012	Travel to and from Austin	3.00
8/21/2012	Draft Discovery responses	2.60
8/21/2012	Prep for Hanushek cross exam	5.20
8/21/2012	Hearing on PTJ/MTD	0.80
8/22/2012	Conference Call w/D. Schanzenbach	0.40
8/22/2012	Conference Call w/Baker & Gray re: Hanushek deposition	0.50
8/22/2012	Preparation for Hanushek deposition	6.20
8/23/2012	Travel to and from Austin	3.00
8/23/2012	Deposition of Eric Hanushek	11.00
8/24/2012	Review Wisnoski PPT, make notes	4.20
8/24/2012	Review primer on school finance from TEA	2.20
8/24/2012	Email to MT re Agreed Motion Bifurcate	0.30
8/27/2012	Review Wisnoski PPT, make notes	2.60
8/27/2012	Review proposed expert deposition schedule from defendants	0.20
8/28/2012	Travel to and from Austin	3.00
8/28/2012	Attend Mini-Trial	6.00
8/28/2012	Email to MT re expert Depos	0.10
8/29/2012	Email to Defendants re Depos	0.10

DATE	DESCRIPTION	TIME
8/29/2012	Email to expert re Depo	0.10
8/29/2012	Travel to and from Austin	3.00
8/29/2012	Attend Mini-Trial	3.00
8/30/2012	Email from R. Rice re: draft analysis of McAdams, efficiency expert	0.20
8/30/2012	Draft Chart of Persons not deposed	0.60
8/30/2012	Confer with LF re McAdams depo	0.60
8/31/2012	Email from R. Rice re: draft analysis of Calhoun County expert Harris	0.20
8/31/2012	Draft Depo Prep outline	3.20
8/31/2012	Email to expert re Depo	0.10
8/31/2012	Email to Plaintiffs re Defendants witnesses	0.20
8/31/2012	Conference all with all Plaintiffs re Depos	0.70
8/31/2012	Conference call with Plaintiffs re Depos, Trial Plan	1.20
8/31/2012	Phone call with RG re Depos	0.30
SEPTEMBER		
9/3/2012	Email to M. Perez re: Edgewood responses	0.30
9/3/2012	Draft Discovery Responses	7.20
9/3/2012	Email to Ct and all Plaintiffs re PTJ	0.30
9/3/2012	Preparation for Belfield deposition	4.80
9/4/2012	Meeting w/Edgewood superintendent	2.50
9/4/2012	Meeting w/C. Belfield	2.70
9/4/2012	Email from R. Rice re: edit comments of Edgewood's response to Defendants' interrogatories	0.10
9/4/2012	Draft Discovery responses	4.20
9/4/2012	Email to Defendants re Belfield	0.10
9/4/2012	Email to Defendants re Discovery	0.10
9/4/2012	Email to Defendants re Discovery	0.10
9/4/2012	Confer with MB re Ponce prep	0.60
9/5/2012	Email to Defendants re subst'n dep.	0.10
9/5/2012	Emails to RR re depos	0.20
9/5/2012	Email to LF re depos	0.10
9/5/2012	Email to IP re depo schedule	0.10
9/5/2012	Review Docs for Discovery	6.90
9/5/2012	Deposition of Clive Belfield	7.20
9/5/2012	Preparation for Kincannon deposition	1.20
9/6/2012	Email from R. Rice re: draft comments of Harris raw data	0.10
9/6/2012	Email from R. Rice re: draft comments of analysis of Odden report re: ELLs	0.10
9/6/2012	Travel to and from Austin	3.00
9/6/2012	Deposition of Susan Kincannon	2.20
9/6/2012	Preparation for Hanks deposition	1.10
9/6/2012	Revise Draft Harris Depo cross exam	1.20
9/6/2012	Email to Defendants re Belfield	0.10
9/6/2012	Emails to Clients	0.20
9/6/2012	Emails to expert re depo Date	0.10
9/6/2012	Confer with LF re Harris Depo	0.40
9/6/2012	Review Docs for Discovery	3.50
9/7/2012	Travel to and from Austin	3.00
9/7/2012	Deposition of Jeffrey Hanks	9.00
9/7/2012	Meeting w/expert Patricia Lopez	0.90
9/7/2012	Email to Defendants re depos	0.10
9/7/2012	Email to Defendants re Discovery	0.10

DATE	DESCRIPTION	TIME
9/7/2012	Email with RR re Adea experts	0.20
9/9/2012	Draft Depo outlines for districts	2.60
9/10/2012	Draft Discovery Reponses	4.80
9/10/2012	Email to JT re Kallison extension	0.10
9/11/2012	Email from R. Rice re: deposition schedule, draft analysis of Duncombe, Colbert reports and prior writings re ELLs	0.40
9/11/2012	Draft Discovery responses	1.80
9/12/2012	Email from R. Rice re: summary of research data on SSI and LEPs and LEP preschool from TEA responses	0.20
9/12/2012	Email from R. Rice re: TEA responses for 2010-11 financial data	0.10
9/12/2012	Travel to and from Austin	3.00
9/12/2012	Deposition of Paul Colbert	3.80
9/12/2012	Preparation for Cervantes deposition	1.80
9/12/2012	Email to Plaintiffs re Discovery responses	0.10
9/12/2012	Preparation for Lopez deposition	1.30
9/12/2012	Email to R. Rice re Discovery	0.10
9/13/2012	Conference Call w/counsel & Schanzenbach	0.40
9/13/2012	Deposition of Jose Cervantes	7.00
9/13/2012	Edgewood ISD's Discovery Log- Draft	0.40
9/13/2012	Draft Disc. Responses	2.60
9/13/2012	Conference call re expert prep.	0.80
9/14/2012	Confer w/R. Rice re: TELPAS data from TEA website, Givens deposition	0.50
9/14/2012	Email to Client	0.30
9/14/2012	Email to Defendants re Discovery	0.20
9/16/2012	Email to Client	0.20
9/16/2012	Email to MPV re Depos	0.10
9/17/2012	Prepping expert Cortez	2.80
9/17/2012	Prepping expert Schanzenbach	2.70
9/17/2012	Letter to School Districts regarding discovery	0.90
9/17/2012	Edgewood ISD's Supplemental Response to Intervenors' RFD	0.70
9/17/2012	Email to Defendants re Discovery	0.10
9/17/2012	Email to IP re state experts	0.20
9/17/2012	Draft Changes to Discovery	1.30
9/17/2012	Email to HM re expert deposition	0.10
9/17/2012	Emails to LF re Depo schedule	0.10
9/18/2012	Emails to JS re case	0.80
9/18/2012	Draft Discovery responses	2.30
9/18/2012	Email to AP re case	0.70
9/18/2012	Email to client LFISD	0.20
9/18/2012	Conference call with Plaintiffs re expert depositions	1.00
9/18/2012	Deposition of Elena Izquierdo	4.60
9/18/2012	Deposition of Diane Schanzenbach	3.30
9/19/2012	Confer w/M. Perez re: depositions/Pompa & Izquierdo	1.00
9/19/2012	Conference Call w/expert Lopez	0.70
9/19/2012	Letter to Intervenors & Charters re: Izquierdo report	0.10
9/19/2012	Email to Client MISD	0.10
9/19/2012	Email to Expert re Suppl Report	0.10
9/20/2012	Email to Defendants re Depos	0.10
9/20/2012	Email to LF re Depos	0.20
9/20/2012	Depo Prep of Lopez	0.50

DATE	DESCRIPTION	TIME
9/20/2012	Deposition of Patricia Lopez	2.10
9/20/2012	Confer w/M. Perez re: Pompa deposition	0.50
9/20/2012	Preparation for Pierce deposition	2.60
9/21/2012	Travel to and from Austin	3.00
9/21/2012	Deposition of Wayne Pierce	7.30
9/21/2012	Conference Call w/J. Sanchez	0.80
9/21/2012	Confer with AP re Hammond Depo	1.20
9/21/2012	Draft Letter to Clients for Discovery	0.80
9/21/2012	Draft Discovery responses	2.90
9/21/2012	Emails with expert re LDF report	0.20
9/22/2012	Email to HM re Discovery responses	0.10
9/22/2012	Email to CD re Discovery responses	0.10
9/24/2012	Confer w/R. Rice	0.30
9/24/2012	Response to Defendants' ROGS & RFPs; Response to Efficiency ROGS & RFPs	2.80
9/24/2012	Draft Prep for A.C. Depo	4.20
9/24/2012	Email to AC re LDF data sheet	0.10
9/24/2012	Email to All Plaintiffs re Hammond Depo	0.10
9/25/2012	Prep A. Cortez Depo	2.60
9/25/2012	Preparation for Day deposition	6.00
9/25/2012	Draft Discovery Reponses	5.80
9/25/2012	Email to client	0.30
9/26/2012	Travel to and from Austin	3.00
9/26/2012	Conference Call w/Harlingen CISD	0.80
9/26/2012	Expert Cortez' report sent to counsel	0.10
9/26/2012	Deposition of Virginia Day	5.60
9/26/2012	Emails to JC & MHR re Discovery	0.50
9/27/2012	Deposition of Albert Cortez	4.00
9/27/2012	Team conference call	0.20
9/27/2012	Emails to Plaintiffs re Podgursky Depo	0.20
9/27/2012	Email to Defendants re Izquierdo Depo	0.10
9/27/2012	Depo Prep of expert	0.20
9/27/2012	Draft changes to Odder Outline	0.40
9/28/2012	Confer w/R. Rice re Izquierdo notes, further deposition	0.50
9/28/2012	Review Parker Report for Depo	2.30
9/28/2012	Email to JS/JC re Depo Parker	0.80
9/28/2012	Email to HCISD re Depo Prep	0.30
9/28/2012	Email to AP re Coultriss Depo	0.30
9/28/2012	Revise documents for LFISD Depo	6.90
9/29/2012	Emails to MT re Vigdor Report	0.30
9/29/2012	Comments on Vigdor Report - Suppl	1.30
9/30/2012	Confer with JS re Podgursky	0.80
9/30/2012	Email with JS, MHR & JC re Depos	0.20
OCTOBER		
10/1/2012	Email from R. Rice re: list of data needed for Ayala's deposition	0.10
10/1/2012	Prepping of La Feria superintendent	3.30
10/1/2012	Draft Prep or N. Cortez Depo	2.90
10/1/2012	Emails with R. Rice re Ayala	0.20
10/1/2012	Draft FOF/COL	6.80
10/2/2012	Email from R. Rice re: analysis of Ayala's report and data on long term ELLs	0.10

DATE	DESCRIPTION	TIME
10/2/2012	Deposition of N. Cortez	4.20
10/2/2012	Travel to and from Austin	3.00
10/2/2012	Meeting at Gray & Becker	1.40
10/2/2012	Prep for Coultriss Depo	5.90
10/2/2012	Prep for Ayala Depo.	1.10
10/2/2012	Confer with MHR re Duncombe/Casey	0.30
10/3/2012	Draft Outline for Kallison cross exam	1.70
10/3/2012	Emails to RG re Equity	0.20
10/3/2012	Confer with AP re Coultriss Depo	0.20
10/3/2012	Email to LFISD	0.10
10/3/2012	Confer with MHR re Moak Depo	0.50
10/3/2012	Email to Defendants re Izquierdo	0.10
10/3/2012	Draft changes to Duncombe Depo outline	0.40
10/3/2012	Email to expert re equity	0.10
10/4/2012	Confer w/R. Rice	0.40
10/4/2012	Travel to and from Austin	3.00
10/4/2012	Deposition of Susie Coultriss	6.10
10/4/2012	Prep for Coultriss Depo	1.20
10/4/2012	Draft Outline for Kallison cross exam	2.30
10/4/2012	Email to Defendants re Izquierdo	0.10
10/4/2012	Email to RG re Equity	0.10
10/5/2012	Email from R. Rice re: research prior Ayala case testimony	0.10
10/5/2012	Email to MHR re Moak Depo	0.10
10/5/2012	Email to KL/IP re Ex. List	0.10
10/5/2012	Revise email from AC re Kallison Report	0.20
10/5/2012	Confer with Plaintiffs re Response to Discovery requests	0.80
10/6/2012	Email from R. Rice re: to review & respond of TEA preschool data	0.10
10/6/2012	Email from R. Rice re: cost of common core implementation research	0.10
10/6/2012	Conference call with Plaintiffs re Trial Strategy	0.60
10/8/2012	Team Meeting	2.00
10/8/2012	Team Meeting re: exhibit list	1.00
10/8/2012	Prep for Ayala Depo	6.50
10/8/2012	Prep for Whitehurst Depo	5.90
10/9/2012	Confer w/R. Rice	0.10
10/9/2012	Preparation for Ayala's deposition	10.90
10/10/2012	Travel to and from Austin	3.00
10/10/2012	Deposition of Laura Ayala	7.20
10/10/2012	Confer w/R. Rice	1.00
10/10/2012	Preparation for Dawn-Fisher deposition	5.10
10/10/2012	Emails to KL re exhibits	0.20
10/10/2012	Email to LF re Guthrie Ex.	0.20
10/10/2012	Confer with JC re Whitehurst Depo	0.20
10/10/2012	Email to Plaintiffs re Wisnoski	0.10
10/10/2012	Email to RG re LDF Depo	0.10
10/11/2012	Travel to Austin	1.50
10/11/2012	Deposition of Lisa Dawn-Fisher	9.80
10/11/2012	Preparation for Whitehurst deposition	5.60
10/11/2012	Confer with MHR re STAAR results	0.20
10/11/2012	Emails to KL re exhibits	0.20
10/12/2012	Deposition of Grover Whitehurst	9.20

DATE	DESCRIPTION	TIME
10/12/2012	Travel to San Antonio	1.50
10/12/2012	Letter to school district regarding Plaintiffs' school record	0.40
10/12/2012	Prep for Whitehurst Depo	2.10
10/12/2012	Email to JS re Depo Excerpts	0.10
10/12/2012	Email to MB re witnesses	0.10
10/13/2012	Prep for Guthrie Depo	4.80
10/13/2012	Emails to experts re exhibits	5.00
10/13/2012	Email to HCISD	0.10
10/13/2012	Emails to R. Rice re exhibits	0.20
10/13/2012	Confer with TEAM re witness order	0.20
10/13/2012	Draft FOF/COL	1.90
10/13/2012	Edgewood ISD's Witness List draft	2.10
10/14/2012	Confer w/R. Rice re: exhibits from Cortez' report	0.20
10/14/2012	Preparation for Guthrie deposition	8.20
10/14/2012	Email to MHR re Folks Depo	0.20
10/14/2012	Email to expert re Exhibits	0.20
10/14/2012	Confer with RR re Exhibits	0.30
10/14/2012	Confer with MT re Witness list	0.20
10/14/2012	Confer with TEAM re Ex. List	0.70
10/14/2012	Email to Client, HCISD	0.10
10/14/2012	Draft FOF/COL	1.30
10/14/2012	Deposition Designations review	1.80
10/14/2012	Edgewood ISD's Exhibit List draft	0.80
10/15/2012	Deposition of James Guthrie	11.60
10/15/2012	Draft outline for Folks Depo	0.70
10/15/2012	Confer with KL re TASB Report	0.20
10/15/2012	Confer with Team re Exh. List	0.40
10/16/2012	Confer w/R. Rice	0.50
10/16/2012	Email from R. Rice re: draft of bilingual FOFs	0.20
10/16/2012	Confer with MHR re Folks Depo	0.40
10/16/2012	Email to RS re Depos of Defendants	0.10
10/16/2012	Email to MPV re Izquierdo Depo	0.20
10/16/2012	Email to Expert re Direct	0.10
10/16/2012	Confer with RC re witnesses on Defs/Intervenors/Charter lists	0.50
10/16/2012	Email to TH & R. Rice re witness lineup	0.10
10/16/2012	Draft FOF/COL	9.20
10/16/2012	Make notes on 3rd Amended Petition by Intervenors	1.30
10/17/2012	Draft FOF/COL	10.30
10/17/2012	Email to RG re Equity	0.10
10/17/2012	Confer with Ap re FOF	0.20
10/17/2012	Confer with MHR & KL re Exhibits	0.70
10/17/2012	Email to Defendants re Beavlieu Depo	0.10
10/17/2012	Email to RC for Direct Preps	0.20
10/17/2012	Confer with Plaintiffs re witness schedule	0.60
10/17/2012	Email to JS re FOF	0.10
10/17/2012	Email to LF re FOF	0.10
10/18/2012	Email from R. Rice re: edits of Edgewood's proposed FOF/COL draft	0.40
10/18/2012	Draft FOF/COL	7.80
10/18/2012	Confer with MHR re FOF	0.20
10/18/2012	Email to Client, EISD	0.10

DATE	DESCRIPTION	TIME
10/18/2012	Email to R. Rice Re Equity	0.10
10/18/2012	Emails to A. Cortez re Suppl Report	0.20
10/18/2012	Review A. Cortez Suppl Report	0.70
10/18/2012	Confer with CC re Ex. Objs.	0.40
10/18/2012	Draft Amended Petition	0.60
10/19/2012	Travel to and from Austin re: meeting w/Judge	3.00
10/19/2012	Attend meeting w/Judge	1.20
10/19/2012	Email from R. Rice re: comments of Edgewood's amended exhibit list	0.10
10/19/2012	Draft FOF/COL	3.20
10/19/2012	Confer with expert re Suppl Report	1.20
10/19/2012	Email to RG re facilities	0.20
10/19/2012	Confer with TEAM re Trial Strategy	1.80
10/19/2012	Review and Amend Depo Designations	2.50
10/20/2012	Confer w/R. Rice	0.75
10/20/2012	Travel to Austin	1.50
10/20/2012	Email from R. Rice re: Coultrass deposition cites	0.10
10/20/2012	Confer with MHR re Parent clients	0.20
10/20/2012	Confer with Plaintiffs re witness schedule	0.20
10/20/2012	Draft FOF/COL	4.80
10/20/2012	Draft Depo Desig for Coultrass	1.60
10/20/2012	Confer with KL re FOF/COL	0.40
10/20/2012	Draft Opening	1.20
10/21/2012	Draft Opening	4.80
10/21/2012	Confer with RC re Opening	0.60
10/21/2012	Draft FOF/COL	4.10
10/21/2012	Emails to MHR re FOF/COL	0.30
10/21/2012	Confer with Plaintiffs re witness schedule	0.20
10/21/2012	Email to KL to exhibit objections	0.10
10/22/2012	Trial - first day of trial	7.50
10/22/2012	Prep for Lopez Direct	1.00
10/22/2012	Draft FOF/COL	2.10
10/23/2012	Attend trial	7.50
10/23/2012	Preparation for Lopez direct	2.90
10/24/2012	Attend trial	7.50
10/24/2012	Preparation for Waggoner cross	2.80
10/25/2012	Attend trial; cross witness Waggoner; direct of Patricia Lopez	7.50
10/25/2012	Travel to San Antonio	1.50
10/28/2012	Travel to Austin	1.50
10/28/2012	Meeting w/trial team	3.00
10/29/2012	Attend trial	7.50
10/29/2012	Confer with RC re objection to exhibits	0.20
10/29/2012	Email to JT re STAAR	0.10
10/29/2012	EM to RC re Teacher Testimony	0.10
10/29/2012	Draft FOF/COL	5.80
10/30/2012	Attend trial	7.50
10/30/2012	Edgewood ISD's Trial Exhibit Objections draft	1.00
10/30/2012	Draft FOF/COL	5.50
10/30/2012	Confer with RC re cleint testimony	0.20
10/30/2012	Confer with RC re COR affidavits	0.30
10/30/2012	Email to Client	0.10

DATE	DESCRIPTION	TIME
10/31/2012	Attend trial	7.50
10/31/2012	Letter to Amarillo clients regarding trial	0.30
10/31/2012	Review Pierce Depo for cross exam	2.50
10/31/2012	Confer with RC re Admission of Edgewood Exhibits	0.20
10/31/2012	Email to expert re prep	0.10
NOVEMBER		
11/1/2012	Attend trial	7.50
11/1/2012	Travel to San Antonio	1.50
11/1/2012	Confer with MB re ELL FOF	0.20
11/1/2012	Confer with Team re lead for crosses	0.40
11/1/2012	Confer with MB re Barnett	0.20
11/2/2012	Revise Aguilar Direct	1.50
11/2/2012	Confer with Plaintiffs re Witnesses not deposed yet	0.80
11/4/2012	Travel to Austin	1.50
11/4/2012	Preparation for Pierce and Casey cross	3.20
11/4/2012	Confer with RC re Exhibits	0.50
11/4/2012	Confer with MB re cost of adeq. Education Ty	0.60
11/4/2012	Confer with RC re depo excerpt supplements	0.90
11/4/2012	Review and comment on STAAR Proffer	0.90
11/4/2012	Confer with MPV re XPs	1.10
11/4/2012	Draft Schanzenbach Direct and Notes for Depo	2.10
11/5/2012	Attend trial; cross Pierce witness, cross Casey witness	7.50
11/5/2012	Draft Schanzenbach direct	1.30
11/5/2012	Review Wiggins Depo for cross exam	1.70
11/5/2012	Email to MHR and JC re Charter Depo Prep	0.70
11/6/2012	Attend trial	7.50
11/6/2012	Preparation for Wiggins cross	2.30
11/6/2012	Email to expert re prep	0.10
11/6/2012	Draft Direct for expert	2.00
11/6/2012	Confer with Plaintiffs re Trial Plan	0.50
11/6/2012	Emails to Defendants re Schanzenbach	0.20
11/6/2012	Emails to RC re Teach Ty	0.10
11/6/2012	Review Schanzenbach Depo for Prep Questions	2.70
11/7/2012	Attend trial	7.50
11/7/2012	Preparation for Schanzenbach direct	3.00
11/7/2012	Draft Prep for Schanzenbach	4.70
11/7/2012	Email to Plaintiffs re Defendants Trial Schedule and Depositions of Intervenors	0.30
11/7/2012	Draft Email re depositions for intervenors	0.20
11/8/2012	Attend trial	7.50
11/8/2012	Travel to San Antonio	1.50
11/8/2012	Travel to Austin	1.50
11/8/2012	Travel to La Feria (1 hr of flight time)	2.00
11/8/2012	Email to M. Bono re Baker Charter Study	0.20
11/8/2012	Email to MB re Budget cuts, Testing, waivers	0.20
11/8/2012	Email with RC re charter depositions	0.10
11/8/2012	Confer with RC & MHR re charter data	0.20
11/8/2012	Prep Schanzenbach	1.00
11/8/2012	Draft Prep for Cortez	3.70
11/9/2012	Prep of Dr. Nabor Cortez	1.80
11/9/2012	Travel to Austin (2 hrs of flight time)	2.00

DATE	DESCRIPTION	TIME
11/9/2012	Review N. Cortez Depo for Prep	6.20
11/9/2012	Email with MB & RC re Charter Depo.	0.20
11/9/2012	Email to Plaintiff re Hammond Depo.	0.10
11/9/2012	Email to R. Couto re Hammond Dep.	0.10
11/9/2012	Email to A. Cortez re updated report	0.20
11/9/2012	Email to Team re Depo Prep of client	0.20
11/9/2012	Draft N. Cortez Direct Outline	1.30
11/10/2012	Email to Client N. Cortez	0.20
11/11/2012	Confer w/M. Perez & M. Bono re: review outline and exhibits for expert testimony	2.00
11/11/2012	Email to MPV re STAAR transfer	0.30
11/12/2012	Team conference call re: scheduling	0.50
11/12/2012	Prep Izquiero for Direct	0.70
11/12/2012	Confer with MPV re XPs Direct	0.60
11/12/2012	Email to Plaintiffs re Trial Calendar	0.10
11/12/2012	Draft Direct for LFISD	7.20
11/12/2012	Conference call with Plaintiffs re Trial Plan	0.70
11/13/2012	Attend trial	7.50
11/13/2012	Confer w/R. Rice	0.50
11/13/2012	Preparation for N. Cortez direct	3.70
11/13/2012	Review Shimotsu Direct	0.70
11/13/2012	Email to A. Cortez re report	0.30
11/14/2012	Attend trial	7.50
11/14/2012	Email to A. Cortez re Wisnoski Depo	0.20
11/14/2012	Review wisnoski Underlying Data for Depo	2.50
11/14/2012	Preparation for Wisnoski deposition	3.80
11/15/2012	Prep for Wisnoski Deposition	6.80
11/15/2012	Confer with RC & JC re Hammond Depo.	1.20
11/15/2012	Email to Client, LFISD	0.30
11/15/2012	Update Direct for LFISD	1.30
11/15/2012	Emails to MB re EISD	0.60
11/16/2012	Deposition of Joseph Wisnoski	9.00
11/16/2012	Travel to San Antonio	1.50
11/16/2012	Email to Tream re Trial Strategy	0.80
11/16/2012	Email to A. Cortez	0.10
11/16/2012	Emal to MHR re trial assignments	0.10
11/16/2012	Prep for Wisnoski Deposition	3.10
11/16/2012	Revise Hammond Deposition Outline	0.80
11/17/2012	Email to Client, Y.C.	0.10
11/17/2012	Emails to Client, LFISD	0.30
11/17/2012	Email to FB re Wisnoski Data	0.30
11/17/2012	Draft Prep for N. Cortez	0.60
11/18/2012	Travel to Austin	1.50
11/18/2012	Preparation of Canales direct	2.80
11/18/2012	Travel to from Houston	4.00
11/18/2012	Attend trial; Canales direct	7.50
11/18/2012	Revise direct for N. Cortez	1.40
11/18/2012	Draft Prep for Client	2.60
11/18/2012	Email to JC re Hammond/Wood Depositions	0.20
11/18/2012	Email to All Plaintiffs re N. Cortez update PPT	0.10

DATE	DESCRIPTION	TIME
11/18/2012	Confer with Client, LFISD	0.80
11/18/2012	Revise Odden cross exam	0.40
11/18/2012	Email to client, Y.C.	0.20
11/18/2012	Confer w/R. Rice	0.20
11/19/2012	Email to client	0.20
11/19/2012	Email to IP re: litigation binders	0.20
11/19/2012	Attend trial; Canales direct	7.50
11/20/2012	Confer w/R. Rice	0.60
11/20/2012	Travel to San Antonio	1.50
11/20/2012	Email to A. Cortez re: updated TEA data	0.10
11/20/2012	Email to RG re: Wisnoski	0.30
11/20/2012	Email to MHR re: Bast deposition	0.60
11/20/2012	Attend trial; N. Cortez direct	7.50
11/21/2012	Confer w/MB re: Edgewood ISD	0.20
11/21/2012	Confer w/MB re: Austin ISD	0.20
11/21/2012	Email to TJ re: upcoming depositions	0.10
11/21/2012	Review Wisnoski underlying data	1.30
11/21/2012	Emails w/RG re: Kallison	0.20
11/21/2012	Confer w/A. Cortez re: supplemental report	1.30
11/21/2012	Email to Defendants re: L. Taylor deposition	0.10
11/21/2012	Confer w/RC re: L. Taylor	0.40
11/21/2012	Team meeting re: strategy	1.20
11/21/2012	Revise L. Harris cross exam	0.80
11/21/2012	Revise Cervantes' direct	0.70
11/23/2012	Review supplemental report from A. Cortez	0.40
11/23/2012	Confer w/A. Cortez re: supplemental report	0.60
11/23/2012	Review A. Cortez' deposition for prep	3.60
11/23/2012	Review/amend cross examination for Carstarphen	1.30
11/25/2012	Draft prep for A. Cortez testimony	3.90
11/25/2012	Email to expert re: supplemental report	0.20
11/25/2012	Emails to RG re: equity analysis	0.80
11/25/2012	Review Scott Proffer	0.50
11/25/2012	Review Scott deposition for Proffer	0.70
11/25/2012	Email to MB re: condensed testimony	0.10
11/25/2012	Confer w/RC re: Scott Proffer	0.50
11/25/2012	Email to Defendants re: witness lineup	0.10
11/25/2012	Review CC Proffers	0.70
11/25/2012	Confer w/MB re: Carstarphen cross exam	0.50
11/25/2012	Travel to Austin	1.50
11/26/2012	Attend trial; Carstarphen cross	7.50
11/26/2012	Email to RS re: L. Taylor deposition	0.10
11/26/2012	Preparation for Kallison cross examination	10.80
11/26/2012	Preparation for Cortez for direct	2.80
11/26/2012	Email to MB re: Edgewood direct	0.20
11/27/2012	Review Amarillo PPT	0.60
11/27/2012	Review Kallison PPT	0.50
11/27/2012	Attend Trial	7.50
11/27/2012	Draft direct for A. Cortez	2.80
11/28/2012	Draft direct Aguilar-Diaz	1.60
11/28/2012	Email to Plaintiffs re: time for witnesses	0.10

DATE	DESCRIPTION	TIME
11/28/2012	Review Kallison testimony & notes for re-cross	0.70
11/28/2012	Attend trial; Kallison cross	7.00
11/29/2012	Attend trial; Kallison cross; Aguilar-Diaz direct	7.50
11/29/2012	Travel to San Antonio	1.50
11/29/2012	Review PPT of A. Cortez	0.90
11/29/2012	Confer w/R. Rice	0.60
11/29/2012	Email to client	0.10
11/30/2012	Email to team re: cross exam assignments	0.20
11/30/2012	Email to Defendants re: discovery responses	0.10
11/30/2012	Email to Defendants re: A. Cortez	0.10
11/30/2012	Letter to clients	1.00
11/30/2012	Draft direct for A. Cortez	5.20
11/30/2012	Draft prep questions for Vigdor	4.90
DECEMBER		
12/2/2012	Travel to Austin	1.50
12/2/2012	Team meeting	2.00
12/2/2012	Draft 2nd amended petition	2.20
12/2/2012	Email to Defendants re: L. Taylor	0.10
12/2/2012	Confer w/MB re: Housson deposition	0.40
12/2/2012	Vigdor prep for trial testimony	6.00
12/2/2012	Email to CD re: Bast deposition	0.10
12/3/2012	Attend trial	7.50
12/3/2012	Edgewood ISD's Second Amended Petition draft	0.30
12/3/2012	Email to JT re: Whitehurst cross examination	0.10
12/3/2012	Draft changes to 2nd amended petition	0.30
12/3/2012	Review Dupre deposition for cross examination	0.60
12/3/2012	Review Wisnoski & Scott depositions for Proffers	2.70
12/3/2012	Email from R. Rice re: expert Whitehurst's reference to charter schools	0.20
12/4/2012	Draft Whitehurst cross exam	0.70
12/4/2012	Draft Scott Proffer	2.00
12/4/2012	Draft Wisnowski Proffer	1.60
12/4/2012	Email to Defendants re: Partridge deposition	0.10
12/4/2012	Email to MB re: client Proffers	0.20
12/4/2012	Attend trial	4.00
12/4/2012	Draft Whitehurst cross exam	6.20
12/5/2012	Attend trial	7.50
12/5/2012	Preparation for Moe deposition	2.70
12/5/2012	Email to RC re exhibits	0.10
12/6/2012	Attend trial	7.50
12/6/2012	Draft Whitehurst cross exam	1.20
12/7/2012	Deposition of Terry Moe	9.20
12/7/2012	Travel to San Antonio	1.50
12/7/2012	Email to RC re: Defendants' supplemental exhibits	0.50
12/9/2012	Travel to Austin	1.50
12/9/2012	Revise Wolters deposition cross examination	1.90
12/9/2012	Review response to Plaintiffs' Motion to recall Duncombe	0.40
12/9/2012	Review Zykowski & L. Davis PPTs for cross examination	2.50
12/9/2012	Review Podgursky supplement	0.70
12/9/2012	Email w/MB re: Davis cross examination	0.30
12/9/2012	Revise Podgursky cross examination	0.70

DATE	DESCRIPTION	TIME
12/10/2012	Attend trial	7.50
12/10/2012	Confer w/RC re: Givens cross examination	0.80
12/10/2012	Confer w/MB re: Podgursky cross examination	0.50
12/10/2012	Email to CD re: deposition of Intervenors	0.10
12/10/2012	Confer w/MB re: Houssen cross examination	0.70
12/10/2012	Prep for L. Davis cross examination	1.80
12/10/2012	Revise Zyskowski cross examination	0.40
12/10/2012	Email to RC re: Wolters cross examination	0.20
12/10/2012	Email to JC re: PTJ/MTD	0.30
12/11/2012	Confer w/RC re: Eissler deposition	0.20
12/11/2012	Confer w/Defendants re: exhibits 4223 & 4224	0.10
12/11/2012	Confer w/MB & MHR re: Podgursky cross examination	0.80
12/11/2012	Draft FOF/COL	2.90
12/11/2012	Attend trial	7.50
12/11/2012	Email to RS re: DiBella deposition	0.10
12/12/2012	Email to MT re: COL	0.20
12/12/2012	Confer w/MHR & MB re: Podgursky cross examination	0.30
12/12/2012	Draft FOF/COL	4.20
12/12/2012	Attend trial	7.50
12/12/2012	Email to Plaintiffs re: Bast deposition	0.10
12/13/2012	Attend trial	7.50
12/13/2012	Travel to San Antonio	1.50
12/13/2012	Revise DiBella's deposition cross examination	2.70
12/13/2012	Email to RC re: Bast deposition	0.10
12/14/2012	Emails w/JC re: PTJ	0.20
12/14/2012	Draft FOF/COL	2.20
12/14/2012	Emails w/RC re: client meeting	0.20
12/14/2012	Emails to MB re: Charter depositions	0.10
12/17/2012	Email to client	0.10
12/17/2012	Email to JC re: updated PTJ	0.10
12/17/2012	Email to Defendants & RS re: Partridge deposition	0.10
12/17/2012	Confer w/RC re: Bast deposition	0.70
12/17/2012	Draft FOF/COL	7.10
12/17/2012	Confer w/R re: Bast deposition	0.70
12/17/2012	Email to RC & IP re: admitted exhibits	0.20
12/18/2012	Draft FOF/COL	7.70
12/18/2012	Revise exhibit list	0.40
12/18/2012	Team meeting re: FOF	0.90
12/18/2012	Email to Plaintiffs' re: Intervenors' witness lead	0.20
12/18/2012	Travel to Amarillo	2.50
12/18/2012	Meet w/clients	3.40
12/19/2012	Draft FOF/COL	5.60
12/19/2012	Email to AC re: LDF report	0.50
12/19/2012	Emails w/RG re: tgt reven FOF	0.20
12/19/2012	Recap of case for clients	1.60
12/20/2012	Draft FOF/COL	9.20
12/20/2012	Travel to San Antonio	2.50
12/20/2012	Edgewood ISD's First Amended Exhibit List revise	0.70
12/20/2012	FOF/COL fraft	15.20

DATE	DESCRIPTION	TIME
12/21/2012	Communication w/M. Bono re: deposition testimony and exhibits of Rob Coleman cross exam	0.30
12/21/2012	Confer w/RC re: exhibits 4223-24	0.20
12/26/2012	PC w/MB re: Charter depositions	0.50
12/26/2012	Review LDF deposition & draft cross examination	7.50
12/26/2012	Confer w/MB re: Coleman cross examination	0.40
12/27/2012	Confer w/RC re: Beaulieu cross examination	0.60
12/27/2012	Draft LDF cross examination	2.10
12/28/2012	Draft re-cap of trial	1.70
12/28/2012	Preparation for LDF cross examination	3.20
12/31/2012	Review TEA data re Ayala	2.80
2013		
JANUARY		
1/2/2012	Preparation for LDF cross examination	6.60
1/2/2012	Email to RS re: Charter depositions	0.20
1/2/2013	Confer w/MB re: Charter parents' depositions	0.70
1/2/2013	Review deposition cross examination for Charter parent	0.20
1/2/2013	PC w/RG re: LDF cross examination	0.40
1/2/2013	Email to RG re: Intervenors & LDF cross examination	0.20
1/3/2013	Meeting w/MALDEF team to discuss trial strategy and scheduling going forward	0.50
1/2/2013	Conference Call w/all Plaintiff parties	0.90
1/3/2013	Draft LDF cross examination outline	4.80
1/3/2013	Emails w/AC re: school finance system	0.30
1/3/2013	Draft & email schedule of cross examination assignment to team	0.70
1/3/2013	Review emails re: Defendants' experts	0.20
1/3/2013	Email to MRU re: cross examination questions	0.70
1/3/2013	Review Strohmeier report documents	1.50
1/4/2013	Email to HM re: STAAR & ELL testimon	0.10
1/4/2013	Draft LDF cross examination outline	4.20
1/4/2013	Email to AC re: Ayala report	0.30
1/4/2013	Emails w/AC re: LDF report	0.50
1/4/2013	Email to MRU re: cross schedule	0.20
1/4/2013	Draft Coultriss cross examination	1.30
1/6/2013	Meeting w/litigation team to discuss trial schedule and strategy	1.00
1/6/2013	Confer w/MB re: Day cross examination	0.50
1/6/2013	Preparation for LDF cross examination	7.90
1/6/2013	Travel to Austin	1.50
1/6/2013	Confer w/MB re: Currah cross examination	0.30
1/7/2013	Review LDF PPT & make notes for cross examination	1.20
1/7/2013	Draft LDF cross examination	4.00
1/7/2013	Confer w/RG re: LDF cross examination	1.20
1/7/2013	Email to RC re: Defendants latest exhibits	0.10
1/7/2013	Attend trial	7.50
1/7/2013	Revise Eissler deposition	1.80
1/8/2013	Confer w/AC re: LDF examination	0.20
1/8/2013	Draft LDF cross examination	1.30
1/8/2013	Draft Coultriss cross examination	2.40
1/8/2013	Attend trial	7.00

DATE	DESCRIPTION	TIME
1/8/2013	Review Coultriss PPT & make notes for cross examination	1.80
1/9/2013	Team meeting	1.00
1/9/2013	Email to RR re: Coultriss cross examination	0.40
1/9/2013	Emails re: LDF data & cross examination	0.40
1/9/2013	Draft Coultriss cross examination	5.00
1/9/2013	Attend trial	6.50
1/10/2013	Attend trial	7.50
1/10/2013	Travel to San Antonio	1.50
1/10/2013	Draft FOF/COL	1.40
1/10/2013	Draft Coultriss cross examination	1.30
1/10/2013	Email to AC re: Ayala report	0.10
1/10/2013	Email to MT re: District FOF	0.10
1/11/2013	Email to expert re: Hanushek	0.10
1/11/2013	Preparation for Ayala cross examination	7.30
1/11/2013	Preparation for Hanushek cross examination	1.50
1/11/2013	Email from R. Rice re: Ayala trial presentation documents, research "years in U.S. school" questions	0.30
1/13/2013	Travel to Austin	1.50
1/13/2013	Review email correspondence from M. Bono	0.10
1/13/2013	Draft Ayala cross examination	8.40
1/13/2013	Email to JT re: Hanushek cross examination	0.10
1/13/2013	Confer w/MB re: Hill cross examination	0.50
1/13/2013	Review Ayala PPT and make notes for cross examination	1.30
1/13/2013	Confer w/MRU re: Roska cross examination	0.80
1/13/2013	Email to Defendants re: Ayala PPT	0.10
1/13/2013	Team meeting re: litigation strategy	0.60
1/13/2013	Email to JT re: Hurley	0.10
1/13/2013	Confer w/expert re: Hanushek cross examination	0.50
1/14/2013	Attend trial	7.50
1/14/2013	Preparation for Smeadshammer cross examination	0.90
1/14/2013	Preparation for Hanushek cross examination	4.80
1/14/2013	Confer w/MB re: CC trial briefs	0.30
1/14/2013	Draft Ayala cross examination	1.00
1/14/2013	Email to plaintiffs re: Hanushek cross examination	0.40
1/15/2013	Emails to Defendants re: TEA supplemental data	0.20
1/15/2013	Emails to AC re: TEA supplemental data	0.20
1/15/2013	Review TEA supplemental data	0.80
1/15/2013	Draft cross examination for Hanushek	11.80
1/15/2013	Email to MB re: Hill testimony	0.10
1/15/2013	Attend trial	2.00
1/15/2013	Emails w/RS re: TEA supplemental data	0.20
1/16/2013	Revise McAdams cross examination	1.30
1/16/2013	Email to CD re: trial schedule	0.10
1/16/2013	Email to client	0.10
1/16/2013	Revise Hammond cross examination	1.30
1/16/2013	Revise Hanushek cross examination	1.80
1/16/2013	Email to experts re: Hanushek testimony	0.30
1/16/2013	Confer w/MRU re: Hanushek article for cross examination	0.40
1/16/2013	Draft FOF/COL	1.10
1/16/2013	Attend trial	7.50

DATE	DESCRIPTION	TIME
1/17/2013	Attend trial	5.00
1/17/2013	Travel to San Antonio	1.50
1/17/2013	Email to RR re: FOF	0.20
1/17/2013	Revise Hammond cross examination	0.30
1/17/2013	Email to client	0.40
1/17/2013	Draft FOF/COL	2.60
1/17/2013	Team meeting re: Intervenor's schedule	0.90
1/17/2013	Confer w/plaintiffs re: Intervenor's FOF	0.40
1/18/2013	Revise Wolter cross examination	1.00
1/18/2013	Email to MRU re: cross examination	0.40
1/18/2013	Draft FOF/COL	6.70
1/18/2013	Draft FOF/COL	5.80
1/20/2013	Draft letter to clients	0.30
1/20/2013	Travel to Austin	1.50
1/21/2013	Confer w/plaintiffs re: Hurley proffer	0.10
1/21/2013	Confer w/plaintiffs re: Intervenor's experts	0.10
1/21/2013	Review Hurley PPT for cross examination	1.40
1/21/2013	Draft motion to exclude Hurley	5.40
1/22/2013	Review FB Hurley proffer & confer w/plaintiffs	1.20
1/22/2013	Revised findings for Hill	0.50
1/22/2013	Emails to AC re: TEA supplemental data for report	0.20
1/22/2013	Emails to RS re: possible stipulations	0.30
1/22/2013	Prep for Bolling cross examination	1.20
1/22/2013	Attend trial	7.50
1/22/2013	Review Reedy deposition for cross examination	2.60
1/23/2013	Review Casey testimony for cross examination	1.10
1/23/2013	Email to CD re: trial calendar	0.10
1/23/2013	Draft FOF/COL	1.30
1/23/2013	Confer w/RS re: trial schedule	0.70
1/23/2013	Review Hurley deposition for possible objections	0.80
1/23/2013	Draft motion to exclude Hurley	1.20
1/23/2013	Attend trial	7.50
1/24/2013	Attend trial	5.50
1/24/2013	Travel to San Antonio	1.50
1/24/2013	Email to GB re: proposed FOF/COL	0.10
1/24/2013	Team meeting re: trial strategy	0.90
1/24/2013	Draft FOF/COL	6.20
1/24/2013	Emails to MHR re: FOF/COL	0.50
1/24/2013	Confer w/plaintiffs re: state's PTJ	0.20
1/25/2013	Revise proposed Charter stipulations	1.80
1/25/2013	Confer w/RC re: FOF/COL	0.30
1/25/2013	Confer w/RS re: Charter stipulations	0.20
1/25/2013	Draft FOF/COL	5.80
1/25/2013	Confer w/MHR re: FOF/COL	0.40
1/25/2013	Draft amended stipulations	2.00
1/25/2013	Confer w/RS re: stipulations	0.20
1/26/2013	Email to AC re: supplemental report	0.10
1/27/2013	Travel to Austin	1.50
1/27/2013	Review A. Cortez Suppl Report	1.30
1/27/2013	Email to AC re Suppl Report	0.20

DATE	DESCRIPTION	TIME
1/27/2013	Emails to parties re Charter Stips	0.30
1/27/2013	Draft changes to Charter Stips	1.20
1/27/2013	Confer with CC re Interr. Expert reports & Articles as Exhibits	0.20
1/27/2013	Confer with Clients re Stips and PTJ	0.50
1/27/2013	Draft Charter Stips	1.90
1/27/2013	Review notes on Flemister and Flores for cross exam	0.70
1/27/2013	Revise Pierce cross exam	1.30
1/27/2013	Confer with Plaintiffs re Stips	0.20
1/27/2013	Confer with RC re Dibella cross exam	0.20
1/28/2013	Attend trial	5.50
1/28/2013	Review Revised A. Cortez Suppl Report	0.50
1/28/2013	Outline changes for Am PTJ	0.80
1/28/2013	Review M. Flores Depo for cross exam	1.80
1/28/2013	Confer with RC re Rolle/Sage cross exam	0.70
1/29/2013	Attend trial	5.00
1/29/2013	Email to RC re TRE and Bonds	0.10
1/29/2013	Email to Defendants re suppl exhibits	0.10
1/29/2013	Draft Amended PTJ	1.90
1/29/2013	Email to Plaintiffs re Am PTJ & FOF	0.20
1/29/2013	Draft Proposed FOF	6.90
1/29/2013	Confer with RC re Wood Outline for cross exam	1.20
1/29/2013	Review Tr Br re Suitability for CC	0.80
1/30/2013	Attend trial	3.00
1/30/2013	Draft Am PTJ	2.70
1/30/2013	Email to GB re proposed COL	0.20
1/30/2013	Draft Financial Efficiency Trial Brief	2.60
1/30/2013	Draft FOF/COL	8.70
1/30/2013	Confer with RC re Defs Exhibits	0.90
1/30/2013	Confer with RC and MB re D. Pierce and strategy	0.30
1/31/2013	Attend trial	3.00
1/31/2013	Travel to San Antonio	1.50
1/31/2013	Draft Amd PTJ	5.20
1/31/2013	Draft Outline for Closing	0.90
1/31/2013	Emails to Other Plaintiffs re Am PTJ	0.30
1/31/2013	Draft FOF/COL	4.30
1/31/2013	Email to A. Cortez re workfile	0.10
1/31/2013	Review Client recs for futher redaction	0.50
FEBRUARY		
2/1/2013	Confer w/R. Rice re: admission of Gandara exhibit by Defs	0.50
2/1/2013	Draft Amd PTJ	7.00
2/1/2013	Draft Outline for Closing	1.20
2/1/2013	Email to clients re closing argument	0.20
2/1/2013	Review Exhibits for Objectins	0.40
2/1/2013	Legal Research on Efficiency	0.60
2/1/2013	Draft Trial Brief on Effcy	0.60
2/2/2013	Draft Closing	1.20
2/2/2013	Legal Research on Efficiency for Trial Brief	2.20
2/2/2013	Email to FB and CC re Objections to Defendans Exhibits	0.20
2/2/2013	Revise Defendants Exhibits for Objections	0.60
2/3/2013	Travel to Austin	1.50

DATE	DESCRIPTION	TIME
2/3/2013	Draft Trial Brief on Effcy	6.20
2/3/2013	Prepare Closing Argument	7.00
2/3/2013	Confer with RC re Defs Exhibits and Objections	0.40
2/4/2013	Prepare Closing Argument	1.50
2/4/2013	Trial	6.50
2/4/2013	Travel to San Antonio	1.50
2/5/2013	Email to RC re exhibits	0.10
2/7/2013	Draft FOF/COL	2.40
2/7/2013	Confer with RC re exhibits	0.60
2/12/2013	Confer with Plaintiffs re exhibits	0.20
2/13/2013	Draft FOF/COL	3.20
2/13/2013	Travel to and from Austin	3.00
2/13/2013	Meeting with Judge Dietz	2.00
2/13/2013	Meeting w/R. Gray	1.00
2/13/2013	Review & confer re: Defendants/Edgewood's exhibits	4.80
2/13/2013	Confer w/R. Rice re: draft amonibus findings and Edgewood findings	0.50
2/13/2013	Communication w/M. Bono regarding taking over Edgewood adequacy section	0.50
2/14/2013	Emails to GB re FOF	0.30
2/14/2013	Email to MT re FOF	0.10
2/14/2013	Draft FOF/COL	2.00
2/15/2013	Communication w/M. Bono regarding current FOF/COL	0.20
2/15/2013	Emails to MT re FOF	0.20
2/15/2013	Draft FOF/COL	6.90
2/15/2013	Conference call with RR re FOF	0.40
2/16/13	Draft FOF/COL	2.30
2/17/2013	Email to RR re FOF	0.10
2/18/2013	Emails to RR and MB re FOF	0.30
2/18/2013	Draft FOF/ COL	6.80
2/18/2013	Emails to GB re FOF	0.10
2/19/2013	Communication to and from w/M. Bono regarding potential and unadmitted exhibits	0.30
2/19/2013	Meeting with GB re FOF	1.20
2/19/2013	Draft FOF/COL	9.60
2/19/2013	Emails with Plaintiffs re FOF	0.10
2/20/2013	Emails with GB re FOF	0.30
2/20/2013	Draft FOF/COL	1.90
2/20/2013	Communication with all parties on how to handle pending deadlines; communication w/M. Bono re the same	1.00
2/21/2013	Confer with MB re FOF/COL	0.60
2/21/2013	Confer with KBM re FOF/COL	0.40
2/21/2013	Draft FOF/COL	5.80
2/22/2013	Emails with GB & TH re FOF	0.30
2/22/2013	Confer with GB & TH re FOF	0.60
2/22/2013	Review Defendants proffered exhibits	0.40
2/22/2013	Emails with Plaintiffs re FOF	0.20
2/25/2013	Communication w/legal staff regarding putting together fee application	0.50
2/25/2013	Email to MB re FOF	0.10
2/26/2013	Communication w/M. Bono regarding next steps to integrate adequacy findings	0.20

DATE	DESCRIPTION	TIME
2/26/2013	Review and edit FOF outline on Equity	0.50
2/26/2013	Emails with GB re FOF	0.20
2/26/2013	Emails to MB re FOF	0.10
2/27/2013	Email to MB re affidavits	0.30
2/27/2013	Confer with MB re Affidavits	0.40
2/28/2013	Conference call with Plaintiffs re FOF/COL outline	0.70
2/28/2013	Draft FOF Adequacy Outline	0.60
2/28/2013	Confer with MB re FOF Adequacy Outline	0.60
	Total Hours	1987.20

Unofficial copy Travis Co. District Clerk Velva L. Price

Edgewood ISD v. Michael Williams
CAUSE NO. D-1-GN-11-003130
Marisa Bono

<u>Date</u>	<u>Description</u>	<u>Hours</u>
2012		
FEBRUARY		
2/17/2012	Review email from R. Rice and respond re: date for STARR data	0.10
JULY		
7/27/2012	Preparation for Garza Deposition	4.00
7/30/2012	Travel to and from Austin for deposition	3.00
7/30/2012	Deposition of Karen Garza	8.40
AUGUST		
8/6/2012	Preparation for Witte deposition	3.00
8/7/2012	Travel to and from Austin for deposition	3.00
8/7/2012	Deposition of Joddie Witte	7.60
8/14/2012	Preparation for Chambers deposition	3.00
8/15/2012	Travel to and from Austin for deposition	3.00
8/15/2012	Deposition of H.D. Chambers	11.70
8/14/2012	Preparation for French deposition	2.00
8/16/2012	Travel to and from Austin for deposition	3.00
8/16/2012	Deposition of Michael French	8.00
8/21/2012	Preparation for Sconzo deposition	2.00
8/22/2012	Travel to and from Austin for deposition	3.00
8/22/2012	Deposition of Guy Sconzo	8.00
8/30/2012	Preparation for Salazar deposition	2.00
8/31/2012	Travel to and from Austin for deposition	3.00
8/31/2012	Deposition of Gonzalo Salazar	9.70
SEPTEMBER		
9/3/2012	Review/prepare document for Ponce deposition prep	3.00
9/4/2012	Preparation of Ponce deposition	6.00
9/5/2012	Deposition of James Ponce	11.10
9/10/2012	Review/prepare documents for Limon deposition prep	2.00
9/11/2012	Preparation for Limon Deposition	5.00
9/12/2012	Deposition of Antonio Limon	5.50
9/14/2012	Preparation for Barnett deposition by phone	1.50
9/17/2012	Deposition of Expert Steven Barnett	6.60
OCTOBER		
10/2/2012	Preparation for Duncombe deposition	3.00
10/3/2012	Communication w/MHR re: strategy for Duncombe; draft/revise email re: same	0.50
10/3/2012	Receipt & review of Kallison report	2.00
10/3/2012	Review Cortez report in preparation for Kallison deposition	1.00
10/3/2012	Plan/prepare for Kallison deposition	3.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>
10/3/2012	Communication w/DH re: Kallison deposition; receipt & review of DH notes on Kallison deposition	0.50
10/3/2012	Travel to and from Austin for deposition	3.00
10/3/2012	Deposition of William Duncombe	9.30
10/4/2012	Plan & prepare for Kallison deposition	4.00
10/4/2012	Review of appendices to Kallison report in preparation for deposition	1.00
10/4/2012	Draft/revise emails to Jorge re: Kallison prep	0.40
10/5/2012	Travel to and from Austin for deposition	3.00
10/5/2012	Deposition of James Kallison	9.10
10/5/2012	Deposition of Lynn Moak	10.20
10/8/2012	Communication with KL, JC & MHR re: deposition summaries for trial exhibits	0.50
10/8/2012	Preparation for Flores deposition	6.00
10/9/2012	Deposition of Steven Flores	8.20
10/13/2012	Reviewed deposition transcripts of J. Witte, H. Chambers, M. French to create designations for trial exhibits	5.00
10/13/2012	Reviewed reports cited in Barnett report to determine which, if any, to include on exhibit list	2.00
10/14/2012	Reviewed notes to determine super witnesses at trial; draft/revise email to DH with recommendations regarding same	1.00
10/14/2012	Draft/revise email to litigation team re: distributing and finalizing deposition excerpts for exhibit list	0.50
10/14/2012	Reviewed deposition transcripts of G. Salazar, W. Duncombe, & S. Coultress and highlighted testimony to create designations for trial exhibits	4.00
10/14/2012	Reviewed deposition transcripts of S. Flores to create designations for trial exhibits	3.00
10/14/2012	Communication w/IP re: distributing transcripts for deposition designations to litigation team members	0.30
10/15/2012	Receipt & review of deposition designations of Patek, Dupre, Harris, Knight, Reedy, Kincannon, Givens, Zyskowski, Odden, Housson, Knight, Wallis, Miles, Coleman, Parker, R. Scott, Cervantes from litigation team members	5.00
10/15/2012	Draft/revise deposition excerpt summary sheet for trial exhibit	1.00
10/15/2012	Draft/revise emails to litigation team about necessary revisions to deposition designations	0.30
10/15/2012	Communication w/J. Sanchez re: assigned deposition designations	0.20
10/15/2012	Communication w/A. Pedersen re: deposition designations	0.20
10/15/2012	Draft/revise witness list; transmit to DH for review	1.00
10/15/2012	Communication w/Belfield re: expert & research reports to include on exhibit list for trial	0.50
10/15/2012	Review reports cited in Belfield report to determine which, if any, to include on exhibit list	2.00
10/15/2012	Draft/revise email to Barnett re: expert & research reports to include on exhibit list for trial	0.10
10/16/2012	Staff meeting re: trial strategy	1.50
10/16/2012	Communication w/Barnett re: trial schedule & testimony preparation	0.50
10/16/2012	Phone conference w/all parties re: trial exhibits & deposition excerpts	1.00
10/16/2012	Communication w/DH re: trial exhibits	0.50

<u>Date</u>	<u>Description</u>	<u>Hours</u>
10/16/2012	Draft/revise proposed FOF/COL	4.00
10/17/2012	Draft/revise proposed FOF/COL	6.20
10/17/2012	Draft/revise email to J. Castillo re: drafting & citations for proposed FOF/COL	0.10
10/17/2012	Draft/revise email to A. Pedersen re: drafting & citations for proposed FOF/COL	0.10
10/17/2012	Read/review Kaufman article for overview of TSF litigation in order to draft proposed FOF/COL	3.00
10/18/2012	Draft/revise proposed FOF/COL	8.00
10/18/2012	Communication w/A. Limon re: trial testimony	0.20
10/18/2012	Read/review Brister dissent to draft proposed FOF/COL	1.00
10/18/2012	Communication w/DH re: court order to amend petition	0.20
10/18/2012	Receipt, review & edits of findings/citations for FOF/COL by MHR	0.50
10/18/2012	Coordinate organization of trial notebooks & exhibit pull boxes w/legal staff	1.00
10/19/2012	Draft/revise proposed FOF/COL	8.20
10/19/2012	Communication w/A. Pedersen & MHR re: draft of FOF/COL findings	0.50
10/19/2012	Meeting w/litigation team to discuss roles during trial, responsibilities for first couple of weeks	1.00
10/19/2012	Draft/revise email to MHR re: handing off FOF/COL to focus on witness prep	0.30
10/20/2012	Travel to Austin	1.50
10/20/2012	Draft/revise direct outline for A. Limon	4.00
10/20/2012	Review Limon deposition transcript to prepare for direct exam	2.00
10/20/2012	Prepare/review documents for Limon trial testimony	2.00
10/20/2012	Receipt, review & edit of trial "to do" list from DH	1.00
10/21/2012	Draft/revise PPT for Limon trial testimony	3.50
10/21/2012	Prepare for Limon trial testimony	3.00
10/21/2012	Draft/revise direct exam for Limon testimony	2.00
10/22/2012	Attend trial	7.50
10/22/2012	Draft/revise PPT for Limon trial testimony	3.00
10/22/2012	Prepare Mr. Limon for trial testimony	3.00
10/22/2012	Prepare Mr. Limon for trial testimony	2.00
10/22/2012	Draft/revise Barnett direct	1.00
10/22/2012	Review Barnett deposition transcript to prepare for direct	2.00
10/23/2012	Attend trial	7.50
10/24/2012	Attend trial, direct A. Limon	7.50
10/24/2012	Receipt/review of FOF/COL draft, edits to the same	2.00
10/24/2012	Draft/revise FOF/COL	2.00
10/25/2012	Attend trial	7.50
10/25/2012	Travel to San Antonio	1.50
10/26/2012	Drafted to do list for coming week	0.50
10/28/2012	Litigation team meeting to discuss coming week	3.00
10/28/2012	Travel to Austin	1.50
10/29/2012	Attend trial	7.50
10/29/2012	Draft/revise COLs on suitability	2.00
10/29/2012	Draft/revise Barnett direct	3.00
10/29/2012	Review Barnett PPT, integrate into direct	2.00
10/30/2012	Attend trial	7.50

<u>Date</u>	<u>Description</u>	<u>Hours</u>
10/31/2012	Attend trial	7.50
NOVEMBER		
11/1/2012	Attend trial	7.50
11/1/2012	Travel to San Antonio	1.50
11/1/2013	Confer with DH re Barnett	0.20
11/1/2012	Confer with DH re ELL FOF	0.20
11/1/2012	Draft/revise Barnett direct	1.50
11/1/2012	Review of deposition designations of Ponce, Currah & Flores for submission as trial exhibit	1.50
11/1/2012	Review of Whitehurst critique to prepare for Barnett direct	1.00
11/1/2012	Communication w/Ponce re: trial & trial testimony	0.50
11/2/2012	Receipt & review of Ponce deposition & excerpts for trial exhibits	1.00
11/2/2012	Draft/revise email to RC re: Ponce communication	0.40
11/4/2012	Travel to Austin	1.50
11/4/2012	Confer with DH re cost of adeq. Educ. Ty	0.60
11/4/2012	Prep for Barnett trial testimony	3.00
11/5/2012	Attend trial	7.50
11/5/2012	Prepare for Barnett direct	2.00
11/6/2012	Attend trial; direct S. Barnett	7.50
11/6/2012	Prepare for Duncombe cross; draft cross	2.00
11/7/2012	Attend trial; cross Duncombe	7.50
11/7/2012	Receipt & review of draft supplemental deposition designations	0.50
11/7/2012	Communication w/MHR & JC re: Pierce & Dunn deposition prep	0.50
11/7/2012	Plan/prepare for Pierce deposition	1.00
11/7/2012	Draft/revise email to RC & DH re: prep for Pierce & dunn depositions	0.40
11/8/2012	Email from DH re Baker Charter Study	0.10
11/8/2012	Email from DH re Budget Cuts, Testing, Waivers	0.10
11/8/2012	Attend trial	7.50
11/8/2012	Draft/outline for Pierce & Dunn depositions; review of State discovery responses & Charter exhibits to prepare deposition outlines	4.00
11/8/2012	Prepare & copy exhibits for Pierce & Dunn depositions	3.00
11/9/2012	Deposition of David Dunn	8.20
11/9/2012	Email from DH re Charter Depositions	0.10
11/9/2012	Travel to San Antonio	1.50
11/9/2012	Receipt & review of supplemental exhibits from State	1.00
11/11/2012	Travel to Austin	1.50
11/11/2012	Review of Belfield deposition testimony to prepare for Belfield direct	3.00
11/11/2012	Draft/revise Belfield direct	2.00
11/12/2012	Drafted Belfield direct; reviewed depo transcript, Vigdor depo transcript, Whitehurst depo transcript to prepare for Belfield direct; communication with Belfield re: trial testimony	9.50
11/12/2012	Conference call re: trial strategy with other plaintiff groups	1.00
11/12/2012	Communication w/Belfield about testimony prep and Chingos & Vigdor reports	0.50
11/12/2012	Draft/revise Belfield direct	3.00
11/12/2012	Review of Belfield exhibits to prepare for direct	1.00
11/12/2012	Receipt/review of Vigdor report to prepare for Belfield direct	1.00
11/12/2012	Communication with MHR & JC re: trial strategy, tasks, scheduling	0.50

<u>Date</u>	<u>Description</u>	<u>Hours</u>
11/13/2012	Plan and prepare for Belfield trial testimony; met with Belfield to prepare for trial testimony	6.00
11/13/2012	Draft/ revise Belfield direct	1.00
11/13/2012	Read Cervantes deposition transcript to prepare for direct testimony	1.00
11/13/2012	Plan and prepare for Cervantes prep direct exam; met with Cervantes to prepare for direct testimony	6.00
11/13/2012	Prep of Belfield for trial testimony	4.00
11/13/2012	Draft/revise Belfield direct	1.00
11/13/2012	Receipt/review of Carstarphen, Coultress, Currah, Flores, Ponce deposition designations for completeness	2.00
11/14/2012	Attend trial, direct examination of Belfield	7.00
11/14/2012	Review of Cervantes deposition & exhibits to prepare for direct	2.00
11/14/2012	Draft/revise Cervantes direct	1.00
11/14/2012	Communication w/Edgewood staff re: creation of Edgewood PPT & documents needed for Cervantes prep	0.50
11/14/2012	Draft/revise email to Edgewood staff re: trial testimony prep for Cervantes	0.30
11/15/2012	Emails from DH re EISD	0.30
11/15/2012	Travel to San Antonio	1.50
11/15/2012	Draft/revise Cervantes direct	2.00
11/15/2012	Prep of Cervantes for trial testimony	5.00
11/16/2012	Plan/prepare for Odden direct exam; read deposition transcript and review exhibits for same	2.00
11/16/2012	Email from Dh re Trial Strategy	0.10
11/16/2012	Prep of Cervantes for trial testimony	2.00
11/17/2012	Receipt/review of Odden deposition transcript to prepare for direct	1.50
11/17/2012	Draft/revise Odden direct	2.00
11/18/2012	Travel to Austin	1.50
11/18/2012	Draft/revise email to JC re: prep for Wood Rolle deposition	0.30
11/19/2012	Attend trial	7.50
11/19/2012	Prep of Cervantes for trial testimony	5.00
11/19/2012	Receipt/review of Edgewood PPT, edits to same	1.00
11/20/2012	Attend trial	7.50
11/20/2012	Travel to San Antonio	1.50
11/21/2012	Team Meeting re strategy	1.20
11/21/2012	Confer with DH re Edgewood ISD	0.20
11/21/2012	Confer with DH re Austin ISD	0.20
11/24/2012	Read Cervantes depo transcript; plan and prepare for Cervantes direct testimony; receipt and review of district powerpoint for Cervantes direct; revision of same.	3.00
11/25/2012	Travel to Austin	1.50
11/25/2012	Draft Carstarphen direct	1.50
11/25/2012	Plan and prepare for Cervantes direct	3.00
11/25/2012	Email from DH re Comp Ed Ty	0.10
11/25/2012	Confer with DH re Carstarphen cross exam	0.50
11/26/2012	Attend trial, direct examination of Carstarphen	8.00
11/26/2012	Travel to San Antonio	1.50
11/27/2012	Met with Cervantes and staff to prepare for Cervantes direct	5.00
11/27/2012	Email from DH re Edg. Direct	0.10
11/28/2012	Travel to Austin	1.50

<u>Date</u>	<u>Description</u>	<u>Hours</u>
11/28/2012	Plan and prepare for Wood Rolle depositions	4.00
11/28/2012	Met with Michelle Jacobs to coordinate for Venable deposition	1.50
11/29/2012	Attend trial; present Cervantes	7.00
11/29/2012	Prepare for Venable deposition	5.00
11/30/2012	Attend and take Venable deposition	9.00
11/30/2012	Read Houssen deposition to prepare for direct examination	1.00
11/30/2012	Travel to San Antonio	1.50
11/30/2012	Email from DH re cross exam assignments	0.10
DECEMBER		
12/2/2012	Travel to Austin	1.50
12/2/2012	Read Houssen deposition plan and prepare for direct	2.00
12/2/2012	Communication with Rick Gray to coordinate cross exam for Houssen	0.30
12/2/2012	Meeting with Edgewood team regarding trial strategy	1.00
12/2/2012	Confer with DH re Houssen Depo	0.40
12/3/2012	Plan and prepare for Folks depo; communication with co-counsel re: same	1.00
12/3/2012	Attend trial	7.00
12/3/2012	Plan and prepare for Whitehurst cross; communication with Barnett re:same	2.00
12/4/2012	Prepare powerpoint for McAllen proffer	4.00
12/4/2012	Draft proffers for McAllen and Harlingen	2.00
12/4/2012	Prepare powerpoint for Harlingen proffer; communication with Jorge re: same	2.50
12/4/2012	Draft direct for Whitehurst (pre-k)	2.50
12/4/2012	Review/ edit Wisnoski PPT	0.30
12/4/2012	Email from DH re Client Proffers	0.10
12/5/2012	Attend trial; direct examination of Folks; proffer for evidence for McAllen and Harlingen	5.50
12/5/2012	Draft/ revise Whitehurst direct	7.00
12/6/2012	Attend trial; assist DH with cross examination of Dr. Whitehurst	6.00
12/6/2012	Draft/ revise motion to exclude expert testimony of Grover Whitehurst; prepare exhibits for the same	3.00
12/6/2012	Draft new cross based on trial testimony regarding preschool; communication with S. Barnett regarding same.	1.00
12/7/2012	Drive back to San Antonio	1.50
12/9/2012	Drive to Austin from San Antonio	1.50
12/9/2012	Review Davis deposition transcript and exhibits for possible cross examination question; communication with DH and JT re: same	1.50
12/9/2012	Review Coleman transcript for potential cross	1.00
12/9/2012	Review Podgursky transcript and reports to prepare for cross; communication with MHR re: same	1.00
12/9/2012	Emails with DH re Davis cross exam	0.30
12/10/2012	Review Podgursky transcript, report, and supplemental report for cross examination	3.00
12/10/2012	Drive to and from firm to print and review supplemental data from defendants for Podgursky	2.00
12/10/2012	Draft questions for Podgursky cross; communication with MHR and DH re:same	2.30
12/10/2012	Draft cross examination of Houssen; communication with L. Lawrence re:same	2.50

<u>Date</u>	<u>Description</u>	<u>Hours</u>
12/10/2012	Confer with DH re Podgursky cross exam	0.50
12/10/2012	Confer with DH re Houssen cross exam	0.70
12/11/2012	Incorporate DH comments into Podgursky cross; communication with DH and MHR re: same; communication with PF re: Podgursky cross	4.50
12/11/2012	Draft/ revise Houssen cross exam	1.00
12/11/2012	Confer with DH re Podgursky cross exam	0.80
12/12/2012	Attend trial; cross exam of Houssen	5.00
12/12/2012	Drive back to San Antonio	1.50
12/12/2012	Email from DH re Podgursky cross exam	0.10
12/13/2012	Attend trial; cross exam of Podgursky	7.50
12/13/2012	Draft/ revise Houssen Cross	2.00
12/13/2012	Drive to San Antonio	1.50
12/17/2012	Review Coleman deposition to prepare cross exam	1.00
12/17/2012	Email from DH re Charter Depositions	0.10
12/18/2012	Meet with DH and RC to discuss trial and depo schedule	1.00
12/18/2012	Meet with DH to discuss FOF/COL	1.00
12/18/2012	Draft/ revise FOF/COL	1.50
12/19/2012	Draft/ revise FOF/COL	7.00
12/20/2012	Draft/ revise FOF/COL	6.00
12/21/2012	Draft/ revise FOF/COL	10.00
12/26/2012	Read/review deposition testimony and exhibits to prepare for Rob Coleman cross examination; communication with DH regarding same	4.00
12/26/2012	Phone conference with DH re Charter Depositions	0.50
12/27/2012	Confer with DH re Coleman cross exam	0.40
12/28/2012	Read/revise Dunn and DiBella depo transcripts and exhibits to prepare for Denise Pierce depo	4.20
12/28/2012	Draft/revise deposition outline for Denise Pierce.	1.00
12/31/2012	Draft/revise deposition outline for Denise Pierce; communication with LF regarding same.	6.00
2013		
JANUARY		
1/2/2013	Draft/revise deposition outline of Mike Flores; read/review TEA data on wayside charter schools to prepare for same	2.00
1/2/2013	Draft/revise deposition outline of Brooks Flemister; communication with DH regarding same.	1.00
1/2/2013	Review sunset advisory committee report for incorporation into Pierce deposition outline.	1.50
1/2/2013	Draft/revise email to Rick Gray regarding cross examination of Coleman.	0.60
1/2/2013	Confer with MB re : Charter parent deposition	0.70
1/3/2013	Read/review Day depo testimony to prepare for cross examination	3.00
1/3/2013	Read/review Currah depo testimony to prepare for cross examination	1.50
1/3/2013	Telephone conference with plaintiff groups to discuss trial witness strategy going forward	1.00
1/3/2013	Email from DH re schedule of corss examiantion	0.1
1/3/2013	Meeting with MALDEF trial team to discuss trial strategy and schedule going forward	0.50
1/4/2013	Travel to and from Austin for Flores/ Flemister/ Pierce depositions	3.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>
1/4/2013	Flores deposition	1.50
1/4/2013	Flemister deposition	2.00
1/4/2013	Pierce deposition	4.00
1/6/2013	Drive to Austin from San Antonio	1.50
1/6/2013	Meeting with litigation team to discuss trial schedule and strategy	1.00
1/6/2013	Read and review Day transcript and exhibits; draft Day cross examination	6.00
1/6/2013	Receipt and review of Coleman powerpoint.	0.50
1/6/2013	Confer with DH re Day cross examination	0.50
1/7/2013	Read/review Barnett trial testimony in preparation for Day cross; draft/revise Day cross examination; review State pre-k trial exhibits in preparation for Day cross exam.	5.00
1/7/2013	Attended trial; MALDEF attorney for Coleman cross examination	7.00
1/7/2013	Confer with DH re Currah cross examination	0.30
1/8/2013	Receipt and review of Currah powerpoint to prepare for Currah cross examination	0.50
1/8/2013	Draft/revise Currah cross examination; read/review State FAST exhibits to prepare for Currah cross	1.40
1/8/2013	Draft/revise correspondence to David Thompson regarding Currah cross examination	0.10
1/8/2013	Receipt and review of Day powerpoint in preparation for Cross exam	0.70
1/8/2013	Draft/revise Day cross exam; review of State pre-k documents and Whithurst testimony to prepare for Day cross exam	5.00
1/9/2013	Attend trial and Currah testimony	5.00
1/9/2013	Revise Day cross exam and exhibits for same	2.00
1/9/2013	Team meeting	1.00
1/10/2013	Attend trial; conduct Day cross exam	3.00
1/10/2013	Drive back to San Antonio from Austin	1.00
1/11/2013	Read/review Hill depo transcript for cross exam	3.00
1/13/133	Drive to San Antonio	1.50
1/13/2013	Read/review Hill deposition testimony to prepare for cross examination; email correspondence to DH and AS re; same	4.20
1/13/2013	Confer with DH re Hill cross examination	0.10
1/14/2013	Attend trial, assist with exhibits during Ayala cross examination; assist new attorney with first cross examination during Roska cross exam	6.00
1/14/2013	Draft/revise Hill cross exam	1.00
1/14/2013	Receipt and review of Calhoun County proposed trial briefs and draft/revise correspondence to DH regarding same	0.50
1/14/2013	Confer with DH re CC Trial Briefs	0.30
1/15/2013	Attend trial; cross examination of Paul Hill	5.00
1/15/2013	Draft/revise Hanushek cross exam	1.50
1/15/2013	Review Email from DH re Hill Ty	0.10
1/16/2013	Attend trial; assist DH with Hanushek cross exam	6.00
1/16/2013	Draft/revise Hanushek cross exam	2.50
1/16/2013	Return drive to San Antonio	1.50
1/17/2013	Receipt and review of Pierce depo transcript; draft/revise Pierce cross examination	4.00
1/17/2013	Draft/revise client update correspondance	0.30
1/18/2013	Draft/revise Pierce cross exam	3.00
1/23/2013	Correspondence to clients regarding update of trial	1.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>
1/30/2013	Confer with DH re D. Pierce and strategy	0.30
FEBRUARY		
2/4/2013	Drive to Austin	1.50
2/4/2013	Attend trial/Closing Arguments	7.50
2/4/2013	Drive to San Antonio	1.50
2/19/2013	Communication w/D. Hinojosa re: taking over Edgewood adequacy section	0.50
2/19/2013	Receipt and review of current FOF/COL draft; draft/revise comments	6.00
2/19/2013	Integrated DH's comments into current FOF/COL	0.50
2/19/2013	Communication w/R. Rice re: FOF/COL and assistance regarding the same	0.50
2/20/2013	Communication w/D. Hinojosa re: current FOF/COL	0.20
2/20/2013	Receipt and review of current FOF/COL draft; draft/revise comments	1.00
2/20/2013	Draft/revise citations in Edgewood adequacy section; review record to complete missing citations in Edgewood adequacy section	6.20
2/20/2013	Draft/revise email to DH regarding red flags in current FOF/COL draft	0.30
2/21/2013	Draft/revise citations in Edgewood adequacy section; review record to complete missing citations in Edgewood adequacy section	5.00
2/22/2013	Draft/revise email correspondence to R. Rice re: attorneys fees	0.20
2/22/2013	Draft/revise citations in Edgewood adequacy section; review record to complete missing citations in Edgewood adequacy section	6.00
2/23/2013	Draft/revise citations in Edgewood adequacy section; review record to complete missing citations in Edgewood adequacy section	3.00
2/23/2013	Draft/revise Edgewood adequacy section	2.20
2/23/2013	Receipt and review of META edits to ELL adequacy sections; draft/revise edits to same to integrate into adequacy draft	2.00
2/25/2013	Receipt and review of META edits to ELL adequacy sections; draft/revise edits to same to integrate into adequacy draft	2.20
2/25/2013	Integrate Intervenor findings into common FOF/COL draft; draft/revise edits to the same	2.00
2/25/2013	Draft/revise email transmitting new Edgewood adequacy section to all parties	0.20
2/25/2013	draft/revise citations in ELL adequacy section; review record to complete missing citations in ELL adequacy section	2.00
2/25/2013	Review of Haynes & Boone comments in response to our comments on initial FOF/COL draft and drafted responses to same, including reviewing record for missing citations	4.00
2/25/2013	Communication w/D. Hinojosa regarding potential unadmitted exhibits; review of emails correspondence from Carol, IP and DH regarding the same	0.30
2/26/2013	Draft/revise email to all parties regarding MALDEF response to H&B comments on initial FOF/COL draft	0.30
2/26/2013	Communication with H&B regarding reworking comments into separate draft	0.20
2/26/2013	Conference call with all parties regarding how to handle pending deadlines; communication with D. Hinojosa regarding same	1.00
2/27/2013	Communication with legal staff regarding putting together fee application	0.50
2/27/2013	Reinserted MALDEF comments into different draft of FOF/COL	1.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>
2/27/2013	Draft/revise attorney affidavit for fees, research for same	2.00
2/28/2013	Draft/revise attorney affidavit for fees, research for same	3.00
2/28/2013	Receipt and review of attorney hours from MHR & JC, communication regarding same	1.00
2/28/2013	Phone conference with Haynes & Boone regarding integrating adequacy findings	0.20
2/28/2013	Draft/revise revised outline based on phone conversation with Haynes & Boone	1.00
2/28/2013	Draft/revise email to Haynes & Boone regarding next steps	0.20
2/28/2013	Receipt and review of Hyanes & Boone comments to initial FOF/COL draft comments, draft/revise response comments	1.00
2/28/2013	Communication w/D. Hinojosa regarding next steps to integrate adequacy findings	0.20
MARCH		
3/1/2013	Communication w/IP regarding fee applications	0.40
3/1/2013	Draft/revise fee affidavit	1.00
3/1/2013	Coordinate with L. Figueroa, K. Lyznik, M. Hernandez, J. Castillo & J. Sanchez to submit resume and hours for fee application	2.00
3/1/2013	Draft/revise missing attorney hours for fee application	3.00
3/2/2013	Draft/revise ELL and low-income section of FOF/COL; communication with DH & MJ regarding same	3.00
3/3/2013	Draft/revise ELL and low-income section of FOF/COL; communication with DH and MJ regarding same	4.50
3/4/2013	Draft/revise ELL and low-income section of FOF/COL	3.50
3/4/2013	Draft/revise email to MJ regarding FOF/COL timeline & pre-K section	0.10
	TOTAL	907.60

Unofficial copy Travis County District Clerk Velva Price

Edgewood I.S.D. v. Michael Williams
CAUSE NO. D-1-GN-11-003130
Rebecca M. Couto da Silva

DATE	DESCRIPTION	HOURS
2012		
OCTOBER		
10/9/2012	Austin tech training	7.00
10/16/2012	Confer with DH re Witnesses on Defs/Intervenors/Charter lists	0.50
10/17/2012	Email from DH re direct preps	0.10
10/18/2012	Populate other Pifs' exhibit list with titles	7.00
10/19/2012	Draft opening ppt	10.20
10/20/2012	Input DH edits into opening ppt	3.70
10/21/2012	Update opening ppt per DH edit	1.50
10/21/2012	Incorporate final edits into opening ppt	2.50
10/22/2012	Locate citations for FOF/COL	4.60
10/23/2012	Draft FOF/COL	3.00
10/13/2012	Confer with DH re cites in expert report	0.30
10/21/2012	Confer with DH re Opening	0.60
10/24/2012	Check citations on Lopez report & send to DH	1.00
10/24/2012	Coordinate witness travel	1.50
10/28/2012	Travel - drive to Austin	2.00
10/28/2012	Meet with trial team (DH/MB/RC)	3.00
10/28/2012	Analyze defs' exhibit objections & draft email for DH to send response	5.50
10/28/2012	Receipt/review of email from DH re Exhibits	0.10
10/28/2012	Confer with DH re Exhibits and Objections	1.40
10/29/2012	Prepare Canales for trial testimony	1.00
10/29/2012	Attend trial	4.80
10/29/2012	Prepare for trial witnesses	3.20
10/29/2012	Update exhibit list	1.00
10/29/2012	Meet w/MB re teacher deposition	0.70
10/29/2012	Update exhibit list; email affs to IP; email state re objections	1.60
10/29/2012	Email affs to IP	1.60
10/29/2012	Email state re objections	1.60
10/29/2012	Confer with DH re Objections to Exhibits	0.20
10/29/2012	Receipt/review of email from DH re teacher testimony	0.10
10/30/2012	Attend trial	3.00
10/30/2012	Attend trial	3.10
10/30/2012	Confer with DH re client testimony	0.20
10/30/2012	Confer with DH re COR affidavids	0.30
10/30/2012	Prepare trial exhibits	3.30
10/31/2012	Attend trial	1.50
10/31/2012	Attend trial	2.20
10/31/2012	Travel home	2.20
10/31/2012	Prep K. Diaz outline & read pertinent FOFs/expert reports	6.00
10/31/2012	Confer with DH re Admission of Edgewood exhibits	0.20
NOVEMBER		

DATE	DESCRIPTION	HOURS
11/1/2012	Exhibits - summarize outstanding objections for DH	0.50
11/1/2012	Attend trial	3.00
11/1/2012	Working lunch - discuss witness coordination & exhibit offers	1.50
11/1/2012	Attend trial	0.90
11/1/2012	T/C w/Dr. Ponce re: affidavits & testimony	0.20
11/1/2012	Attend trial	2.70
11/1/2012	Draft/revise emails re: district affidavits	0.30
11/1/2012	Plan/prepare for Shimotsu direct	0.10
11/1/2012	Draft revise email re: prep for Shimotsu	0.10
11/1/2012	Coordinate superintendent witness travel	0.10
11/1/2012	Research Charter & Intervenor witness (in disc. responses & online)	4.00
11/1/2012	Prep for teacher prep (Diaz)	2.00
11/2/2012	Prep for Shimotsu teacher prep	0.60
11/2/2012	Send witness research summary to DH (Diaz)	0.20
11/2/2012	Review document production from State	2.00
11/2/2012	Finalize meet/confer email to state re: state's exhibits and sound	0.50
11/2/2012	Draft teacher prep outline	1.30
11/2/2012	Draft: teacher prep outline	3.00
11/3/2012	Travel to Harlingen	4.00
11/3/2012	Meet w/Krishtel Diaz to prepare for testimony	4.00
11/3/2012	Prep witness Krishtel Diaz	4.00
11/3/2012	Exhibit negotiation/finalization with other parties	2.10
11/3/2012	Review of state's document production since 10/22/2012	4.80
11/4/2012	Travel from Harlingen	7.00
11/4/2012	Confer with DH re Exhibits	0.50
11/4/2012	Confer with DH re deposition excerpt supplements.	0.90
11/5/2012	Prep to pre witness Roxy Shimotsu	5.40
11/6/2012	Travel to RGV	5.50
11/6/2012	Prep witness R. Shimotsu	4.00
11/7/2012	Attend trial	3.00
11/7/2012	Court/working lunch to discuss trial strategy w/DH & MB	1.50
11/7/2012	Attend trial	1.50
11/7/2012	Prep for D. Dunn deposition	3.00
11/7/2012	Review Charter pleadings & review Edgewood I, II, IV and WOC II	4.00
11/7/2012	Misc: negotiating over exhibit admission w/state	0.30
11/7/2012	Travel from RGV to Austin	4.00
11/8/2012	Receipt & review of email from DH re Charter Depos	0.10
11/8/2012	Confer with DH re Charter Data	0.20
11/8/2012	Dunn depo / prep	14.00
11/9/2012	Prep for Dunn depo.	3.00
11/9/2012	Take/attend Dunn depo	8.00
11/9/2012	Receipt/review email from DH re Charter Depo.	0.10
11/9/2012	Receipt/review email from DH re Hammond Depo	0.10
11/11/2012	Draft/revise email w/DH re: Hammond deposition	0.20
11/11/2012	Draft/revise emails w/plaintiff groups re: witness presentation	0.10
11/13/2012	Attend 1/2 day in court	4.00
11/13/2012	Prep witness R. Shimotsu	7.00
11/14/2012	Attend trial	7.50
11/15/2012	Confer with DH re Hammond Depo	1.20
11/14/2012	Prep for Hammond depo	4.00

DATE	DESCRIPTION	HOURS
11/15/2012	Prep for Hammond depo	13.00
11/16/2012	Take Hammond deposition	4.50
11/16/2012	Receipt/review email from DH re Trial strategy	0.10
11/19/2012	Attend trial	7.50
11/20/2012	Attend trial	7.50
11/21/2012	Confer with DH re L. Taylor testimony	0.40
11/21/2012	Team meeting re trial strategy	1.20
11/26/2012	Prep Harris cross	10.30
11/27/2012	Attend trial	7.50
11/27/2012	Prep for Venable deposition	4.20
11/28/2012	Prep for Rolle deposition	15.00
11/29/2012	Take/attend Rolle deposition	8.00
11/29/2012	Prep for Wood deposition	2.70
11/30/2012	Take/attend Wood deposition	6.00
11/30/2012	Email from DH re cross exam assignments	0.10
DECEMBER		
12/4/2012	Attend trial	7.50
12/5/2012	Attend trial	7.50
12/6/2012	Attend trial	7.50
12/7/2012	Prep for Wolter's deposition	8.60
12/7/2012	Travel home	4.00
12/9/2012	Email from DH re Defendants Supp'l exhibits	0.50
12/10/2012	Travel to Austin from home	4.00
12/10/2012	Take/attend Wolter's deposition	5.00
12/10/2012	Email from DH re Wolters cross exam	0.10
12/10/2012	Confer with DH re Givens cross exam	0.80
12/11/2012	Attend trial	7.50
12/11/2012	Confer with DH re Eissler Depo	0.20
12/12/2012	Attend trial	7.50
12/13/2012	Attend trial	7.50
12/14/2012	Attend trial	7.50
12/14/2012	Receipt/review email from DH re Bast Depo	0.10
12/17/2012	Take/attend DiBella's deposition	6.00
12/17/2012	Confer with DH re Bast Depo	0.70
12/18/2012	Prep for Bast deposition	16.20
12/18/2012	Confer with DH re Bast Depo	0.70
12/18/2012	Email from DH re admitted exhibits	0.10
12/19/2012	Travel for Bast deposition	2.00
12/19/2012	Attend/take Bast deposition	11.00
12/19/2012	Travel (to San Antonio)	2.00
12/28/2012	Confer with DH re Beauliew cross exam	0.60
12/31/2012	Prep for Jones deposition	8.90
2013		
JANUARY		
1/1/2013	Document review of defendants' exhibits & proposed exhibits & disc. Resp.	
1/2/2013	Review defs' proposed exhibits introduced late for objectionable material	4.80
1/2/2013	Prep for Eissler deposition	2.10

DATE	DESCRIPTION	HOURS
1/2/2013	Maintain Edgewood exhibit list & work on negotiating outstanding objections w/State & other parties	0.70
1/3/2013	Prep for Eissler deposition	7.60
1/3/2013	Email from DH re schedule of cross examiantion assignments	0.10
1/3/2013	Meeting w/MALDEF trial team to discuss trial strategy and schedule going forward	0.50
1/6/2013	Prep for Bealieu cross	2.00
1/6/2013	Team meeting	1.00
1/6/2013	Update exhibit list	1.00
1/6/2013	Document review of new produced exhibits	6.00
1/7/2013	Attend trial	7.50
1/7/2013	Review Dawn-Fisher cross / prep to DH	3.00
1/7/2013	Review DH email re Defs. latest exhibits	0.10
1/8/2013	Attend trial	7.50
1/8/2013	Prep for Eissler deposition	2.10
1/9/2013	Take/attend Eissler deposition	8.00
1/9/2013	Document/exhibit review	3.00
1/9/2013	Team meeting	1.00
1/10/2013	Attend trial	7.50
1/11/2013	Prep Hammond cross	4.20
1/13/2013	Conduct Smedshammer family/school district research for DH cross	2.30
1/13/2013	Prep McAdam's cross	4.10
1/14/2013	Attend trial	7.50
1/14/2013	Prep Hammond's cross	5.50
1/15/2013	Prep McAdam's cross	7.90
1/15/2013	Attend trial	4.00
1/15/2013	Prep Hammond's cross	1.00
1/15/2013	Review/edit Hanushek's cross	0.70
1/16/2013	Attend trial	6.00
1/16/2013	Integrate DH's comments into McAdams' cross	2.10
1/16/2013	Integrate DH's comments into Hammond's cross	1.50
1/17/2013	Attend trial	7.50
1/18/2013	Read over FOF/COLs to prepare for Wolters' cross	3.00
1/18/2013	Draft Wolters' cross	6.80
1/21/2013	Edit Bast's cross	3.70
1/21/2013	Assist DH w/Bast's cross/prep	2.10
1/22/2013	Attend trial	7.50
1/22/2013	Draft/revise FOFs	2.10
1/22/2013	Draft/revise Wolters' FOFs	0.70
1/22/2013	Analyze intervenors' documents to see what expert material were admitted	2.20
1/23/2013	Maintain exhibits; redraft exhibit 4224A-Z	1.60
1/23/2013	Draft/revise Beaulieu FOFs	1.60
1/24/2013	Trial - Partridge testimony	4.00
1/24/2013	Draft/edit Charter's stipulations & Intervenors' FOFs	7.70
1/25/2013	Draft/edit FOF/COLs to include record citations	9.40
1/25/2013	Confer with DH re FOF/COL	0.30
1/26/2013	Proof FOF/COLs	2.00
1/26/2013	Confer with DH re exhibits 4333-24	0.20
1/27/2013	Work on Charter stipulations	2.00
1/27/2013	Prep DiBella's cross	6.20

DATE	DESCRIPTION	HOURS
1/27/2013	Prep Rolle's cross	3.10
1/27/2012	Confer with DH re Dibella cross exam	0.20
1/28/2013	Attend trial	7.50
1/28/2013	Prep Rolle's cross	3.50
1/28/2013	Prep Wood's cross	1.70
1/28/2013	Confer with DH re Rolle/Sage cross exam	0.70
1/29/2013	Trial - Rolle's testimony	7.50
1/29/2013	Prep Wood's cross	3.60
1/29/2013	Prep Dunn's cross	4.80
1/29/2013	Confer with DH re Wood Outline for cross exam	1.20
1/30/2013	Trial - Rolle's cont., Wood & Dunn testimony	7.50
1/30/2013	Confer with DH re Defendants' exhibits	0.90
1/30/2013	Confer with DH re D. Pierce and Strategy	0.30
1/31/2013	Research for PTJ	2.80
1/31/2013	Analyze the state's exhibits & email re: objections	1.50
1/31/2013	Draft/revise PTJ	3.50
1/31/2013	Update FOF/COLs for Charter testimony	3.70
FEBRUARY		
2/1/2013	Analyze state's exhibits to be admitted	2.70
2/1/2013	Draft/revise PPT	3.60
2/1/2013	Email w/state regarding exhibits	0.20
2/1/2013	Draft/revise PPT	2.10
2/3/2013	Edit trial brief & file	2.00
2/3/2013	Draft/revise PPT	6.60
2/3/2013	Review 300 exhibits proposed by Defendants for admission	4.20
2/4/2013	Attend trial	6.75
2/4/2013	Draft/revise closing PPT	4.00
2/5/2013	Correct HRL exhibits & closing PPT, proof other districts' exhibits	2.10
	TOTAL	708.45

TIME SHEET

Attorney Jorge Sanchez

<u>DATE</u>	<u>DESCRIPTION</u>	<u>TIME</u>
9/18/12	REV iew email from Davis Hinojosa and attachments: School finance for aprents, internal litigation memo, copy of deposition schedule, intervenor's requests for disclosure, Second amended response to P's and Intervenors request for disclosure, First amended petition, <i>WOC v Neeley</i>	2.8
9/19/12	Review travel options dates, times and locations for departure and return accommodations for 9/25 trip.	.9
	Email Rocio re: finalizing travel plans,	.1
	Review deposition notice	
9/24/12	Research background information for deponent, Linda Roska on google	.5
	Review statewide statistics on finance and performance of Texas school particularly as to LEP, free and reduced school lunch disabled and Latino populations on dropouts, completions, graduation	2.7
9/25/12	travel to and from Linda Roskam deposition	.8
	attend Linda Roskam deposition	3.5
	Confer with co-counsel Tom Hunter	.3
	review email From David Hinojosa and attachment re: deposition of Rob Coleman	.4
9/26/12	travel to,, from Rob Coleman deposition	.7
	attend deposition of Rob Coleman	2.7
	Review documents for Schroeder deposition Reports TEA Academic Excellence Indicator 2005-2006, 2010-2011	2.3
9/26/11	travel to and from deposition of Rodney Schroder	.7
	Confer with cooperating counsel	.5
	Attend deposition for Schroeder	4.5
9/28/12	REV email from David Hinojosa re: Allan Parker report possible questions, review plea in intervention	.5
9/30/12	Review Podgursky report for deposition	2.2
	Review Vigdor report	.7
10/1/12	travel to and from Podgursky depostion	.7
	Confer with Maribel Hernandez-Rivera re dep	.5
	attend Podgursky depostion	7.7
	Research Allan Parker on internet re: writings and activities not in the present case	1.6
	Review Allan Parker expert report	.3
10/2/12	travel to and from Parker deposition	.7
	Confer with jorge Castillo co-counsel on dep areas	.3

	Attend Parker deposition	4.0
10/11/12	Review writings from Paul hill and expert report	4.8
10/12/12	travel to and from Deposition of Paul Hill	.7
	Attend depostion of Paul Hill	6.1
	Confer with cooperating counsel	.5
10/15/12	review deposition of Rob Coleman designate portions for submission to the court	1.1
	review deposition of Allan Parker designate portions for submission to the court	3.4
	review deposition of Robert Scott designate portions for submission to the court	3.1
	review deposition of Jose cervantes designate portions for submission to the court	1.2
10/19/12	Drafting findings of fact for witnesses with citation depositions, review depositions and draft findings of fact for Linda Roska Rob Coleman, Podgursky, Allan Parker, Dan Casey	5.2

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Edgewood ISD v. Michael Williams
CAUSE NO. D-1-GN-11-003130
Luis Figueroa

<u>Date</u>	<u>Description</u>	<u>Hours</u>
2012		
AUGUST		
8/13/2012	Document review of over 100,000 documents in response to State's RFP	5.00
8/14/2012	Document review of over 100,000 documents in response to State's RFP	5.00
8/15/2012	Document review of over 100,000 documents in response to State's RFP	5.00
8/16/2012	Document review of over 100,000 documents in response to State's RFP	5.00
8/17/2012	Document review of over 100,000 documents in response to State's RFP	5.00
8/20/2012	Preparation of Harris deposition	4.80
8/22/2012	Preparation of Harris deposition	5.60
8/27/2012	Preparation of Harris deposition	6.20
8/27/2012	Document review of over 100,000 documents in response to State's RFP	5.00
8/28/2012	Preparation of McAdams deposition	5.20
8/28/2012	Document review of over 100,000 documents in response to State's RFP	5.00
8/29/2012	Document review of over 100,000 documents in response to State's RFP	5.00
SEPTEMBER		
9/3/2012	Preparation of McAdams deposition	5.20
9/4/2012	Preparation of McAdams deposition	4.80
9/4/2012	Preparation of Kincannon deposition	1.80
9/5/2012	Travel to and from Austin	3.00
9/5/2012	Deposition of Donald McAdams	7.20
9/6/2012	Travel to and from Austin	3.00
9/6/2012	Deposition of Susan Kincannon	5.20
9/7/2012	Travel to and from Austin	3.00
9/7/2012	Deposition of Larry Harris	5.90
9/10/2012	Preparation of Hoke deposition	1.80
9/11/2012	Travel to and from Austin	3.00
9/11/2012	Deposition of Tracy Hoke	8.00
9/11/2012	Preparation of Wiggins deposition	1.20
9/12/2012	Travel to and from Austin	3.00
9/12/2012	Deposition of Paul Colbert	3.80
9/12/2012	Deposition of William Wiggins	5.00
9/17/2012	Preparation of Waddell deposition	1.80
9/17/2012	Preparation for Vigdor deposition	7.70
9/18/2012	Travel to Dallas	3.00
9/18/2012	Deposition of Stephen Waddell	1.80
9/18/2012	Preparation for Miles deposition	2.60
9/19/2012	Travel to San Antonio	3.00
9/19/2012	Deposition of Floyd Miles	7.10
9/23/2012	Preparation for Odden deposition	5.00
9/24/2012	Preparation for Vigdor deposition	8.50
9/24/2012	Travel to Austin	1.50
9/25/2012	Deposition of Jacob Vigdor	4.90
9/25/2012	Travel to San Antonio	1.50

<u>Date</u>	<u>Description</u>	<u>Hours</u>
9/25/2012	Preparation for Frost deposition	1.20
9/26/2012	Travel to and from Austin	3.00
9/26/2012	Deposition of Diane Frost	5.80
9/26/2012	Preparation for Odden deposition	5.20
9/27/2012	Travel to and from Austin	3.00
9/27/2012	Deposition of Allan Odden	8.60
OCTOBER		
10/1/2012	Preparation for Carstarphen deposition	1.50
10/2/2012	Travel to and from Austin	3.00
10/2/2012	Deposition of Meria Carstarphen	7.30
	TOTAL	213.70

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Edgewood ISD v. Michael Williams

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

Maribel Hernandez-Rivera

<u>Date</u>	<u>Description</u>	<u>Hours</u>
2012		
SEPTEMBER		
9/26/2012	Response to Discovery Request; Draft Objections	4.70
9/27/2012	Background reading.	3.00
9/27/2012	Call w. team.	0.20
9/27/2012	Podgursky Deposition Preparation; Read Vigdor and Darling Hammon reports.	1.90
9/28/2012	Podgursky Deposition Preparation; Read and analyzed Podgursky's reports and supporting materials. Conducted research.	7.00
OCTOBER		
10/1/2012	Podgursky Deposition; Attended deposition, asked questions and took notes.	11.00
10/2/2012	AISD Deposition	6.00
10/2/2012	Preparation for Duncombe Deposition; Read report and supporting materials. Conducted research.	4.00
10/3/2012	Duncombe Deposition; Attended deposition, and took notes.	12.50
10/4/2012	Preparation for Moak Deposition; Read reports and supporting materials. Conducted research.	6.10
10/5/2012	Moak Deposition; Attended deposition and took notes.	12.50
10/8/2012	Team meeting re primer	2.00
10/8/2012	Response to TX Charter School Interrogatories; Edit.	5.00
10/8/2012	Team meeting re Exhibit List	1.00
10/9/2012	Compile Exhibits	11.00
10/10/2012	Compile Exhibits	9.50
10/11/2012	Compile Exhibits	11.00
10/12/2012	Compile Exhibits	12.00
10/15/2012	Compile Exhibits	2.00
10/15/2012	Deposition Designations for Charles Dupre, Joseph Thinas Patek, Larry Harris.	4.00
10/15/2012	Preparation for Folks deposition; Drafted deposition questions and conducted research.	10.00
10/16/2012	Folks Deposition; Attended deposition, asked questions and took notes.	8.00
10/17/2012	Draft Exhibits Objections for: Defendant's Exs. 7,777-7,999 + 10,000-10,100; Intervenor's Exs. 8,026-8,050	12.00
10/18/2012	Findings of Fact; Fact check, add citations and add data related to Edgewood Plaintiff Districts.	12.00
10/19/2012	Findings of Fact; Insert data for individual plaintiffs, insert data regarding educational outputs (i.e. TAKS, college readiness and STAAR)	12.00
10/20/2012	Findings of Fact; Data check, input AIES and TEA data, add citations to Lopez, Moak and Hanushek.	12.00
10/21/2012	Findings of Fact; Input citations related to meaningful discretion claim. Input data related to attrition rates and comp ed funding for the adequacy claim.	16.00
10/22/2012	Trial; Opening Argument.	7.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>
10/22/2012	Findings of Fact and Conclusions of Law; Add citations to Casey's report with respect to weights. Edit.	8.00
NOVEMBER		
11/5/2012	Communication with team;	0.30
11/5/2012	Research; Figure out source of Ex. 4094.	0.70
11/5/2012	Deposition preparation - Denise Pierce; Draft questions. Read Lisa Dawn Fisher (Def's) expert report and deposition. Read Rolle and Wood reports.	6.00
11/7/2012	Deposition preparation - Denise Pierce; Look at performance of charters attended by plaintiffs. Look at performance of acad unacceptable charters and pull the AEIS reports for those. Also, pull the comparison of Acad Unacc charters to Acad Unacc public school districts.	7.00
11/8/2012	Charter Schools deposition preparation; Look at performance of charters attended by plaintiffs. Look at performance of acad unacceptable charters and pull the AEIS reports for those. Also, pull the comparison of Acad Unacc charters to Acad Unacc public school districts.	12.00
11/8/2012	Confer with DH re Charter data	0.20
11/9/2012	Charter Schools deposition preparation; Created and populated Charter Schools AEIS Comparison Chart.	5.00
11/12/2012	Team conference call re: scheduling	0.50
11/13/2012	Communication with team.	0.50
11/13/2012	Findings of fact; Gather more specific findings from depo designations and AEIS district reports on the achievement (or lack thereof) of ELL and low income students in the other plaintiff districts.	3.50
11/14/2012	Findings of fact; Gather more specific findings from depo designations and AEIS district reports on the achievement (or lack thereof) of ELL and low income students in the other plaintiff districts.	2.00
11/16/2012	Email from DH re Trial strategy	0.10
11/16/2012	Email from DH re Trial assignments	0.10
11/17/2012	Communication with team and law firm re: scheduling.	4.10
11/21/2012	Email from DH re Bast Depo	0.10
11/28/2012	Meet with J. Colyer about how to conduct a cross examination.	0.70
11/28/2012	Communication with team.	0.30
11/29/2012	Meeting with J. Borek and A. Harris re: how to conduct a cross examination.	2.10
11/30/2012	Travel to TX	6.00
DECEMBER		
12/1/2012	Bast deposition preparation; Read Merrifield & Bast Report. Conduct research. Draft depo questions.	6.00
12/2/2012	Team meeting.	2.00
12/3/2012	Trial; Dr. A. Cortez's testimony.	5.00
12/3/2012	Moe deposition preparation; Read Moe report and citations.	7.00
12/4/2012	Moe deposition preparation; Make outline of Moe report. Research Moe.	10.00
12/5/2012	Trial; Dr. Folks' testimony.	4.00
12/5/2012	Moe deposition preparation; Read reports on teacher issues (i.e. merit pay, etc)	10.00
12/6/2012	Moe deposition preparation; Draft deposition outline. Call w. A. Sencenbaugh to coordinate. Gather exhibits. Met with D. Hinojosa.	16.00
12/7/2012	Moe deposition preparation; Print exhibits.	4.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>
12/7/2012	Moe deposition; Led deposition.	12.00
12/9/2012	Podgursky cross preparation; Check Podgursky's data.	5.00
12/10/2012	Trial; Dr. Zyskoski testimony.	5.00
12/10/2012	Podgursky cross preparation; Read depo transcript and exhibits.	6.00
12/11/2012	Podgursky cross preparation; Summarize Podgursky's role in the case and suggest areas for potential cross. Look into possible motion to exclude. Review cross outline.	6.00
12/11/2012	Confer with DH re Podgursky cross exam	0.80
12/11/2012	Housson cross preparation; Draft cross questions regarding the different impact of minimum standards on different districts.	6.00
12/12/2012	Email from DH re Podgursky cross exam	0.10
12/12/2012	Trial; Provide feedback on Podgursky's testimony.	7.00
12/12/2012	Housson cross preparation; Review cross outline.	3.00
12/12/2012	Podgursky cross preparation; Research extent to which leading questions are permitted on cross	3.00
12/13/2012	Podgursky cross examination; Operate PowerPoint. Provide advice on stats. Keep a list of the areas that Podgursky testified on during other crosses.	3.00
12/13/2012	Housson cross examination; Operate PowerPoint. Provide feedback on direct examination.	3.00
12/13/2012	Edit Spanish school finance terms.	1.00
12/14/2012	TX-NYC travel	6.00
2013		
JANUARY		
1/2/2013	Findings of Fact; Citation gathering.	7.00
1/3/2013	Findings of Fact; Citation gathering.	7.00
1/3/2013	Email from DH re schedule of cross examination	0.10
1/4/2013	questions.	7.00
1/7/2013	questions.	7.00
1/8/2013	questions.	7.00
1/9/2013	questions.	5.70
1/10/2013	questions.	5.00
1/11/2013	Roska's cross examination preparation; Review deposition. Draft cross questions. Coordinate with lead counsel.	5.50
1/13/2013	Travel to TX.	6.00
1/14/2013	Trial & Conducted Roska's cross examination; Monitored direct examination and asked questions.	4.00
1/14/2013	Hanushek's cross examination preparation; Read deposition and exhibits. Draft questions related to teacher quality.	3.00
1/15/2013	segregation. Read Ladd article and Choice on Equity to offer proposed questions for cross.	3.00
1/15/2013	Trial - Hanushek's cross examination preparation; Look at Hanushek's statements about how much our future economy and earnings would improve if students had better teachers (and fired the worst 5-10%). Look at Hanushek's testimony in Lobato. Look at Schanzenbach's analysis of Hanushek's state-level analysis. Advise and draft proposed cross examination questions.	7.00
1/16/2013	Trial; Read Chetty article and advise re: Hanushek's cross.	5.00

<u>Date</u>	<u>Description</u>	<u>Hours</u>
1/16/2013	McAdams and Hammond cross examination preparation; Compile Exhibits.	5.00
1/17/2013	Trial - McAdams and Hammon cross examination; Operate PowerPoint.	5.00
1/17/2013	Bast cross examination preparation; Read Bast deposition and exhibits. Make list of arguments made by Bast. Draft questions.	5.00
1/18/2013	Bast cross examination preparation; Read Bast deposition and exhibits. Make list of arguments made by Bast. Draft questions.	10.00
1/21/2013	list of arguments made by Bast. Draft questions. Coordinate with other counsel.	10.00
1/22/2013	Trial & Conducted Bast Cross Examination	5.00
1/22/2013	Bolling Cross Examination Preparation; Look at district and school AEIS reports. Research charter schools in the area.	5.10
1/23/2013	Trial; Bolling's testimony.	3.00
1/23/2013	Motion to exclude Hurley Testimony; Research	2.00
1/23/2013	Findings of Fact and Conclusions of Law; Draft Findings of Fact for Roska and Bast. Fill in cites for Limon and A. Cortez.	5.00
1/24/2013	Findings of Fact and Conclusions of Law; Look at the districts that have testified and look at their achievement gaps. (STAAR, TAKS, TEAPAS, college readiness). Focus on economically disadvantaged students and ELLs.	10.00
1/25/2013	Findings of Fact and Conclusions of Law; Fill in cites for Cervantes, Vigdor, and Schanzenbach. Table of Contents. Formatting. Edit. Final proof read.	14.00
1/25/2013	Confer with DH re FOF/Col	0.40
1/26/2013	Travel to NYC.	6.00
FEBRUARY		
2/4/2013	Closing Arguments & Ruling	5.00
	TOTAL	575.30

Unofficial copy Travis Co. District Attorney General L. P. Rice

Edgewood ISD v. Michael Williams
CAUSE NO. D-1-GN-11-003130
Jorge Castillo

<u>Date</u>	<u>Description</u>	<u>Hours</u>
2012		
OCTOBER		
10/1/2012	Travel from NY to Texas	4.50
10/1/2012	Preparing for A. Parker expert deposition	1.50
10/2/2012	Preparing for and attending A. Parker deposition	5.50
10/2/2012	Travel from Austin to San Antonio	1.50
10/3/2012	Debrief of A. Parker deposition	0.40
10/3/2012	Preparation for Kallison deposition	3.60
10/4/2012	Further debrief of A. Parker deposition	0.50
10/4/2012	Preparation for Kallison deposition	9.50
10/5/2012	Kallison deposition w/M. Bono	9.50
10/5/2012	Preparation for Currah deposition	4.00
10/8/2012	Preparation for Currah deposition	10.50
10/8/2012	Travel from San Antonio to Austin	1.50
10/9/2012	Currah deposition	6.80
10/9/2012	Travel from Austin to San Antonio	1.50
10/10/2012	Preparing for Whitehurst deposition	6.20
10/11/2012	Preparation for Whitehurst & meeting w/D. Hinojosa re: same	8.30
10/12/2012	Whitehurst deposition w/D. Hinojosa	11.20
10/13/2012	Travel from Texas to NY	4.30
10/15/2012	Designating depositions for trial & team communications re: same	9.50
10/17/2012	Coordinating deposition designations w/staff	1.30
10/17/2012	Drafting FOFs regarding Kallison deposition	4.00
10/18/2012	Correcting designation for Oden expert deposition	1.50
10/19/2012	Designating depositions of Currah & Flores; team communications re: same	3.50
10/19/2012	Edits to FOF/COLs	2.60
10/21/2012	Drafting, editing, reviewing, cite checking & formatting FOF/COLs	8.00
10/22/2012	Work on FOFs	10.90
10/23/2012	Review Woods report & drafting summary	2.50
10/23/2012	Review for designations of Flores deposition	2.00
10/24/2012	Designating Flores & Currah depositions & emails re: same	9.30
10/25/2012	Preparing for trial questions for expert Wood	1.00
10/25/2012	Finalizing Flores & Currah designations	1.00
10/29/2012	Emails designating Ponce deposition	0.30
10/30/2012	Designating Ponce deposition	3.00
10/31/2012	Designating Ponce deposition	4.40
NOVEMBER		
11/1/2012	Edits to Barnett trial PPT	4.80
11/2/2012	Finishing edits to Barnett trial PPT	2.10
11/7/2012	Edits to Barnett expert trial exhibits	4.00
11/7/2012	Initial research for Dunn deposition	1.40
11/8/2012	Preparation for Dunn deposition & drafting exhibits re: same	9.20
11/9/2012	Preparation for Dunn deposition & drafting exhibits re: same	7.70

Exhibit B

Unofficial copy Travis Co. District Clerk Velda L. Price

DAVID G. HINOJOSA

(210) 473-1935(c)
pil_david@hotmail.com

1915 Rindle Ranch
San Antonio, Texas 78249

LEGAL EXPERIENCE

Mexican American Legal Defense and Educational Fund (MALDEF)

San Antonio, TX

Southwest Regional Counsel, Feb. 2011 – Present

Staff Attorney/Senior Litigator, Dec. 2003 - Feb. 2011

Litigates complex civil rights impact cases in federal and state courts in the areas of education, employment and immigration—mostly as lead counsel; serves as appellate counsel; drafts amicus briefs; provides counsel and advice to intakes; presents on local, state and national panels; serves as expert on attorney's fees; and testifies before various local and state governmental agencies on impact litigation and policy. Notable cases include:

- Obtained order granting relief on all claims alleging unconstitutionality of Texas school finance system, on behalf of a group of low-wealth school districts and parents of low income and English Language Learner children. (Final Judgment has not issued) (200th Dist., Travis Co., Texas.).
- Prevailed on behalf of English language learner and low income students in first school adequacy challenge in Colorado; arguing appeal before Colorado Supreme Court. *Lobato-Ortega v. Colorado* (Colo.)
- Forced plaintiff organization to drop taxpayer challenge to Texas's law affording instate tuition to students regardless of their legal status after filing motion to dismiss on behalf of intervening student organization. *IRCOT v. Texas/University Leadership Initiative* (281st Dist., Harris Co., Tex.).
- Negotiated agreed permanent injunction and award of fees, after obtaining preliminary injunction, against New Mexico re-certification program, which required foreign national driver's license holders to recertify their eligibility, in violation of equal protection clause. *Garcia v. Padilla* (1st Judic. Dist., Santa Fe Co., NM).
- Obtained statewide injunction requiring Texas Education Agency to improve monitoring and secondary school programs for English Language Learner students; argued appeal before the Fifth Circuit; reversed but remanded to add school districts as defendants. *United States, GI Forum and LULAC v. Texas* (E.D. Tex.).
- Enjoined permanently Texas driver's license regulations, which denied licenses to certain persons permitted to reside in the U.S; argued both appeals. *Salazar v. Tex. Dept. of Public Safety* (345th Dist., Travis Co., Tex.).
- Represented undocumented immigrants as co-counsel in two-week jury trial against rancher who assaulted plaintiffs; clients awarded \$75,000 in compensatory and punitive damages. *Vicente v. Barnett* (D. Ariz.).
- Forced State Defendants to provide tuition exemptions to military veterans who were denied assistance on the basis of their citizenship status when they first entered the military, in violation of Title VI and Fourteenth Amendment; obtained reimbursement of tuition paid. *Dominguez v. Texas* (W.D. Tex.).
- Successfully defended against a school district's motion to dismiss a desegregation decree- compelling district to enter into a three-year consent order- and awarded fees. *CRUCIAL v. Ector County ISD* (W.D. Tex.).
- Served as lead and co-counsel in Title VII discrimination case alleging segregation in the workplace on behalf of 78 plaintiffs; case ultimately settled for \$2.8 million. *Colindres v. Quietflex* (S.D. Tex.).
- Permanently enjoined school principal from segregating minority students in classrooms under Fourteenth Amendment; obtained punitive damages and attorney's fee award. *Santamaria v. Dallas ISD* (N.D. Tex.).
- Litigated five-week trial of Texas school finance system; argued case before the Texas Supreme Court; awarded fees of \$1.2 million on appeal. *West Orange-Cove CISD v. Neeley* (250th Dist., Travis Co., Tex.).

Lone Star Legal Aid

Galveston, TX

Staff Attorney, Aug. 2000 – Dec. 2003

Carried docket of over fifty cases on behalf of the indigent, practicing in many areas of law including employment, landlord-tenant, family and consumer protection; participated in several trials and filed numerous motions; fashioned plaintiffs' docket in office that traditionally defended evictions; forced housing authority to comply with federal notice requirements for persons denied tenancy; negotiated local transit authority's practices to better serve disabled persons; developed local domestic violence safety plan and numerous *pro se* documents.

Travis County District Attorney's Office

Austin, TX

Family Justice Division Law Clerk, Mar. 1999 – June 2000

Prepared discovery and trial preparation, performed legal research, and drafted pleadings for family civil division.

EDUCATION

The University of Texas at Austin School of Law

Austin, TX

J.D., May 2000; *Lic'd*, Nov. 2000

- Clinical Experience: Immigration and Criminal Defense
- Texas Hispanic Journal of Law & Policy
- Chicano/Hispanic Law Students' Assoc.- President
- Texas Law Fellowship- Bexar County Legal Aid Summer Intern
- Who's Who Among American University Students

New Mexico State University

Las Cruces, NM

B.A. w/ Honors Certificate, May 1997

- GPA: 3.94

OTHER PROFESSIONAL EXPERIENCE

United States Air Force

Norton AFB, CA & WSMR, NM

Air Traffic Controller, 1989 – 1997

Conducted air traffic control operations both in an air traffic control tower and a radar unit.

- Medals: Commendation, Achievement, Outstanding Volunteer Service and National Defense
- 46th Test Group Airman of the Year; Two-time White Sands Missile Range Airman of the Year

LICENSES/ACTIVITIES/AWARDS

Licensed to practice in: Texas; W.D., N.D. & S.D. of Texas; Fifth & Ninth Circuit Courts of Appeal; U.S. Supreme Court

Expert Panelist/Presenter at over forty local, state and national conferences, 2002 - Present

San Antonio Area Association of Bilingual Education's Advocate of the Year, 2009

YMCA Youth Soccer and Basketball Coach, 2007-Present

Career Day Speaker at primary and secondary schools, 2005 - Present

St. Mary's University Law Student Mentor, 2007-present

Texas Association of Bilingual Educators Community Advocate of the Year, 2007

Alpha Chi and Golden Key National Honor Societies

SKILLS AND INTERESTS

Conversant in Spanish; CEXIS and Westlaw proficiency; basketball; swimming; exploring the outdoors with my children; political/cultural literature; cultural festivals.

MARISA BONO

110 Broadway Ste. 300 • 210.224.476 ext. 204 • mbono@maldef.org

PROFILE

Native San Antonio attorney with broad experience in pre-trial litigation, discovery, and trial, and appellate work in state and federal court. Licensed to practice in the United States Supreme Court, the Western, Northern, and Southern Districts of Texas, and Texas state court.

LEGAL EXPERIENCE

Mexican American Legal Defense and Educational Fund (MALDEF) (San Antonio, Texas)

Staff Attorney, December 2010 to Present

- Attorney handling immigration-related cases in MALDEF's Southwest Regional Office, covering states in Fifth and Tenth Circuits.
- Specialize in constitutional law, school funding immigration, and discrimination issues.
- Led litigation team in First and Fourteenth amendment case on the behalf of day laborers in Texas federal court.
- Co-chair litigation team in school funding case in three-month bench trial in Texas state court.
- Co-chair litigation team in school funding case in two-month bench trial in Colorado state court.
- Led appellate team in vigilante rancher civil assault case in Ninth Circuit and United States Supreme Court.

Kustoff & Phipps, L.L.P. (San Antonio, Texas)

Associate Attorney, August 2008-2010

- Handled all aspects of litigation in high volume, plaintiff-side civil practice, including investigation, discovery, motion practice, and trial.
- Handled primarily DTPA, fraud, and personal injury cases in Bexar and surrounding counties.

Mexican American Legal Defense and Educational Fund (MALDEF) (San Antonio, Texas)

Staff Attorney and Skadden Fellow, 2006-2008

- Co-chair litigation team in 42 U.S.C. §§ 1981, 1985 action including claims of civil assault and battery in Arizona federal district court.
- Co-chair litigation team in Fourteenth Amendment and Title VI lawsuit on the behalf of veterans against state entities.
- Co-chair appellate team in civil assault case in Arizona state court.
- Member of litigation team for Voter ID case in Arizona federal district court.
- Investigated and developed FLSA class action on the behalf of janitorial workers in New Mexico.
- Provide direct representation for immigrant victims of crime applying for temporary status.

United States District Court, Northern District of Texas (Dallas, Texas)

Judicial Clerk to the Honorable Jerry Buchmeyer, Senior District Judge, 2005-2006

- Completed bench and research memorandums and jury instructions in civil and criminal dockets.
- Drafted opinions and summary memorandum opinions for both civil and criminal cases.

EDUCATION

University of Michigan Law School, Ann Arbor, MI

Juris Doctor, 2005, Clarence Darrow Full Merit Scholarship

- MICHIGAN LAW REVIEW, Managing Editor
- Latino Law Students Association, President
- Child Advocacy Law Clinic, Student Attorney
- Recipient of 2002 Legal Research and Writing Prize, Best Oral Argument

University of Michigan Ford School of Public Policy, Ann Arbor, MI

Masters in Public Policy, 2005, Full Merit Scholarship

Rice University, Houston, Texas

Bachelor of Arts, Political Science

- NCAA Div. I Cross Country and Track

SKILLS AND ASSOCIATIONS

Proficient in written and spoken Spanish

San Antonio Ethics Review Board – Mayor’s Appointment

AVANCE-San Antonio, Board of Directors, Board Chair of Development, 2009 – Present

San Antonio Mayors Commission on the Status of Women – District 7 Appointment, 2010-2013

Texas Trial Lawyers Association, Board of Advocates, 2009-2011

San Antonio Trial Lawyers Association, Board of Directors, 2009-2011

Unofficial copy Travis Co. District Clerk Velda L. Price

REBECCA COUTO DA SILVA

4423 Cole Ave. 210, Dallas, Texas 75205
310.975.9185, rebeccacoutodasilva@gmail.com
Licenses: TX24082473, CA248019

EDUCATION

THE UNIVERSITY OF MICHIGAN LAW SCHOOL

Ann Arbor, MI
2006

Juris Doctor, magna cum laude, Order of the Coif, GPA 3.714 (top 10%)

- MICHIGAN LAW REVIEW: Executive Editor 2005-2006; Associate Editor 2004-2005
- Book Award (top performer in the class), Psychology of Litigation 2004
- Legal Practice Program, Senior Judge chosen by professors to assist with legal research and writing class, 2004-2006
- Campbell Moot Court, Competitor
- Scholarships: Juan Tienda Scholarship for Dedication to the Latino Community; Women Lawyers Ass'n of Michigan; Dean's Scholar
- Appointed by the law school's deans to plan and implement the 2006 summer's MAP (Michigan Access) program to create a safe space for diverse students and highlight the role of diversity in law school.

STANFORD UNIVERSITY

Stanford, CA
2001

Bachelor of Arts with Distinction in History and Psychology with a minor in Sociology, GPA 3.8

- Phi Beta Kappa Society, Member
- Psi Chi, National Honor Society in Psychology, Member
- Worked full-time through school to offset tuition

LEGAL EXPERIENCE

MEXICAN AMERICAN LEGAL DEFENSE & EDUCATION FUND (MALDEF)

San Antonio, TX

Staff Attorney

April 2011 – present, Summer 2004 (*as Legal Intern in LA*)

- Head of the labor practice in MALDEF's Southwest Regional Office, covering states in the Fifth and Tenth Circuits.
- Served as counsel in five trials over a period of 14 months; delivered opening statement, presented and crossed key witnesses.
- Argued and defended against motions, including multiple discovery victories in federal court and defeating a motion to dismiss.
- Researched and drafted portions of briefs for the Supreme Court of Colorado and the Fifth Circuit.
- Extensive experience with discovery, including supervising/conducting discovery process for a federal constitutional case.
- Specialize in constitutional law, voting rights, school funding, discrimination, and labor issues.

LATHAM & WATKINS LLP

Los Angeles, CA

Associate

2006-2011, Summer 2005 (*as Summer Associate*)

- Crafted discovery plans; supervised discovery; deposed key witnesses; defended depositions of key witnesses.
- Researched and drafted motions, responsive papers, cost memoranda, and attorneys' fees motions/oppositions.
- Served as second chair of large team defending a non-profit corporation in a case involving the City of Los Angeles as co-defendant.
- Researched and wrote briefs for detainees in the Ninth Circuit, immigration court, and for the Bureau of Immigration Appeals.
- Supervised representation, including research and writing, of asylum applicants and victims of domestic violence.
- Sought insurance and grant coverage for victims of Hurricane Katrina, resulting in many out-of-court settlements.
- Experienced in international investments, First Amendment, insurance coverage, contracts/leases, ERISA, mass tort, and asylum law.

MUNGER, TOLLES & OLSON LLP

Los Angeles, CA

Summer Associate

Summer 2004

- Researched and wrote memoranda regarding: attorneys' fees under the *qui tam* provisions of the False Claims Act, dismissal under the state-secrets doctrine and the prevailing-party inquiry, scope-of-employment, and co-conspirator liability for an organization.
- Sponsored to work at MALDEF Los Angeles for 4 weeks as part of the firm's 1L Diversity Fellows Program.

INTERESTS

- Speaking in the community regarding constitutional law, civil rights, labor rights, and education issues.
- Helping educate and mentor law students (e.g., Judge, UCLA Moot Court Honors Program, 2010).
- Practicing Brazilian jiu-jitsu and yoga.

LANGUAGES

- Brazilian Portuguese – basic conversational skills and literacy.
- Spanish – basic conversational skills, including ability to communicate with Spanish-speaking clients, intermediate/advanced literacy.

Last updated December 15, 2012

Jorge Sánchez

5115 S. University 3rd Floor Chicago, Illinois 60615 • (312) 420-6784 • attysanchez@gmail.com

LEGAL EXPERIENCE

DESPRES SCHWARTZ AND GEOGHEGAN, Chicago, Illinois
Attorney April 1999-April 2004 and January 2006-June 2011

Practice concentrated in the area of employment/labor law with substantial litigation experience in civil rights and public interest cases.

Responsible for all phases of litigation including prospective client interviews, drafting demand letters, drafting complaints, drafting discovery, conducting and defending depositions, discovery motion practice, drafting and responding to Motions to Dismiss and Motions for Summary Judgment, pre-trial, jury instructions motions in limine, pre-trial orders, trial, post trial motions, fee petitions, drafting appellate briefs and motions, appellate arguments.

Represented union clients in matters before the NLRB, Department of Labor, grievance committees and in arbitrations. Cases primarily in Federal Court on Title VII (race and sex discrimination), Section 1983 (Equal Protection, Due Process and First Amendment), Section 1981, WARN Act, ERISA (breach of fiduciary duty), Labor Management Reporting and Disclosure Act. Research, writing and consulting on general litigation.

MEXICAN AMERICAN LEGAL DEFENSE AND EDUCATIONAL FUND, Chicago, IL
Staff Attorney April 2004 – January 2006

Responsible for litigation in areas of immigration rights, voting rights, employment and miscellaneous.

Responsible for communicating policy positions to legislators and governmental decision makers, acting as resource on employment law issues for attorneys in other MALDEF offices. After the departure of Regional Counsel became de facto head of regional office.

Responsible for supervising junior attorneys and staff, identifying and conducting litigation, responding to requests for information and advocacy made to regional office, representing MALDEF in meetings with the Joyce Foundation, as a member of the board of the Illinois Coalition for Immigrant and Refugee Rights and member of the board of the Illinois Campaign for Political Reform as well as various ad hoc commissions which requested input from an organization representing the Latino community.

Policy Analyst/Staff Attorney September 1996-April 1999

Developed, disseminated and lobbied in favor of policy positions for regional office of national Latino civil rights organization in the areas in immigration, government benefits, education, economic development, and land use issues.

Legislative activities: Researched and wrote policy and position papers, prepared and presented comments for public hearings, lobbied - grass roots and direct, media (Spanish and English).

LAWYERS COMMITTEE FOR CIVIL RIGHTS, Chicago, Illinois

Law Clerk July 1994 - September 1994

Prepared direct examination of two expert witnesses for an IDEA administrative hearing.
Drafted proposed findings of fact for the same hearing.

Researched and wrote memo on possible causes of action against school board for disparate punishment for disciplinary infractions.

PEOPLES LAW OFFICE, Chicago, Illinois

Summer Associate May 1994- July 1994

Drafted response to Defendant's Motion for Summary Judgement Based on Qualified Immunity in a Section 1983 excessive force case.

Researched and wrote memos on: relation back of complaint and effect on statute of limitations when a party is misnamed, state Tort Immunity Act, municipal (*Monell*) liability.

EMPLOYMENT LAW CENTER, San Francisco, California

Summer Associate May 1993 - August 1993

Researched and wrote memos on: First Amendment protections for soliciting work on public streets and service of process on out of state corporations.

Compiled and edited a manual for day laborer advocates on immigrations law issues, social service eligibility, worker's compensation, filing claims for unpaid wages.

Outreach and education - organized "know your rights" meetings around issues of concern to day laborers including police harassment, recovering unpaid wages and INS raids.

ADMISSIONS

State of Illinois Bar

United States District Court for the Northern District of Illinois

United States District Court for the Eastern District of Michigan

United States District Court for the Northern District of Indiana

United States District Court for the Western District of Wisconsin

United States District Court for the Central District of Pennsylvania

United States Court of Appeals for the Seventh Judicial Circuit

EDUCATION

UNIVERSITY OF CALIFORNIA BERKELEY, BOALT HALL SCHOOL OF LAW, Berkeley, California

Juris Doctor May 1995

Articles Editor, *La Raza Law Journal* • Member, Admissions Policy Committee

Member, Admissions Committee • Research Assistant for Professor Angela Harris

Recipient of Graduate Research Grant • Co-chair La Raza Law Students Association

Graduate Student Instructor, for four semesters in Ethnic Studies, Chicano Studies and

Native American Studies • Member, Civil Rights Speakers Committee • Chair, Migrant Legal

Services

BROWN UNIVERSITY, Providence, Rhode Island
Bachelor of Arts, Semiotics January 1989

LAW OFFICES OF DENNIS CUNNINGHAM, San Francisco, California
Practitioner Supervised Clinical Intern January 1995- May 1995

Drafted arguments for discovery motions: motion to reveal identity of police informant, motion to compel the deposition of named defendant in a *Bivens* and Section 1983 First Amendment and Fifth Amendment Constitutional tort case.

Researched and wrote memos on: the scope of protection in a civil context of F.R.Cr.P. 6(e) (Grand Jury Secrecy); municipal liability under *Monell* in Section 1983 actions.

CENTER ON RACE POVERTY AND THE ENVIRONMENT, San Francisco, California
Practitioner Supervised Clinical Intern August 1994- December 1994

Prepared comments for a zoning board hearing for a community group opposed to the expansion of a hazardous waste incinerator.

Prepared written comments in response to an environmental compliance memo proposing the siting of a hazardous waste recycling facility.

Prepared legal memo which served as basis for lawsuit under California's Tanner Act requiring the translation of zoning board hearing into Spanish where community affected by proposed zoning change was overwhelmingly Spanish speaking.

SELECTED LITIGATION AND APPELLATE ADVOCACY

Chicago Teachers Union, Local 1 American Federation of Teachers, AFL-CIO v. Board Of Education City Of Chicago et al., Case No. 10-cv-4852 (N.D. Ill.) Counsel for Chicago Teachers Union challenging, pursuant to 42 U.S.C. §1983, the dismissals of tenured teachers on the grounds that such dismissals violate the due process and contract clauses of the United States Constitution. Performing research to aid in conceiving, drafting and editing complaint, assisting with preparation of motion for preliminary injunction and oral argument of same. Drafted response to motion to dismiss.

Brown-Conley et al., v. Nestlé, USA, Case No. 09-cv-5996 (N.D.Ill.). Lead counsel for employment discrimination case brought under 42 U.S.C. §1981 and Title VII of the Civil Rights Act of 1964 (42 U.S.C. §2000(e)(2)) challenging employment testing and structure of factory apprenticeship program as not relevant to the requirements of production job sought by plaintiffs. Responsible for all phases of litigation.

Gold v. Cerpa et al, Case No. 09-cv-4527 (N.D. Ill.), Lead Counsel in race discrimination in employment case brought under 42 U.S.C. §1983, 42 U.S.C. §1981 and Title VII against Illinois Department of Transportation and individuals defendants.

Hallinan v. Fraternal Order of Police of Chicago Lodge No. 7, Case No. 06-cv-2586 (N.D. Ill.) Counsel for two police officers expelled from union for running for union office brought under §1983 and asserting First Amendment, Equal Protection, and Due Process claims. Assisted with drafting complaint and opposition to motion to dismiss. On appeal, co-writing and final editing of opening brief, writing and editing reply brief, and arguing case before the United States Court of Appeals for the Seventh Circuit (Seventh Circuit). Oral argument at <http://www.ca7.uscourts.gov/tmp/1JoQQUoS.mp3>, opinion at 570 F.3d 811, (7th Cir. 2009).

Jackson v. Cerpa et al., Case No. 06-C-3676 (N.D. Ill.) Lead counsel for African American owned business suing for violation of equal protection under §1983 and intentional discrimination under Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000(d)) and interference with contract. Responsible for all phases of litigation. Defeated summary judgment motion. Case to be set for trial.

Doe v. Hlavacek et al, Case No. 06-cv-00362 (N.D. Ill.) Lead counsel in case challenging Elmwood Park, Illinois school board policy denying enrollment to undocumented student. Claims brought under §1983 challenging denial of constitutional due process and equal protection rights. Responsible for all phases of litigation. Through subsequent settlement, winning a change in policy prohibiting the school district from requiring documents unobtainable by undocumented persons as a condition for school enrollment. Advocating for and providing input to effect a change in state regulations to prohibit, statewide, requests for such documents for enrollment by school boards.

Brotherhood of Locomotive Engineers and Trainmen, General Committee of Adjustment, Central Region (BLET) v. Union Pacific Railroad Company, Case No. 05-cv-07293 (N.D. Ill.) Counsel for BLET, drafting Seventh Circuit appellate briefs for Railway Labor Act case to enforce a New York Dock arbitration decision which was dismissed erroneously. Arguing appeal. Oral argument at <http://www.ca7.uscourts.gov/tmp/1JoUoTU6.mp3>, opinion at 500 F.3d 591 (7th Cir. 2007), winning reversal of district court and entering judgment in favor of BLET.

Vergara, et al v. City of Waukegan, et al., Case No. 04-cv-06586 (N.D. Ill.) Co-counsel in §1983 case challenging on first amendment and equal protection grounds, Waukegan's parade and public assembly ordinance on its face and the application of the ordinance with the intent to chill plaintiffs' first amendment expressive and petition rights. Drafting complaint, drafting and responding to written discovery, conducting and defending depositions, drafting response to motion to dismiss.

Gonzalez v. City of Aurora, Case No. 02-cv-8346 (N.D. Ill.), After departure of initiating attorney, became lead counsel in a lawsuit under Section Two of the Voting Rights Act challenging as discriminatory the 2000 electoral map for the City of Aurora -- a hybrid at-large and district based map. Drafting opposition briefs to motion for summary judgment and supplemental briefs on the significance under *Thornburg v. Gingles*, 478 U.S. 30, 106 S. Ct. 2752, 92 L. Ed. 2d 25 (1986) of the preconditions needed to establish a prima facie case and of the Senate factors needed to establish liability. Drafting appellate opening and reply briefs challenging grant of summary judgment and arguing appeal before Seventh Circuit. Oral argument at <http://www.ca7.uscourts.gov/tmp/1JoRK6WX.mp3>, opinion at 535 F.3d 594 (7th Cir. 2008).

Ramos, et al v. Ashcroft, et al., Case No. 02-cv-8266 (N.D. Ill.) Co-counsel, in *Bivens* action challenging practice of Immigration Control and Enforcement (ICE) of using applications for immigration benefits to investigate, prosecute and deport individuals for violations of the immigration code. Editing class notice and settlement, negotiating terms of settlement.

Peña, et al v. Amer Meat Pkg Corp, et al., 02-cv-02763 (N.D. Ill.) Lead counsel in Worker Adjustment and Retraining Act (WARN Act) case against meat packing company which closed its doors due to refusal to bring hog slaughtering and butchering facility into compliance with USDA regulations. Responsible for all phases of litigation. On appeal drafting appellate briefs and arguing appeal. Oral argument at <http://www.ca7.uscourts.gov/tmp/1JoTOJ7Q.mpg>, opinion at 362 F. 3d 418 (7th Cir. 2004), winning reversal of grant of summary judgment.

Kozlowski et al., v. Fry, Case No. 00-cv-5296 (N.D. Ill.) Counsel for Cook County public defender supervisors in sex discrimination case challenging lower pay for female supervisors. Claims brought pursuant to the Equal Pay Act, Title VII and §1983 (equal protection).

Boyd v. Illinois State Police, Case No. 98-cv-08348 (N.D. Ill.) Co-counsel in race discrimination case challenging disparate pay for a largely minority group of workers whose jobs were transferred when Chicago crime lab merged into the Illinois State Police crime lab. Drafting amended complaints, drafting and responding to discovery requests, taking and defending oral depositions, responding to motions to dismiss and for summary judgment, preparing for and conducting trial. Drafting appellate briefs challenging grant of summary judgment based on erroneous jury instruction. Arguing case on appeal. Oral argument at: <http://www.ca7.uscourts.gov/tmp/1JoPTT5R.mpg>, opinion at: 384 F.3d 588 (7th Cir. 2004), agreeing that jury instruction was erroneous but that plaintiffs were not prejudiced by it.

Barnett, et al v. Daley, et al., 92-cv-1683 (N.D. Ill.), Counsel in Section 2 Voting Rights Act case, attending trial to protect the interests of Latino intervenors in redrawing of electoral map to redress VRA violation established by African American plaintiffs. Drafting responses opposing the imposition of costs on intervening, but unsuccessful, Latino plaintiffsB successfully reducing amount due from over \$86,000 to under \$12,000.

Bari v. Federal Bureau of Investigation et al., Case No. 91- cv-1057 (N.D. Cal.), Intern in a practitioner supervised clinical placement with attorney Dennis Cunningham, drafting arguments for motion to reveal identity of police informant and motion to compel the deposition of named defendant in a *Bivens* and §1983 First Amendment and Fifth Amendment Constitutional tort case. Research and writing memos on the scope of protection in a civil context of F.R.Cr.P. 6(e) (Grand Jury Secrecy) and municipal liability under *Monell* in Section 1983 action.

Sledd v. Lindsay, et al., Case No. 91-cv-01917 (N.D. Ill.) Intern with the People's Law Office Chicago, Illinois, drafting response to Defendant's Motion for Summary Judgement Based on Qualified Immunity in a §1983 excessive force case, conducting legal research and writing memos on relation back of complaint and effect on statute of limitations when a party is misnamed, Illinois Tort Immunity Act and municipal (*Monell*) liability.

As a summer (1993) associate with the Employment Law Center, San Francisco conducting legal research and writing a memo on First Amendment protections for soliciting work on public streets under the commercial speech doctrine and liberty interests in choosing one's profession.

OTHER WORK EXPERIENCE

LATINO YOUTH ALTERNATIVE HIGH SCHOOL, Chicago, IL

Coordinator

August 1995 - August 1996

Supervisory and Personnel

Supervising a staff of eight for non-profit community-based "second chance" high school. Drafting job descriptions for teachers/counselors. Preparing interview questions, scoring criteria and conducted team interviews of prospective candidates. Evaluating staff. Assisting with application of personnel policy to disciplinary actions and termination for larger umbrella agency. Serving as a member of management team for multi-service community based organization serving at-risk youth. Preparing budget based on projected income and expenses. Reviewing and selecting benefit packages for agency staff.

Development/Grant Compliance

Reviewing funder guidelines and agency practices and procedures for compliance with grant requirements and fund restrictions. Preparing and reviewing periodic reports required by foundation, corporate and government funders. Reapplying for and expanding existing funding sources.

UNITED FARM WORKERS OF AMERICA, AFL-CIO, Calexico and Los Angeles, CA and

Full time Volunteer Organizer

January 1991 - August 1992

Staffing union field office. Conducting intake for potential workers compensation cases
Assisting union members in navigating union health and pension plans. Assisting union and community members with applications for immigration benefits, tax preparation, Supporting strike actions and organizing drives.

Door to door fundraising and advocacy in support of UFW and grape boycott. Direct action and outreach to consumers in supermarket parking lots to build support for boycott. Phone fundraising.

Organizing informational events on college campuses to promote UFW's mission and grape boycott. Organizing coalitions of student groups (environmental, labor, Latino, religious) to plan and raise funds for speaking events with Cesar Chavez. Training students to access funding sources on their campuses, arranging logistics for events and travel.

MISCELLANEOUS

Languages: Fluent in written and spoken Spanish, basic conversational French.

Volunteer: Coach, American Youth Soccer Organization Region 751, September 2000 -2006
Board Member, Illinois Coalition for Immigrant and Refugee Rights
September 1997 - June 2000

Personal: Year-round bicycle commuter, collector of 1960-1970 Brazilian MPB.

Luis Figueroa

Experience

Mexican American Legal Defense & Educational Fund, San Antonio, TX

Legislative Staff Attorney, 2004-Present

- Advocate in fast paced state legislative and municipal policy arenas in nine state region for legislation promoting and protecting the rights of Latinos with primary focus on the areas of immigrant rights, political access, educational equity, and access to higher education
- Provide invited testimony on state legislation related to state enforcement of immigration laws, voter identification requirements at the polls, the Texas Top Ten Percent Plan, and Texas Grants as well as public testimony in numerous legislative hearings
- Co-Founded and lead TRUST Coalition that successfully defeated anti-immigrant state-based legislation in 2007, 2009 and 2011 by uniting non-traditional stakeholders
- Analyze bills and ordinances, draft legislation, testimony, primers, and advocacy materials, and lead coalitional efforts in immigrant and voting rights
- Coordinate multi-state election protection efforts and co-chaired the Texas Latino Complete Count Committee for Census 2010
- Handle policy-related media inquiries for the Southwest Regional Office
- Support the litigation efforts at MALDEF including work on Texas voting rights cases, school finance, and higher education access litigation
- Periodically serve as acting Regional Counsel

Consumers Union, Washington, D.C.

Ester Peterson Fellow, 2003-2004

- Lead advocate for student loan reform policy
- Assistant advocate for consumer protections in the areas of telecommunications, prescription drug benefits, and mutual fund reform

Internships

Texas Watch, Fellow, Summer 2002 & Spring 2003, Austin, TX

- Analyzed Texas Supreme Court decisions impacting Texas consumers
- Drafted memos on federal judicial nominations pertaining to consumer interests
- Currently serve on Board of Directors

Texas State Representative Terri Hodge, Intern, Fall 2002, Austin, TX

- Researched potential legislation addressing undocumented immigrant minors detained in Texas prisons

Advancement Project, Intern, Summer 2002, Washington, D.C.

- Assisted on litigation related to violations of the National Voter Registration Act
- Researched projects on civil rights issues such as redistricting and zero tolerance policies

White House Office of Political Affairs, Intern, Fall 1999, Washington, D.C.

- Prepared travel and weekly briefs for use by senior staff
- Drafted correspondence to Democratic Party officials and constituents

Texas Rural Legal Aid, Volunteer Legal Assistant, Summer 1998, El Paso, TX

- Analyzed and organized evidence for cases involving migrant farm worker rights

Luis Figueroa

Education

The University of Texas School of Law, Austin, TX

- Juris Doctorate, May 2003
- Immigration Clinic Student Attorney, Spring and Fall 2002
- *Texas Hispanic Journal of Law & Policy*, Editorial Board, 2002-03
- Public Interest Law Association, Board Member, 2000-02

Trinity University, San Antonio, TX

- B.A. in Political Science and Speech Communication, May 2000
 - Concentration: American Politics and Law

Publications

Voting Rights in Texas: 1982-2006, *Southern California Review of Law and Social Justice*, Vol. 17 Number 2, Spring 2008. Co-Authored with Nina Perales and Griselda Rivas.

State Government: Election Law in Texas, *State & Local Law News*, vol. 31, no. 1, November 2007. Co-Authored with Sabine Romero.

A Legal Analysis of the Texas Medicaid Reimbursement Scheme and Its Effects on the Border Region, *Texas Hispanic Journal of Law & Policy*, Vol. 9, Fall 2003.

Awards

- *2011 Champion of Equity and Justice Award* by LULAC for legislative and litigation efforts on behalf of the Latino community
- *2009 Spirit of Change Award* by State Representative Joaquin Castro for legislative contribution on higher education issues on behalf of Latino students
- *2009 Meritorious Award* by the Texas Association of Chicanos in Higher Education for legislative advocacy promoting minority access in higher education
- *2008 Emma Tenayuca Award* by the Austin Workers Defense Project for successfully defeating an anti-solicitation proposed ordinance aimed at criminalizing day laborers and homeless panhandling
- *2004 Workhorse Award* by the Neighborhood First Alliance for work in protecting voting rights in Bexar County in the 2004 elections
- *2003 Excellence in Public Interest Award* by the Texas Law Fellowship for commitment to public interest law during law school

MARIBEL HERNÁNDEZ RIVERA

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EXPERIENCE

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON LLP, New York, NY

Fried, Frank/MALDEF Fellow, December 2011 – Present

Working for two years as a commercial litigator at Fried, Frank, Harris, Shriver & Jacobson LLP before working as a staff attorney for the Mexican American Legal Defense and Education Fund. Participated in Texas school finance trial where I conducted depositions and cross examinations. Helped write a U.S. Supreme Court amicus brief challenging Arizona's S.B. 1070 law. Represented a detained immigrant in deportation proceedings and won a Motion to Terminate Without Prejudice. Obtained Judgement of Divorce for pro bono client. Updated an ethics outline for immigration attorneys. Participated in various Deferred Action for Childhood Arrivals clinics as a screener and application preparer. Worked on document review. Currently representing a client appealing his criminal conviction and a client seeking asylum.

THE HONORABLE MARY M. SCHROEDER, U.S. COURT OF APPEALS, NINTH CIRCUIT, Phoenix, AZ

Law Clerk, August 2010 – August 2011

CRAVATH, SWAINE & MOORE, LLP, New York, NY

Summer Associate, Summer 2009, *offer extended*

Researched the fiduciary duties of a company's board of directors and the introduction of new legal theories and issues on appeal. Performed financial analysis comparing various companies' executive compensation packages. Helped a Dominican family obtain a humanitarian visa. Partnered with the ACLU of Michigan to monitor court proceedings and identify prospective clients for their debtor's prison project.

IMMIGRANT RIGHTS CLINIC, NEW YORK UNIVERSITY SCHOOL OF LAW, New York, NY

Student Advocate, August 2008 – May 2009

Represented a client in deportation proceedings and worked with a community-based organization to develop and conduct a national legislative campaign. Responsibilities included: interviewing and counseling, legal and factual research, preparation of court documents, appearances and hearings in immigration court.

UNITED NATIONS HIGH COMMISSIONER FOR REFUGEES, Maputo, Mozambique

Intern, May 2008 – August 2008

Conducted trainings throughout the country to ensure the preparedness of Mozambican authorities in case of a mass influx of Zimbabwean refugees. Researched the administrative appeal's procedure and created a guide to be used by refugees as they submit their appeals pro se. Researched and analyzed Mozambique's immigration, refugee and citizenship laws. Interviewed Zimbabweans in Mozambique.

THE CLINTON FOUNDATION HIV/AIDS INITIATIVE, Beira, Mozambique

Volunteer, June 2006 – August 2006

Site Manager, September 2006 – June 2007

Oversaw the construction of and managed the first HIV/AIDS pediatric clinic in the country's central region. Recruited, hired, and supervised clinic staff. Provided operational and management advice to the Clinical Director of Beira's Central Hospital. Established contacts with local authorities, Ministry of Health officials and other NGO representatives. Designed a referral study for pediatric HIV/AIDS patients within the Central Hospital and peripheral units.

MICHAEL C. ROCKEFELLER MEMORIAL FELLOWSHIP, Marseille, France

Fellow, September 2004 – July 2005

Volunteered full time for a senior citizens' organization, tutored disadvantaged youth, and studied the challenges faced by immigrants in France.

HARVARD UNIVERSITY, Cambridge, MA

Minority Recruitment Program Coordinator, September 2001 – June 2004

Organized, oversaw and executed on-campus visits, information sessions, group tours, phone-a-thons, and recruitment trips across the country directed toward prospective and admitted minority students. Led and trained student recruiters each academic year.

GOLDMAN SACHS, New York, NY

Investment Banking Analyst, Summer 2002 and Summer 2003, *offer extended*

Ran financial analysis, conducted research and created client presentations in the Financial Institutions and Latin American Groups.

FULBRIGHT PROGRAM, Cambridge, MA

Administrative Assistant, September 2000 – June 2002

UNITED STATES SENATOR PAUL WELLSTONE, Washington, DC

Legislative Intern, March 2000 – June 2000

EDUCATION

NEW YORK UNIVERSITY SCHOOL OF LAW, New York, NY

J.D., May 2010

Honors: Dean John Sexton Prize, awarded to a graduating student for outstanding service to the law school community

New York University Law Review, Articles Editor and Diversity Committee Chair

Academy of Achievement, Student Delegate, based on academic and professional achievement

American Bar Association Legal Opportunity Scholar, based in part on community service

Bickel & Brewer Scholar, full tuition scholarship based on commitment to Latino community

Paul & Daisy Soros Fellow, based on academic and professional achievement

Activities: Immigrant Rights Clinic, Spanish-English Translator

Research Assistant for Professor Cristina Rodriguez

Research Assistant for Professor Anthony C. Thompson

Teaching Assistant for Professor Richard H. Pildes

Latino Law Students Association, Chair and 3L Admissions Student Reader

Women of Color Collective, Elections Chair

PRINCETON UNIVERSITY, WOODROW WILSON SCHOOL, Princeton, NJ

M.A. in Public Affairs, June 2010

Activities: Students of Color Hosting Weekend, Co-Chair

Student and Alumni of Color Symposium, Mentorship Committee Co-Chair

HARVARD UNIVERSITY, Cambridge, MA

A.B. in Social Studies, Certificates in French and Latin American Studies, *magna cum laude* in field, June 2004

Thesis: *A Citizenship of Aliens: The Case of Undocumented Mexican Immigrants in Los Angeles*

Activities: Concilio Latino, Latino Umbrella Organization, Co-Chair

David Rockefeller Center for Latin American Studies, Student Advisory Board Member

Association Cultivating Inter-American Democracy, Democratic Forum Director

Harvard-Radcliffe RAZA, President and Finance Commissioner

ADMISSIONS: Ninth Circuit Court of Appeals (2010), New York State Bar (2012), U.S District Court for the Southern District of New York (2012), U.S. District Court for the Eastern District of New York (2012).

ADDITIONAL INFORMATION: Fluent in Spanish; proficient in French and Portuguese. Active Phillips Exeter Academy alumna. Born, lived and traveled extensively in Mexico. Member of the American Bar Association and the American Immigration Lawyers Association.

JORGE MARTÍN CASTILLO

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MEMBERSHIPS & ADMISSIONS

Member, New York State Bar (2011), Bar. No. 4893194
Applicant, California State Bar (2013)
Admitted, U.S. District Court for the Southern District of New York (2011)
Admitted, U.S. District Court for the Eastern District of New York (2011)

EXPERIENCE

MEXICAN AMERICAN LEGAL DEFENSE & EDUCATIONAL FUND, Los Angeles, CA

Staff Attorney, Fried Frank Fellow, January 2013–present

Preparing a class action suit against an employer that systematically denies its workers the minimum employee protections required by the state. Assisting immigrant youth advocacy organization in a case challenging a state policy that discriminates against recipients of Deferred Action for Childhood Arrivals (DACA).

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON LLP, New York, NY

Associate, MALDEF Fellow, January 2011–December 2012

Staffed on commercial litigation matters regarding securities regulations, shareholder disputes, internal investigations, and breach of contract claims. Participated in several stages of litigation from pre-litigation reviews, drafting pleadings, collecting and reviewing discovery, motion practice, and post-judgment enforcement. Extensive pro bono docket, including successfully securing intervention in a federal voting rights case, assisting in vindicating the rights of Texas Latinos' access to an equitable public education system, assisting clients in obtaining asylum relief, and gaining wrongfully denied unemployment benefits.

IMMIGRANT RIGHTS CLINIC, New York University School of Law, New York, NY

Student Advocate, August 2009–May 2010

Represented appellee in the U.S. Court of Appeals for the Second Circuit regarding access to discretionary relief. Co-wrote an amicus brief to the Board of Immigration Appeals analyzing the same. Assisted the Northern Manhattan Coalition for Immigrant Rights on federal immigration legislative proposals and strategy, and planned teach-ins.

GIBSON, DUNN & CRUTCHER LLP, New York, NY

Summer Associate, May 2009–July 2009

Examined the constitutionality of prejudgment maritime attachment, began the incorporation process for a non-profit, and analyzed the retroactive effect of a local housing ordinance. Attended litigation trainings and court appearances.

CRIMINAL & COMMUNITY DEFENSE CLINIC, New York University School of Law, New York, NY

Student Advocate, August 2008–May 2009

Studied the broad impact of the criminal justice system on individuals, families, communities, and society, including collateral consequences and alternatives to incarceration. Successfully defended and obtained dismissals in two misdemeanor cases working with the Neighborhood Defender Services of Harlem, and assisted immigration counsel.

PUBLIC DEFENDER, THIRTEENTH JUDICIAL CIRCUIT, Tampa, FL

Legal Intern–Intake Division, May 2008–August 2008

Drafted memoranda concerning Florida substantive and procedural criminal law. Assisted incarcerated clients in First Appearance Court, Arraignment, and Motion Calendar. Interpreted in the deposition of attempted murder victim.

CATHOLIC CHARITIES – LEGAL SERVICES FOR IMMIGRANTS PROJECT, Milwaukee, WI

Immigration Paralegal, August 2006–August 2007

Composed various affirmative immigration petitions. Translated documents and served as interpreter in adjudication hearings. Collaborated in preparation of continuing legal education presentations and know-your-rights initiatives.

EDUCATION

NEW YORK UNIVERSITY SCHOOL OF LAW, New York, NY

J.D., May 2010

WASHINGTON UNIVERSITY, St. Louis, MO

B.A. in Religious Studies and Political Science, Minor in Psychology, *cum laude*, May 2006

ADDITIONAL INFORMATION

AFFILIATIONS: NYU Black, Latino, Asian Pacific American Law Association (board member); Hispanic National Bar Association (member); Federal Bar Counsel (member); Greater University Service Foundation (treasurer).

SPEAKING: The New Sanctuary Movement, 8th Annual Gathering for Peace & Justice in Camden (February 2011).