

Cause No. D-1-GN-11-003130

THE TEXAS TAXPAYER & STUDENT §  
FAIRNESS COALITION, et al. §

IN THE DISTRICT COURT

vs. §

MICHAEL WILLIAMS, et al. §

OF TRAVIS COUNTY, TEXAS

*Consolidated Case:* §

MARIO FLORES, et al., §

vs. §

MICHAEL WILLIAMS, et al., §

200TH JUDICIAL DISTRICT

**CHARTER SCHOOL PLAINTIFFS' APPLICATION FOR ATTORNEYS' FEE AWARD**  
**(Second Phase)**

To the Honorable John K. Dietz, Judge of the  
250th Judicial District Court of Travis County, Texas:

The Charter School Plaintiffs file this motion pursuant to Tex. Civ. Prac. & Rem. Code § 37.009<sup>1</sup> and respectfully show the court as follows:

1. This action was brought by Plaintiff Texas Charter Schools Association, on its own behalf and on behalf of its member charter schools, and by the other Plaintiffs, Mario Flores, Christopher Baerga, Dana Allen, Jason and Sarah Christensen, and Brooks Flemister,<sup>2</sup> on behalf of themselves and their children, Aidan Flores, Abby Baerga, Teal Evelyn Allen, Luke and Grace Christensen, and Ulric Flemister, respectively. The case was filed for the purpose of obtaining a declaratory judgment that the methods by which the State of

<sup>1</sup> Tex. Civ. Prac. & Rem. Code Ann. § 37.009 (Vernon), reads, in full, "In any proceeding under this chapter, the court may award costs and reasonable and necessary attorney's fees as are equitable and just."

<sup>2</sup> The Plaintiffs identified herein are collectively referred to herein as "Charter School Plaintiffs."

Texas funds public schools, in general, and the charter schools, in particular, violates Art. VII, § 1 of the Constitution of the State of Texas.<sup>3</sup>

2. Defendant Texas Education Agency (TEA) is the state agency charged with enforcing the school laws of the State of Texas. Defendant Michael Williams is the Commissioner of Education and is the chief executive officer of the TEA. Defendant Susan Combs is the Comptroller of Public Accounts and is the chief steward of the state's finances, acting as tax collector, chief accountant, chief revenue estimator and chief treasurer for all of state government. In particular, she oversees the payments by the State of monies due to the public schools of the State of Texas under the School Foundation Program.

3. Pursuant to the section 37.009 of the Texas Civil Practice & Remedies Code this court may award reasonable attorneys' fees to litigants in declaratory judgment actions, including actions against the State of Texas.<sup>4</sup>

4. An affidavit by Robert A. Schulman, establishing the hours expended and services provided by the law firm of Schulman, Lopez & Hoffer, LLP, counsel for the Charter School Plaintiffs, is attached and is incorporated by reference.<sup>5</sup>

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<sup>3</sup> "A general diffusion of knowledge being essential to the preservation of the liberties and rights of the people, it shall be the duty of the Legislature of the State to establish and make suitable provision for the support and maintenance of an efficient system of public free schools." Tex. Const. art. VII, § 1.

<sup>4</sup> Sovereign immunity does not protect the state from attorney fees awards when a declaration interpreting a statutory enactment is properly brought. By authorizing declaratory judgment actions to construe the legislative enactments of governmental entities and authorizing awards of attorney fees, the Declaratory Judgment Act necessarily waives governmental immunity for such awards. *Texas Educ. Agency v. Leeper*, 893 S.W.2d 432, 446 (Tex. 1994). For example, in *Bullock v. Regular Veterans Ass'n of U.S.*, Post No. 76, 806 S.W.2d 311, 316 (Tex. App.—Austin 1991, no writ), the appellate court held that Section 37.009 of the Civil Practice & Remedies Code authorizes courts hearing declaratory judgment actions to award costs and reasonable and necessary attorney's fees "as are equitable and just" against the Comptroller of Public Accounts and the State of Texas. Section 37.009, according to the court, "does not restrict the entities against whom such fees may be awarded, as does chapter 38. Such an award will not be disturbed absent a clear showing that the court abused its discretion." *Oake v. Collin County*, 692 S.W.2d 454, 455 (Tex.1985); *Ritchie v. City of Fort Worth*, 730 S.W.2d 448, 451 (Tex.App.1987, writ ref'd n.r.e.). Therefore, section 37.009 waives sovereign immunity and authorizes trial courts to award reasonable and necessary attorney's fees.

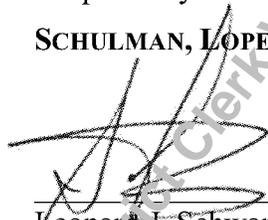
<sup>5</sup> The Charter School Plaintiffs are submitting time expended in preparing for and conducting the second phase of this trial, only through January 31, 2014, and will supplement the submission when the second phase concludes and just prior to or immediately after entry of final judgment, as appropriate.

5. Charter School Plaintiffs are, in accordance with the Affidavit of Robert A. Schulman, hereinbefore in paragraph 4 referenced, asking this Court to award them \$645,970.50 (subject to amendment as appropriate<sup>6</sup>) in attorneys' fees for all work performed as of January 31, 2014, in the prosecution of this case.

Wherefore, Charter School Plaintiffs respectfully request that the court award reasonable attorneys' fees against Defendants in this action and that the Court grant any further relief to which Charter School Plaintiffs are entitled.

Respectfully submitted,

**SCHULMAN, LOPEZ & HOFFER, L.L.P.**



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**ATTORNEYS FOR PLAINTIFFS**

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<sup>6</sup> The Charter School Plaintiffs hereby reserve the right to supplement this Application as necessary to update the attorneys' fees and costs incurred on and after February 1, 2014 until the conclusion of all proceeding in this Court.

CERTIFICATE OF SERVICE

The undersigned certifies that on February 28, 2014, a true and correct copy of Charter Schools Plaintiffs' Application for Attorneys' Fees Award, along with the accompanying Charter School Plaintiffs' Memorandum of Law in Support of Application for Attorneys' Fees Award and Affidavit of Robert A. Schulman, was served upon the following counsel of record *via* e-mail pursuant to the agreement of the parties and in compliance with the Texas Rules of Civil Procedure:

Shelley N. Dahlberg, Nichole Bunker-Henderson, Linda Halpern, Amanda Cochran-McCall, Eric Vinson, and Beau Eccles, Texas Attorney General's Office, P. O. Box 12548, Capitol Station, Austin, Texas 78711; Attorneys for State Defendants;

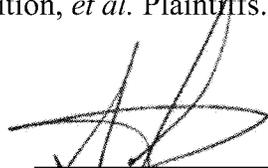
Mark R. Trachtenberg, Haynes & Boone, LLP, Houston Center, 1221 McKinney Street, Suite 2100, Houston, Texas 77010; and John W. Turner, Micah E. Skidmore and Michelle C. Jacobs, Haynes & Boone, LLP, 2323 Victory Avenue, Suite 700, Dallas, Texas 75219; Attorneys for Calhoun County, *et al.* Plaintiffs;

David G. Hinojosa, Marisa Bono, and Celina Moreno, Mexican American Legal Defense and Educational Fund, Inc., 110 Broadway, Suite 300, San Antonio, Texas 78205; and Roger Rice, META, Inc., 240 "A" Elm Street, Suite 22, Somerville, Massachusetts 02144; Attorneys for Edgewood ISD, *et al.* Plaintiffs;

J. Christopher Diamond, The Diamond Law Firm, PC, 17484 Northwest Freeway, Suite 150, Houston, Texas 77040; and Craig T. Enoch, Melissa A. Lorber and Amy Saberian, Enoch Keever PLLC, 600 Congress, Suite 2800, Austin, Texas 78701; Attorneys for Efficiency Intervenors;

J. David Thompson III and Philip Fraissinet, Thompson & Horton, LLP, Phoenix Tower, Suite 2000, 3200 Southwest Freeway, Houston, Texas 77027; and Holly G. McIntush, Thompson & Horton, LLP, 400 West 15th Street, Suite 1430, Austin, Texas 78701; Attorneys for Fort Bend ISD, *et al.* Plaintiffs; and

Richard E. Gray III, Toni Hunter and Richard Gray IV, Gray & Becker, PC, 900 West Avenue, Austin, Texas 78701; and Randall (Buck) Wood and Douglas Ray, 2700 Bee Caves Road, Austin, Texas 78746; Attorneys for Texas Taxpayer & Student Fairness Coalition, *et al.* Plaintiffs.

  
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leonard j. schwartz

THE TEXAS TAXPAYER & STUDENT §  
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200TH JUDICIAL DISTRICT

AFFIDAVIT OF ROBERT A. SCHULMAN  
(Second Phase)

STATE OF TEXAS §  
COUNTY OF BEXAR §

Before me, the undersigned authority, personally appeared on this day, Robert A. Schulman, who, after being by me duly sworn on oath, deposed and said:

1. My name is Robert A. Schulman. I am over 18 years of age and am fully competent to testify to the matters stated in this affidavit. I have personal knowledge of the facts and statements contained in this affidavit, and each of them is true and correct.

2. I am a member of Schulman, Lopez & Hoffer, LLP, in San Antonio, Texas, and have been practicing law in Texas since 1975. This affidavit is submitted on the issue of attorneys' fees for the Charter School Plaintiffs, *Mario Flores, et al.* I was lead counsel for the Charter School Plaintiffs in this litigation.

3. I participated in the First Phase of the above styled and numbered cause of action (known as the public school finance litigation). My trial experience includes complicated and

document-intensive cases addressing state constitutional issues specific to open-enrollment charter schools. I am familiar with the reasonable and customary rates, charges, and costs for legal services in Central Texas for cases similar to this one. My experience and qualifications are set forth in more detail in my résumé which is attached to the affidavit as Exhibit “A.”

4. The biographies of my co-counsel Leonard Jay Schwartz, Joseph (Joe) Hoffer, Allen Keller, Russell Wilson and Bryan Dahlberg are attached as Exhibits “B,” “C,” “D,” “E” and “F.” The résumés of Paralegals Cynthia Pacheco and Mary Zaiantz, and for the firm’s Legal Investigator, Ramón Medina, are attached hereto as Exhibits “G,” “H” and “I.”

5. In forming my opinions, I relied on my personal knowledge of our having attended each day and/or having reviewed the transcript of each day of trial, and having personally participated and/or supervised discovery in this matter. I further reviewed the pertinent pleadings, the attorneys’ time records for the Charter School Plaintiffs, and considered the appropriate fee in this matter. I am very familiar with the work that was necessary to prepare and try this case, including hundreds of hours of preparation and internal and shared analysis with the Texas Charter Schools Association, one of the Plaintiffs in this case, which hours are not reflected in the attached invoices. I am also familiar with the work that will be necessary to handle an appeal of this case.

6. The Charter School Plaintiffs sought attorneys’ fees after the initial phase of the trial, and hereby adopt, incorporate<sup>1</sup> and repray and reurge their prior filings in support of an award of attorneys’ fees.

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<sup>1</sup> “Statements in a pleading may be adopted by reference in a different part of the same pleading or in another pleading or in any motion, so long as the pleading containing such statements has not been superseded by an amendment as provided by Rule 65.” Tex. R. Civ. P. 58.

7. Preparation for the Second Phase of the trial involved meetings and interviews with potential and selected fact witnesses, potential and selected expert witnesses, meetings with clients and charter school operators, review, analysis, and production of volumes of client documents and documents produced by other Plaintiffs, the Interveners and the State Defendants, review and analysis of many expert reports, consultations with expert witnesses, written discovery, and attendance at, defense of and/or review of the depositions of factual and expert witnesses.

8. The Second Phase of the trial lasted 11 days, during which multiple witnesses testified in person, and more than 679 exhibits were admitted into evidence. The trial was conducted in a "paperless" fashion, requiring the imaging and management of exhibits presented electronically at trial.

9. The Charter School Plaintiffs prevailed on their claim that the funding formulas used by the State of Texas were inadequate as applied to Charter Schools. That claim was not advanced by the ISD Plaintiffs or by the interveners, but only by the Charter School Plaintiffs. The mere fact that funding formulas were found to be inadequate as applied to ISDs does not mean that the formulas were necessarily inadequate as applied to Charter Schools. As the Court knows, Charter Schools are not subject to all of the same rules and regulations as ISDs, and it does not follow that a funding formula found inadequate as applied to ISDs would automatically be inadequate as applied to Charter Schools. Because neither the ISDs Plaintiffs nor the Interveners, sought this particular relief on behalf of Charter Schools, in the absence of the lawsuit brought by the Charter School Plaintiffs, the Court's Final Judgment might not have addressed Charter Schools at all. If it did, in the absence of pleadings seeking a Judgment that the funding formulas are inadequate as applied to Charter Schools, the State of Texas would have

been free to have dismissed such references to Charter Schools as dicta, and have continued to fund Charter Schools based on the old funding formulas, until such time as a lawsuit was brought to litigate the adequacy of the funding formulas as applied to Charter Schools.

10. If some evidence of the ISD Plaintiffs concerning the inadequacy of the funding formulas used by the State benefitted the Charter School Plaintiffs, the reverse is also true. For instance, during the Second Phase of the trial, Charter School Plaintiffs' expert witness Toni Templeton presented an analysis of all Charter Schools and all School Districts, broken down by Weighted Average Daily Attendance ("WADA"). That analysis showed that Charter Schools are clustered within a very narrow range of WADA. Uniquely among the evidence introduced by the Plaintiffs and Interveners, that analysis also illustrated the unconscionably large gap in WADA between property poor and property rich School Districts.

11. I am the custodian of the records of Schulman, Lopez & Hoffer, LLP. Attached hereto as Exhibit "J" are 153 pages of records from Schulman, Lopez & Hoffer, LLP of the Firm's efforts expended in this cause. These records are maintained by Schulman, Lopez & Hoffer, LLP in the regular course of our business, and it was the regular course of business of Schulman, Lopez & Hoffer, LLP, for an employee or representative of Schulman, Lopez & Hoffer, LLP, with knowledge of the act, event, condition, opinion, or diagnosis recorded to have prepared the record and/or to have transmitted information to be included in the record; and the record was made at or near the time, or reasonably soon thereafter. The records attached hereto are exact duplicates of the original entry of the work described, except that, in order to preserve attorney-client confidentiality, and attorney work product confidentiality, which privileges are expressly asserted, the records have been redacted. Un-redacted copies will be tendered directly to the Court, for *in-camera* inspection by the Court.

12. I believe the rates requested, \$450 an hour for Robert Schulman, \$450 an hour for Leonard Schwartz, \$350 an hour for Joe Hoffer, \$300 an hour for Russell Wilson, and \$200 an hour for Allen Keller, are reasonable and customary rates in Central Texas for the level of experience of the lawyers doing the work, and the complexity of the case. I am also familiar with the level of experience of any additional attorneys reflected in the time records, and it is my belief that the rates charged for said work is reasonable, given the level of experience of the individuals performing the services within Central Texas. The number of hours expended by the attorneys listed above and reflected in Exhibit "J" were reasonable and necessary for the complexity of the case. I have carefully reviewed the time records of Schulman, Lopez & Hoffer, LLP, attached as Exhibit "J" and adjusted the billings for Cynthia Pacheco and Mary Zaiontz to no-charge billings that I felt was not substantive legal work done under the direction of an attorney. Their \$95 and \$140 an hour rate is reasonable and customary for the work of legal assistants of their experience in Central Texas, and the hours that are billed by them were in my opinion, reasonable and necessary.

13. The total amount reflected on the attached Exhibit "J" for attorneys' fees of Schulman, Lopez & Hoffer, LLP, in the representation of the Charter School Plaintiffs from the last application for attorneys' fees submitted to the Court on March 13, 2013 – the last fee entry in the prior submission was dated January 31, 2013 – through January 31, 2014, is \$645,970.50, all of which I believe to be reasonable and necessary. That amount does not include additional fees that were incurred, or will be incurred, but have not been charged.<sup>2</sup> That amount also does

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<sup>2</sup> This application for attorneys' fees includes entries through January 31, 2014. Additional attorney time has been devoted but not calculated to date. More time will be required to complete the trial phase of this proceeding. The Charter School Plaintiffs would, with permission of the Court, supplement this as necessary to accurately reflect the time involved in the trial of this matter.

not include hours worked during February 2014, the billing for which has not been finalized. In my opinion, \$20,000 for the month of February is a conservative estimate of the reasonable attorneys' fees incurred in this matter on behalf of the Charter School Plaintiffs. It is impossible at this time to estimate the additional fees and costs that will be incurred in the further processing of this litigation from the end of February until such time as the Court's final Judgment is appealed.

14. Taking into consideration the factors set forth in Rule 1.04 of the Texas Disciplinary Rules for Professional Conduct, and the factors set forth in *Arthur Andersen & Co. v. Perry Equipment Corporation*, 945 S.W.2d 812, 818 (Tex. 1997), the fees set forth in Exhibit "J" are reasonable and necessary. More specifically, I have taken into consideration the novelty and difficulty of the questions involved, the significance of the issues involved, the fee arrangement with the clients, the skill required to perform the legal services, the time limitations imposed by the circumstances, the experience, reputation, and ability of the attorneys, the benefit conferred, and the time and labor required. Based on all of these, and all of the factors set forth in Rule 1.04 of the Texas Disciplinary Rules of Professional Conduct and the *Arthur Andersen* factors, all of the services rendered by counsel for the Charter School Plaintiffs in the prosecution and trial of this case were necessary, and the amount of time spent and rates charged for such services (as reflected in the time records) are reasonable, and that a reasonable and necessary fee for the Charter School Plaintiffs for the prosecution of this matter by Schulman, Lopez & Hoffer, LLP is \$645,970.50.

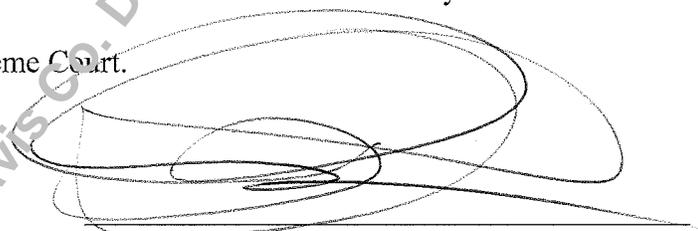
15. In applying the Supreme Court's decision in *Tony Gullo Motors L.L.P. v. Chapa*, 212 S.W.3d 299 (Tex. 2006) regarding segregation of fees, I have determined that the discrete

legal services advanced by the Charter School Plaintiffs that involve both a recoverable and unrecoverable claim are so intertwined that they need not be segregated.

16. Consequently, I believe that the reasonable and necessary fee incurred by the Charter School Plaintiffs in the preparation and prosecution of this matter, after taking into consideration all of the factors set forth in Rule 1.04 of the Texas Rules of Disciplinary Procedure, and the factors set forth in the *Arthur Andersen* case, as well as taking into consideration the issue of segregation, as set forth in the *Tony Gullo Motors* case, is \$645,970.50.

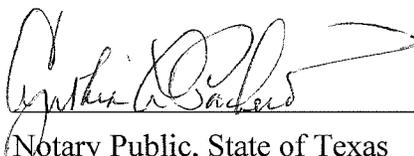
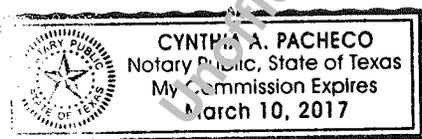
17. It is further my opinion that in the event this case is appealed directly to the Supreme Court, the sum of \$475,000 would be a reasonable fee for the representation of the Charter School Plaintiffs in such appeal. If this case is first appealed to the Court of Appeals, it is my opinion that an additional fee of \$475,000 would be reasonable and necessary for the work at the Court of Appeals, and \$150,000 would be a reasonable and necessary fee should the case be appealed thereafter to the Texas Supreme Court.

Further Affiant Sayeth Not.



Robert A. Schulman, Affiant

SWORN to and SUBSCRIBED before me on the 28th day of February 2014, by Robert A. Schulman.



Notary Public, State of Texas

## EXHIBIT "A"

Robert "Bob" Schulman has been advising and defending public schools and local government for over 35 years. Mr. Schulman actively advises and represents charter schools, private schools, public school districts and other public, private and nonprofit entities across Texas on a daily basis.

Prior to forming Schulman, Lopez & Hoffer, LLP, Mr. Schulman was a founder and partner with the education law firm of Schulman, Walheim & Heidelberg (1979-99) and a partner and manager of the San Antonio office of two other Texas education law firms (1999-2011). Mr. Schulman has achieved state-wide and national recognition for his experience, knowledge and successes in representing, school districts, charter schools and other public agencies. He is a current member and past President of the Texas Public Finance Authority Charter School Finance Corporation.

### **Education and Honors**

Mr. Schulman practices before state and federal agencies and is licensed to practice before the U. S. Court of Appeals, Fifth Circuit, and U. S. District Courts (Southern, Northern and Western Districts of Texas) and admitted by the Supreme Court of Texas. His preparatory education was at St. Mary's University (B.A. 1968); his legal education at St. Mary's University School of Law (J.D. 1974). He was admitted to the Texas bar in 1975.

### **Affiliations**

Mr. Schulman is a member of the San Antonio Bar Association, Texas Association of School Boards, State Bar of Texas (School Law Section), National Council of School Attorneys, Education Law Association, and Texas Association of Community College Attorneys. He has been published in the Texas Bar Journal and is often called upon as a presenter for professional conferences and gatherings. Mr. Schulman is a long-standing member of the Planning Committee for the Annual University of Texas School Law Conference.

## EXHIBIT "B"

Leonard Jay Schwartz, was born in San Antonio, Texas September 23, 1943. He was admitted to Texas Bar, 1968, Ohio bar 1971, Mr. Schwartz received his preparatory education, University of Texas (BBA, 1965) and his legal education at the University of Texas (J.D. 1968); He is a member, American Bar Association, Federal Bar Association, Texas Bar Association, He is a member of the Bar Association 5th Cir., Phi Delta Phi Honorary Legal Fraternity, Texas Bar Committee on Federal Judiciary Relations and Texas Bar Foundation.

Mr. Schwartz has a long and distinguished career representing various governmental entities, school districts and other public entities and institutions in New York, Ohio and Texas. Before joining Schulman, Lopez & Hoffer, as Of Counsel, he was a partner in Waterman & Schwartz and its successor firms in Austin, Texas from 1981-85 and managing director, and shareholder in Schwartz & Eichelbaum, PC from 1985-2001. In addition to serving as Of Counsel to Schulman, Lopez & Hoffer, Mr. Schwartz's expertise in special education law is revealed through his continuing General Counsel status for the Texas School for the Deaf since 2009 and General Counsel for the Texas School for the Blind and Visually Impaired since 2012.

Mr. Schwartz is a member of the bars of the Supreme Court of Ohio and Texas and has appeared before the United States Supreme Court, the United States Court of Appeals for the Fifth, Sixth, Seventh Circuits and Eleventh Circuits, the United States District Courts for the Southern and Northern Districts of Ohio, the District of Nebraska, and the Southern, Eastern, Western and Northern Districts of Texas.

His significant cases include: *Jett v. Dallas Independent School District*, 491 U.S. 701 (1989), U.S. Supreme Court; *Bazaar v. Fortune*, 489 F.2d 225 (5<sup>th</sup> Cir. 1973)(en banc); *Doe v. Hillsboro Independent School Dist.*, 113 F.3d 1412 (5<sup>th</sup> Cir. 1997)(en banc); *Columbus Education Association v. Columbus City School District*, 623 F.2d 1155 (6<sup>th</sup> Cir.1980); *Garza v. Brownsville Independent School District*, 700 F.2d 253 (5<sup>th</sup> Cir.1983); *Shanley v. Northeast Independent School District*, 462 F.2d 960 (5<sup>th</sup> Cir.1972); *Sterzing v. Fort Bend Independent School District*, 576 F. Supp. 657 (S.D.1972), *judg't vacated on other grounds*, 496 F.2d 92 (5<sup>th</sup> Cir.1974); *Leffall v. Dallas Indep. School Dist.*, 28 F.3d 521, 529 (5<sup>th</sup> Cir.1994); *Johnson v. Dallas Indep. School Dist.*, 38 F.3d 198 (5<sup>th</sup> Cir.1994), cert. denied, 514 U.S. 1017 (1995); *Seifert v. Lingleville Indep. Sch. Dist.*, 692 S.W.2d 461 (1985); *State v. Singer*, 50 Ohio St.2d 103, 362 N.E.2d 1216 (1977); *Hernandez v. Meno*, 828 S.W.2d 491 (Tex. App. —Austin 1992, writ denied); *Rodriguez v. Bd. of Trustees of Laredo Indep. Sch. Dist.*, 143 F. Supp.2d 727 (S.D. Tex. 2001) and *Demkowicz v. Endry*, 411 F. Supp. 1184 (S.D. Ohio 1974).

## EXHIBIT "C"

Joseph "Joe" Hoffer's practice areas include: (1) civil litigation; (2) labor and employment; (3) board governance including due process hearings and grievances, open meetings act and public information act; (4) business transactions including public procurement and contracting, False Claims Act, trademark and copyright, and interlocal and shared services arrangements; (5) student law including special education, discipline, civil rights and grievances; and (6) administrative law, including appeals of state agency action. Mr. Hoffer is admitted by the Supreme Court of Texas, and is also admitted to practice before the U.S. Court of Appeals for the Fifth Circuit and the U.S. District Courts for the Northern and Western Districts of Texas.

### **Education and Honors**

Texas A&M University, College Station, Texas and Southwest Texas State University, San Marcos (B.A. summa cum laude 2003); St. Mary's University School of Law (J.D. 2006); While in law school, Mr. Hoffer served on the Editorial Board of the St. Mary's Law Journal, serving as Research/Articles Editor his third year and as a staff writer his second year. Mr. Hoffer was on the law school Dean's List and graduated in the top of his class.

### **Affiliations & Admissions**

Mr. Hoffer is admitted by the Supreme Court of Texas and the United States District Courts for the Western, Eastern, and Northern Districts of Texas, and before the United States Fifth Circuit Court of Appeals. Mr. Hoffer is a member of the State Bar of Texas Administrative and Public Law Section, School Law Section, and Labor and Employment Law Section; he is also a member of the Texas City Attorneys Association/Texas Municipal League; Texas Council of School Attorneys; Randolph Metrocom Chamber of Commerce; Judson Education Foundation, Inc.; Education Law Association; the Military Child Education Coalition; and National Alliance of Public Charter School Attorneys.

## EXHIBIT "D"

Allen M. Keller's practice includes the representation of school districts, charter schools and other public and private sector employers in all areas, including labor, employment civil rights matters, and special education matters. Mr. Keller calls on his experience as a Briefing Attorney with the Fourteenth Court of Appeals in Houston, Texas (2009-2010) in his representation of our clients.

### **Education and Honors**

University of North Texas (B.A. 2004); St. Mary's University College of Law (J.D., cum laude, 2009). St. Mary's Law Journal Editorial Board, 2008-09; St. Mary's Law Journal Staff Writer, 2007-08.

### **Affiliations**

Mr. Keller is licensed by the State Bar of Texas and admitted to practice before the United States District Court, Western District of Texas; he is also a member of the State Bar of Texas School Law Section.

Unofficial copy Travis Co. District Clerk Velda L. Price

## EXHIBIT "E"

Russell Wilson has previously served as the Wilson County Attorney from 1996 through 2012. As the County Attorney, Russell has significant experience with development of counties along the Eagle Ford Shale and drafting rules, ordinances and regulations concerning seismic lines, water lines, oil and gas drilling, etc. on County Roads and infrastructure. Russell also has extensive experience advising Commissioners Court on civil matters including employment law, transportation, oil & gas leases of county lands, emergency service districts, utilities, flood control, tow truck, road bond issues, elections, open meetings and open records, county budgets and in drafting county regulations.

Russell Wilson's practice with the Firm include: (1) County Law; (2) Municipal Law; (3) labor and employment; (4) county and city governance; (5) open meetings act and public information act; (6) business transactions including public procurement and contracting; (7) administrative law. Mr. Wilson is admitted by the Supreme Court of Texas, and is also admitted to practice before the U.S. Court of Appeals for the Fifth Circuit and the U.S. District Court for the Western District of Texas.

### Education and Honors

Texas Lutheran University, Seguin, Texas (B.A. magna cum laude 1988); Texas Tech University School of Law (J.D. 1991); While in law school, Mr. Wilson was a member of the Texas Tech Law Review and an Associate Editor. Mr. Wilson received the M L Penn Award, Best Research Law Review Article while at Texas Tech.

### Affiliations & Admissions

Mr. Wilson is admitted by the Supreme Court of Texas, the United States District Court for the Western District of Texas, and before the United States Fifth Circuit Court of Appeals. Mr. Wilson is a member of the State Bar of Texas Oil, Gas and Energy Law Section; He is also a member of the Texas District and County Attorneys Association.

### Presentations

*County Regulation of Energy Exploration*, County Judges and Commissioners Association of Texas, Midland, April 2013.

*County & Municipal Regulation of Energy Exploration*, Half Moon Seminars, Texas Energy Production Land Law Seminar, San Antonio, November 2012, and Houston, January 2013.

*County Oil & Gas Issues*, Texas District and County Attorneys Association, Civil Law Seminar, May 2012.

*Disaster Law*, Texas District and County Attorneys Association, Annual Seminar, September 2009.

## EXHIBIT "F"

Bryan P. Dahlberg's practice includes representation of school districts, charter schools and other public entities in all areas, including construction and real estate disputes and transactions, condemnation proceedings, employment and litigation. Upon graduating from law school, Mr. Dahlberg worked for Magnum Hunter Resources Corp., Twomey May, P.L.L.C. and May, McCreight & Associates, P.L.L.C. in Houston. From March 2010 through July 2011, Mr. Dahlberg worked for another Texas education law firm's Houston office. Additionally, his employment law experience includes defense of Title VII hostile work environment, ADEA, workers' compensation retaliation, and FLSA/wage and hour claims.

### **Education, Honors, Affiliations & Admissions**

Admitted to bar 2008, Texas. Preparatory education, University of Texas (B.A., Philosophy 2005); legal education University of Houston Law Center (J.D. 2008). Member: Labor and Employment section of the State Bar of Texas. Mr. Dahlberg is licensed to practice before the United States District Court for the Eastern, Southern and Western Districts of Texas.

Unofficial copy Travis Co. District Clerk Angela L. Price

**EXHIBIT "G"**

Cynthia Pacheco, Paralegal, attended the Southwest Texas State University and the University of Texas at San Antonio. Ms. Pacheco served as Research Assistant in preparation of a civil practice law forms guide authored by a former College Professor/general law practitioner. Ms. Pacheco has worked as a Legal Assistant/ Paralegal for over 30 years, and for the past 25 years has specialized in civil litigation practice and school law.

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**EXHIBIT "H"**

Mary Zaiontz, Paralegal, B.S. in Mathematics from the University of California, Irvine in (1986). From 1989-2007 she worked as legal librarian for Matthews & Branscomb, P.C. managing one of the largest law libraries in South Texas. From 2007-09 she worked as corporate paralegal for Cox Smith Matthews Incorporated. Ms. Zaiontz began working as a Research Paralegal for the firm's attorneys in 2009.

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## EXHIBIT "I"

Ramón Medina joined Schulman, Lopez & Hoffer, LLP, in January 2012 as a non-attorney Legal Investigator. Ramon came to the Firm from the Texas Education Agency (TEA), where for the last 12 years he worked at the TEA directing, managing and supervising the audit, investigative, review and other monitoring activities over regional education service centers (ESCs), open-enrollment charter schools (OECS), school districts and Federal and state grant programs. During his tenure at the TEA, Ramón conducted compliance, financial, and performance audits of public schools and reviewed the annual financial and compliance reports filed by ESCs, OECS, independent school districts (ISDs), and nonprofit grantees. He also oversaw the State Compensatory Education program. Ramón is also an author and developer of various modules of the TEA's Financial Accountability Systems Resource Guide. Ramón also provided business advisory services to public school officials and administrators, presented information regarding OECS issues and regulatory requirements to the State Board of Education, the Commissioner's Charter School Cabinet and TEA executive management, conducted presentations for the benefit of public school officials and administrators, independent auditors and TEA staff at various regional and statewide conferences and other forums, and testified in administrative hearings, judicial proceedings, informal reviews and record reviews.

After receiving a Bachelor of Business Administration in Accounting and a Master in Professional Accounting with a concentration in Auditing and Financial Reporting, Mr. Medina began his professional career with Arthur Andersen & Company in Houston, Texas. He subsequently went to work for the University Lands Accounting Office at The University of Texas Systems conducting accounting and audit work pertaining to entities with oil, gas and other leases on Permanent University Fund lands. For the last 12 years, Mr. Medina worked at the TEA directing, managing and supervising the audit, investigative, review and other monitoring activities over the Texas public school system and Federal and state grant programs. In July 2011, Mr. Medina started his own school business advisory service, Fenix Subiendo, L.L.C., before commencing his employment with Schulman, Lopez & Hoffer, L.L.P. as Legal Investigator.

Ramón is knowledgeable of various financial and operational functions and practices of governmental entities and nonprofit organizations and federal and state legal compliance requirements. Ramon assists the Firm's attorneys and clients in compliance and programmatic reviews, responding to administrative agency audits, actions and investigations, and litigation before administrative agencies and state and federal courts.



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DATE	DESCRIPTION	TIME
2/1/2013	(RS) Receive and review Defendants' Supplemental Response to FBISD Plaintiffs' Request for Production; review Response; from Attorney General; receive and review revised exhibit from; receive and review notice of refilling of supplemental data to FERPA-protected folder; receive and review corrected Response and replacement exhibits; receive and review exhibits to be proffered for admission by Defendants; receive and review additional exhibits and revised Excel spreadsheet of Defendants' 16th Amended Trial Exhibit List.	0.3
2/1/2013	(RS) Receive and review State's Plea to the Jurisdiction and Motion to Dismiss as to Intervenor's Third Amended Plea in Intervention and TCSA Plaintiffs' Charter Cap Claim filed by Edgewood and TTSFC Plaintiffs; prepare communiqué to TCSA staff and litigation staff regarding and responsive to same; began review of pleadings and court's order issued in response to pre-trial plea to jurisdiction filed against Intervenor's; conduct research and direct staff in further research in preparation of response to Plea; receive and review inquiry regarding same from Denise Pierce; confer with Joe Hoffer regarding same and assist Mr. Hoffer in preparation of response to Ms. Pierce regarding same; prepare advisory response; receive and review further inquiry from Ms. Pierce.	1.9
2/1/2013	(JH) Prepare outline of closing argument thoughts for Bob Schulman. (No charge)	0.2
2/1/2013	(JH) Receive and review Plea to Jurisdiction filed by Edgewood; confer with Mr. Schulman regarding same; communicate with TCSA regarding their directives on response; contact counsel for intervenors to determine his response.	0.2
2/1/2013	(BD) Compare exhibit lists and list of admitted exhibits and confirm what exhibits to be offered into evidence; conduct legal research regarding judicial notice.	1.4
2/1/2013	(LS) Conduct research regarding [REDACTED]; prepare memo regarding [REDACTED]; prepare communiqué to Bob Schulman forwarding findings regarding [REDACTED] and copy of law review article for closing argument.	3.3
2/1/2013	(LS) Begin research on cap argument response to MALDEF motion to Dismiss.	1.8
2/1/2013	(LS) Receive and review communiqué from Holly McIntush with Fort Bend ISD and Calhoun County ISD Plaintiffs' Partial Joinder in Edgewood ISD and TTSFC Plaintiffs' Plea to the Jurisdiction and Motion to Dismiss; receive and review Edgewood and Texas Taxpayer & Student Fairness Coalition Plaintiffs' Plea to the Jurisdiction and Motion to Dismiss as to Intervenor's Third	1



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	Amended Plea in Intervention and Charter School Plaintiffs' Charter Cap claim; review today's late pleadings and numerous communiqués regarding same. (No charge)	
2/1/2013	(RS) Prepare outline for closing statements/arguments; prepare lengthy communiqué to David Dunn, TCSA and litigation staffs regarding same; receive and review advisory from Joe Hoffer and Leonard Schwartz concerning same.	1.6
2/1/2013	(RS) Continue communiqué exchanges with Denise Pierce regarding process for responding to Plea and Motion to Dismiss; conduct telephone conference with Chris Diamond regarding Intervenors' response to same; confer with Joe Hoffer's regarding discussions with Mr. Diamond; receive and review communiqué from Leonard Schwartz regarding response to Plea and Motion; receive and review communiqué from Mr. Diamond regarding Intervenor's response to Plea ignoring inapplication of arguments to charters; prepare response to Mr. Diamond; confer with Mr. Hoffer regarding [REDACTED] [REDACTED] receive and review proposed outline of response to Plea and Motion from Mr. Schwartz; direct Mr. Schwartz and staff regarding [REDACTED]	1.2
2/1/2013	(RS) Receive and review FBISD and Calhoun County Plaintiffs' Partial Joinder in Edgewood and TTSCF Plaintiffs' Plea to the Jurisdiction and Motion to Dismiss against Intervenors; prepare communiqué to TCSA and litigation staff forwarding same; receive and review Intervenors' Trial Brief on the Standard Governing the Constitutional Claims Asserted Under Article VII, Section 1 of the Texas Constitution and Response to Defendants' Plea To Jurisdiction noting no arguments applicable to charter schools; receive and review communiqué from Bryan Dahlberg regarding TCSA Plaintiffs' exhibits offered by not admitted to date.	0.8
2/2/2013	(BD) Draft Motion for Judicial Notice under Texas Rule of Evidence 204 requesting notice of historical charter school funding legislation and amendments; forward same to Leonard Schwartz with comment.	1.3
2/2/2013	(LS) Review pleadings filed today (No charge); prepare follow-up advisory to Bob Schulman with comments and possible arguments regarding cap motions; prepare communiqué to Joe Hoffer and Mr. Schulman with argument regarding [REDACTED] [REDACTED]; review and prepare comments to Bryan Dahlberg's draft of Motion to Take Judicial Notice.	1.6
2/2/2013	(RS) Complete outline for Closing arguments to include response to Plea to Jurisdiction; prepare communiqué to Leonard Schwartz requesting review and comment to proposed closing argument outline; prepare second advisory communiqué to Mr. Schwartz and Joe Hoffer regarding and attaching highlighted sections of Trial Brief on the Standard Governing the Constitutional Claims Asserted	1.4



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Under Article VII, Section 1 of the Texas Constitution and response to Defendants' Plea to the Jurisdiction; direct Bryan Dahlberg regarding Motion for Court to take Judicial Notice of certain historical statutes; receive and review draft Motion for Judicial Notice from Mr. Dahlberg.

2/3/2013	(BD) Communiqué exchange with Bob Schulman regarding necessary statutes to include in Motion for Judicial Notice; conduct legal research to identify appropriate statutes and previous amendments; revise and edit Motion to include identified amendments reflecting changes in charter school funding regime.	2.8
2/3/2013	(CAP) Proof and revise Motion for Judicial Notice; prepare exhibits in support of Motion; communiqué exchange with Bob Schulman and Bryan Dahlberg regarding exhibits to ensure accuracy of same (No charge).	1
2/3/2013	(LS) Review of miscellaneous filings by the parties of last minute pleadings, including FBISD 4th Amended Exhibit List; TCSA Motion for Court to take Judicial Notice; Efficiency interveners' filings; Calhoun County Exhibit List; receive and review communiqué from Shelly Dahlberg objecting to Plaintiffs' further introduction of data; review Bob Schulman's outline for closing argument. (No charge)	2.5
2/3/2013	(RS) Continue review and analysis of Intervenors' Brief in response to Plea to Jurisdiction as applicable to charter cap; prepare advisory communiqué to Joe Hoffer regarding same; prepare communiqué to Chris Diamond concerning same, issues outlined within same and prior witness testimony addressing shared claims over the charter school cap; prepare directive to Bryan Dahlberg and Paralegal regarding exhibits entered and to be offered; prepare second communiqué to Paralegal requesting admission status of Taylor report and Baker deposition excerpts; review advisory response; continue review and research of [REDACTED]; prepare directive to Mr. Dahlberg regarding preparation of Motion for Court to Take Judicial Notice of [REDACTED]; prepare lengthy advisory to David Dunn and Denise Pierce regarding same.	1.8
2/3/2013	(RS) Prepare modifications to closing arguments in view of Intervenors' Response to Plea To the Jurisdiction filed by the state; prepare communiqué to Leonard Schwartz forwarding current version of closing arguments for review and input.	0.9
2/3/2013	(RS) Review report from Bryan Dahlberg regarding [REDACTED]; prepare response and further directive to Mr. Dahlberg regarding [REDACTED]; prepare follow-up response to Mr. Dahlberg citing [REDACTED]; review communiqué from Denise Pierce regarding closing remarks; incorporate same as revisions to closing argument; prepare response to Ms. Pierce forwarding current version of closing	1.3



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	argument; review FBISD Plaintiffs' additional exhibits to be offered into evidence; review communiqué from Assistant Attorney General, Shelley Dahlberg questioning authorship of exhibits; review response to same; review state's reply and objections; review follow-up communiqué with revised version of exhibits; receive additional exhibits to be offered for admission into evidence on behalf of Calhoun County Plaintiffs; review same.	
2/3/2013	(RS) Finalize Motion for Judicial Notice; direct staff in completion of same; receive and review communiqué from Mr. Dahlberg regarding same; prepare reply and further directive to Mr. Dahlberg regarding same; direct staff in filing of Motion and exhibits to same; prepare further revisions to Motion and further directive to staff regarding same; receive and review revised, final version of Motion; review and approve same for filing.	0.8
2/4/2013	(RS) Travel to Austin.	1.8
2/4/2013	(RS) Review and prepare for closing arguments.	0.6
2/4/2013	(RS) Attend court session; present closing arguments and receive Court's omnibus bench order.	5.5
2/4/2013	(LS) Attend court; post-court meeting with David Dunn, Denise Pierce and Bob Schulman regarding the court's decision and appeal options.	6.5
2/4/2013	(RS) Prepare communiqué to Denise Pierce regarding closing arguments; receive and review rough draft transcript of today's court proceeding including Court's recitation and omnibus order; prepare communiqué to TCSA and litigation staff forwarding same; prepare advisory to Drs. Anthony Rolle and Craig Wood regarding decision; Confer with staff regarding extent of Court's announced decision on charter school claims.	1.3
2/4/2013	(RS) Return travel from Austin. (No charge)	1.5
2/5/2013	(LS) Review Judge Dietz's order. (No charge)	0.2
2/5/2013	(RS) Review communiqué from Jim Ho requesting scheduling of teleconference; review response from David Dunn to Joe Hoffer concerning same; review communiqué from Edgewood Plaintiffs' counsel Rebecca Couto with information concerning corrected exhibits to be proffered for admission at upcoming meeting with Court; prepare response to all participants advising of availability for Court conference; review TCSA press release from Denise Pierce; review press release (litigation update by Lindsey Jones).	1
2/5/2013	(RS) Review communiqué from Assistant Attorney General requesting scheduling of telephone conference to finalize objections to exhibits not yet admitted; review response from TTSFC Plaintiffs' counsel, Rick Gray, requesting scheduling of court-ordered discussion/meeting to discuss Judge Dietz's findings and his order; review responses from all other plaintiffs' counsel advising of their availability for a conference call or in person conference; direct staff regarding same; review communiqué from Mr. Gray requesting availability for meeting on 02/13; prepare response to Mr. Gray and	0.6



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	all counsel concerning same.	
2/5/2013	(RS) Receive and review observations from Joe Hoffer regarding Judge's oral ruling; prepare lengthy advisory to Jim Ho, TCSA and litigation staff regarding Judge's ruling and related matters.	0.7
2/6/2013	(RS) Receive and review communiqué from Jim Ho concerning Judge Dietz's bench ruling and recommendations for press release(s) regarding same; prepare response to Mr. Ho, TCSA and litigation staff regarding same and appeal; prepare report to staff forwarding Mr. Ho's commentary for review/input; receive and review communiqué from Maria-Theresa Sigua advising of Denise Pierce and David Dunn's availability for a teleconference with Mr. Ho; receive and review communiqué from Mr. Ho regarding court's ruling, press strategy, and avenues for appeal of the court's Order; forward same to Mr. Schwartz; receive response from Mr. Schwartz with recommendations for preparation of appeal brief; prepare communiqué to litigation attorneys addressing each of Mr. Ho's recommendations.	2.1
2/6/2013	(RS) Receive and review communiqué from FBISD Plaintiffs' counsel with signature page and errata sheets for Dan Casey deposition; review errata sheets. (No charge)	0.2
2/7/2013	(LS) Telephone conference with Bob Schulman regarding appeal. (No charge)	0.2
2/7/2013	(LS) Extended telephone conference with David Dunn; Jim Ho; Denise Pierce, Bob Schulman regarding appeal; follow-up with Bob Schulman regarding same. (No charge)	1
2/7/2013	(RS) Receive and review communiqué from Court Operations Officer, confirming date, time and location for attorney conference required by Judge Dietz; forward to staff; receive link to news article from Denise Pierce, review same; receive and review Notice of Withdrawal of Rebecca Couto as counsel for Edgewood Plaintiffs.	0.4
2/7/2013	(LS) Prepare communiqués to Bob Schulman and Joe Hoffer regarding [REDACTED]	0.4
2/7/2013	(LS) Receive and review communiqué from MALDEF with Notice of Withdrawal of Counsel; receive and review communiqué from Bob Schulman regarding school finance meeting with court. (No charge)	0.2
2/7/2013	(RS) Telephone conference with Jim Ho, Leonard Schwartz and TCSA administrators regarding appeal; follow-up telephone conference with Mr. Schwartz concerning same.	0.8
2/7/2013	(RS) Receive and review communiqué from Leonard Schwartz regarding Judge's holding; receive and review response to Mr. Schwartz from Joe Hoffer regarding same; prepare reply to Mr. Schwartz and Mr. Hoffer regarding same and preparation of Findings of Fact and Conclusions of Law; receive and review response from Mr. Schwartz concerning same and recommending specific findings and conclusions; prepare reply to Mr. Schwartz and	0.9



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	Mr. Hoffer with directive supplement Findings of Fact previously drafted.	
2/8/2013	(CAP) Review Chris Diamond's request for transcripts not previously provided; upload transcripts for dates requested as e-mail attachments; forward same to Mr. Diamond. (No charge)	0.2
2/8/2013	(RS) Receive and review communiqué from Chris Diamond regarding Charter Plaintiffs intent to appeal Court's ruling; prepare response to Mr. Diamond concerning same; receive and review communiqué from Assistant Attorney General, Robin Sanders regarding scheduling of teleconference following court appearance on exhibit admission issues; prepare response to Ms. Sanders concerning same.	0.4
2/8/2013	(RS) Receive and review communiqué from Tracy Young with "After Judge Oral Ruling What Next for Charter Schools: Fact Sheet"; review same; prepare advisory response to Ms. Young with recommended revision to same; receive and review communiqué from Chris Diamond to Paralegal requesting additional trial transcripts; receive and review response from Paralegal forwarding PDF files of transcripts referenced in Mr. Diamond's communiqué.	0.5
2/11/2013	(RS) Receive and review request for input concerning resolution of exhibit objections from Holly McIntush. (No charge)	0.1
2/12/2013	(LS) Receive and review communiqués from Bob Schulman and Paralegal regarding Motion to Take Judicial Notice. (No charge)	0.1
2/12/2013	(RS) Review defense exhibit to be proffered for admission from Assistant AG, Michael Patterson; review communiqué from David Hinojosa soliciting objections to proffered exhibits; review proffered exhibits and direct staff regarding same; review and identify specific historical funding statutes pertaining to charter school funding and facility support to become exhibits for Motion to Take Judicial Notice; direct staff to resubmit Motion to Take Judicial Notice with accompanying exhibits; review and approve notice to counsel and the court's administrators forwarding same; conduct extended telephone conference with Chris Diamond regarding Intervenors cost contributions, attorney's fees and costs motions, appeal of trial court decision and preparation of findings of fact and conclusions of law; prepare report to TCSA administrators, Jim Ho and office litigation staffers concerning Intervenors' appellate intentions; review Mr. Ho's response to TCSA proposed fact sheet for charters.	1.7
2/12/2013	(RS) Review FIRST ratings for TTSCF Plaintiffs' focus district offered as exhibit from Richard Gray; direct staff regarding same.	0.4
2/12/2013	(RS) Receive and review Texas Tribune article from Denise Pierce regarding finance trial results. (No charge)	0.2
2/13/2013	(LS) Attend court for Status Conference; attend meeting with David Dunn, Denise Pierce, & Bob Schulman regarding same. (No charge)	4.5
2/13/2013	(LS) Begin draft letter to Judge Dietz.	0.9
2/13/2013	(RS) Prepare communiqué to Denise Pierce, Jim Ho and staff	1.1



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	attorneys regarding Intervener's intentions to appeal District Court Judgment; prepare communiqué to staff attorneys with summary/analysis of Judge's bench ruling; prepare advisory communiqué to Leonard Schwartz regarding TCSA Plaintiffs' Motion for Judicial Notice and accompanying exhibits for submission at post-trial conference with Judge Dietz.	
2/13/2013	(RS) Travel to Austin.	1.5
2/13/2013	(RS) Attend hearing before Judge Dietz regarding Findings of Fact, Conclusions of Law, admission of exhibits, proposed judgment and motions for award of attorneys fees; prepare memorandum to file concerning Judge's ruling and dictates for findings and conclusions, proposed judgment and standing found for charter plaintiffs.	1.6
2/13/2013	(RS) Attend post-hearing conference at TCSA regarding issues discussed/resolved before Judge Dietz; confer with Leonard Schwartz regarding preparation of correspondence to Court to confirm ruling on standing and resulting effect of declaratory judgment findings in favor of charter school plaintiffs.	1.5
2/13/2013	(RS) Consider and compare transcripts of Courts oral pronouncements of February 4, 2013 with dictates and discussions to analyze findings and conclusions of Court regarding charter school claims of constitutional inadequacy; prepare first draft of Findings of Fact and Conclusion of Law finding for all charter plaintiffs; conduct telephone conference with Leonard Schwartz regarding preparation of correspondence to Court.	1.4
2/13/2013	(RS) Travel time for return from Austin. (No charge)	1.5
2/14/2013	(CAP) Begin legal research for nation-wide cases on charter school finance issues as requested by Bob Schulman; download Westlaw cases for review; conduct Internet research for articles on prior court decisions regarding same; prepare request to Katherine Rogers, Paralegal at Haynes & Boone, for copy of Findings of Fact and Conclusions of Law.	1
2/14/2013	(LS) Prepare revisions of letter to Judge Dietz; extended telephone conference with Bob Schulman regarding letter and approach; prepare communiqué to Paralegal for pleadings of other parties; prepare communiqué to Paralegal for Judge Dietz communiqué address and names of all counsel that needs to be shown on letter to Judge Dietz; format of revised draft; prepare communiqué to Bob Schulman with revisions and final letter; prepare communiqué with pdf version of letter to Paralegal for sending to Judge Dietz and all counsel.	2.4
2/14/2013	(RS) Review current version of draft Findings of Fact and Conclusions of Law and begin preparation of revisions and additions to same addressing standing and constitutional inefficiency claims and announced trial findings; prepare advisory to Denise Pierce regarding charter plaintiffs' appeal; prepare directive to Leonard Schwartz requesting assistance in preparation of revised and additional findings and conclusions and preparation of	2.6



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	correspondence to Court to confirm Court's position of charter plaintiff standing; review responsive communiqué from Mr. Schwartz regarding same; review draft of correspondence prepared by Mr. Schwartz to Judge Dietz regarding standing of charter plaintiffs; prepare revisions to same; prepare advisory communiqué to Mr. Schwartz regarding same; review second draft from Mr. Schwartz concerning same with additional revisions; direct Mr. Schwartz and staff regarding same.	
2/15/2013	(CAP) Prepare First Amended Master Exhibit List to incorporate all exhibits submitted to the Court on behalf of TCSA Plaintiffs; prepare communiqué to Lacy Lawrence and Della Sawvel for updated exhibit lists and data to determine dates of admission of TCSA Plaintiffs' proffered exhibits, including those provisionally admitted.	0.6
2/15/2013	(LS) Revise draft letter to Judge Dietz; communiqué exchanges with Paralegal to complete draft letter and forward to Judge Dietz and counsel for the other parties.	0.5
2/15/2013	(RS) Review list of current charter plaintiffs' admitted exhibits; review list of charter plaintiff exhibits drawing objections and not admitted; direct staff in preparation of Amended Trial Exhibit List for submission to the Court and all counsel requesting admission of same; receive Edgewood Plaintiffs' Second Amended Exhibit List; receive and review Ninth Amended Master Exhibit List from TTSFC Plaintiffs with additional exhibits proposed; review same.	0.8
2/15/2013	(RS) Receive and review communiqué from Denise Pierce regarding attorney's fees and costs; confer with Joe Hoffer concerning same; prepare response to Ms. Pierce regarding same (No charge)	0.5
2/16/2013	(RS) Receive and review communiqué from Denise Pierce with [REDACTED]	0.2
	[REDACTED] review case law; prepare advisory response to Ms. Pierce concerning same.	
2/18/2013	(RS) Receive and review proposed Order for FBISD Plaintiffs Granting Leave to File Fifth Amended Petition (Petition previously filed without leave of court); receive and review report from Leonard Schwartz analyzing charter plaintiff petition as to general claims of unconstitutional system; receive and review communiqué affidavit regarding EOC rosters with request for notification of objections to same from FBISD Plaintiffs; prepare no objection response to same.	0.7
2/19/2013	(CAP) Review trial transcript for 01/28 as directed by Bob Schulman for information concerning court's exchange with defense counsel regarding Charter Plaintiffs' pleading.	0.3
2/19/2013	(CAP) Communiqué exchange with Della Sawvel regarding exhibits missing from of admitted exhibits. (No charge)	0.1
2/19/2013	(CAP) Telephone conference with Della Sawvel regarding reduction	0.1



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	on two invoices for transcript drafts and status of admission of exhibits. (No charge)	
2/19/2013	(RS) Prepare communiqué to Leonard Schwartz and Joe Hoffer regarding FBISD Plaintiffs Motion for Leave to file Fifth Amended Petition and why it cannot serve as precedent for late amendments; prepare communiqué to Mark Trachtenberg defining issues and requesting teleconference with Court, ISD Plaintiffs and State to discuss court's decision Findings and Conclusions as to Charter Plaintiffs; review response from Mr. Trachtenberg regarding same and proposing open dates and times; review State's request to FBISD for update of TTSFC exhibit; review draft Charter Plaintiffs' First Amended Exhibits List; review documents to be offered with same; review current list of admitted exhibits; receive transcript of February 13, 2013 court proceeding; review and analyze same as to Charter Plaintiff's entitlement to prevail on adequacy and suitability claims; prepare further clarification to Mr. Hoffer and Mr. Schwartz regarding history of FBISD late petition amendment filing.	2.5
2/20/2013	(CAP) Review Civil Practice & Remedies Code, Sec. 37.009; begin preparation of motion for attorney fees	2
2/20/2013	(CAP) Telephone conference with Della Sawvel to discuss exhibits not admitted but proffered by TCSA Plaintiffs. (No charge)	0.1
2/20/2013	(RS) Review report from Paralegal regarding offered exhibits not admitted; conduct extended telephone conference with Mark Trachtenberg regarding preparation of and district plaintiffs' sharing of draft findings and conclusions with charter plaintiffs and confidentiality expected with regard to same; review communiqué from Mr. Trachtenberg regarding same and forwarding proposed findings and conclusions to date; engage in communiqué exchanges with Chris Diamond regarding same and "confusion of district plaintiff's regarding the Court's position on charter school claims; prepare report and directive to Leonard Schwartz regarding discussions with Mr. Trachtenberg concerning extending decision to grant school district claims for efficiency and suitability to charter school plaintiffs and preparation of proposed findings and conclusions supporting same; continue review of in charter school plaintiffs proposed findings of fact and conclusions of law.	3.3
2/21/2013	(RS) Review communiqué from Shelley Dahlberg regarding scheduling for conference with Court Attorney; review communiqué from Mark Trachtenberg regarding same; prepare response to Mr. Trachtenberg, regarding same, extension of date for submission of Findings and Conclusions and other issues related to proposed Judgment; review States' Motion to strike charter plaintiff's claims for lack of notice rejected by Court; prepare comprehensive internal memorandum and report to Leonard Schwartz regarding same and impact on Findings and Conclusion; prepare advisory to Denise Pierce regarding appeal, relating discussions with Mr. Trachtenberg concerning possible joint submission of Findings and Conclusions	2.2



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	and proposed Order and related matters.	
2/21/2013	(RS) Continue review of transcripts and exhibits as required to draft additional Findings of Fact and Conclusions of Law; receive and review communiqué from Mark Trachtenberg regarding district plaintiffs' decision to not request additional time for preparation and submission of Findings and Conclusions.	1.5
2/22/2013	(RW) Conference with Paralegal regarding Motion for Attorney's Fees; research Motion for Attorney's Fees; begin drafting Motion for attorney's fees.	1.7
2/22/2013	(CAP) Telephone conference with Della Sawvel regarding exhibits not reflected on her list as having been admitted; she is working on additions to the final exhibit list.	0.1
2/22/2013	(CAP) Finalize First Amended List of Exhibits for submission to counsel and the court; prepare communiqué to all counsel and court staff with copy of List and exhibits not yet admitted; e-file List and exhibits; confer with Deputy Clerk regarding rejection of same, as it is considered discovery (No charge).	0.3
2/22/2013	(BD) Research charter school funding litigation throughout other states and locate articles, opinions and news reports to assist in drafting findings of fact and conclusions of law. (No charge)	0.7
2/22/2013	(RS) Review from Leonard Schwartz proposed Conclusion of Law on Plaintiffs' standing to challenge the constitutionality of school finance laws of the State of Texas, distribution of tax monies and maintenance of the state's education system; prepare advisory response to Mr. Schwartz concerning same analyzing body of pleading and prayer challenging constitutionality; engage in subsequent multiple communiqué exchanges with Mr. Schwartz concerning same; review communiqué from Mr. Schwartz regarding scheduling of teleconference with Mr. Trachtenberg to prepare for and agree as to issue to be discussed in conference with Court and State; prepare response to Mr. Schwartz; review response from Mr. Schwartz; prepare communiqué to Mark Trachtenberg regarding same; review response from Mr. Trachtenberg regarding conference call participants; prepare reply to Mr. Trachtenberg, regarding same; direct staff regarding scheduling; multiple communiqué exchanges with Mr. Schwartz in preparation.	1.6
2/22/2013	(RS) Conduct teleconference with Mark Trachtenberg, Michelle Jacobs and Leonard Schwartz regarding preparation of proposed Findings of Fact and Conclusions of Law; review communiqué from Mr. Trachtenberg regarding draft of District Plaintiffs' 635 count Findings of Fact and Conclusions of Law; continue review and analysis of same; review template used by District Plaintiff for preparation of Findings and Conclusions; direct staff regarding use of same; prepare color coded edits and commentary to Findings and Conclusions drafted by District Plaintiffs; prepare communiqué to Mr. Schwartz regarding absence in District Plaintiffs' draft of findings against charter Plaintiffs claims and inclusion of findings	3



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against Intervenors' claims; prepare follow-up communiqué to Mr. Schwartz suggesting [REDACTED]

2/22/2013	(RS) Prepare follow-up advisory to Mr. Schwartz attaching proposed adaptation of Plaintiffs' Findings to include charter plaintiffs explaining key to color coded sections and revisions.	0.3
2/22/2013	(RS) Receive proposed additional exhibits for State Defendants; review same; review and approved communiqué from Paralegal offering TCSA Plaintiffs' First Amended Exhibits, and resubmission of Exhibits 9019 through 9022. (No charge)	0.2
2/23/2013	(RS) Receive and review communiqué from Leonard Schwartz proposing Finding and Conclusion addressing cap on number of charter schools as violation of equal protection; research burden of proof on equal protection claims; Continue review and preparation of edits to district Plaintiffs' draft Findings and Conclusion; prepare detailed communiqué and directive to Mr. Schwartz and Joe Hoffer summarizing tasks to be accomplished in preparation of Findings/Conclusion, Judgment and motion for attorney's fees.	1.8
2/24/2013	(RS) Conferred with and direct Russell Wilson in preparation of motion for attorneys' fees; review communiqué from Mr. Wilson regarding motion content and approach; review communiqué from Mark Trachtenberg to Carol Jensen and Stacey Rosen requesting clarification on the court's rulings on TCSA Plaintiffs' claims with request to schedule teleconference to discuss same with counsel; review communiqué from Mr. Wilson addressing memorandum, draft motion and affidavit prepared for review; review communiqué from Mr. Trachtenberg regarding Court's decision to include charter plaintiffs in grant of Declaratory relief on claims of adequacy and suitability; review correspondence from Court's attorney, Carol Jensen, regarding same; review request from Mr. Trachtenberg for proposed Finding with citations regarding charter school funding mechanisms.	1.3
2/25/2013	(RW) Confer with Bob Schulman regarding request for attorneys' fees; conduct online research regarding same; prepare draft motion for attorneys' fees; prepare draft shell of affidavit in support thereof; prepare communiqué Mr. Schulman regarding same.	2.4
2/26/2013	(RW) Receive and review communiqué from Bob Schulman regarding recovery of court costs, realtime transcripts and expert witness fees and expenses; conduct online research into those issues; prepare communiqué to Mr. Schulman regarding same.	1.9
2/26/2013	(CAP) Review trial transcripts for testimony of Dr. Lisa Dawn-Fisher regarding charter school funding; prepare memorandum for Bob Schulman containing references to page and line numbers concerning same.	1
2/26/2013	(CAP) Conduct review of Wisnoski and Dawn-Fisher presentations for references to charter funding; review Pierce and Dunn	1.5



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	depositions for same; prepare matrix of references to charter funding in depositions for Bob Schulman's review.	
2/26/2013	(RS) Receive and review communiqué from Chris Diamond to Mr. Trachtenberg regarding circulation of judgment prior to presentation to the court; receive and review Mr. Trachtenberg's response to Mr. Diamond concerning same and possible extension of deadline for submission of Findings of Fact and Conclusions of Law; prepare follow-up communiqué to Mr. Trachtenberg regarding extension of deadline to submit Findings and Conclusions.	0.3
2/26/2013	(RS) Review and reply to communiqué from Leonard Schwartz regarding scheduled teleconference with Mark Trachtenberg, Shelley Dahlberg and Court; review communiqué from Carol Jenson to Mark Trachtenberg, Stacey Rosen and Shelley Dahlberg advising of judge's availability (delayed due to Internet outage at SLH) for teleconference; prepare communiqué to Mr. Trachtenberg, regarding same; review response from Mr. Trachtenberg advising call not required as Court has issued clarification; review second communiqué from Carol Jenson (dated 02/25) requesting submission of proposed language of the judgment, Findings and Conclusions prior to submission of 02/28 draft; review Mark Trachtenberg's response to Ms. Jenson court's rulings on charter plaintiffs' claims required for preparation of Findings and Conclusion; review Ms. Jenson's response to same; prepare communiqué to Denise Pierce, with copy to David Dunn, forwarding communiqué exchanges.	0.8
2/26/2013	(RS) Review communiqué from Mr. Trachtenberg to all Plaintiffs' counsel advising that the District Plaintiffs cannot meet the court's 02/28 deadline.	0.1
2/26/2013	(RS) Review communiqué from Chris Diamond to Mark Trachtenberg regarding request for extension of deadlines; review correspondence from Mr. Trachtenberg setting new deadlines for fee affidavits and Findings/Conclusions/Judgment.	0.2
2/26/2013	(RS) Direct staff to collect and assemble trial transcript excerpts, depositions and in court presentations referring to charter school funding mechanisms in preparation of specific charter school Findings and Conclusions as requested by District Plaintiffs; review relevant excerpts from Joe Wisnoski PowerPoint trial presentation, Dr. Dawn-Fisher deposition, report and trial presentation, and Denise Pierce and David Dunn depositions and trial presentations; review all attachments; review 01/09 trial transcript with highlighted references to Dr. Dawn-Fisher's testimony addressing charter funding; review Defendants' Amended Master Exhibit List for AG; review District Plaintiff's proposed Findings and Conclusions in terms of Court's clarification of Charter Plaintiff claims on adequacy and suitability and prepare draft of special funding findings and conclusions for charter school plaintiffs.	3.1
2/26/2013	(RS) Prepare directive to Russell Wilson regarding recoverable	2.2



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court costs, including expert witness fees and expenses and real-time transcripts for purposes of attorneys' fee motion; review Mr. Wilson's legal memorandum, draft motion for attorneys' fees and draft affidavit in support; prepare revisions to affidavit and Motion; prepare communiqué to Mr. Wilson highlighting excerpts from proposed Findings and Conclusions for consideration in preparation of Motion for Attorneys Fees and Affidavit; review follow-up communiqué from Mr. Wilson with revisions to attorney fee affidavit; prepare advisory to Mr. Wilson regarding extension of deadline for filing same; request Mr. Wilson prepare further memorandum describing theories for cost recovery related to declaratory relief; review memo on recoverable costs from Mr. Wilson with attached; review memo from Mr. Wilson regarding circumstances under which prevailing party is entitled to expert witness fees assessed as court costs.

2/26/2013	(RS) Prepare communiqué to Mr. Wilson directing redacted and unredacted invoices as attachments to affidavit directing un-redacted copy of invoices be submitted to the court for in-camera inspection.	0.2
2/26/2013	(RS) Receive and review communiqué from Chris Diamond regarding circulation of proposed judgment/order by District Plaintiffs as directed by Court; receive and review final version of 12/03 transcript; receive and review updated list of admitted exhibits; receive and review communiqué from Mark Trachtenberg regarding proposed findings with citations explaining charter funding; prepare response to Mr. Trachtenberg regarding same; receive and review communiqué from Chris Diamond to Mr. Trachtenberg regarding circulation of proposed judgment/order; receive and review Mr. Trachtenberg's response to Mr. Diamond concerning same; direct staff regarding same; direct Paralegal to conduct line by line transcript review and analysis.	1.4
2/27/2013	(CAP) Convert PDF versions of trial transcripts for 01/08, 01/09, 01/28 and 01/30; conduct line-by-line review of 01/08 and 01/09 transcripts, highlight entries referencing funding in Dr. Lisa Dawn-Fisher's trial testimony within same; conduct line-by-line review of 01/28 transcript; prepare summary of testimony by Denise Pierce concerning funding; highlight all references in trial transcript; prepare communiqué to Bob Schulman; forward all highlighted transcripts and documents prepared within summary of data contained within same for incorporation of data in Findings of Fact and Conclusions of Law.	4
2/27/2013	(RS) Prepare communiqué to Chris Diamond concerning extension of deadlines proposed by District Plaintiffs and State without contributions from Charters or Interveners; receive and review Mr. Diamond's response to same; direct staff in proper transcript citations for Findings and Conclusions in compliance with Court directives; receive and review confirmation of Court's consideration	0.9



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	of deadline extensions from Mark Trachtenberg; prepare case status report to TCSA and litigation staff; receive and review response from appellate counsel, Jim Ho regarding same.	
2/27/2013	(RS) Engage in communiqué exchanges with Jim Ho regarding topics and scheduling of telephone conference; receive and review notice of Court's approval of deadline extensions from Mark Trachtenberg; prepare advisory to litigation staff; receive and review communiqués from Calhoun County Plaintiffs, and FBISD Plaintiffs, objecting to submission of new exhibits proffered by Defendants; receive and review response from FBISD Plaintiffs, regarding same and additional agreed to exhibits; prepare objections to Charter Plaintiffs to same; receive and review response from MALDEF Plaintiffs, objecting to additional exhibit submission; receive and review communiqué from Assistant Attorney General withdrawing exhibits.	0.8
2/27/2013	(RS) Request and receive report from staff on status of submission and admission of Charter Plaintiffs' additional exhibits; direct staff to determine status of admission of discovery exhibits proffered by other parties; receive and review report regarding same; receive and review communiqués from David Hinojosa identifying MALDEF admitted not found on master list; prepare communiqué to all counsel regarding Charter Plaintiffs' additional exhibits.	0.4
2/27/2013	(RS) Receive and review communiqué Attorney General requesting entry of exhibit offered under withdrawn objections but not appearing in record; prepare no objection response for Charter Plaintiffs regarding same; receive and review no objection responses from other parties regarding same; receive and review staff report attaching requested deposition testimony of Denise Pierce and David Dunn concerning charter school funding references for preparation of Findings and Conclusion; continue preparation of funding Findings and Conclusion extracted from same; continue review of Joe Wiskoski's report and deposition testimony in preparation of same.	1.7
2/27/2013	(RS) Receive and review request for agreement of all parties to close record; prepare response approving same; receive and review agreement of each party; receive and review communiqué from Court Reporter concerning post-trial exhibits; receive and review communiqué from Carol Jenson, Court Attorney, directing process for; prepare advisory communiqué to Jim Ho, TCSA staff and litigation attorneys regarding status of preparation of Findings of Fact, Conclusions of Law and proposed Order; receive and review advisory response from Mr. Ho regarding same.	0.7
2/27/2013	(RS) Conduct telephone conference with Jim Ho regarding same and Court's request and deadline for preparation of and joint filing of Findings and Conclusions; prepare advisory communiqué to TCSA staff, office litigation attorneys, and Mr. Ho regarding Mr. Ho's recommendation for submission of separate Charter Plaintiffs'	1.2



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	Findings and Conclusions; receive and review response from Leonard Schwartz concerning same; prepare reply and directive to Mr. Schwartz regarding assistance in preparation of separate and joint filings of Findings and Conclusions and matters addressed by Mr. Ho; prepare communiqué to Mr. Ho forwarding confidential Findings and Conclusions provided by Mark Trachtenberg.	
2/27/2013	(RS) Review request of trial transcript of Denise Pierce testimony and staff prepared references to charter school funding mechanisms; edit in the testimony and add to proposed charter school funding findings; receive and review Court Reporter's corrections to master exhibit list; prepare communiqué to all counsel regarding finality of Charter Plaintiffs exhibit list; prepare correspondence to Jim Ho, TCSA staff and staff attorneys regarding submission of separate and joint Findings and Conclusions; receive and review response from Mr. Schwartz concerning same; prepare reply to Mr. Schwartz regarding same.	1.1
2/28/2013	(RM) Telephone conference with Bob Schulman regarding preparation of brief discussing conclusions and findings and review and preparation of summary of testimony during School Finance trial (01/2013 through start of case in chief). (No charge)	0.1
2/28/2013	(CAP) Conduct line-by-line review of all invoices with Motion for Attorney Fees; identify descriptions to be redacted prior to submission for the Court's consideration/ruling.	3
2/28/2013	(RS) Conduct telephone conference with Ramon Medina directing review of trial transcripts of testimony of Charter Plaintiff witnesses not previously summarized for preparation of Findings and Conclusions on funding mechanisms; review Attorneys Fees Affidavit filed by Rick Gray; direct staff regarding preparation of Charter Plaintiff filing; conduct attorney conference with Russell Wilson directing preparation of attorneys fees motion and affidavit; review draft motion and affidavit; prepare revisions and additions to same; direct Mr. Wilson concerning redaction of invoices submitted with attorneys' fee affidavit/motion; prepare communiqué to Chris Diamond regarding filing of attorneys' fee affidavits and request for recovery of expert fees and projected future fees; review Mr. Diamond's response concerning same; prepare reply to Mr. Diamond regarding same; review response from Mr. Diamond; prepare directive to Mr. Wilson regarding same.	1.5
2/28/2013	(RW) Receive and review Gray motion and affidavit for attorney's fees; revise motion for attorney's fees and supporting affidavit accordingly; prepare communiqué and confer with Bob Schulman regarding the same.	2.2
2/28/2013	(RS) Receive and review Defendants' Motion and proposed Order for admission of additional Exhibit 11354; receive and review communiqué from Assistant Attorney General regarding motion for leave to designate an expert for Defendants' fees request; prepare response advising that Charter Plaintiffs do not oppose; receive and	0.8



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	review communiqués from other parties equally not opposed; prepare communiqué to Jim Ho regarding significance to appellate court of appearance party affiliations and possible impact on appeal and as yet unwritten judgment of trial court; receive and review advisory response from Mr. Ho concerning same; receive and review revised list of admitted exhibit list from Court Reporter; direct staff regarding same.	
2/28/2013	(RS) Review Defendants' Motion for Admission of Exhibit 11354 and proposed Order; request report from staff anticipating additional final transcript cost; review follow-up communiqué with breakdown of invoices for final transcript costs to date; prepare additional edits to affidavit for attorneys' fees with directive to Russell Wilson regarding same; review communiqué from Mark Trachtenberg requesting proposed Findings and Conclusions on funding for Charter Plaintiffs to incorporate in District Plaintiff submission; continue preparation of proposed funding Findings and Conclusions.	0.4
2/28/13	(RS) Prepare correspondence to Mr. Trachtenberg regarding conflicts apparent in Court's pronouncement regarding Charter Plaintiffs' claims; review response from Mr. Trachtenberg regarding decision of District Plaintiffs to not revise proposed Findings and Inclusions to incorporate claims of Charter Plaintiffs; prepare advisory to Mr. Trachtenberg regarding Charter Plaintiffs' intent to limit contribution of joint filing to funding mechanisms reserving right to submit its Findings and Conclusions separately and subsequent to issuance of judgment.	0.7
3/1/2013	(RW) Finalize legal research on what is and what is not taxable court as costs, and distinction between amounts recoverable from the State of Texas as attorneys' fees, and amounts recoverable as court costs, under present statutes and case law; prepare research memo to Bob Schulman regarding same.	0.4
3/1/2013	(RW) Attorney conference with Bob Schulman regarding billing records; work with staff to obtain electronic copy of billing records; convert to Excel spreadsheet, format for filing with court.	2.1
3/1/2013	(RS) Prepare response to inquiry from Leonard Schwartz and Russell Wilson regarding attorneys' fee recovery documentation; prepare directive to Mr. Wilson regarding identification and redaction of confidential data; direct Mr. Wilson to review taxable costs; receive and review taxable costs matrix from Mr. Wilson; review recoverable court costs; receive and review communiqué from Mr. Schwartz regarding billing rates for Affidavit and Motion; prepare response and further directive regarding same; receive and review response from Mr. Schwartz regarding lodestar formula and supporting case law; review cases and provide further directives to	1.5



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	Mr. Schwartz regarding attorney fee recovery for DEC actions; receive and review follow-up lengthy research advisory from Mr. Schwartz addressing same; review Court's Omnibus Order and preceding comments; direct Mr. Wilson regarding same.	
3/1/2013	(RS) Receive and review attorney fee spreadsheet prepared by Russell Wilson; conduct cursory review of spreadsheet; prepare response to Mr. Wilson directing format changes and modifications to billing rates to reflect lodestar amounts; prepare communiqué to appellate counsel regarding preparation of Findings and Conclusions for the Charter Plaintiffs as compared to Findings and Conclusions to be submitted by ISD Plaintiffs and Intervener.	0.7
3/1/2013	(RS) Prepare response communiqué to Mark Trachtenberg regarding Charter Plaintiffs' proposed Findings of Fact and Conclusions of Law and decision to submit separate from ISD Plaintiffs and Intervener; receive and review reply from Mr. Trachtenberg regarding Charter School Plaintiffs' claim of unconstitutional impact under inequitable M&O taxing formulas, prepare response to same, provide cite to Court's order regarding denial of "meaningful discretion"; receive and review response from Mr. Trachtenberg regarding Charter Schools' inability to levy taxes; prepare advisory and explanatory reply to Mr. Trachtenberg regarding same.	0.8
3/1/2013	(RS) Prepare follow-up communiqué to Mark Trachtenberg, regarding extent of Charter School Plaintiff's participation in preparation of jointly proposed Findings and Conclusions.	0.3
3/2/2013	(RW) Prepare billing records from case to produce copy of records that may be filed in court, with sufficient specificity, as required by case law, to allow Trial Judge to evaluate the time spent on each activity, and to allow Trial Judge to decide what portions of bills to disregard if he does not allow recovery for legal work done on certain causes of action, so that trial Judge does not disregard entire bill because work is not segregated and quantifiable; modify spreadsheet to separately track hours billed and hours written off for each firm employee, so that filing with the trial court specifically identifies the amount claimed for recovery by each attorney; prepare communiqué to Bob Schulman and Joe Hoffer regarding same.	5.7
3/2/2013	(RS) Prepare directive to staff for review of 1/30/13 trial transcript for preparation of Findings and Conclusions adopting testimony of	0.2



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Dr. Anthony Rolle, Dr. Craig Wood and David Dunn.

3/3/2013	(RS) Receive and review communiqué from Mark Trachtenberg requesting information concerning state property tax claim and applicability of same to Charter Plaintiffs'; receive and review follow-up communiqué from Mr. Trachtenberg advising of ISD Plaintiffs' agreement to not include charter schools in their proposed adequacy and tax issues Findings to propose separate Findings for charter school funding but to include charter schools in Findings of inadequacy.	0.6
3/3/2013	(RS) Receive and review from Russell Wilson spreadsheet of firm finance trial billings through February, per attorney, for inclusion with attorneys' fee motion; review and revise headings on spreadsheet; direct staff regarding same.	0.9
3/4/2013	(RM) Confer with Russell Wilson regarding preparation of MS Excel file for master invoice to District Court.	0.3
3/4/2013	(RM) Confer with Russell Wilson regarding conversion of invoices to MS Excel format; confer with Paralegal regarding same; review communiqué and attachment from Paralegal regarding converted files; prepare MS Excel version of invoice to TCSA; confer with staff and Mr. Wilson regarding functionality of QuickBooks; review QuickBooks regarding preparation of master MS Excel file; develop MS Word files containing monthly invoice data toward preparation of master invoice document; confer with Mr. Wilson regarding MS Excel formula for master invoice document.	3.4
3/4/2013	(RM) Review communiqué and attachment from Bob Schulman regarding preparation of summary Findings of Fact from 01/30/2013 testimony; review firms files for official/final trial testimony for 1/30/13; prepare communiqué to Paralegal regarding same; review reply from Paralegal regarding same; review 01/30/2013 trial transcript.	0.9
3/4/2013	(RM) Confer with Bob Schulman regarding preparation of brief disclosing findings and conclusions for submission to the court.	0.1
3/4/2013	(RW) Adapt spreadsheet to billing records in the format generated by firm software; debug hours calculator for tracking hours of each employee; confer with Paralegal regarding identification and qualifications of former firm employees, so that the qualifications of those employees may be included in the billing records submitted to the Trial Judge with sufficient specificity to prove that the hourly rate	1.2



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	at which recovery is sought is justifiable under Texas law; print final copy of hours for redaction, to remove attorney-client privileged information from billing records before filing with the Trial Court.	
3/4/2013	(RW) Continue adapting each entry for time in the billing records into the spread sheet developed for filing with the court, making sure that every claim for hours is entered separately, with sufficient specificity, as required by case law, to allow Trial Judge to evaluate the time spent on each activity, and to allow Trial Judge to decide what portions of bills to disregard if he does not allow recovery for legal work done on certain causes of action, so that Trial Judge does not disregard entire bill because work is not segregated and quantifiable; ensure that hours billed and hours written off, for each firm employee, are separately tracked, so that the Trial Judge is aware of how much the amount sought for recovery as attorneys' fees has already been discounted, before he decides if the amount of attorneys' fees awarded to client should be discounted; confer with Paralegal, Ramon Medina and Bob Schulman, to clarify questions about billings; prepare communiqué to Paralegal, Mr. Medina and Mr. Schulman regarding same.	11
3/4/2013	(CAP) Confer with Administrative Assistant regarding invoices previously billed and conversion of same to Excel; convert invoice; discussion with Russell Wilson concerning same; discussion with Ramon Medina regarding "clean up" of converted file; convert all invoices to Word format and forward to Mr. Medina for edit and conversion to Excel files.	1.2
3/4/2013	(RS) Prepare communiqué to Mark Trachtenberg regarding Finding of Fact concerning charter funding; prepare second communiqué to Mr. Trachtenberg in response to ISD Plaintiffs' decision to not include Charter Plaintiffs in their joint Findings; receive and review response communiqué from Mr. Trachtenberg regarding his having received draft of Defendants' Findings and separate Findings to be filed in response by and on behalf of Charter Plaintiffs; prepare comprehensive advisory to Mr. Trachtenberg reviewing Court's decision and its application to Charter Plaintiffs' claims unconstitutional funding as previously requested; receive and review response from Mr. Trachtenberg requesting scheduling of teleconference with Shelley Dahlberg, Assistant Attorney General,	1.8



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	and Carol Jenson, Court's Attorney, to clarify Judge Dietz's decision; prepare reply to Mr. Trachtenberg regarding same with outline of proposed Findings; receive and review response from Mr. Trachtenberg.	
3/4/2013	(RS) Review Court Attorney's prior advisory on Judge's decision addressing Charter Plaintiffs' claims; prepare communiqué to Ramon Medina forwarding same for review in preparation of draft Findings; receive and review communiqué exchanges between Mr. Medina and Paralegal regarding final trial transcript for 1/30/13; prepare follow-up communiqué to Mr. Medina forwarding current draft of Findings.	0.5
3/4/2013	(RS) Receive and review communiqué exchanges between Della Sawvel, Court's Reporter, and counsel, regarding names and acronyms contained in the transcript; receive and review communiqué from Ms. Sawvel with final transcript for 12/4/12; prepare communiqué to Chris Diamond regarding request received by David Dunn from charter operator for copies of depositions, sharing court reporter costs; direct Paralegal to provide Mr. Diamond with all witness depositions and exhibits; receive and review response from Mr. Diamond regarding inclusion of costs for invoices in his attorney fee affidavits; prepare reply to Mr. Diamond explaining recoverable costs.	0.7
3/4/2013	(RS) Receive and review communiqué from Chris Diamond regarding cost recovery; prepare response to Mr. Diamond concerning same, recovery of expert fees and fees submitted at lodestar rates; receive and review reply from Mr. Diamond regarding billing rate; prepare requested response to Mr. Diamond concerning billing rates submitted; receive and review staff prepared proposed affidavit and exhibit in support of motion for recovery of attorneys fees; review, revise and prepare comments and directives regarding same; prepare further directives to Mr. Wilson with revisions; receive and review revised affidavit and exhibits from Mr. Wilson; receive and review communiqué from Mr. Wilson concerning October 2012 and February 2013 billing records, not located.	1.1
3/5/2013	(RM) Prepare communiqué to Bob Schulman regarding status of preparation of Summary of Findings of Fact; review draft transcript of trial testimony for 01/30/2013 noting evidence presented by Dr.	1.2



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	Anthony Rolle; prepare summary of Findings of Fact; review communiqué from Mr. Schulman providing instructions on how to proceed.	
3/5/2013	(RM) Review MS Excel functions and formulas to ascertain how to prepare master invoice for submission to District Court; review communiqué from Russell Wilson regarding 10/2012 and 02/2013 invoices; reply to Mr. Wilson regarding same; prepare communiqué to Mr. Wilson regarding results; review communiqués and attachments from Paralegal regarding invoice 1929 and 2074; review follow-up communiqué from Mr. Wilson regarding missing invoices; prepare communiqué to Paralegal providing list of invoices received, converted into a usable format and forwarded to Mr. Wilson.	0.8
3/5/2013	(RM) Continue to review draft transcript of trial testimony for 01/30/2013 noting evidence presented by Dr. Anthony Rolle; continue to prepare summary of Findings of Fact.	0.8
3/5/2013	(RM) Review communiqués and attachments from Paralegal regarding missing invoices; prepare communiqué to Paralegal and Russell Wilson regarding invoice 2072; convert PDF copy of invoice 2072 into usable MS Excel format; prepare communiqué to Mr. Wilson forwarding requested file.	1.6
3/5/2013	(RW) Finalize adaptation of firm billing records into the spreadsheet developed for filing with the Trial Judge; modify spreadsheet to be filed with Trial Judge to make it easier to read "report" section that displays the number of hours billed, and recovery of attorney's fees sought, and number of hours already written off, for each firm employee; prepare Notice of Filing of Request for Attorneys' Fees; finalize Affidavit in Support of Request for Attorneys' Fees, which makes spreadsheet attached to Request for Attorneys' Fees admissible as a business records affidavit; attorneys' fees; finalize exhibits A-M to affidavit, which state the names and qualifications of each firm employee for which reimbursement is sought, with sufficient specificity to prove that the hourly rate at which recovery is sought is justifiable under Texas law; legal research into in camera filings under Texas law; prepare affidavit for in camera filing with Trial Court; prepare notice of in camera filing with Trial Court; prepare unredacted copy of billing records for filing in camera with Trial Court; confer with Ramon Medina, Paralegal and Bob	8.2



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	Schulman regarding same.	
3/5/2013	(CAP) Redact invoices to be submitted as Exhibit M with Notice and Affidavit for attorneys' fee award; scan same; organize and e-file same; prepare communiqués to counsel and court administrators forwarding copies of Notice and Affidavit with Exhibits A through L attached and Notice of In-Camera submission; after-hours delivery of overnight delivery package to the court with USB drive containing unredacted invoices for the court's eyes only.	4
3/5/2013	(RS) Prepare directive to staff regarding modifications and additions to Motion for Attorneys' Fees; receive and review staff communiqués regarding recalculation of invoices at lodestar rates for inclusion with same; receive and review staff communiqué concerning inclusion of "No charge" entries in Excel worksheet; receive and review communiqué from Court Reporter regarding confirmation of admission of exhibits identified in master exhibit list; receive and review response from Attorney General's office concerning same; receive and review current version of Attorney Fees Affidavit incorporating modifications and additions as directed; prepare further directives to staff regarding same.	0.7
3/5/2013	(RS) Receive and review final version of spreadsheet containing all billing items; review spreadsheet; receive and review follow-up explanatory communiqué from Russell Wilson regarding February 2013 billings; review same; prepare fee estimates for February and March 2013 for affidavit; receive and review proposed final version of Notice of Filing, affidavit and supporting exhibits for attorneys fees from Mr. Wilson; prepare further staff directives regarding same and assembly of exhibits for same; receive and review Interveners' Notice of Filing of Affidavits and Motion for Award of Attorneys' fees; receive and review Notice of Filing and attachments filed by MALDEF Plaintiffs for recovery of attorney fees; receive and review Calhoun County Plaintiffs' Notice of Filing and attachments in attorneys' fee claim; receive and review communiqué from Leonard Schwartz regarding same; direct staff in preparation of modifications to charter school submissions in response to same.	2
3/5/2013	(RS) Receive and review Defendants' Motion for Leave to Designation Expert for Attorneys' Fees and proposed Order; receive and review FBISD Notice of Filing and attachments in support of FBISD Plaintiffs' request for attorneys' fees; receive and review	1.3



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Defendants' Notice of Attorneys' Fees and affidavit in support; receive and review Notice of Filing by META with attachments in attorneys' fees claims; confer with and direct staff regarding e-filing of Charter Plaintiffs' Notice, affidavit and exhibits for recovery of attorneys' fees; receive and review final confirmation of e-filing of Charter Plaintiffs' attorney fees submissions and Notice of In-Camera Filing and Business Records Affidavit; direct staff in preparation of additions to Charter School submission in response to same.

- 3/5/2013

(RS) Receive and review communiqué from Ramon Medina regarding assignment to assist in preparation of Fact Findings; prepare directive to Mr. Medina regarding analysis of Wood, Rolle and Dunn trial testimony for same; receive and review communiqué from Leonard Schwartz with [REDACTED]; engage in communiqué exchanges with Russell Wilson proposing additional revisions to Affidavit; receive and review revision to same; receive and review Notice of In-Camera Filing and final of Affidavit.

1.2
- 3/6/2013

(RM) Prepare communiqué to Bob Schulman forwarding summary of Findings of Fact for trial testimony provided by Drs. Craig Wood and Anthony Rolle on 01/30/2013.

0.2
- 3/6/2013

(RM) Review draft transcript of trial testimony for 01/30/2013 noting evidence presented by Dr. Craig Wood; review Exhibit 9055 for same; review communiqué from Bob Schulman regarding circulation of judgment and Findings of Fact and Conclusions of Law; review communiqué from Mr. Schulman regarding Dr. Anthony Rolle's testimony concerning the State funding formulas for open-enrollment charters; reply to Mr. Schulman responsive to inquiry; review communiqué from Mr. Schulman regarding Dr. Wood's testimony concerning the State funding formulas for open-enrollment charters; reply to Mr. Schulman responsive to his inquiry; review communiqué from Mr. Schulman regarding review of David Dunn's testimony concerning same; review trial testimony for 01/30/2013 noting evidence presented by Mr. Dunn concerning State funding formulas for open-enrollment charters; reply to Mr. Schulman responsive to his inquiry and request.

3.6
- 3/6/2013

(RM) Review communiqué from Bob Schulman regarding preparation of Findings of Fact summary; review communiqué and

1.4



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	attachment from Paralegal regarding corrected Exhibit 9054; continue to prepare summary of Findings of Fact for testimony and trial presentation by Dr. Anthony Rolle; prepare communiqué to Mr. Schulman forwarding status report on same.	
3/6/2013	(RM) Continue to review draft transcript of trial testimony for 01/30/2013 noting evidence presented by Dr. Anthony Rolle; continue to prepare summary of Findings of Fact; review Exhibit 9054, Dr. Rolle presentation, noting evidence presented by Dr. Rolle during his testimony; prepare communiqué to Paralegal regarding corrected Exhibit 9054.	2.5
3/6/2013	(CAP) Telephone conference with Deputy District Clerk regarding Exhibit M to Notice and Affidavit for attorneys' fees submitted by e-file on 03/05 and reasons for rejection of same by the Clerk; prepare four separate letters District Clerk attaching and referencing four PDF files containing Exhibit M documentation; discussion with e-filing service representative regarding delays in upload of documents (No charge); e-file all letters with respective files attached.	1.2
3/6/2013	(RS) Prepare advisory communiqué to Leonard Schwartz regarding attorneys' fee demand made by Charter Plaintiffs compared to that by ISD Plaintiffs and Intervenors; receive and review reply from Mr. Schwartz concerning same; receive and review communiqué from Ramon Medina to Paralegal requesting final copy of exhibit introduced into evidence on behalf of Charter Plaintiffs; receive and review staff response to same; receive and review communiqué from Judge Dietz formally denying Defendants' Pleas to the Jurisdiction; forward same to litigation attorneys.	0.4
3/6/2013	(RS) Receive and review communiqué from Chris Diamond regarding status of proposed judgment to be prepared by ISD Plaintiffs and State prepare response to Mr. Diamond regarding same; receive and review from Mr. Diamond e-mail exchange with Mark Trachtenberg estimating proposal to be submitted on 03/08; confer with staff regarding resubmission of Exhibit M (invoices) in support of Charter Plaintiffs' Motion for Attorneys' Fees; receive and review follow-up notification of filing and acceptance of same; receive and review communiqué from Ramon Medina proposing Findings of Fact for Rolle testimony and trial presentation.	1
3/6/2013	(RS) Prepare directive to Ramon Medina regarding Findings of Fact	0.8



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for Rolle testimony and trial presentation and location of testimony regarding charter formula funding; receive and review response from Mr. Medina regarding same; prepare further directive to Mr. Medina regarding same; receive and review lengthy response from Mr. Medina with excerpts from David Dunn trial testimony concerning funding inadequacies, charter formulas and related issues; receive and review follow-up response from Mr. Medina with summary of notes for Findings of Fact based upon Rolle and Wood trial testimony and relevant excerpts from the trial transcript concerning formula funding; review summary prepared by Mr. Medina.

3/6/2013	(RS) Receive and review request from Mark Trachtenberg for Charter Plaintiffs' proposed Finding of Fact on average funding formulas; prepare response to Mr. Trachtenberg concerning same; receive and review follow-up communication from Mr. Trachtenberg proposing reference to TEA charter school funding explanation from TEA website; prepare response to Mr. Trachtenberg advising of need for updated sources for Findings of Fact, of trial testimony identified for submission of proposed Findings on charter school inadequate funding issue and of status and proposed submission dates for charter plaintiffs proposed Findings; receive and review reply from Mr. Trachtenberg regarding same.	0.6
3/7/2013	(LS) Numerous communicu� exchanges with Bob Schulman regarding Findings of Fact and Conclusion of Law; extended telephone conference with Mr. Schulman regarding same.	1.2
3/7/2013	(AK) Attorney conference with Bob Schulman regarding Findings of Fact for charter school adequacy claims; review testimony of Denise Pierce and Joe Wisnoski discussing Tier I and Tier II funding for charter schools; draft findings and submit to Mr. Schulman for review.	2.5
3/7/2013	(RS) Continue preparation of Charter Plaintiffs' Findings and Conclusions on Funding Formulas extracted from Court records; review request from Denise Pierce to review Findings and Conclusions on formulas prior to submission; prepare response to Ms. Pierce regarding status of preparation of same; direct staff to provide Ms. Pierce with draft Findings and Conclusions upon completion of same; direct staff to provide Ms. Pierce with copy of submitted request for recovery of attorneys' fees on behalf of	1.8



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Charter Plaintiffs; review Ms. Pierce's request for copies of Attorneys' Fee Motions and Affidavits filed by all other parties; review follow-up communiqué from Ms. Pierce requesting

[REDACTED]

[REDACTED]; prepare response to Ms. Pierce [REDACTED]

[REDACTED]; direct staff in use of court requested template for preparation of Findings and Conclusions; review first run draft Findings and Conclusions from Allen Keller.

3/7/2013

(RS) Receive and review communiqué from Mark Trachtenberg interpreting Court's findings with regard to Charter Plaintiffs' claims to prevail on adequacy and suitability but not on efficiency claims; prepare communiqué to Leonard Schwartz and Joe Hoffer regarding same; prepare communiqué to Denise Pierce forwarding draft Findings and Conclusions for review; receive and review response from Ms. Pierce regarding same; prepare reply to Ms. Pierce regarding same; receive and review draft proposed Judgment from Mr. Trachtenberg with explanation of additional edits prepared by Edgewood ISD Plaintiffs, Intervenors and Charter Plaintiffs; prepare response to Mr. Trachtenberg regarding status of Charter Plaintiffs' version of Findings and Conclusions; direct Mr. Schwartz and Mr. Hoffer in review of draft Judgment provided by Mr. Trachtenberg.

1.2

3/7/2013

(RS) Receive and review final version of 12/06/12 trial transcript; receive and review communiqué from Denise Pierce Findings and Conclusions on charter-related issues; prepare response to Ms. Pierce concerning same, re-request scheduling of teleconference with David Dunn and Toni Templeton to discuss Findings and Conclusions; receive and review reply from Ms. Pierce with Ms. Templeton's proposed modifications to draft Findings and Conclusions; engage in communiqué exchanges with Ms. Pierce regarding drafting of Findings based on trial testimony, and incorporation of Ms. Templeton's recommended additions to same.

0.4

3/7/2013

(RS) Prepare communiqué to Mark Trachtenberg forwarding document with four proposed Findings on charter funding formula averaging; receive and review response from Mr. Trachtenberg with his recommended additions to proposed Findings; prepare reply to Mr. Trachtenberg regarding same with directive to Allen Keller to

1.6



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confirm exhibit number for deposition exhibit admitted into evidence; receive and review response from Mr. Trachtenberg with exhibit attached; prepare reply to Mr. Trachtenberg regarding same, provide copy to litigation staff for review; receive and review exhibit from Paralegal, note it is the same as that provided by Trachtenberg; receive and review communiqué from Mr. Keller with revised version of Findings with inclusion of cite to Joe Wisnoski deposition testimony and presentation.

3/7/2013	(RS) Prepare communiqué to Mark Trachtenberg regarding proposed Charter Plaintiffs' Findings; review proposed Judgment; prepare communiqué to litigation staff with proposed Judgment attached, advise staff Judgment excludes issues on which Charter Plaintiffs prevailed, with request for input concerning same; receive and review response from Joe Hoffer regarding same.	1
3/8/2013	(RW) Receipt and review of communiqués from Bob Schulman regarding Findings of Fact and Conclusions of Law; communiqués conveyed proposed findings of fact and conclusions of law from both the School District Plaintiffs, and the State of Texas; begin review trial transcripts for Charter School Plaintiff's proposed findings of fact and conclusions of law.	1.2
3/8/2013	(RS) Receive and review communiqué from Jim Ho requesting current version of Charter Plaintiffs' proposed Findings and Conclusions; prepare response to Mr. Ho concerning deadline for submission of complete set of Findings and four to be submitted on charter formula averaging, forward proposed judgment to Mr. Ho for review; prepare advisory to Drs. Craig Wood and Anthony Rolle regarding Judge's "decision" related to charters; receive and review response from Dr. Rolle with request for copy of Judge's decision; prepare reply to Drs. Rolle and Wood with further discussion concerning Judge's decision;(no charge) receive and review proposed alternate Findings for charters to be submitted with ISD Plaintiffs' and State's draft; prepare response to Mr. Trachtenberg advising that neither are correct and accurate set of proposed Findings will be resubmitted by Charter Plaintiffs; prepare staff directive correcting transcript citations and the incorporation of TCSA recommendations into proposed.	1.3
3/8/2013	(RS) Receive and review revised Findings with updated citations and TCSA modifications; forward same with advisory communiqué	0.6



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	to Mark Trachtenberg; receive and review response from Mr. Trachtenberg attaching Charter Plaintiffs' Findings proposed by the State; prepare advisory communiqué to Mr. Trachtenberg and Shelley Dahlberg, Assistant Attorney General, concerning revise same; receive and review reply from Ms. Dahlberg for additional citations to Joe Wisknoski testimony references; prepare response to Ms. Dahlberg accepting same.	
3/8/2013	(RS) Receive and review communiqué from Mark Trachtenberg with merged funding formula Findings for Charter Plaintiffs, prepare response to Mr. Trachtenberg, with copy to Jim Ho, regarding proposed process for submission of Findings to Court, prepare communiqué to Shelley Dahlberg and Mr. Trachtenberg, stressing Charter Plaintiffs' agreement to submit jointly on funding formula Findings and intention of Charter Plaintiffs to submit individual Findings and Conclusions separate from those to be jointly filed by ISD Plaintiffs and State; prepare communiqué to Mr. Trachtenberg and Ms. Dahlberg and Carol Jenson, Court Attorney, requesting teleconference with Ms. Jenson to further discuss Findings and Conclusions submission; receive and review response from Ms. Jenson requiring further submissions to be written.	1
3/8/2013	(RS) Receive and review communiqué from Mark Trachtenberg regarding preparation of proposed Findings for all parties, as directed by Judge Dietz with request for Charter Plaintiffs' Findings addressing adequacy claim; confer with litigation staff attorneys regarding same; prepare multiple communiqués and directives to Russell Wilson with draft proposed Judgment, State's proposed Findings for Charter Plaintiffs' claims, trial testimony summaries of key charter witnesses, and current version of Charter Plaintiffs' proposed Findings and Conclusions, for review and analysis in drafting Findings of Fact.	0.8
3/9/2013	(RS) Draft summary of Findings of Fact for each party comporting with Court's Omnibus Order excepting rulings applicable to charters.	0.8
3/10/2013	(LS) Work on Findings of Fact and Conclusions of Law.	5.8
3/10/2013	(RS) Prepare communiqué to Leonard Schwartz and Joe Hoffer regarding Court's decline for scheduling teleconference and alternatives for submission of separate Charter Plaintiffs' Findings due 03/12; prepare additions to summary of Findings to include	2.2



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Judge's ruling as to charters, claims prevailed upon by the charters and related matters; forward same in follow-up communiqué to Mr. Schwartz and Mr. Hoffer; prepare second follow-up communiqué to Mr. Schwartz and Mr. Hoffer with additional data on proposed Findings/Conclusions regarding equal protection claim; forward all proposed Findings to Russell Wilson with directive to research the record for information in support of contentions on efficiency/equity for the charters.

- 3/10/2013 (RS) Prepare follow-up directive to Russell Wilson for review of testimony by Dr. Lisa Dawn-Fisher as to lack of facility funding for charters and universality of facility requirements; review appellate rules regarding timing of filing of Findings and Conclusions post written judgment; review relevant case law; prepare advisory recommendation to staff regarding [REDACTED] 1
- 3/10/2013 (RS) Receive and review Ramon Medina's review of trial transcripts for testimony relevant to Charter Plaintiffs' claims from testimony of Wood, Rolle, Dunn and Pierce; prepare communiqué to Leonard Schwartz forwarding proposed Judgment provided by Mark Trachtenberg; prepare advisory to Mr. Schwartz regarding Mr. Medina's review of trial transcripts and Russell Wilson's review of transcripts for similar testimony by state witnesses for use in drafting Findings; review previously prepared excerpts from Wayne Pierce testimony concerning charter funding; review Dr. Pierce's deposition testimony regarding same; prepare follow-up advisory to Mr. Schwartz with excerpts from same for use in preparation of proposed Judgment. 1.9
- 3/10/2013 (RS) Receive and review communiqué from Leonard Schwartz recommending alternative of submitting separate Findings of Fact for individual Charter Plaintiffs and TCSA; prepare response to Mr. Schwartz concerning same; prepare communiqué to Mr. Schwartz with attached file outlining testimony and evidence presented by Dr. Anthony Rolle for use in preparation of Findings. 0.4
- 3/10/2013 (RS) Receive and review proposed Judgment from staff regarding charter claims; revise proposed Judgment sections concerning 2.4



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Charter Plaintiffs' claims; prepare communiqué to Leonard Schwartz and Russell Wilson attaching same, directing incorporation of attorneys' fee claims within same; receive and review response from Mr. Schwartz with recommended revisions to draft Judgment; prepare next set of revisions to Judgment accordingly; prepare reply to Mr. Schwartz attaching same and advising of TCSA request to review Charter Plaintiffs' proposed Findings and Conclusions prior to final submission of same

3/11/2013	(MZ) Locate and review expert report by James Strohmeyer regarding facilities funding.	0.5
3/11/2013	(MZ) Research Texas Court Rules and case law regarding effect of late or non-filing of Findings of Fact on appeal.	1
3/11/2013	(LS) Extended telephone conference with Bob Schulman on Finding of Fact and Conclusion of Law. (No charge)	2
3/11/2013	(LS) Work with Bob Schulman on Finding of Fact and Conclusion of Law.	8
3/11/2013	(RW) Multiple communiqué exchanges with Bob Schulman and Leonard Schwartz regarding factual matters to be stressed in Charter School Plaintiff's proposed Findings of Fact and Conclusions of Law; proposed Findings of Fact and Conclusions of Law from both the School District Plaintiffs, and the State of Texas; review trial transcripts and deposition transcripts of Charter School Plaintiff witnesses Denise Pierce, Brooks Flemister, Dr. Anthony Rolle, Dr. Lisa Dawn Fisher and David Dunn, to identify volume and page of testimony to be cited to Trial Court in support of Charter School Plaintiff's proposed Findings of Fact and Conclusions of Law; work on draft Findings of Fact, incorporating citations to the record of Charter School Plaintiffs witnesses; conduct legal research in Texas Administrative Code regarding school construction; research deadlines to file Findings of Fact and Conclusions of Law.	11.8
3/11/2013	(RS) Extended telephone conference with Leonard Schwartz regarding preparation of Findings and Conclusions on efficiency and due process claims to be identified in proposed Judgment; prepare advisory to Drs. Craig Wood and Anthony Rolle regarding Judge's decision on charters; receive and review response from Dr. Wood concerning same; conduct teleconference with and directive to Paralegal regarding access to trial transcripts for review in	1



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	preparation of Findings/Conclusions and Judgment; receive and review trial transcripts for 01/28 through 01/30; draft outline for demonstrating charter school funding disparities from trial testimony and presentations; prepare directive to litigation staff for review of same in finalizing Findings of Fact; prepare lengthy advisory to Denise Pierce and Jim Ho, with copy to litigation staff, regarding proposed Findings/Conclusions and Judgment for Charter Plaintiffs; receive and review communiqué from Ms. Pierce requesting completed draft. (No charge)	
3/11/2013	(RS) Receive and review communiqué from Russell Wilson with attached notes and excerpt from Dr. Lisa Dawn-Fisher testimony; review same; prepare response to Mr. Wilson with cite to Dawn-Fisher testimony on amount, per student, available to districts for facility support; receive and review reply from Mr. Wilson with synopsis of Dr. Dawn-Fisher's WADA comparisons in trial and deposition testimony; review Mr. Wilson's synopsis of same; receive and review communiqué from Leonard Schwartz with edited version of Charter Plaintiffs' Findings and Conclusions; review same; receive and review communiqué from Mr. Wilson with attached summary of Pierce trial testimony on 01/28; conduct review of summary; incorporate all in proposed Judgment.	2
3/11/2013	(RS) Direct staff in review of Strohmeier report for finding on facility costs; receive and review communiqué from staff responding to same; review pertinent sections of report; forward report to Leonard Schwartz and Mr. Wilson for findings on facility costs; prepare communiqué to Mr. Wilson with attached template for preparation of Findings of Fact; prepare communiqué to Mr. Schwartz regarding significant David Dunn testimony; receive and review current version of Findings/Conclusions from Mr. Schwartz; review same; receive and review follow-up response from Mr. Schwartz with revised Findings/Conclusion. (No charge)	1.1
3/11/2013	(RS) Prepare communiqué to Leonard Schwartz and Russell Wilson with Strohmeier report, deposition and exhibits in support attached for review; direct Mr. Wilson in summary of Strohmeier documentation with data regarding building costs; prepare proposed finding based on Strohmeier testimony and exhibits; receive and review three additional Strohmeier finding proposals; prepare	0.8



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communiqué to Jim Ho concerning review of proposed Findings for Judgment, submission of same by Trachtenberg without further input on behalf of charters, and to submit separate post-judgment Findings/Conclusions; receive and review reply from Mr. Ho regarding same; forward same to Mr. Schwartz; review current version of Charter Plaintiffs' proposed Findings; prepare communiqué to staff with same, direct [REDACTED]

[REDACTED] (No charge)

3/11/2013	(RS) Prepare communiqué to Russell Wilson with request for status of Charter Plaintiffs' attorneys' fees award section of Judgment; receive and review communiqués from Leonard Schwartz with cites to Pierce trial testimony on 01/29 concerning issues referenced within same; receive and review Finding No. 16 from Mr. Schwartz (on charter cap of 215) with cite to trial transcript of authority for such Finding; receive and review addition to Finding No. 16 from Mr. Schwartz citing data from trial transcript on application by 100 separate entities vying for six available Texas charters; receive and review Finding No. 15 from Mr. Schwartz with recommended revisions on FSP funds under ADA received by charters as compared to ISDs. (No charge)	2.6
3/12/2013	(MZ) Locate cites needed for final Findings of Fact and Conclusions of Law; revise same to include all final revisions and comments from Bob Schulman	2.5
3/12/2013	(LS) Numerous communiqué exchanges with Bob Schulman and staff regarding drafting final Findings of Fact and Conclusions of Law.	0.9
3/12/2013	(RW) Finalize all aspects of proposed Final Judgment, Findings of Fact and Conclusions of Law; prepare communiqué to Bob Schulman and Leonard Schwartz regarding same; review and incorporate changes from Mr. Schulman, Mr. Schwartz and TCSA; confer with Legal Assistant regarding filing; draft proposed written requests for Findings of Fact and Conclusions of Law for filing after Trial Judge signs Judgment; draft Request for Amended and Additional Findings of Fact and Conclusions of Law for immediate filing if initial findings and conclusions of Trial Judge are not as requested.	8.2
3/12/2013	(JH) Review, revise Findings of Fact and Conclusion of Law; confer with Bob Schulman regarding same.	1.4



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- 3/12/2013 (RS) Receive, review and respond to multiple communiqués from Leonard Schwartz with revisions to Findings 1 through 4; direct Mr. Schwartz in additional revisions to same; continue review of proposed Findings of Fact and Conclusions of Law; prepare communiqué to Mr. Schwartz attaching current version of same with directive for review and comparison of Finding 1 in same to his draft of Finding 1; receive and review brief cite to summaries of pertinent findings in LTTS Charter and Thompson v. Elmo ISD from Mr. Schwartz with request for teleconference to discuss same; conduct teleconference with Mr. Schwartz regarding same; continue preparation of proposed Judgment based on same. 4.1
- 3/12/2013 (RS) Receive and review communiqué from Russell Wilson with current version of proposed Judgment; review draft Judgment, prepare revisions to same; receive and review follow-up communiqué from Mr. Wilson regarding preparation of final version of Findings of Fact/Conclusions of Law; prepare response and directive to Mr. Wilson regarding same; prepare follow-up response to Mr. Wilson, with copy to Leonard Schwartz, enclosing revised Judgment for review and consideration of submission of two proposed Findings/Conclusions – one consistent with Judge Dietz's order and one directed at the Court of Appeals; direct staff in identification of citations to case authorities for incorporation into Findings; receive and review cites requested; prepare directives to Mr. Schwartz regarding drafting of section of Judgment on efficiency and equal protection claims. 1.5
- 3/12/2013 (RS) Receive and review communiqué from Russell Wilson with current "clean" and tracked versions of Judgment; continue review of proposed Findings; prepare communiqué to Mr. Wilson forwarding same for pairing with Findings and Conclusions; prepare advisory to Denise Pierce and Jim Ho concerning submission of Charter Plaintiffs' Judgment and Findings of Fact and Conclusions of Law; receive and review reply from Ms. Pierce concerning same; prepare response to Ms. Pierce regarding additional edits required and deadline for submission to court; receive and review recommendations regarding proposed Findings, Conclusions and Judgment from Mr. Ho; prepare response to Mr. Ho outlining reasons and strategy for staggering submissions; continue review 4



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	and revision of proposed Final Judgment; prepare directive to Mr. Wilson with draft for review for consistency; receive and review response from Mr. Wilson with most recent edited version of Final submissions.	
3/12/2013	(RS) Multiple communiqué exchanges with staff regarding finalization of Findings/Conclusions and proposed Judgment; continue preparation of same; receive and review comments and revisions from TCSA (Lindsey Jones); incorporate same into final for submission to court.	0.8
3/12/2013	(RS) Prepare cover letter to Judge Dietz for submission with Charter Plaintiffs' Findings and Conclusions; direct staff in e-filing with proposed Findings and Conclusions and Judgment; receive and review "final" version of letter to Judge Dietz, approve same for filing; receive and review notification of e-filing of letter and accompanying Findings and Conclusions and Final Judgment on behalf of Charter Plaintiffs; direct Legal Assistant in submission of e-filed documentation to all counsel and the court's staff; receive and review communiqué from Russell Wilson with draft Request for Findings of Fact and Conclusions of Law and Request for Additional or Amended Findings of Fact and Conclusions of Law; review same; prepare response to Mr. Wilson concerning time for filing such Requests following entry of Judgment; receive and review reply from Mr. Wilson confirming filing deadline and calendaring of future events and deadline triggered by same.	1.4
3/12/2013	(RS) Receive and review Interveners' proposed Findings of Fact and Conclusions of Law; receive and review Interveners' proposed Final Judgment; receive and review Mark Trachtenberg's lengthy communiqué to Judge Dietz and his administrators regarding proposed Findings of Fact and Conclusion of Law, with copy of same attached; review final version of Findings/Conclusions (282 pages); prepare communiqué to Joe Hoffer and Leonard Schwartz regarding same.	1.6
3/12/2013	(RS) Receive and review communiqué from Mark Trachtenberg forwarding ISD Plaintiffs' proposed Judgment to Judge Dietz and Carol Jenson. (No charge)	0.2
3/13/2013	(RW) Receive and review of multiple communiqués from Bob Schulman and Leonard Schwartz regarding written requests for Findings of Fact and Conclusions of Law once judgment is signed.	0.3



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	(No charge)	
3/13/2013	(RS) Prepare communiqué to Carol Jenson regarding finding issues as described in letter to the Court submitted with Charter Plaintiffs' proposed Judgment, Findings and Conclusions; receive and review communiqué from Ms. Jenson regarding same; receive and review Motion and proposed Order for admission of provisionally admitted exhibits filed by Edgewood Plaintiffs; receive and review second filing of proposed Final Judgment and accompanying letter by Interveners.	0.5
3/14/2013	(RS) Receive and review communiqué from Carol Jenson requesting copies of Charter Plaintiffs' proposed Findings, Conclusions and Judgment; direct staff regarding same; prepare communiqué to Jim Ho and TCSA administrators forwarding a copy of proposed Findings of Fact and Conclusions of Law filed on behalf of Charter Plaintiffs; direct Russell Wilson for review of ISD Plaintiffs' proposed Findings and Conclusions in preparation of additional findings accepted before or subsequent to entry of written judgment; review rules of appellate procedures regarding same; direct staff regarding same.	0.9
3/15/2013	(RS) Receive and review Defendants' Response to Plaintiffs' and Interveners' Request for Attorneys' Fees and attached Exhibit; receive and review communiqué from Legal Secretary, Attorney General's Office, to Judge Dietz forwarding a file-stamped copy of Response; prepare directive to litigation staff for review of Response, request comments concerning same; receive and review edited draft Findings and Conclusions for ISD Plaintiffs and Interveners with communiqué from Michelle Jacobs, associate counsel for Calhoun County Plaintiffs, advising cross-references were updated within same and document was cite checked.	0.4
3/18/2013	(CAP) Line-by-line review of Request for Findings of Fact and Conclusions of Law drafted by Russell Wilson; prepare revisions to same; convert PDF format; send request to Bob Schulman to obtain approval for filing today; telephone conference with Mr. Schulman concerning same.	0.2
3/18/2013	(RW) Receive and review motion for Findings of Fact and Conclusions of Law from Defendants; receive and review communiqué from Bob Schulman; revise Findings of Fact and Conclusions of Law; prepare communiqué to Paralegal forwarding	0.4



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	same; confer with Paralegal regarding same.	
3/18/2013	(RS) Receive and review communiqué from Ft. Bend ISD Plaintiffs regarding addition of page numbers to Bamberg deposition; receive and review Defendants' Request for Findings of Fact and Conclusions of Law; prepare communiqué to Paralegal directing finalization and filing of Charter Plaintiffs' Request for Findings and Conclusions.	0.3
3/19/2013	(RW) Receive and review multiple communiqués from Bob Schulman regarding Findings of Fact and Conclusions of Law. (No charge)	0.2
3/19/2013	(LS) Review pleading filed by Attorney General.	0.5
3/19/2013	(RS) Receive and review Defendants' Amended Response to Applications for Attorneys' Fees and exhibit in support of same; receive and review Defendants' Amended Request for Findings of Fact and Conclusions of Law; direct staff to compare same; receive and review staff report.	0.2
3/20/2013	(MZ) Compare Defendants' Response to Request for Attorneys' Fees to Amended Request; communiqué exchange with Bob Schulman regarding differences.	0.5
3/20/2013	(LS) Quick review of numerous pleadings filed by different parties.	0.2
3/20/2013	(RS) Direct staff regarding Amended Response to Application for Attorneys' Fees. (No charge)	0.2
3/21/2013	(RS) Receive and review communiqué from Court Reporter requesting directive with regard to submission of exhibits to the Supreme Court; receive and review response from Assistant Attorney General followed by exchanges between the Court Reporter and Assistant Attorney General concerning PDF file size limit for e-filing to the Supreme Court and submission of substantial number of documents in record; receive and review Second Amended Response by Defendants to Plaintiffs' and Intervenors' Requests for Attorneys' Fees and exhibit in support.	0.3
3/22/2013	(RS) Prepare advisory communiqué to Jim Ho, Denise Pierce and litigation staff forwarding and regarding pertinent e-mail exchanges regarding completion of the record for review; receive and review response from Mr. Ho regarding court's intentions on Charter Plaintiffs' overall funding claim; prepare advisory response to Mr. Ho regarding same and Court's revision of Charter Plaintiff's findings on adequacy and suitability.	0.8
3/25/2013	(RS) Receive and review Intervenors' Response to school district	0.3



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	Plaintiffs' proposed Findings of Fact and Conclusions of Law.	
3/26/2013	(RS) Receive and review revisions to Reply to Defendants' Response to Motion for Attorneys' Fees and direct staff regarding further revisions and additions to same.	1.1
3/27/2013	(RS) Receive and review ISD Plaintiffs' Response to Intervener's Brief on Proposed Findings of Fact and Conclusions of Law; prepare staff directive regarding filing of Reply by ISD Plaintiffs to Defendants' Response and Objection to attorneys' fees submissions; receive and review staff.	0.3
3/28/2013	(LS) Review District Plaintiffs' Joint Reply to Defendants' Second Amended Response to Plaintiffs' and Interveners' Requests for Attorneys' Fees and Objections to Defendants' Request for Attorneys' Fees.	0.6
3/28/2013	(RW) Confer with Bob Schulman; begin review of State's filing in opposition to Plaintiffs' request for attorneys' fees, and of draft replies made by other plaintiffs filings in response to State's filing in opposition to granting Plaintiffs' requests for attorneys' fees.	1.1
3/28/13	(RS) Receive and review ISD Plaintiffs' Reply to Defendants' Response to ISD Plaintiffs' and Interveners' attorneys' fee submissions and Objections to Defendants' Request for Attorneys' Fees with attached exhibit; prepare correspondence to Denise Pierce regarding filing of Objections by Defendants to request for attorneys' fees filed by ISD Plaintiffs, Intervener, and Charter Plaintiffs and recommending Reply by Charter Plaintiffs; receive and review communiqué from Russell Wilson regarding scope of Reply; receive and review response from Ms. Pierce regarding timelines and costs; prepare advisory reply to Ms. Pierce; receive and review Notice of Exhibits in Support of ISD Plaintiffs' Reply to Defendants' Response to attorneys' fees requests and Objections to Defendants' Request for attorneys' fees; review exhibits filed with Notice.	0.9
4/1/2013	(LS) Review communiqué exchange between Bob Schulman and Denise Pierce regarding Defendants' 2nd Amend Response to Plaintiffs and Interveners Requests for Attorneys' Fees.	0.3
4/1/2013	(RS) Receive and review directive from Denise Pierce to proceed with preparation of Reply to Response to Requests for Attorneys' fees; prepare advisory to Ms. Pierce regarding presentment of claims to Judge Dietz; direct Russell Wilson to review and consider adaptation of arguments in Response by District Plaintiffs and Interveners.	0.4
4/8/2013	(RW) Begin drafting Reply to State's 2nd Response to Plaintiffs	6.8



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	Request for Attorneys fees; prepare communiqué to Bob Schulman regarding same; receive and review revisions from Mr. Schulman regarding State's 2nd Response to Plaintiffs Request for Attorneys fees; conduct legal research; incorporate changes from Mr. Schulman; prepare communiqué to Mr. Schulman forwarding changes for review.	
4/8/2013	(RS) Prepare directive to Russell Wilson regarding preparation of Response to Defendants' Objections to Attorneys Fee Requests; receive and review communiqué from Della Sawvel, Court's Reporter, with final version of 12/10/12 trial transcript; direct staff regarding same. (No charge)	0.2
4/8/2013	(RS) Receive and review communiqué from Russell Wilson with draft Reply to State Defendants' Objections to Attorneys Fee Request; begin review of Reply; prepare revisions to same; prepare response to Mr. Wilson forwarding revised draft for preparation of additions to same; receive and review reply from Mr. Wilson with revised draft Reply; prepare additional edits to draft Reply; forward same to Mr. Wilson with directive to highlight passages within same that are copied from ISD Plaintiffs' and Intervenor's Replies.	1.2
4/9/2013	(RW) Receive and review communiqués from Bob Schulman regarding revisions; incorporate revision and suggestions into Reply to State's Response to Request for Attorneys Fees; prepare communiqué to Mr. Schulman forwarding same for review; receive communiqué from Mr. Schulman with additional revisions; prepare revisions to Attorneys' Fees Response as directed.	3.2
4/9/2013	(RS) Continue review of Reply to Defendants' Objections to Request for Attorneys Fees; prepare communiqué to Russell Wilson concerning changes previously recommended not incorporated within current version of Reply; request he re-review directives and include same in draft; receive and review response from Mr. Wilson with attached draft Reply containing requested revisions/additions; prepare revisions to same.	0.3
4/10/2013	(RW) Complete amendments to Attorneys' Fees Response; prepare communiqué to Bob Schulman regarding same; receive and review communiqué from Mr. Schulman regarding amendment revisions; finalize Attorneys' Fees Response; prepare communiqué to Mr. Schulman forwarding final for review.	3.3
4/10/2013	(RS) Receive and review Russell Wilson's current version of Charter Plaintiffs' Reply to Defendants' Response and Objections to Request for Attorneys' Fees; receive and review requested revisions from Mr. Wilson following his further review of same for flow and consistency; direct Mr. Wilson to finalize same for filing.	0.2
4/11/2013	(RW) Receive and review communiqués from Paralegal; review final draft; prepare communiqué to Paralegal regarding final draft.	0.4
4/11/2013	(RS) Prepare communiqué to Denise Pierce with attached draft Reply to Defendants' Objections to Request for Attorney Fees, request commentary to same. (No charge)	0.2



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4/12/2013	(RW) Receive and review communiqué from Bob Schulman with attached communiqués from Denise Pierce; receive and review response to multiple communiqués from Paralegal regarding final format before filing.	1.1
4/12/2013	(RS) Receive and review Denise Pierce's proposed revisions to Introduction and part B of Reply to Response/Objections by Defendants to Attorney Fees Request; prepare communiqué to Ms. Pierce concerning same and pending court judgment; prepare directive to Russell Wilson and staff regarding same; receive review and approve revised version of Reply from Mr. Wilson; direct staff regarding same.	0.5
4/13/2013	(RS) Prepare advisory communiqué to Denise Pierce regarding delay in issuance of judgment and party motion to abate issuance pending end of Legislative Session. (No charge)	0.2
4/16/2013	(RS) Communiqué exchanges with staff regarding final version of Reply to Defendants' Response/Objection to Request for Attorneys' Fees; conduct final review and revision of Reply; forward same to Paralegal for proofing, preparation in final and filing; receive and review notification from Paralegal to all counsel and interested parties with final version of Reply e-filed with the court.	0.7
4/16/2013	(RS) Receive and review communiqué from Chris Diamond inquiring as to judgment status; prepare response to Mr. Diamond regarding same. (No charge)	0.1
4/22/2013	(RS) Receive and review communiqué from Mark Trachtenberg with attached correspondence to Judge Dietz and Carol Jenson, submitted on behalf of Calhoun County ISD Plaintiffs, requesting issuance of a single final judgment and single set of findings; forward letter to Denise Pierce and Leonard Schwartz.	0.2
4/23/2013	(LS) Review case forwarded by Denise Pierce regarding new decision by Arizona trial court dismissing on Motion for Summary Judgement a Student Equity/Charter School funding case; prepare communiqué to Bob Schulman regarding case.	0.6
4/23/2013	(LS) Review letter sent by Mark Trachtenberg to Judge Dietz asking for a postponement of final order; prepare communiqué to Mr. Schulman regarding suggestions for reply.	0.5
4/23/13	(RS) Receive and review Motion from School District Plaintiffs for delay of issuance of Judgment pending conclusion of Legislative Session and Legislature's funding decisions; conduct attorney conference with Leonard Schwartz regarding same.	0.2
4/24/2013	(LS) Review letter to Judge Dietz from plaintiffs' groups responding	0.4



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to Trachtenberg letter; review letter from Denise Pierce to Bob Schulman asking about potential response by Texas Charter School Association; prepare communiqué to Mr. Schulman regarding response; receive and review communiqué from Mr. Schulman with letter to Ms. Pierce requesting direction to take in regards to Trachtenberg letter.

- 4/24/2013 (RS) Receive and review communiqué from Rick Gray with letter to the Court on behalf of TTSCF Plaintiffs, Edgewood ISD Plaintiffs and Fort Bend ISD Plaintiffs in response to Calhoun County ISD Plaintiff's letter, with request to consider and issue findings and judgment without regard to the current legislature's pending legislation impacting school funding issues; forward same to Leonard Schwartz; receive and review response from Mr. Schwartz with recommendation to prepare a similar letter for Charter Plaintiffs; prepare communiqué to Denise Pierce, forward Gray's letter for review and consideration by Ms. Pierce and David Dunn; receive and review response from Ms. Pierce with input concerning same, and inquiry as to intentions of Interveners; prepare reply to Ms. Pierce, advising of intent to consult Intervener's counsel regarding same; prepare communiqué to Chris Diamond concerning same; receive and review advisory response from Mr. Diamond; prepare report to Ms. Pierce. 0.7
- 5/31/2013 (RS) Receive and review notification of Judge Dietz' request to arrange conference; communiqué exchanges with Denise Pierce regarding attendance at hearing set by Judge Dietz; receive follow-up request from Ms. Pierce on [REDACTED]; prepare response on potential outcome of meeting with the Court; attorney conference regarding same. 0.5



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DATE	DESCRIPTION	TIME
6/1/2013	(RS) Prepare communiqué to TCSA administrators regarding upcoming attorney conference called by Judge Dietz and anticipated results.	0.1
6/3/2013	(RS) Telephone conference with David Dunn and Denise Pierce regarding upcoming conference requested by Judge Dietz; schedule meeting at TCSA prior to same.	0.2
6/3/2013	(RS) Receive and review notice from Leonard Schwartz concerning attendance at attorney conference called by Judge Dietz; receive and review request from Denise Pierce to Mr. Schwartz regarding same with request for telephone conference with charter/taxpayer parent plaintiffs regarding same; confer with Chris Diamond regarding absence of Interveners from e-mail exchanges regarding same; direct staff to provide Mr. Diamond with copies of party communications to date; receive and review party attorney communiqués regarding same.	0.6
6/3/2013	(RS) Prepare communiqué to David Dunn, Denise Pierce, Leonard Schwartz and Joe Hoffer regarding attorney conference attendance, attorneys' fee recovery and recap of questions, concerns over continuation of trial to address legislative changes, and follow-up telephone conference to address same; receive and review reply from Mr. Hoffer; receive and review reply from Mr. Dunn regarding same; confer with and direct staff regarding scheduling of phone conference.	0.3
6/3/2013	(RS) Receive and review advisory from Denise Pierce to charter/taxpayer parents regarding scheduling of a phone conference to provide litigation update and continuation of trial.	0.1
6/4/2013	(RS) Receive and review request by Assistant Attorney General to hold tomorrow's hearing in District Court, on the record; receive and review communiqué from Court Clerk regarding same.	0.1
6/5/2013	(RS) Prepare communiqué to Chris Diamond regarding [REDACTED] prepare communiqué to David Thompson regarding scope and process.	0.5
6/5/2013	(RS) Travel to Austin (TCSA offices). (NO CHARGE)	1.5
6/5/2013	(RS) Pre-hearing conference with David Dunn and Denise Pierce; attend hearing; post-hearing conference with Ms. Pierce.	1.7
6/5/2013	(RS) Receive transcript of today's proceedings before Judge Dietz; forward same to litigation staff and TCSA staff for review; review and analyze same; prepare request to David Dunn for scheduling of phone conference regarding same; follow-up extended teleconference with Mr. Dunn and Denise Pierce regarding trial reopening and potential impact on District Court Judgment and appeal.	1
6/5/2013	(RS) Review Motion to Reopen Evidence; review responses filed to same; prepare outline of charter school plaintiff position with regard to and preparation for hearing in Travis County District Court regarding same.	0.7



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6/5/2013	(RS) Conduct numerous exchanges with Court Reporter and engage in discussions with Denise Pierce, Joe Hoffer and staff regarding resolution of payments owed to Court Reporter for school finance trial invoices; direct staff concerning same; review invoices and payment records and engage in further exchanges with Court Reporter, and discussions with Ms. Pierce, Mr. Hoffer and staff regarding same.	0.5
6/5/2013	(RS) Return travel following hearing. (NO CHARGE)	1.5
6/6/2013	(RS) Receive and review communiqué with attached spreadsheet from Mark Trachtenberg for input of data on counsel availability for evidentiary hearing; direct and confer with staff for completion of same; receive and review draft of edited spreadsheet.	0.2
6/7/2013	(RS) Prepare directive to staff regarding input of data to multi-party spreadsheet and dates of attorney availability for inclusion on same; receive and review communiqué from Joe Hoffer regarding complexities of reopening case; prepare response to Mr. Hoffer. (NO CHARGE)	0.1
6/7/2013	(RS) Receive and review Denise Pierce's communiqué to Court Reporter regarding unpaid invoices and submission of balance due. (NO CHARGE)	0.1
6/10/2013	(RS) Prepare client update to Charter School Plaintiffs regarding status of case and reopening of trial, direct staff regarding review of same; receive and review Excel spreadsheet file from Mark Trachtenberg requesting dates of availability through November for evidentiary hearing; receive and review information provided by TCSA regarding witness availability; prepare informational response to Mr. Trachtenberg, proposing trial process and schedule, identifying available dates for Firm and those provided by Denise Pierce and David Durin; direct staff to complete Excel Spreadsheet in conformance with same.	1
6/10/2013	(CP) Review and revise Bob Schulman's draft Legal Update regarding school finance lawsuit and Charter Plaintiffs' position concerning same.	0.2
6/10/2013	(LS) Review draft legal update prepared by Bob Schulman.	0.1
6/10/2013	(RS) Prepare for and participate in extended teleconference scheduled for Charter Plaintiffs; provide finance trial update.	0.3
6/10/2013	(RS) Receive and review party counsel communiqués regarding availability for evidentiary hearing before Judge Dietz on reopening of evidence in trial; prepare communiqué to Mark Trachtenberg, Rick Gray and David Hinojosa proposing party pre-determination of agreements and differences and preparation of individual position statements and briefs in lieu of joint submission suggested by the Court; conduct extended telephone conferences with David Thompson, Mr. Gray and Chris Diamond regarding proposal to substitute trial depositions for trial witnesses; prepare comprehensive advisory to Denise Pierce regarding same.	0.9
6/11/2013	(RS) Receive and review edited client case status update; prepare additional changes and additions to same; direct staff regarding	0.5



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	same; receive and review revisions to update; conduct review and prepare explanation of status for Charter Plaintiffs, requesting plaintiff responses; direct staff regarding completion of final and distribution of same;	
	[REDACTED] receive and review staff communiqué to Chris Diamond with trial transcripts received from Court Reporter (NO CHARGE).	
6/12/2013	(LS) Receive calendar spreadsheet from Mark Trachtenberg; review same.	0.2
6/12/2013	(LS) Receive and review communiqué from David Dunn regarding [REDACTED]	0.1
	[REDACTED] (NO CHARGE).	
6/12/2013	(RS) Receive and review Rule 270 Motion to Reopen Evidence from Mark Trachtenberg; conduct communiqué exchanges with [REDACTED];	1
	receive and review edited Excel spreadsheet from staff with addition of dates of availability by counsel and representatives for Charter Plaintiffs; prepare communiqué to Mr. Trachtenberg with attached spreadsheet of current available dates, subject to multiple administrative hearings, discovery dispute hearings, and injunctive relief; conduct communiqué exchanges with counsel confirming scheduling of teleconference to discuss Motion to Reopen and related issues.	
6/14/2013	(LS) Review communiqué from Bob Schulman with opinion on issues raised by Court's opening of case; multiple communiqué exchanges with Mr. Schulman, Denise Pierce and David Dunn regarding position on reopening of case and Charter Plaintiffs. (NO CHARGE)	0.9
6/14/2013	(LS) Receive and review communiqué from Denise Pierce with [REDACTED]	0.2
6/14/2013	(LS) Receive and review communiqué from Mark Trachtenberg with attached spreadsheet revision requesting input on same.	0.1
6/14/2013	(RS) Conduct multiple communiqué exchanges with Denise Pierce and staff regarding payment of Court Reporter invoices by TCSA, agreement with Chris Diamond concerning same, and preparation of payment demand to Mr. Diamond with breakdown of invoices; conduct multiple communiqué exchanges and telephone conferences with plaintiff and defendant and intervener counsel and office staff regarding completion of spreadsheet matrix requested by Court in response to Motion to Reopen the Evidence to include trial process proposed, discovery process proposed, scope of continued trial, support for continued trial and availability of counsel for trial scheduling; review privileged case update prepared by Denise Pierce for Charter Plaintiffs and litigation staff; prepare supplementary update to address expected outcomes for hearing to	1.9



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	consider Motion to Reopen, and summary of recommendations and advice regarding same; receive and review inquiry from David Dunn regarding same; prepare advisory response.	
6/15/2013	(LS) Review and revise spreadsheet; prepare communiqué to Bob Schulman with same.	1.6
6/17/2013	(LS) Multiple communiqué exchanges with Bob Schulman and parties' counsel regarding opening of trial and spreadsheet submission to the court; receive and review communiqué from Denise Pierce regarding opening of trial spreadsheet submission to the court and TCSA's position; review spreadsheet forwarded by Mr. Schulman; prepare suggested revisions to same; forward to Mr. Schulman for consideration.	0.8
6/17/2013	(RS) Review party-circulated spreadsheet for submission to trial court regarding and responding to motion to reopen evidence; engage in communiqué exchanges with TCSA and Leonard Schwartz for review and proposed additions to same; receive and review TCSA proposed revisions to spreadsheet; receive and review recommended revisions from Mr. Schwartz; engage in communiqué exchanges with counsel regarding proposed dates and potential for filing joint motion by the parties concerning open dates for trial continuance.	0.7
6/18/2013	(RS) Receive and review spreadsheet of counsel availability revised by Denise Pierce; receive and review communiqué from Mark Trachtenberg regarding completion of spreadsheet; prepare response to Mr. Trachtenberg concerning same; receive and review other party responses to Mr. Trachtenberg's request; receive and review Calhoun County ISD Plaintiffs' Motion to Reopen the Evidence; receive and review Fort Bend ISD Plaintiffs' Response supporting Motion; prepare advisory communiqué to litigation staff regarding same; receive and review reply from Joe Hoffer concerning same; receive and review final spreadsheet regarding counsel availability, party positions and relevant issues in response to court request for same; receive and review Edgewood ISD Plaintiffs' Response to Motion to Reopen the Evidence; forward same to litigation staff for review; receive and review reply from Mr. Hoffer regarding same.	1.2
6/19/2013	(RS) Travel to Austin. (NO CHARGE)	1.5
6/19/2013	(RS) Attend court hearing.	1.5
6/19/2013	(RS) Attend post-hearing conference at TCSA.	1
6/19/2013	(RS) Return travel from Austin. (NO CHARGE)	1.5
6/19/2013	(RS) Receive and review Judge Dietz's Order on Motion to Reopen Evidence from Court Operations Officer; direct staff in preparation of letter to Charter Plaintiffs regarding reopening of case, as ordered by Judge Dietz; receive, review and revise draft letter; receive and review Advisory to the Court of Parties' Position Regarding Reopening of the Evidence and Entry of Judgment.	1.1
6/19/2013	(RS) Review and approve notice to Chris Diamond regarding payment of invoices by Interveners; review invoices; approve notice	0.1



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6/19/2013	to Mr. Diamond; confer with and direct staff regarding same. (CP) Prepare explanatory letter to Charter Plaintiffs regarding reopening of trial; forward same to Bob Schulman for review/additions (NO CHARGE).	0.4
6/20/2013	(RS) Receive and review communiqué from Assistant Attorney General regarding review of Judge Dietz's order, preparation of side-by-side summary of statutes reflecting legislative changes applicable to issues in lawsuit, and scheduling of conference to discuss same and proposed scheduling order; prepare advisory to TCSA and staff counsel regarding response to same; receive and review communiqué exchanges between counsel for all parties concerning same; receive and review David Hinojosa's response to Assistant Attorney General request and difficulty in specifying additional limitations; forward same to TCSA with request for assistance in identifying relevant statutes to charter schools; receive and review reply from Ms. Pierce with directive to Lindsey Jones requesting Ms. Jones to release copy of TCSA legislative summary packet for review; receive and review same from Ms. Jones, begin review, select relevant statutes within same; confer with Mr. Hoffer concerning same.	2.2
6/20/2013	(RS) Receive and review, from staff, current version of advisory to Charter Plaintiffs on reopening of case; prepare additional revisions to same.	0.2
6/21/2013	(RS) Prepare informational advisory to Denise Pierce regarding position on continuation of trial process and potential for consensus among parties regarding same; receive request from Ms. Pierce for review of draft press release on continuation of school finance trial; review same; prepare comprehensive set of remarks to same and advisory to Ms. Pierce concerning same.	1
6/21/2013	(RS) Receive and review multiple communiqué exchanges between counsel regarding scheduling of teleconference to discuss proposed scheduling order and confer on spreadsheet requested by Judge Dietz and counsel's availability/non-availability for scheduling same; receive and review exchange between David Hinojosa and Shellee Dahlberg concerning Mr. Hinojosa's recommendation for in-person meeting; prepare communiqué to Ms. Pierce, David Dunn and litigation attorneys forwarding e-mail exchanges between counsel, [REDACTED]	1.3
	[REDACTED] receive and review Ms. Pierce's reply requesting teleconference to confer on charter plaintiffs' strategy and further involvement.	
6/21/2013	(RS) Finalize letter to Charter Plaintiffs regarding reopening of case; direct staff for final review and submission of same to clients; receive and review communiqué to Charter Plaintiffs with final version attached (NO CHARGE); receive and review draft of 06/19 hearing transcript provided by Court Reporter; prepare lengthy communiqué to Chris Diamond regarding Court Reporter invoices	1.5



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	owed by his clients, not yet paid to Reporter or reimbursed to TCSA in compliance with our prior agreement; receive and review Administrative Assistant's communiqué to Mr. Diamond forwarding same with invoices (NO CHARGE).	
6/24/2013	(RS) Receive and review [REDACTED]	0.1
	[REDACTED]	
	receive and review confirmation from David Dunn scheduling phone conference. (NO CHARGE)	
6/26/2013	(LS) Extended conference with David Dunn, Denise Pierce, Bob Schulman and James Ho regarding evidence and arguments to be presented; post-conference meeting with Ms. Pierce and Mr. Schulman regarding TCSA's position regarding same. (NO CHARGE)	1.3
6/26/2013	(RS) Prepare for TCSA phone call; participate in conference call with Denise Pierce, David Dunn, Leonard Schwartz and Jim Ho; post-conference call with Mr. Dunn, Mr. Schwartz and Ms. Pierce; follow-up teleconference with Mr. Schwartz, all regarding trial reopening approach; receive and review press release from TCSA to charter plaintiff parents on continuation of trial; receive and review [REDACTED]	1.5
7/1/2013	(RS) Conduct telephone conference with Chris Diamond; conduct telephone conference with Rick Gray; conduct two telephone conferences with Denise Pierce; conduct follow up telephone conference with Mr. Diamond, all regarding tomorrow's conference with Court regarding continuance of trial.	0.5
7/3/2013	(RS) Review communicate exchanges between counsel regarding update of Dr. Lisa Dawn-Fisher's analysis and dataset to be used for same, Assistant Attorney General's request for amended pleadings raising additional claims and relevant legislation, proposing attorney conference to discuss proposed Scheduling Order; forward communicate exchanges to TCSA and staff attorneys with request for review of same [REDACTED]	1.9
	[REDACTED]	
	[REDACTED]; prepare	
7/3/2013	(RS) Review ISD Plaintiffs' Joint Proposal for Scheduling Order; review commentary from Assistant Attorney General concerning same; review communicate from Interveners' counsel suggesting discussion of proposed Scheduling Order with Assistant Attorney General prior to entering into agreement with ISD Plaintiffs; prepare response agreeing to schedule teleconference.	0.5



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7/7/2013	(RS) Receive and review communique from counsel for Interveners with recommendations for proposed Scheduling Order; direct Russell Wilson in review of proposed Scheduling Order [REDACTED] [REDACTED] receive and review Mr. Wilson's response regarding same; prepare further directive to Mr. Wilson regarding same.	0.3
7/8/2013	(RW) Receive and review communiqués from Chris Diamond and Bob Schulman regarding proposed Scheduling Order; review and revise same; prepare communique to Mr. Schulman offering alternatives in response to same; receive and review follow up directive from Mr. Schulman; add definitions of Charter Plaintiffs and incorporate Charter Plaintiffs in proposed Scheduling Order; prepare communique to Mr. Schulman forwarding same; receive and review communique from Leonard Schwartz responding to proposed Order.	2.2
7/8/2013	(RS) Receive and review Mark Trachtenberg's request to schedule counsel conference on Proposed Scheduling Order; receive and review multiple exchanges between counsel regarding same and their availability; prepare communiqué to Denise Pierce, Leonard Schwartz and Joe Hoffer regarding nonparticipation in same; receive and review communiqué exchange between David Thompson and Assistant Attorney General proposing two pleadings amendment deadlines in Proposed Scheduling Order, to allow for an initial amendment and a final amendment for the ISD Plaintiffs, Interveners and Charter Plaintiffs; receive and review memorandum from Russell Wilson regarding review of Proposed Scheduling Order with recommendations for revisions to same; direct Mr. Wilson regarding same; receive and review revised Proposed Order; prepare outline of arguments to propose at Scheduling Order conference of party counsel.	0.8
7/9/2013	(RS) Receive and review communique from Denise Pierce requesting Proposed Scheduling Order; direct staff regarding same; receive and review communiqués exchanged between counsel regarding Proposed Scheduling Order; receive and review communiqué from Attorney General regarding scope of evidence and deadlines in Proposed Scheduling Order; prepare response to defense counsel regarding same.	1.1
7/10/2013	(LS) Multiple communique exchanges with Bob Schulman regarding amended pleadings; review pleading filed by other Plaintiff groups; prepare extensive notes for drafting Charter Plaintiff's amended pleadings; prepare communique to Mr. Schulman regarding same.	0.9
7/10/2013	(RS) Receive and review lengthy communiqué from Denise Pierce regarding proposed scheduling order and staffing for trial continuation; prepare response to same; receive and review communiqué from Defense counsel regarding and proposing delay of Scheduling Order pending determination of trial scope; prepare response to same.	0.4
7/11/2013	(RS) Telephone conference with Denise Pierce regarding Proposed	1



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	Scheduling Order; receive and review FBISD Plaintiffs' Sixth Amended Petition; receive and review FBISD Plaintiffs' Fourth Request for Production to Defendants; prepare communiqué to TCSA administrators and litigation staff forwarding FBISD Amended Petition for review with request for directive on amendment of Charter Plaintiffs' Petition; receive and review reply from David Dunn regarding same; preparation of same; conduct communiqué exchange with Mr. Dunn regarding amendments and strategy for drafting same.	
7/11/2013	(RS) Direct Leonard Schwartz in review of FBISD pleading and prepare recommendations for amendment by Charter Plaintiffs, and contact the court to confirm with Judge's deadline (as pronounced at February hearing) for pleading amendments; receive and review communiqué from Mr. Schwartz with [REDACTED]; [REDACTED]; [REDACTED];	0.7
	receive and review reply from Mr. Schwartz regarding same and TCSA position with regard to the Proposed Scheduling Order.	
7/12/2013	(RS) Receive and review current version of legislation spreadsheet; analyze same in preparation for counsel conference.	0.4
7/12/2013	(RS) Participate in extended teleconference with counsel for all parties regarding Scheduling Order, relevant revisions to include in legislation spreadsheet and related issues; prepare report to Lindsey Jones regarding same and preparation by TCSA of list of bills affecting charters; receive and review response from Ms. Jones regarding same. (NO CHARGE)	1.4
7/12/2013	(RS) Receive and review Defendants' proposed Scheduling Order; prepare communiqué to defense counsel regarding same; conduct communiqué exchange with Toni Templeton regarding preparation of relevant legislation not referenced in currently proposed legislation spreadsheet and deadline for revising current legislation spreadsheet to incorporate Charter Plaintiffs' recommended additions to same.	0.4
7/15/2013	(RS) Receive and review requests from Lindsey Jones for legislation spreadsheet and Charter Plaintiffs' proposed additions; direct staff regarding same; prepare communique to Ms. Jones regarding identification of recent legislation affecting charter school education costs; receive advisory response from Ms. Jones; direct staff regarding same; receive request from Toni Templeton for Requests for Production submitted to date; prepare advisory response concerning same; receive and review advisory from Ms. Jones regarding correction of data to ISD spreadsheet charter school reference; prepare advisory response to Ms. Jones regarding same; receive and review revised draft of Proposed Scheduling Order; forward same to TCSA administrators and firm	0.8



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7/16/2013	<p>attorneys for review, with advisory regarding same.  (RS) Receive, review and respond to staff communiqué regarding [REDACTED]  [REDACTED]; conduct communiqué exchange with Lindsey Jones regarding [REDACTED]  [REDACTED]; direct Paralegal to confer with Holly McIntush concerning status of Charter Plaintiffs' revisions to Scheduling Order and spreadsheet; receive and review communiqué from Paralegal concerning same; direct Leonard Schwartz regarding edits to spreadsheet to incorporate Charter Plaintiffs' recommended revisions and a statement to the parties on requested addition to Scheduling Order.</p>	0.6
7/16/2013	<p>(CP) Locate and collect all revisions to proposed scheduling order; research information exchanged with TCSA administrators and client communiqués regarding same; organize and collate all party exchanges regarding same; engage in communicate exchanges with Bob Schulman regarding same; conduct telephone conference with Leonard Schwartz concerning same; forward same to attorneys.</p>	0.6
7/16/2013	<p>(LS) Review multiple communicate exchanges and proposals regarding scheduling; review each rendition of new, proposed scheduling order. (NO CHARGE)</p>	1.5
7/16/2013	<p>(RS) Receive and review inquiry from Toni Templeton regarding response to data requests by ISD Plaintiffs; receive and review revised Proposed Scheduling Order with additions requested by Defendants; receive and review communiqué exchanges between counsel regarding additions to same, [REDACTED]  [REDACTED]; direct staff to locate current version of Proposed Scheduling Order reflecting Charter Plaintiffs' requested revisions and provide same to Leonard Schwartz for final review.</p>	0.5
7/17/2013	<p>(CP) Communicate exchange with Bob Schulman regarding Interveners' proposed additions to legislative spreadsheet not received by our office; prepare request to Melissa Lorber to provide a copy; receive and review response from Ms. Lorber attaching same; forward Excel file to Mr. Schulman for his review.  (NO CHARGE)</p>	0.1
7/17/2013	<p>(CP) Telephone conferences and in-office discussions with Bob Schulman and Leonard Schwartz regarding additions to Scheduling Order, spreadsheet with legislative revisions and preparation of amended pleading. (NO CHARGE)</p>	0.4
7/17/2013	<p>(LS) Telephone conference with Bob Schulman and Paralegal</p>	0.9



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7/17/2013	regarding amendment of proposed scheduling order; receive and review communique from Paralegal regarding same; revise proposed scheduling order to add SB 376 to list of legislation and to change language on expert witnesses; prepare communique with proposed revision to draft scheduling order to all counsel in case; telephone conference with Paralegal regarding Amended Petition. (RS) Review current draft of proposed Scheduling Order; prepare additional provision expanding definitions of expert witnesses to comport with statute and case law; review Leonard Schwartz's communiqué to all counsel requesting addition to Order concerning Designation of Experts and inclusion of SB376 to legislation spreadsheet; prepare reply to all counsel in response to defense counsel's request for explanation of inclusion of SB376; review and forward to staff communiqué from Interveners' counsel regarding same; direct response to same; review communiqué from defense counsel objecting to Charter Plaintiffs' proposed addition to Scheduling Order on experts as burdensome to all parties; review communiqués from Plaintiffs' counsel regarding same; prepare communiqué approving proposed Order; review notification from defense counsel of States withdrawal from participation in Scheduling Order; review proposed version of Order and spreadsheet; review and notify parties regarding same.	1.7
7/17/2013	(RS) Review communiqué exchanges between Interveners' counsel FBISD Plaintiffs' counsel, and Holly McIntush regarding revision to description of SB1575/HB2497; prepare additional notations to spreadsheet regarding non-exclusiveness of listed legislation for consideration during continuation of trial; review communiqués from Ms. McIntush to the court forwarding final versions of Order and spreadsheet; review communiqué from Ms. McIntush with "notation" on behalf of Charter Plaintiffs requiring amendment to same; prepare response to Ms. McIntush regarding and requesting same; review Defendants' Advisory to the Court and multiple attachments to same; review Defendants' Objections to Scheduling Order; prepare communiqué to TCSA administrators forwarding Defendants' HB5 spreadsheet filed with Advisory with explanation of withdrawal by Defendants from agreement on proposed Scheduling Order and spreadsheet submission.	1.8
7/18/2013	(RS) Receive and review communiqué from Holly McIntush to all counsel with amended spreadsheet including notation requested by Charter Plaintiffs; receive and review FBISD Plaintiffs' Advisory to the Court Regarding Reopening of Evidence and attached Exhibits (proposed Scheduling Order and summary of legislation); forward Exhibit B (legislative summary) to TCSA administrators and firm's litigation staff for review.	0.2
7/22/2013	(RS) Receive and review request from Denise Pierce for scheduling of phone conference to discuss status and strategy; prepare response to Ms. Pierce regarding same; receive and review replies from Ms. Pierce concerning Scheduling Order and amendment of	0.3



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	pleadings; prepare advisory response and report to Ms. Pierce accounting for events leading to agreement to terms of Scheduling Order.	
7/23/2013	(LS) Review communique from Bob Schulman regarding suggested litigation from TCSA; prepare response to Joe Hoffer and Mr. Schulman regarding limitations on the litigation suggested by Denise Pierce. (NO CHARGE)	0.3
7/23/2013	(RS) Conduct interoffice exchanges with Leonard Schwartz and Joe Hoffer regarding (separate) Scheduling Order concerns, discovery, witness designations and general litigation issues.	0.3
7/29/2013	(RS) Receive and review TTSFC Plaintiffs' Eighth Amended Petition and direct staff regarding same.	0.1
7/30/2013	(RS) Receive and review request from Judge Dietz' Staff Attorney for Rule 11 agreement between all parties to proposed Scheduling Order, and particularly, with regard to trial date; prepare advisory to TCSA administrators and litigation staff with Staff Attorney's e-mail attached for review with request to provide response to matters addressed in advisory; receive and review reply from Leonard Schwartz	0.3
7/31/13	(CP) Receive directive from Bob Schulman to confer with Denise Pierce; telephone call to Ms. Pierce regarding same, left message; receive and review communique from Ms. Pierce approving same; communique exchange with Holly McIntush regarding same; communique exchange with Ms. McIntush's assistant concerning same. (NO CHARGE)	0.1
8/1/2013	(RS) Receive and review communications exchanged between counsel regarding; receive and review FBISD Plaintiffs' Fifth Requests for Production to Defendants and direct staff regarding same.	0.2
8/2/2013	(RS) Receive and review Calhoun County Plaintiffs' Second Amended Petition; receive and review notice from Assistant Attorney General confirming the state Defendants will file a separate Rule 11 and Scheduling Order; receive and review inquiry from Interveners' attorney on status of	1.2
8/2/2013	(NO CHARGE); receive and review current version of Rule 11 agreement.	
8/2/2013	(RS) Review final e-filed version of Rule 11 agreement and attached Scheduling Order submitted to court; review the state Defendants' Rule 11 agreement (for commencement of evidentiary	6.7



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	hearing on 1/21/14); forward a copy of same to TCSA administrators and litigation staff; review confidential court documents from Judge Dietz with directive to maintain confidentiality of same (Attorneys' Eyes Only); conduct research and confer with and direct staff attorneys regarding same; receive final version of 10/22/12 trial transcript; review communiqué from Judge Dietz scheduling two working sessions, and directing scheduling by counsel of monthly pre-trial conferences from September through December, for finalizing Judgment and Findings of Fact and Conclusions of Law; direct staff regarding same; begin in depth review of confidential materials received from court; engage in multiple discussions with staff attorneys regarding same.	
8/7/2013	(LS) Extended telephone conference with Bob Schulman regarding amending petition; review draft of Amended Petition prepared by Mr. Schulman; review Amended Petition filed by Edgewood Plaintiffs; edit draft of Amended Petition; prepare communiqué to Mr. Schulman, Joe Hoffer and Paralegal forwarding suggested changes to draft of amended petition.	2.8
8/7/2013	(JH) Perform detailed review and revisions to draft amended petition prepared by Bob Schulman; confer with Mr. Schulman regarding new section on legislative changes and impact on constitutional claims.	1.7
8/7/2013	(RS) Receive staff reminder of filing deadline of initial amendments and amendment of Charter Plaintiffs' Petition (NO CHARGE); review Edgewood ISD Plaintiffs' Third Amended Petition; review Interveners' Third Amended Plea in Intervention; prepare advisory communiqué to TCSA administrators and staff attorneys with amended plea for review, and page number referencing to legislative changes; review request from Lindsey Jones for copies of all amended pleadings filed; direct staff and prepare response to Ms. Jones regarding same and discussions and strategy conference regarding amendment of Charter Plaintiffs' claims; prepare follow-up communiqué to Ms. Jones concerning Edgewood Petition as related to proposed amendments to Charter Plaintiffs' claims.	1.5
8/7/2013	(RS) Begin preparation of Charter Plaintiffs' amended Petition; prepare communiqué to Lindsey Jones and Denise Pierce regarding "initial" pleading amendment deadline and second October deadline for additional amendments; continue preparation of Charter Plaintiffs' Amended Petition; forward draft to Joe Hoffer and Leonard Schwartz for review with directives concerning same; review proposed revisions and comments from Mr. Schwartz; confer with Mr. Hoffer regarding same; review Mr. Hoffer's comments and revisions; prepare final version of amended pleading; direct staff regarding same.	2
8/7/2013	(CP) Conduct review of final draft of Amended Petition; prepare edits to same; convert and e-file Petition (NO CHARGE); prepare communiqué to all counsel forwarding a copy of Petition.	1



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8/8/2013	(CP) Revise Amended Petition; convert and e-file same (NO CHARGE); prepare communique to all counsel forwarding a copy with explanation of need for amendment, no substantive changes made save and except for typos and format errors.	0.4
8/8/2013	(CP) Conduct review of Second Amended Petition filed yesterday evening; note required edits to same and provide to Bob Schulman for review. (NO CHARGE)	0.3
8/8/2013	(RS) Receive and review request from Lindsey Jones for Charles Plaintiffs' Amended Petition; receive and review communiqué from Denise Pierce regarding same; prepare reply to Ms. Pierce concerning same; receive and review response from Ms. Pierce requesting scheduling of planning meeting; confer with and direct staff regarding and directing preparation of a Third Amended Petition; receive and review Third Amended Petition; direct staff to finalize same and notice to parties regarding same; receive and review TTSFC Plaintiffs' Second Amended Petition.	0.5
8/12/2013	(RS) Receive and review letter from Assistant Attorney General regarding upload of documents in response to FBISD's Fourth Request for Production to Defendants; direct staff regarding same; communiqué exchanges with Denise Pierce regarding scheduling of planning meeting; direct staff concerning same (NO CHARGE); receive and review Defendants' Request for Court Reporter; prepare communiqué to Ms. Pierce, Joe Hoffer, Leonard Schwartz and Lindsey Jones forwarding a copy for review.	0.2
8/13/2013	(RS) Receive and review inquiry from Denise Pierce regarding consensus of parties on new bills to be considered during continuation of trial; prepare response to Ms. Pierce regarding same; conduct communiqué exchange with Ms. Pierce concerning same in light of list disseminated by the parties (excluding Defendants); review and analyze rules of ethics and professional standards and prepare report to Leonard Schwartz and Joe Hoffer regarding same and pending discussion with Judge Dietz regarding confidential communications provided by Court; receive and review response from Mr. Hoffer regarding same; prepare reply to Mr. Hoffer and Mr. Schwartz with cite to rules of ethics addressing client communication.	1
8/13/2013	(RS) Prepare communiqué to TCSA administrators and litigation attorneys regarding Judge Dietz's in-chambers comments to counsel on school finance bills and state testing results, and anticipated data to be disclosed at upcoming work sessions; direct staff in location of court advisory filed by Assistant Attorney General on Defendants' list of bills pertinent to trial; receive and review reply from staff with Defendants' 7/17 Advisory identifying legislation considered to be relevant to the issues in the lawsuit; conduct review of Advisory.	1
8/14/2013	(CP) Discussion with Bob Schulman regarding receipt of state Defendants' Response to FBISD Plaintiffs' Fifth Request for Production and sharing of same with Toni Templeton. (NO	0.1



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8/14/2013	CHARGE) (RS) Receive request from Denise Pierce regarding status report on trial court work sessions requested by Judge Dietz; confer with Leonard Schwartz and prepare comprehensive response to same; prepare communiqué to Ms. Pierce forwarding Judge's e-mail regarding work sessions. (NO CHARGE)	0.3
8/15/2013	(LS) Receive and review communique from Denise Pierce on [REDACTED]	0.2
8/15/2013	(RS) Receive and review Defendants' Notice of Withdrawal of Findings of Fact and Conclusions of Law and exhibits in support; forward same to litigation staff; direct staff regarding consideration of withdrawal of Charter Plaintiffs Findings and Conclusions.	0.2
8/16/2013	(RS) Prepare follow-up communique to Leonard Schwartz regarding Defendants' Notice of Withdrawal of Findings of Fact and Conclusions of Law; receive and review reply from Mr. Schwartz regarding same.	0.2
8/19/2013	(LS) Extended telephone conference with Joe Hoffer and Bob Schulman regarding court's work-session to be held on 8/20; review proposed Findings of Fact and Conclusions of Law in preparation for work session.	2.6
8/20/2013	(RS) Receive and review communique from Denise Pierce requesting Leonard Schwartz's attendance at meeting with Judge Dietz and counsel; prepare response acknowledging Mr. Schwartz will attend; receive and review [REDACTED] from Mr. Schwartz, Judge's memorandum received at meeting today with counsel; conduct extended telephone conference with Mr. Schwartz regarding same (NO CHARGE); prepare internal memo to Joe Hoffer concerning discussion with Mr. Schwartz and Judge's position on confidentiality of drafts for counsel's eyes only.	0.5
8/20/2013	(LS) Attend work session with Judge Dietz regarding Findings and Conclusions and re-opening trial; telephone conference with Bob Schulman reporting status of meeting; prepare communique to Joe Hoffer and Mr. Schulman with confidential memorandum (protected by oral court order) written by Judge.	4.6
8/21/2013	(LS) Prepare summary of work session with Judge Dietz and all parties and forward to Bob Schulman.	0.3
8/21/2013	(RS) Receive and review Leonard Schwartz's internal memorandum regarding attorney work session with Judge Dietz, including scheduling of future work sessions prior to trial, completion of Findings of Fact and Conclusions of Law, and related matters; prepare advisory response and directive to Mr. Schwartz regarding same; confer with Mr. Schwartz regarding same.	0.3
8/23/2013	(RS) Receive and review Leonard Schwartz's memo on District Court work session results and orders; prepare response and further inquiry to Mr. Schwartz; direct staff regarding 8/26 deadline for designation of fact witnesses.	0.1
8/23/2013	(LS) Prepare internal memo to Bob Schulman regarding case status and court's position on reopening of trial.	0.8



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8/23/2013	(RS) Prepare communique to Leonard Schwartz regarding results and responses to court/parties' work session regarding trial continuance; prepare status report to appellate counsel Jim Ho concerning court order confidentiality of certain documents and potential for sharing same with appellate counsel; prepare directive to Mr. Schwartz regarding designation of fact witnesses.	0.5
8/24/2013	(LS) Multiple communique exchanges with Bob Schulman regarding witnesses designation.	0.8
8/24/2013	(RS) Multiple communique exchanges with Leonard Schwartz regarding witnesses designation. (NO CHARGE)	0.8
8/26/2013	(LS) Review filing's by the individual plaintiff groups and by the State defendants designating witnesses.	0.6
8/26/2013	(CP) Prepare list of Fact Witnesses due today; review list filed by TTSFC Plaintiffs; confer with Bob Schulman regarding same (NO CHARGE); e-file Fact Witness list revised by Mr. Schulman; receive and review communique from Edgewood Plaintiffs' counsel regarding error in same (duplicate designation of two witnesses); confer with Mr. Schulman concerning Amended List, prepare and e-file same (NO CHARGE).	0.3
8/26/2013	(RS) Two telephone conferences with Denise Pierce and Leonard Schwartz regarding designation of fact witnesses; prepare directive to staff regarding same; [REDACTED]; prepare report to Mr. Schwartz regarding same and research and [REDACTED]; direct staff regarding preparation of fact witness disclosure, review FBISD Plaintiffs' Fact Witness List; review TTSFC Plaintiffs' Designation of Trial Witnesses; communiqué exchange with Chris Diamond regarding filing of witness designation; review CCISD Plaintiffs' and Edgewood Plaintiffs' Designation of Fact Witnesses; review proposed fact witnesses designations; prepare revisions to same and direct staff in finalizing and distribution of same; review Interveners' Fact Witness Designation; confer with staff regarding same and revision of charter witness list; review and approve First Amended Witness Designation by Charter Plaintiffs.	2.4
8/26/2013	(RS) Telephone conference [REDACTED]; review communiqué from Jim Ho regarding scheduling of phone conference to discuss Judge Dietz's orders and other relevant issues.	0.4
8/27/2013	(RS) Receive and review communiqué from Edgewood Plaintiffs counsel's assistant concerning discussing with Deputy District Clerk and rejection of e-filed Fact Witness Designations; confer with and direct staff regarding same; receive and review communiqué from Jim Ho rescheduling teleconference for today until tomorrow, respond to Mr. Ho. (NO CHARGE)	0.2
8/28/2013	(LS) Review Proposed Order submitted by Assistant Attorney General regarding confidentiality; multiple communique exchanges with Joe Hoffer and Bob Schulman regarding court imposed	0.4



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8/28/2013	<p>confidentiality; conduct telephone conference with Mr. Schulman and Mr. Hoffer regarding same. (NO CHARGE)</p> <p>(RS) Receive and review Defendants' Proposed Order and communiqué to Court attorney, Carol Jenson, regarding in-camera proceeding; receive and review requests by counsel for Calhoun County Plaintiffs for opportunity to review and assert objections to Defendants' Proposed Order; forward Proposed Order to TCSA administrators and staff litigation attorneys for review; receive and review communicate from Denise Pierce regarding same; conduct attorney conference with Joe Hoffer and Leonard Schwartz regarding Court's pronouncement of confidentiality over specified documents; prepare advisory response to Ms. Pierce concerning same; conduct telephone conference with Jim Ho regarding same.</p>	1.1
8/29/2013	<p>(RS) Receive and review court's proposed Order from 8/20 hearing; conduct telephone conference with Joe Hoffer regarding same and directive to Leonard Schwartz to review and prepare response to same; receive and review Mr. Schwartz's correspondence to the Court concerning same; receive and review correspondence from counsel for ISD Plaintiffs' to Judge Diez regarding the Judge's proposed Order, with attached revised Order for consideration; receive and review objection by defense counsel to ISD Plaintiffs' proposed Order; direct staff regarding same.</p>	0.3
8/30/2013	<p>(LS) Telephone conference with Joe Hoffer and Bob Schulman regarding proposed order on confidentiality; prepare communicate to briefing attorney asking for revision of order to clarify parties' attorneys responsibility under the Order; prepare communicate to staff requesting same.</p>	0.2
8/30/2013	<p>(RS) Receive and review objection of State Defendants to ISD Plaintiffs' proposals and Order concerning 8/20 hearing; receive and review response from ISD Plaintiffs' counsel; receive and review Defendants' Second Set of Interrogatories to Plaintiffs and Interveners and Requests for Disclosure; receive and review Edgewood Plaintiffs' Second Requests for Disclosure to Defendants; prepare communiqué to TCSA administrators, Jim Ho and staff litigation attorneys forwarding discovery requests for review and consideration of preparation of discovery to the Defendants.</p>	1
9/3/2013	<p>(RS) Receive final of trial transcript for January 8 2013; receive and review communiqué from [REDACTED]</p> <p>[REDACTED] receive and review TTSFC Plaintiff's Second Request for Disclosures to Defendants; forward same with directive to Mr. Schwartz; receive and review Defendants' Objections and Responses to FBISD Plaintiffs' Request for Production and letter from Assistant Attorney General concerning access to documents disclosed on FTP server; direct staff regarding same and availability of documents, download of same, upload of same into Dropbox and</p>	0.8



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9/4/2013	notification to include Mr. Schwartz in all party communications. (RS) Review Court Reporter's revision to January 8, 2013 trial transcript; review communiqué from Denise Pierce regarding discovery to state defendants; prepare response to Ms. Pierce concerning same; review reply from Ms. Pierce regarding preparation of same; confer with Joe Hoffer and Leonard Schwartz regarding same; review Ms. Pierce's e-mail to James Ho (NO CHARGE); prepare communiqué to Mr. Hoffer and Mr. Schwartz regarding sharing of confidential court communications with clients; review TTSFC Plaintiffs' Responses to Defendants' Requests for Disclosure; review correspondence from Assistant Attorney General regarding upload of Defendants' Responses and Supplemental Response to FBISD Plaintiffs' Fourth Request for Production to FTP secure server site; direct staff regarding same; review party request for e-mail distribution list for service of documents and correspondence; confer with staff regarding same; direct staff regarding same.	0.9
9/5/2013	(RS) Prepare advisory communiqué to Denise Pierce, Lindsey Jones and Toni Templeton regarding deadline for discovery responses by Charter Plaintiffs, TCSA assistance in preparing and answering discovery, identification of evidence and witnesses for continuation of trial; conduct communiqué exchange with Ms. Pierce regarding same; receive and review final trial transcript for January 19, 2013; review communiqué exchanges between all counsel regarding scheduling of monthly status meetings as directed by Court; confer with Leonard Schwartz concerning response to Court's requests for dates of availability for counsel conferences; receive and review Attorney General's upload of Bates stamped documents in response to FBISD Plaintiffs' Fifth Request for Production; direct staff regarding same. (NO CHARGE)	0.7
9/6/2013	(RS) Receive and review correspondence from Richard Gray regarding scheduling of Court ordered status conferences; receive and review Interveners' Objection to Sealing Court Records and exhibits in support; prepare commentary and forward to staff attorneys for review; receive and review request from Denise Pierce for telephone conference regarding discuss discovery responses, and preparation of Disclosures and Interrogatories to Defendants; prepare advisory reply to Ms. Pierce confirming availability.	0.5
9/7/2013	(RS) Prepare communiqué to Leonard Schwartz regarding Interveners' Objection to Plaintiffs' Attempts to Seal the Record and Exhibits, and preparation of discovery.	0.2
9/8/2013	(RS) Receive and review communiqué exchanges between counsel regarding scheduling of court-ordered status meetings; direct Leonard Schwartz in responding to same and attending same.	0.1
9/9/2013	(RS) Receive and review Leonard Schwartz's directive to staff to notify counsel of dates of availability for status meetings and determination of next meeting date; receive and review staff reply confirming date for next meeting; receive and review Richard Gray's	0.5



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	communiqué to all counsel reflecting dates proposed for scheduling status meetings; receive and review staff communiqué to all counsel providing dates and designation for participation for Charter Plaintiffs; confer with and direct staff regarding identification of document(s) referenced in trial transcript; review transcript; direct staff in further review.	
9/9/2013	(RS) Conduct telephone conference with Denise Pierce regarding discovery preparation and responses and delegation of responsibilities regarding same.	0.2
9/10/2013	(LS) Review current filings regarding reopening of case; multiple communicate exchanges with Bob Schulman regarding reopening of trial, FOF/COL and upcoming telephone conference with Denise Pierce; telephone conference with Ms. Pierce and Mr. Schulman regarding upcoming status conference with Judge Dietz.	1.2
9/10/2013	(RS) Confer with staff regarding Court Reporter's request for identification of trial exhibits; review communiqué from Denise Pierce regarding same; prepare response to Ms. Pierce regarding same; review agreed-upon dates for status meetings from Richard Gray; review CCISD, FBISD and TTSFC Plaintiffs' brief and exhibits in support of reopening evidence; prepare advisory to Ms. Pierce, Lindsey Jones, Joe Hoffer and Leonard Schwartz regarding same and Edgewood Plaintiffs' opposition to motion to reopen evidence; prepare follow-up communiqué regarding in-house teleconference scheduling regarding discovery and pre-trial issues; attorney conferences with Mr. Schwartz concerning same and scheduling of follow-up phone conference, status of and responses to motions to reopen evidence, opposition to same, Findings of Fact, Conclusions of Law, and Judge's possible decision on motions to reopen the evidence; review reply from Ms. Pierce regarding same; conduct telephone conference with Ms. Pierce.	1
9/11/2013	(RS) Receive, review and respond to Michelle Jacobs' request for confirmation of SLH attorneys and staff for inclusion on distribution list; receive communiqué from Denise Pierce regarding changes on Supreme and possible impact on litigation; receive and review communiqué from Tracy Young with Austin American Statesman article on pending decision to reopen evidence in trial. (NO CHARGE)	0.3
9/12/2013	(LS) Review new pleading by MALDEF prior to court; attend court; prepare communicate to Denise Pierce, Bob Schulman and Joe Hoffer regarding status of case and future hearing dates; telephone conference with Mr. Schulman after court to advise him on developments and to plan strategy; telephone conference with Ms. Pierce to update her on what happened in court; prepare communicate to Ms. Pierce regarding working session next week; review new pleading by MALDEF prior to court; review state's motion for court to take judicial notice.	4.7
9/12/2013	(RS) Receive and review Defendants' First Request to the Court to Take Judicial Notice; forward same to Denise Pierce, Leonard	0.5



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	Schwartz and Joe Hoffer with recap of motion; receive and review Edgewood ISD Plaintiffs' Response to Brief Supporting Reopening the Evidence; forward same to Ms. Pierce, Mr. Schwartz and Mr. Hoffer for review; receive and review Mr. Schwartz's notes on this day's Court proceedings; receive, review and respond to Ms. Pierce's request to schedule work session regarding same; prepare advisory to Mr. Hoffer and Mr. Schwartz regarding same; receive and review Court Reporter's final of January 15, 2013 trial transcript.	
9/13/2013	(LS) Review the State Defendants' first request to Court to take Judicial Notice.	0.7
9/16/2013	(RS) Receive and review Findings of Fact and Conclusions of Law outline circulated by counsel at September 12, 2-13 work session; direct Leonard Schwartz to forward same to TCSA team in preparation for meeting on September 17, 2013; receive and review Defendants' Preliminary Designation of Fact Witnesses; receive and review communiqué from Court's Reporter, Della Sawvel, with attached final transcript of January 16, 2013 trial proceedings.	0.4
9/17/2013	(LS) Review pleadings by other parties in preparation for drafting of interrogatories.	1.6
9/17/2013	(LS) Meeting at TCSA with Denise Pierce, Toni Templeton, Lindsey Jones and Bob Schulman regarding issues and strategy for reopened trial.	2
9/17/2013	(RS) Travel to Austin for meeting at TCSA. (shared travel expense - only 1/2 charge)	0.8
9/17/2013	(RS) Receive and review Defendants' Amended Preliminary Designation of Fact Witnesses; forward same to TCSA administrators and Leonard Schwartz; conduct telephone conference with Mr. Schwartz concerning same, judgment and Findings of Fact and Conclusions of Law; direct staff to provide copies of confidential documents to Mr. Schwartz for review; prepare advisory communiqué to Mr. Schwartz regarding Judge Dietz's confidential draft documents, with directive for review of Defendants' Notice of Withdrawal of Findings of Fact and Conclusions in Law, accompanying exhibits, motions, responses and orders already filed, for determination of whether Charter Plaintiffs' proposed Findings and Conclusions should be withdrawn.	0.8
9/17/2013	(RS) Return travel from Austin. (shared travel expense - only 1/2 charge) (NO CHARGE)	0.8
9/17/2013	(RS) Attend meeting at TCSA with Leonard Schwartz and Denise Pierce; prepare "To Do" list for trial; forward same to TCSA administrators and office staff for review.	2
9/17/2013	(LS) Receive and review communicate from Toni Templeton regarding [REDACTED]	0.2
9/17/2013	(LS) Receive communicate from Bob Schulman regarding article in American Statesman regarding [REDACTED] review article.	0.5
9/17/2013	(LS) Multiple communicate exchanges with Bob Schulman regarding [REDACTED]	0.8



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9/18/2013	judges "work product" FOF/COL. (CP) Continue to download Defendants' Responses to FBISD's Fourth Request for Production documentation from FTP server. (NO CHARGE)	2.5
9/18/2013	(CP) Confer with Leonard Schwartz, receive directive to contact all counsel to determine date for Dr. Lisa Dawn-Fisher deposition (NO CHARGE); prepare communique to all counsel requesting date for scheduling Dr. Dawn-Fisher deposition.	0.1
9/18/2013	(LS) Conduct research regarding issue of [REDACTED]; prepare communique to Denise Pierce, Lindsey Jones, Toni Templeton and Bob Schulman with results of research.	2.9
9/18/2013	(LS) Prepare communique to Paralegal regarding discovery and depositions; receive and review communique from Bob Schulman requesting budget.	0.6
9/19/2013	(CP) Confer with and instruct File Clerk in review of trial transcripts and comparison of exhibits referenced to those saved on network to determine missing exhibits. (NO CHARGE)	0.3
9/19/2013	(RS) Extended teleconference with Interveners' counsel regarding his clients' Plea to the Jurisdiction; extended telephone conference with Leonard Schwartz concerning same; prepare advisory to Denise Pierce regarding discussion with Interveners' counsel on reasons for filing of Plea to the Jurisdiction; telephone conference with Mr. Schwartz and Ms. Pierce regarding same; telephone conference with Interveners' counsel and Mr. Schwartz concerning same.	0.8
9/19/2013	(RS) Review e-mail exchanges between counsel and responses regarding discovery deadline extension for expert report; confer with Leonard Schwartz regarding designation of Toni Templeton as expert in Response to Defendants' Request for Disclosures; review Mr. Schwartz's draft response outlining Ms. Templeton's anticipated testimony; multiple communiqué exchanges with Mr. Schwartz concerning pleading amendment, possible adoption of Interveners' position, and matters to be addressed on appeal; review communiqué from Denise Pierce urging objection to deadline for expert designation; communiqué exchanges with Mr. Schwartz and Ms. Pierce regarding same; review revised "final" version of proposed Scheduling Order, as agreed upon by Defendants, ISD Plaintiffs and Interveners, and communiqué exchanges between Mr. Schwartz and all counsel concerning extended deadline for Charter Plaintiffs' designation of experts and objections by counsel to same.	2
9/19/2013	(LS) Receive and review communique from Shelley Dahlberg regarding request for 10/21 deadline for experts reports; receive and review communique from Rick Gray supporting Ms. Dahlberg; receive and review communique from Joe Hoffer on need for us to respond; receive and review communique from Bob Schulman on how to respond to Ms. Dahlberg; prepare communique to Paralegal regarding [REDACTED]; telephone conference	1.6



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	with Mr. Schulman and Chris Diamond; review [REDACTED]	
9/19/2013	(LS) Multiple communicate exchanges with Denise Pierce and Bob Schulman regarding meeting with Chris Diamond.	0.6
9/19/2013	(LS) Review Edgewood ISD Plaintiffs' Response Brief to Calhoun County ISD Plaintiffs, Fort Bend ISD Plaintiffs, and TTSFC Plaintiffs' Brief in Support of Reopening the Evidence and Exhibit A.	2.1
9/21/2013	(RS) Prepare advisory communiqué to Leonard Schwartz regarding objection to scheduling order with proposed response to the parties concerning Charter Plaintiffs' opposition to same; prepare follow-up communiqué to Mr. Schwartz with current versions of proposed scheduling order, requesting status of notice to the parties regarding same.	0.4
9/23/2013	(LS) Meeting at TCSA with Denise Pierce, Lindsey Jones, David Dunn, Bob Schulman, and (Chris Diamond by phone) regarding disclosure of witnesses and preparation of expert reports.	2
9/23/2013	(LS) Conduct legal research regarding [REDACTED]	4
9/23/2013	(RS) Travel to Austin for meeting at TCSA. (NO CHARGE)	1.5
9/23/2013	(RS) Attend meeting with TCSA Legal Team, Toni Templeton, Denise Pierce and Lindsey Jones along with Leonard Schwartz regarding identification and disclosure of witnesses expert witness and preparation of expert reports; participate in telephone conference with parties and Interveners' counsel; receive and review case law and research memos from Mr. Schwartz regarding Interveners' Plea to the Jurisdiction of [REDACTED] direct staff regarding same.	2
9/23/2013	(RS) Return travel from Austin. (NO CHARGE)	1.5
9/24/2013	(LS) Receive and review communicate from Denise Pierce directing me to contact Polly McIntush regarding experts reports; prepare communicate to Ms. McIntush regarding advising court that we will be requesting the 10/24 deadline for our experts' reports.	0.7
9/24/2013	(LS) Prepare communicate to Denise Pierce, Lindsey Jones, Toni Templeton and Bob Schulman concerning the response to Shelley Dahberg's objection as to when report is due.	0.2
9/24/2013	(LS) Multiple communicate exchanges with Denise Pierce on responding to court on draft expert reports.	0.2
9/26/2013	(RS) Receive and review Denise Pierce's communiqué regarding discussion with Dr. Anthony Rolle; receive and review Joe Hoffer's communiqué to Ms. Pierce with current versions of compromise and release agreement and amendment to engagement letter. (NO CHARGE)	0.5
9/27/2013	(LS) Review of Efficiency Interveners' Plea to the Jurisdiction and Motion for Entry of Final Judgment; prepare advisory communicate to Denise Pierce, Bob Schulman and Lindsey Jones regarding same.	1.4
9/27/2013	(RS) Receive and review Leonard Schwartz's communiqué	0.3



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	exchanges with Denise Pierce and Lindsey Jones on status of draft amended petition and deadline for filing same (NO CHARGE); receive and review advisory from Assistant Attorney General concerning production of financial data and quality checked data; receive and review Interveners' Plea to the Jurisdiction and Motion for Entry of Final Judgment.	
9/28/2013	(RS) Prepare communiqué to TCSA administrators and litigation staff with Interveners' Plea to the Jurisdiction and Motion for Entry of Final Judgment; receive and review reply from Joe Hoffer concerning same; prepare response to Mr. Hoffer on TCSA administrators' position with regard to same.	0.2
9/30/2013	(CP) Confer with Leonard Schwartz regarding status of discovery due tomorrow; prepare communique to Mr. Schwartz and attach all discovery requests propounded to Defendants in current phase of trial to date. (NO CHARGE)	0.2
9/30/2013	(LS) receive and review communique from Denise Pierce regarding deadline for disclosure; prepare communique to Paralegal forwarding Ms. Pierce's question about deadlines; receive communique from Ms. Pierce regarding [REDACTED]; prepare response to Ms. Pierce regarding same; receive communique from Shelly Dahlberg with directions as to how we are to respond to disclosure; prepare communique to Bob Schulman with my objections to Ms. Dahlberg's directives; conduct legal research to [REDACTED]; multiple communique exchanges with Ms. Dahlberg regarding language for response	0.6
9/30/2013	(LS) Telephone conference with Paralegal regarding discovery pleadings by other plaintiff groups; prepare communique to Toni Temptation asking her to draft her Vita for attachment to disclosure.	0.3
9/30/2013	(RS) Multiple communiqué exchanges with TCSA administrators and Mr. Schwartz regarding likelihood of ISD Plaintiffs filing a response and/or opposition to Interveners' Plea and Motion, preparation of Response brief for Charter Plaintiffs and request by TCSA for review of draft.	0.3
9/30/2013	(RS) Review communiqué from Assistant Attorney General requesting production of backup materials support expert reports due on October 14 and October 21; forward such communiqué to Leonard Schwartz and Denise Pierce for review; confer with Mr. Schwartz and Joe Hoffer regarding response to Assistant Attorney General's "demand" on production of backup materials, prepare edits to Mr. Schwartz's draft of same; review Mr. Schwartz's request to [REDACTED] to produce in Responses to Defendants' Request for Disclosures due tomorrow; review Notice of Hearing on Interveners' Plea to the Jurisdiction and Motion for Entry of Final Judgment set for October 4; review communiqué from Ms. Pierce recommending oral response to same in lieu of written response; prepare reply to Ms. Pierce	0.8



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9/30/2013	recommending filing of a short brief and/or list of authorities with the court in response to Interveners' Plea and Motion. (RS) Receive and review Edgewood Plaintiffs' Objections and Response to Defendants' Second Set of Interrogatories and Response to Defendants' Request for Disclosures; receive and review Leonard Schwartz's request to [REDACTED] [REDACTED] receive and review communiqué from Denise Pierce to Mr. Schwartz regarding identification of fact and expert witness; receive and review Mr. Schwartz's response regarding same (NO CHARGE); prepare communiqué to Mr. Schwartz [REDACTED]	0.3
9/30/2013	(LS) Continue reviewing pleadings by the parties; continue preparation on Response to Plea to the Jurisdiction; prepare communicate to Denise Pierce, Tony Templeton, and Lindsey Jones, and Mr. Schulman regarding draft response to PTJ; telephone conference with Chris Diamond regarding our response; review CCISD's Request for Disclosure to Defendants.	0.8
9/30/2013	(LS) Review all disclosures and responses filed by all parties; prepare mootness response; create draft of litigation budget for submission to TCSA.	5.2
10/1/2013	(CP) Prepare revisions to Charter Plaintiffs' discovery responses to Defendants' discovery; communicate exchanges with Leonard Schwartz concerning same (NO CHARGE); communicate exchange with Denise Pierce and telephone call to (NO CHARGE) Ms. Pierce regarding signature on same; revise verification for Ms. Pierce's signature; finalize responses (sans verification) and forward "final" to all counsel and staff.	1
10/1/2013	(LS) Review Interveners' 3rd Supplemental Responses to Defendants' Request for Disclosure from all Parties; review Texas Taxpayer Coalition's Amended Responses to Defendants' Requests for Disclosure.	0.7
10/1/2013	(LS) Review letter from Shelley Dahlberg regarding uploading of material from TEA at secureftp.oag.state.tx.us; forwarded same to Denise Pierce, Lindsey Jones and Toni Templeton for review; review Edgewood Plaintiff's Joinder to Respond to Request for Judicial Notice.	0.5
10/1/2013	(LS) Continue reviewing all new filings by parties; continue to prepare Response to Plea to the Jurisdiction; multiple communicate exchanges with Denise Pierce, Tony Templeton, and Lindsey Jones, and Bob Schulman regarding tack and strategy for response; review CCISD's Request for Disclosure to Defendants.	1
10/1/2013	(RS) Receive and review ISD Plaintiffs' Motion to Take Judicial Notice, appendix in support and Notice scheduling Motion for hearing; confer with Leonard Schwartz on completion of Charter Plaintiffs' Response to Defendants' Requests for Disclosures and Answers to Interrogatories, due today and response to Assistant	0.2



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	Attorney General regarding her demand for backup data, along with expert reports; receive and review Mr. Schwartz's advisory to Assistant Attorney General concerning same; receive and review final version of Charter Plaintiffs' Response to discovery requests; receive and review Defendants' Responses to Edgewood Plaintiffs' Second Request for Disclosures.	
10/2/2013	(CP) Prepare communique to all counsel and staff forwarding Toni Templeton's vitae, inadvertently excluded from discovery responses sent yesterday; telephone call to Denise Pierce, left detailed message requesting status of verification page for interrogatory responses sent out yesterday (unverified). (NO CHARGE)	0.1
10/2/2013	(LS) Continue work on draft of a Response to Plea to the Jurisdiction.	4.5
10/2/2013	(LS) Meeting with Denise Pierce, Toni Templeton and Lindsay Jones regarding Response to Plea to Jurisdiction; conduct legal research [REDACTED]; review filings by State on joining Plea to the Jurisdiction and Response by other plaintiffs to the Plea to the Jurisdiction in preparation for search for supporting authorities; review new Defendants' Production Letter; forwarded same to Ms. Templeton; review Defendants' Amended Responses to Edgewood ISD and to Texas Taxpayers's Request for Disclosure.	3.2
10/2/2013	(CP) Receive and review multiple filings by the ISD Plaintiffs and Intervenor; forward to Leonard Schwartz and Bob Schulman for review; confer with file clerk in print out and organization of same; receive and review communique from Denise Pierce with verification page for Answers to Interrogatories; prepare communiqués to all counsel forwarding verification page for inclusion with Answers. (NO CHARGE)	1
10/2/2013	(RS) Review proposed litigation budget revisions from Leonard Schwartz; multiple communiqué exchanges with Mr. Schwartz regarding same. (NO CHARGE)	0.3
10/2/2013	(RS) Review FBISD Plaintiffs' Objections and Responses to Defendants' Second Set of Interrogatories, and Fourth Amended Response to Defendants' Request for Disclosures; forward same with advisory to Mr. Schwartz; review CCISD Plaintiffs' Second Request for Disclosure to Defendants, Objections and Responses to Defendants' Second Set of interrogatories and Response to Defendants' Request for Disclosure; forward same with directive to Mr. Schwartz; review TTSFC Plaintiffs' Responses to Defendants' Request for Disclosures; review Intervenor's Third Supplemental Response to (all parties') Requests for Disclosure; review TTSFC Plaintiffs' Amended Response to Defendants' Request for Disclosures; review Edgewood Plaintiffs' Partial Joinder to CCISD, FBISD and TTSFC Plaintiffs' Response to Defendants' First Request to the Court to Take Judicial Notice; review correspondence from defense counsel regarding upload of	2.1



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	Defendants' Supplemental Responses to Plaintiffs' Request for Production.	
10/2/2013	(RS) Receive and review CCISD, FBISD and TTSFC Plaintiffs' Response to Defendants' First Request to the Court to Take Judicial Notice; prepare comments and forward same to Leonard Schwartz and Denise Pierce in consideration of Response by Charter Plaintiffs; receive and review Mr. Schwartz's response to same; prepare comprehensive advisory reply to Mr. Schwartz; conduct follow-up exchanges with Mr. Schwartz regarding same, necessity for distinguishing Charter Plaintiffs' claims from those of ISD Plaintiffs and Interveners, and related issues.	0.7
10/2/2013	(RS) Receive and review communiqué from Denise Pierce regarding potential for disparate impact claim based on the school finance system's affect on minorities; prepare advisory to staff regarding same. (NO CHARGE)	0.2
10/3/2013	(LS) Review Efficiency Interveners' Motion to Take Judicial Notice.	0.4
10/3/2013	(RS) Receive and review TCSA's version of Response to Interveners' Plea to the Jurisdiction; prepare comments to same and forward to Leonard Schwartz for review; prepare communiqué to Interveners' counsel with current draft of Response; prepare follow-up communiqué to Mr. Schwartz and TCSA administrators regarding comments by Interveners' counsel concerning Charter Plaintiffs' Response; conduct telephone conference with Chris Diamond regarding and approving same and direct Mr. Schwartz to finalize response.	0.9
10/3/2013	(RS) Receive and review ISD Plaintiffs' Motion to Take Judicial Notice and exhibits to same; receive and review Interveners' Motion to Take Judicial Notice and attached exhibits; forward same to Leonard Schwartz and TCSA administrators for review; receive and review Defendants' Response to ISD Plaintiffs' Motion to Take Judicial Notice and supporting exhibits; receive and review Defendants' Joinder of Interveners' Plea to the Jurisdiction and supporting exhibits; receive and review CCISD, FBISD and TTSFC Plaintiffs' Response to Interveners' Plea to the Jurisdiction; forward same to TCSA administrators, Mr. Schwartz and Joe Hoffer for review. (NO CHARGE)	0.9
10/3/2013	(RS) Communiqué exchange with Denise Pierce regarding disparate impact claim.	0.2
10/3/2013	(RS) Review Interveners' Plea to the Jurisdiction; communiqué to Leonard Schwartz regarding meeting with TCSA to consider preparation of Response to Interveners' Plea to the Jurisdiction, legislative summary to be considered; prepare advisory to Mr. Schwartz and TCSA regarding pre-filing review of Response by Interveners' and status of preparation of Amended Petition (in advance of upcoming deadline); review communiqué from Ms. Pierce regarding hearing date for Defendants' Request for Judicial Notice; prepare advisory response to Ms. Pierce regarding same and summary of arguments of parties concerning same; forward	1.1



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legislative synopsis to Mr. Schwartz regarding same; begin review of Leonard Schwartz's draft Response to Interveners' Plea to the Jurisdiction; prepare communiqué to Mr. Schwartz, Denise Pierce, Toni Templeton and Joe Hoffer regarding [REDACTED]

10/3/2013	(RS) Receive and review staff-prepared communiqué to all counsel forwarding Toni Templeton's vitae (NO CHARGE); receive and review correspondence from Assistant Attorney General regarding upload of corrected data in response to discovery requests; direct staff in download of same (NO CHARGE); receive and review Defendants' Amended Responses to Edgewood Plaintiffs' Second Request for Disclosures and Defendants' Responses to TTSFC Plaintiffs' Second Rule 194 Requests for Disclosure; forward copy of same to Leonard Schwartz, Denise Pierce, Lindsey Jones and Ms. Templeton for review. (NO CHARGE)	0.4
10/4/2013	(LS) Prepare for court; conference with Denise Pierce regarding same; review new pleadings filed by parties.	3.9
10/4/2013	(LS) Attend court for status hearing with Denise Pierce; prepare communicate to Bob Schulman and Joe Hoffer regarding status update on hearing; prepare communiqué to Paralegal regarding deadlines.	2.8
10/4/2013	(MZ) Prepare Confidentiality Agreement for FERPA protected materials exchanged between Toni Templeton, as testifying and consulting expert, and Schulman, Lopez & Hoffer.	1.5
10/4/2013	(CP) Confer with Paralegal regarding preparation of confidentiality agreement as directed by Bob Schulman; confer with Mr. Schulman concerning same, receive additional information for drafting same (NO CHARGE); confer with Paralegal and provide additional data regarding same; receive and review draft of agreement (NO CHARGE).	0.1
10/4/2013	(CP) Merge current amended petition with version provided by Lindsey Jones to determine what revisions were made by Ms. Jones; provide same to Bob Schulman for review. (NO CHARGE)	0.1
10/4/2013	(CP) Conduct line-by-line review and edits of Charter Plaintiffs' Response to Interveners' Plea to the Jurisdiction and to State Defendants' Joinder (NO CHARGE); forward same to Leonard Schwartz and Denise Pierce for review with request for input from Mr. Schwartz concerning same; telephone conference with Mr. Schwartz confirming approval (NO CHARGE); e-file Response; prepare communiqué to all counsel forwarding copy of Response; confer with Legal Assistant for Edgewood ISD Plaintiffs' regarding documents disclosed to Attorney General's FTP server and misidentification of same; conduct multiple communicate exchanges with Attorney General's office Legal Assistants and Assistant Attorney General, confirm misidentified folder containing responses to multiple Requests for Production (for four different Plaintiff groups); prepare communiqué to Toni Templeton with explanation	3



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10/4/2013	<p>of same; download multiple folders from FTP server.</p> <p>(RS) Review draft of September 12th Hearing on Scheduling transcript from Court Reporter; review draft of August 20th In-Camera Discussion Off the Record transcript from Court Reporter; review revised untracked draft of Amended Petition from Lindsey Jones; prepare communiqué to Denise Pierce regarding collaboration with TCSA prior to submission of filings in final; review response from Ms. Pierce concerning same; prepare reply to Ms. Pierce regarding same, forwarding proposed confidentiality agreement with Toni Templeton as expert entitled to FERPA protected information for review and signature, and deadline for Amended Petition; review staff communiqué to Ms. Pierce and Step regarding upload of documentation in Drop box for review (NO CHARGE); review staff follow-up communiqué to Ms. Templeton regarding access to documents in Drop box (NO CHARGE).</p>	0.4
10/4/2013	<p>(RS) Review, from Leonard Schwartz, current version of Charter Plaintiffs' Response to Interveners' Plea to the Jurisdiction, prepare additions/revisions to same; direct staff to finalize Response and forward to Mr. Schwartz and Denise Pierce for review; review staff communiqué to same with final version of Response; review communiqué from staff to all counsel with copy of final Response (e-filed with the Court); review Edgewood Plaintiffs' Response to Interveners' Plea; review communiqués from Ms. Pierce and Lindsey Jones with recommended revisions to Response; review communiqué exchange between staff and Ms. Pierce on delayed receipt e-mail with edits to Response, and directive from Ms. Pierce requesting follow-up by phone on future filings prior to submission; review post-hearing status report from Leonard Schwartz and intent by Interveners to file mandamus; review update from Ms. Pierce regarding court hearing; research trial court mandamus issue; prepare research memo to Mr. Schwartz regarding same.</p>	2.4
10/4/2013	<p>(RS) Confer with Mr. Schwartz concerning TCSA request for information disclosed by state Defendants in response to discovery requests and status of discovery to state Defendants by Charter Plaintiffs; prepare communiqué to Denise Pierce regarding same and availability of data uploaded by staff; direct staff to assist Ms. Pierce in download of same; prepare follow-up communiqué to Ms. Pierce concerning Interrogatories to Defendants prepared by Mr. Schwartz and deadline for submission; review staff advisory on limited access to data outlined in letter from Assistant Attorney General; prepare update advisory to Ms. Pierce with explanation of same and need for preparation of Confidentiality Agreement for TCSA access to documents disclosed by the parties; direct staff in preparation of Rule 11 or similar agreement with TCSA for confidentiality of documents disclosed in discovery.</p>	0.8
10/4/2013	<p>(RS) Receive, review and revise proposed FERPA confidentiality agreement for Toni Templeton as expert entitled to view protected student information; prepare revisions and additions and direct staff</p>	0.3



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	regarding same.	
10/4/2013	(RS) Prepare final revisions/edits to Charter Plaintiffs' Response to Interveners' Plea to the Jurisdiction; receive, review and respond to team communiqué regarding same; direct staff regarding same.	1.2
10/7/2013	(LS) Begin reviewing draft of amended petition; prepare communique to Bob Schulman regarding first impression of amended petition; review communique exchanges between Denise Pierce and Mr. Schulman.	1.2
10/7/2013	(LS) Multiple communique exchanges with Bob Schulman regarding tracking changes in amended petition and scheduling conference call with Denise Pierce, Lindsey Jones and others at the TCSA regarding amended petition.	0.3
10/7/2013	(RS) Conduct communiqué exchange with Denise Pierce and Leonard Schwartz regarding preparation of Charter Plaintiffs' Amended Petition; receive and review proposed Amended Petition from Lindsey Jones; receive and review request from defense counsel for scheduling of dates for Superintendent depositions; conduct telephone conference with Ms. Jones requesting tracked changes for review; direct staff in preparation of tracked version of Amended Petition; receive and review Ms. Pierce's request for pleading amendment telephone conference; prepare response to same; begin review and preparation of revisions and additions to draft Amended Petition.	3.1
10/8/2013	(JH) Extended conference call on litigation strategies and workflow. (NO CHARGE)	0.5
10/8/2013	(LS) Review communique exchange between Toni Templeton and Anthony Rolle regarding new tables for their reports; review reports.	0.4
10/8/2013	(LS) Extended telephone conference with Joe Hoffer, Bob Schulman, Denise Pierce and Lindsey Jones regarding operations and communications.	1.2
10/8/2013	(CP) Teleconference with Leonard Schwartz regarding calendar entry for today indicating a meeting with counsel in Judge Dietz's office, not on his calendar (NO CHARGE); telephone calls to Court Clerk, Reporter and Court's attorney to determine whether meeting has been cancelled (NO CHARGE); telephone conference with Paralegal for Plaintiffs' law firm, confirm no meeting set for today; notify Mr. Schwartz meeting is not set and confirming time for teleconference with TCSA this afternoon (NO CHARGE)	0.1
10/8/2013	(RS) Participate in telephone conference with TCSA administrators, Joe Hoffer and Leonard Schwartz regarding pleading amendment and TCSA involvement in editing pleadings and other filings, as required. (NO CHARGE)	0.2
10/8/2013	(RS) Continue preparation of edits and additions to Fourth Amended Petition.	1.5
10/8/2013	(RS) Conduct telephone conference with Chris Diamond regarding deadline for filing of amended pleading and Intervener's intention to file mandamus action to stay trial proceedings.	0.2
10/9/2013	(CP) Conduct review and revision of formatting to amended	1.5



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	petition as requested by Bob Schulman and inclusion of addition to same. (NO CHARGE)	
10/9/2013	(LS) Prepare communique to Lindsey Jones asking her to provide Toni Templeton with the outline of our arguments so they can be addressed in Ms. Templeton's and Anthony Rolle's reports.	0.1
10/9/2013	(CP) Upload data in Dropbox to share with Toni Templeton from school finance trial phase I; conduct communique exchange with Ms. Templeton regarding same; forward master exhibit list of Defendants' exhibits for Ms. Templeton to review and determine if data she needs is contained therein. (NO CHARGE)	2
10/9/2013	(LS) Review current draft of amended petition; prepare revision on current draft of amended petition; prepare communique to Bob Schulman forwarding same with comments for review.	2.2
10/9/2013	(LS) Prepare communique to Toni Templeton asking her to prepare and forward a two or three paragraph synopsis of what the new tables show so that we can show in our pleadings what is the purpose in these tables.	0.2
10/9/2013	(LS) Receive communique from Bob Schulman forwarding 4th Amended Petition; review and edit 4th Amended Petition; receive and review summary table prepared by Toni Templeton for David Dunn detailing Lisa Dawn Fisher's calculations and showing differences between Ms. Fisher's and the way that Anthony Rolle's calculations are done; receive communique from Mr. Schulman to Mr. Rolle regarding his approach to funding comparisons; prepare communique to Mr. Rolle regarding his report.	6.2
10/9/2013	(RS) Prepare communique to Dr. Anthony Rolle concerning preparation of report(s) and coordination of data with Toni Templeton, review of prior reports, and clarification of required analysis within same supporting Charter Plaintiffs' position; receive and review Excel file prepared by Ms. Templeton reflecting ISD and charter ADA and WADA calculations compiled from data provided by the state's witness and Dr. Rolle; receive and review Ms. Templeton's Excel file with updated financial (tables) data for incorporation into expert report, with request for input to include within same.	0.4
10/9/2013	(RS) Prepare directive to Leonard Schwartz regarding Lindsey Jones's preparation of outline of case arguments for Toni Templeton's reference in compilation of data for expert report; receive and review response from Mr. Schwartz concerning same; receive and review Ms. Jones's communique to Ms. Templeton regarding same; prepare reply to Mr. Schwartz concerning Dr. Anthony Rolle's prior testimony and strategy for review of relevant data by experts in preparation of their report(s).	0.6
10/9/2013	(RS) Multiple communique exchanges with Joe Hoffer, Toni Templeton, Lindsey Jones and Leonard Schwartz regarding edits to and preparation of final draft of Amended Petition; prepare same and direct staff regarding same.	3.6
10/10/2013	(CP) Prepare communique to Dr. Anthony Rolle and provide trial	0.2



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	transcripts on days Dr. Lisa Dawn-Fisher appeared as a witness; upload into Dropbox Dr. Dawn-Fisher's report and related data provided by Defendants, as directed by Bob Schulman; prepare follow-up communique to Dr. Rolle advising of upload of same (NO CHARGE); receive and review confirmation from Dr. Rolle of receipt of transcripts and exhibits.	
10/10/2013	(LS) Telephone conference with Toni Templeton regarding new tables and the requested synopsis.	0.3
10/10/2013	(CP) Reformat entire Word document (Amended Petition) with tracked changes to remain; conduct line-by-line review and revision of same; prepare comments to sections of Petition for Bob Schulman to review and respond to in preparation of final draft to submit to TCSA; review Education Code and add cite requested by Mr. Schulman. (NO CHARGE)	2.8
10/10/2013	(LS) Receive communique from Denise Pierce asking [REDACTED]	0.4
10/10/2013	(LS) Receive communique from Lindsey Jones with current draft of proposed Amended Petition; review current draft; prepare communique to Ms. Jones regarding Amended Petition.	2.5
10/10/2013	(RS) Receive and review communiqué from Denise Pierce regarding witnesses identified on behalf of Charter Plaintiffs; prepare response to Ms. Pierce with data requested; conduct communiqué exchange with Joe Hoffer and Leonard Schwartz concerning proposed budget for current phase of litigation, receive and review same (NO CHARGE); receive and review staff communiqué to Dr. Anthony Rolle regarding upload of data for his review in preparation/finalization of expert report; receive and review Dr. Rolle's reply confirming receipt of data (NO CHARGE); direct staff concerning "reminder" to Dr. Rolle of deadline for completion of report and to contact parent/plaintiffs to determine current status of students/children for Amended Petition; receive and review notification from Ms. Pierce advising of her contact with superintendents for children's schools to determine their status.	0.4
10/10/2013	(RS) Receive and review initial data for expert report, provided by Toni Templeton; attorney conference with Leonard Schwartz regarding edits required in same.	0.4
10/10/2013	(RS) Direct staff in revision of near-final draft of Amended Petition (NO CHARGE); receive and review same with edits/comments; prepare additions and edits to same; forward draft of Petition to TCSA administrators for final review and revision, with recommendations for additions to same, including current FAST data.	3.8
10/11/2013	(CP) Conduct line-by-line review of final version of amended petition; confer with and receive direction from Bob Schulman for cite reference(s) within same; e-file final and prepare communique	1



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	to all counsel forwarding a final copy. (NO CHARGE)	
10/11/2013	(LS) Prepare communique to Toni Templeton requesting the revised report when it is completed, regardless of date or time.	0.2
10/11/2013	(CP) Telephone conference with [REDACTED]	0.1
10/11/2013	(CP) Conduct communique exchange with Lindsey Jones regarding current amended pleading (fourth) and prior amendments filed [REDACTED]. (NO CHARGE)	0.1
10/11/2013	(LS) Review drafts of TCSA's Amended Petition; prepare communique to Bob Schulman, Denise Pierce and Lindsey Jones with comments upon each draft; review multiple communiqués from Toni Templeton regarding the report; review communique between Ms. Templeton and Anthony Rolle regarding new reports to be filed next week; prepare communique to Ms. Pierce, Ms. Jones and Mr. Schulman suggesting a change in the language of the amended pleading as part of the introduction.	4.9
10/11/2013	(RS) Receive and review Ninth Amended Petition filed by TTSFC Plaintiffs; receive from Court Reporter, and conduct brief review of record of September 13 court proceeding pertaining to same.	0.3
10/11/2013	(RS) Continue preparation of additions and edits to Amended Petition; confer with TCSA and firm attorneys and staff in preparation of revisions to Amended Petition; Communiqué exchanges with TCSA administrators and Leonard Schwartz regarding recommended additions to same and deletions to information outlined in same; forward to TCSA administrators for review; review TCSA-edited revised version from Lindsey Jones and Denise Pierce; confer with staff regarding review and incorporation of Ms. Jones' edits; teleconference with Ms. Jones and Ms. Pierce; review final additions/revisions to Petition; direct staff in finalizing same with inclusion of cite to Edgewood IV lawsuit; telephone conference with staff confirming filing of final version and distribution to all counsel.	2.8
10/12/2013	(RS) Receive and review communiqué from Toni Templeton with current draft of expert report. (NO charge)	0.25
10/13/2013	(LS) Multiple communique exchanges with Denise Pierce, David Dunn, Toni Templeton and Lindsey Jones (copies to Robert Schulman and Joe Hoffer) directing TCSA to [REDACTED]	0.6
10/13/2013	(RS) Confer with Leonard Schwartz regarding preparation of advisory to address confidentiality of discussions between Toni Templeton, in her capacity as an expert witness; review Mr. Schwartz's advisory communiqué to TCSA administrators and litigation attorneys concerning same; conduct follow-up conference with Mr. Schwartz regarding response from David Dunn and [REDACTED]	0.7



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discussion with Ms. Templeton and Dr. Anthony Rolle in preparation of expert report; [REDACTED]

10/14/2013	(LS) Review of Texas Taxpayer & Student Fairness Coalition Plaintiffs' First Supplemental Designation of Expert Witnesses.	0.4
10/14/2013	(LS) Confer with Paralegal regarding formatting of expert reports and directing her to notify counsel that the reports are joint; extended telephone conference with Toni Templeton regarding formatting and filing of reports.	0.6
10/14/2013	(LS) Multiple communicate exchanges with Paralegal and Toni Templeton regarding filing of expert reports; conduct review and editing of expert reports.	3.8
10/14/2013	(LS) Receive and review detailed communicate from Denise Pierce regarding case; prepare response to Ms. Pierce regarding [REDACTED]	0.5
10/14/2013	(LS) Review of CCISD Plaintiffs' Fourth Supplemental Designation of Expert Witnesses; review Fort Bend ISD Plaintiffs' Third Supplemental Designation of Expert Witnesses and expert's report and vita; review of Edgewood Plaintiffs' designation of expert witness and report; review of Efficiency Intervenors' Fourth Supplemental Response to Request for Disclosure; review of Fort Worth Plaintiffs' Second Supplemental Designation of Expert Witnesses and reports from Moak and Casey.	2.8
10/14/2013	(LS) Telephone conference with Toni Templeton regarding dates for her deposition; communicate to Paralegal (cc to Anthony Rolle and Ms. Templeton) regarding changes to Mr. Rolle's report and dates for his deposition.	0.3
10/14/2013	(LS) Telephone conference with Toni Templeton regarding her report.	0.2
10/14/2013	(CP) Telephone conferences with Toni Templeton and Dr. Anthony Rolle regarding dates of availability for deposition and finalizing information contained in expert report; confer with and receive directive from Leonard Schwartz on submission of final report (three files), notification to counsel of "rush" to submit same, conversion to PDF format, dates for depositions and prior designation of experts (NO CHARGE).	0.2
10/14/2013	(CP) Download and save multiple submissions received from the parties designating experts and providing supporting documentation. (NO CHARGE)	0.7
10/14/2013	(CP) Conduct review and comparison of Excel file and PDF converted files; reorganize print out of expert report to organize same for scanning; reformat multiple pages in expert report; prepare communicate to all counsel forwarding final version of expert report in PDF format. (NO CHARGE)	2.7
10/14/2013	(RS) Conduct communiqué exchanges, in-office conferences, and	0.4



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telephone conferences with TCSA staff, office attorneys and office staff in preparation of final version of Charter Plaintiffs' expert report; direct staff to determine if discovery requests were made for information exchanges between the parties and experts and/or the parties and witnesses; receive and review Denise Pierce's communiqué to Dr. Anthony Rolle with information concerning upcoming trial schedule (NO CHARGE); receive and conduct initial review of expert designations and accompanying data from ISD Plaintiffs and Interveners; receive and review final versions of December 5, 2013 trial and August 20, 2013 hearing transcripts from Court Reporter; receive and review final version of Charter Plaintiffs' expert report.

10/15/2013	(CP) Conduct review of discovery exchanged in current phrase of lawsuit to determine if requests were made for information exchanged between the parties and experts and/or the parties and witnesses; prepare research memo to Bob Schulman regarding same.	0.4
10/15/2013	(LS) Communicate exchange with Marisa Bono, MALDF office, regarding attorney-client privileged document accidentally sent to all counsel with request to delete.	0.3
10/15/2013	(LS) Receive file from MALDF with McAllen Zip File; reviewed the McAllen files.	1.1
10/15/2013	(RS) Receive and review data from Edgewood ISD Plaintiffs in supplemental response to Requests for Disclosures and Zamora expert report inadvertently excluded from disclosure on October 14; receive and review request from Edgewood ISD Plaintiffs' counsel to delete confidential Word file produced in error; direct staff concerning same; receive and review staff memo regarding review of discovery requests concerning exchanges between the parties and experts and/or parties and witnesses; receive and review Edgewood Plaintiffs' Second Supplemental Response to Defendants' Requests for Disclosures; receive and review second request from defense counsel for dates for scheduling superintendent depositions and responses by ISD Plaintiffs' and Interveners' counsel regarding same.	0.4
10/16/2013	(RS) Receive and review January 7, 2013 trial transcript (final) from Court Reporter; receive and review communiqué from Richard Gray with dates of availability of Wayne Pierce for deposition. (NO CHARGE)	0.2
10/17/2013	(RS) Receive and review communiqué from defense counsel and attached notices for depositions of Diane Frost, Toni Templeton, Albert Cortez, Lynn Moak, Anthony Rolle, Roberto Zamora, Daniel Casey, Ron Eissler, Bill Hammond, Curtis Culwell, Catherine Clark and Wayne Pierce; receive and review communiqué in response from counsel for Edgewood Plaintiffs requesting dates for scheduling depositions of defendants' witnesses; direct staff regarding same. (NO CHARGE)	0.3
10/18/2013	(RS) Receive and review Richard Gray's communiqué advising	0.3



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receive and review communiqué exchanges between counsel regarding dates of availability for scheduling multiple depositions; receive and review attachment to Culwell report clarifying completion rates referenced within same; receive and review transcript for January 10 trial proceeding from Court Reporter; direct staff regarding same.

10/21/2013	(LS) Receive communique from Shelley Dahlberg regarding TEA financial data; review same.	0.3
10/21/2013	(LS) Multiple communique exchanges with Bob Schulman regarding TEA financial data.	0.2
10/21/2013	(LS) Multiple communique exchanges with Denise Pierce regarding working from TCSA's offices; receive communiqué from Shelley Dahlberg regarding deposition dates for Superintendents; telephone conference with Bob Schulman regarding depositions.	0.4
10/21/2013	(RS) Review and forward report and accompanying data from experts Dr. Catherine Clark (FBISD Plaintiffs), Dr. Albert Cortez (Edgewood ISD Plaintiffs), and Dr. Wayne Pierce (TTSFC Plaintiffs); review and forward information supplementation to Culwell report previously disclosed (FBISD Plaintiffs).	0.1
10/21/2013	(RS) Review communiqué exchanges between party counsel regarding scheduling of depositions of Superintendent/witnesses; confer with Leonard Schwartz concerning response on behalf of Charter Plaintiffs, and scheduling depositions (NO CHARGE); review advisory from defense counsel regarding errors found in and updates to ASATR files previously disclosed; forward same to Mr. Schwartz, Denise Pierce and experts; receive inquiry from Ms. Pierce regarding same; prepare inquiry to defense counsel regarding same; review response; provide response to Mr. Schwartz and TCSA litigation team; review notice scheduling Jerilynn Pfeifer deposition; review Defendants' Responses to Charter Plaintiffs' Second Request for Disclosures; forward same to Mr. Schwartz, Ms. Pierce and Toni Templeton for review (NO CHARGE)	0.2
10/22/2013	(LS) Receive communique from Richard Gray forwarding expert report of Wayne Pierce; downloaded all parts; review the report of Wayne Pierce.	1.4
10/22/2013	(LS) Receive State's Response to our Request for Disclosure; review same.	0.7
10/22/2013	(LS) Receive communique from Edgewood Plaintiffs with report from Dr. Albert Cortez; review of Cortez report.	0.4
10/22/2013	(LS) Receive communique from TTSFC regarding deposition of Everman ISD Superintendent, Jerilynn Pfeifer; prepare communique to Paralegal regarding same for scheduling.	0.3
10/22/2013	(RS) Review revised financial data (ASATR14 based on LPE) from defense counsel; review final transcript of October 4, hearing on Motion for Judicial Notice; review TTSCF Plaintiffs' de-designation	0.5



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of Superintendents Chambers, Wallace and Salazar as trial witnesses; review TTSFC Plaintiffs' de-designation of Dr. Ray Freeman as a trial witness; review communiqué from Denise Pierce regarding revision of report by Charter Plaintiffs' expert; prepare advisory response to Ms. Pierce regarding same (with copy to Leonard Schwartz, Lindsey Jones and Charter Plaintiffs' experts); review request from defense counsel for alternative dates to schedule Julio Cavazos deposition and response by Edgewood ISD counsel concerning same (NO CHARGE); review defense counsel's request for dates to schedule depositions of 20 named witnesses, imposing deadline for next day at noon; review Mr. Schwartz's proposed response to defense counsel request; confer with Mr. Schwartz regarding same.

10/23/2013	(RS) Confer with Leonard Schwartz regarding response to defense counsel's request for dates to schedule depositions of non-superintendent witnesses not previously identified in her request for availability of witnesses (NO CHARGE); review Mr. Schwartz's notice to defense counsel concerning same; review communiqué from Denise Pierce concerning parties not designated by Charter Plaintiffs as potential witnesses, but identified by opposing counsel as witnesses to be deposed; review Mr. Schwartz's follow-up notification to defense counsel identifying witnesses whose depositions may be scheduled in compliance with the Court's guidelines; review defense counsel's request to Mr. Schwartz regarding de-designation of witnesses identified in prior Fact Witness Disclosure, and Mr. Schwartz's reply confirming same; review Mr. Schwartz's communiqué to David Dunn and Ms. Pierce requesting dates for scheduling their depositions. (NO CHARGE)	0.3
10/23/2013	(RS) Review notices scheduling depositions of Diane Frost, Toni Templeton, Albert Cortez, Lynn Moak, Anthony Rolle, Roberto Zamora, Dan Casey, Ron Eissler, Bill Hammond, Curtis Culwell, Catherine Clark and Wayne Pierce; review communiqué from Edgewood ISD Plaintiffs' counsel to defense counsel with list of defense witnesses and request for dates for depositions for same; direct staffs regarding same. (NO CHARGE)	0.2
10/24/2013	(LS) Prepare communiqués to Denise Pierce, Bob Schulman, David Dunn, Toni Templeton and Lindsey Jones regarding Notices in case, scheduling depositions and preparation of our witnesses for depositions.	0.7
10/24/2013	(RS) Receive and review Defendants' Second Amended Preliminary Designation of Fact Witnesses; receive and review Defendants' Motion to Strike Spring Branch ISD Superintendent from FBISD Plaintiffs' Witness List. Direct staff regarding same. (NO CHARGE)	0.2
10/25/2013	(LS) Receive communiqués from Denise Pierce, Bob Schulman, Lindsey Jones regarding the case; extended telephone conference with Ms. Pierce, Mr. Schulman and Ms. Jones regarding preparations for upcoming depositions, strategy about whom to	1.3



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	depose or to attend deposition and how we should prepare for Toni Templeton's and Anthony Rolle's depositions and other matters.	
10/25/2013	(RS) Prepare directive to Leonard Schwartz regarding topics for scheduled teleconference with TCSA; prepare items for TCSA status conference; receive and review communiqué from Denise Pierce concerning teleconference, requesting rescheduling of same (NO CHARGE); receive and review signed Scheduling Order; review e-mails and prepare advisory correspondence to Intervenor's counsel regarding sharing transcript costs and appeal costs; prepare communiqué to TCSA administrators and Mr. Schwartz regarding [REDACTED] participate in status conference; prepare letter to Dr. Anthony Rolle regarding preparation for deposition; prepare communiqué to Lindsey Jones concerning review of deposition transcripts for attendance at upcoming deposition and preparation sessions for same.	1.2
10/26/2013	(RS) engage in communiqué exchanges with David Dunn regarding [REDACTED] and scheduling of phone conference to discuss same. (NO CHARGE)	0.1
10/28/2013	(CP) Begin review of missing exhibits list compiled by File Clerk and search network file folders to determine status of same; transfer multiple files to network folders, organize exhibits admitted and edit list of missing exhibits; begin reorganization of folders in Dropbox to determine which files have been "lost" or inadvertently removed; prepare list of missing data. (NO CHARGE)	1.3
10/28/2013	(LS) Extended telephone conference with Denise Pierce and David Dunn regarding witnesses to call.	0.4
10/28/2013	(RS) Conduct teleconference with Dr. Anthony Rolle regarding expert testimony; receive and review communiqué from Lindsey Jones requesting specific deposition transcripts; direct staff to upload into Dropbox all available transcripts; receive and review Amended Notices for depositions of Case, Clark, Cortez, Culwell, Frost, Moor and Zamora; receive and review communiqué from Denise Pierce regarding discussion with David Dunn and Leonard Schwartz agreeing to [REDACTED] [REDACTED] prepare reply to Ms. Pierce, Mr. Dunn and Mr. Schwartz concerning [REDACTED]	0.4
10/29/2013	(CP) Continue review of list of missing exhibits and search of file documentation for same including e-mails from counsel, CDs provided by counsel and determine data still missing. (NO CHARGE)	2.4
10/29/2013	(LS) Work with Toni Templeton at TCSA on how to be a successful deponent; work with Ms. Templeton on preparing for her deposition testimony by charging necessary areas of proposed testimony; conference with Ms. Templeton and Denise Pierce on the areas that Ms. Templeton will be testifying on; prepare communique to all counsel providing dates for David Dunn deposition.	4.8
10/29/2013	(RS) Conduct multiple communiqué exchanges with Leonard	0.4



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	Schwartz regarding preparation of case budget; confer with Mr. Schwartz concerning same; prepare outline of proposed budget for review by Mr. Schwartz, reflecting discount and current estimate of fees (pre-trial and post-trial).	
10/29/2013	(RS) Receive and review communiqué from Interveners? counsel requesting October 22, 2012 trial transcript, and advising he is close to filing for Mandamus; direct staff to locate transcript (NO CHARGE); receive and review transcript and forward to Interveners? counsel; prepare communiqué to Leonard Schwartz and TCSA administrators regarding status of Mandamus filing; receive and review Amended Notice of Wayne Pierce Deposition; receive and review Mr. Schwartz?s communiqué to defense counsel with list of dates for scheduling David Dunn deposition.	0.3
10/30/2013	(CP) Organize folders in Phase I of litigation and re-save depositions in Dropbox for access by TCSA administrators and office litigation staff; prepare communicate to Leonard Schwartz inquiring as to expert designation by Defendants in light of data provided by defense counsel (only one expert and report provided). (NO CHARGE)	3
10/30/2013	(LS) Review of revised deposition schedule; forward deposition schedule to Toni Templeton, Lindsey Jones and Denise Pierce.	0.1
10/30/2013	(RS) Receive and review Notice of David Dunn Deposition; prepare request to Interveners' counsel for copy of deposition transcripts for Hammond, Eissler and Cortez (from first trial) for review by Lindsey Jones; receive and review Denise Pierce's communiqué regarding trial preparation.	0.2
10/31/2013	(RS) Receive and review communiqué exchanges between counsel regarding need for corrections to Scheduling Order entered by Judge Dietz and agreement of defendant and school district plaintiffs to submit of Amended Order; prepre communiqué to interveners' counsel concerning same; conduct telephone conference with Intervener's counsel regarding same; forward observations and communiqués between party counsel and synopsis of exchanges with Interveners' counsel regarding from Ms. Pierce regarding of analytical summary in Charter Plaintiffs' expert report data; prepare response to same to Leonard Schwartz.	0.4
10/31/2013	(RS) Receive and review communiqué from Dr. Anthony Rolle regarding his current condition, post-surgery; direct staff and inform litigation team regarding same. (NO CHARGE)	0.2
11/4/2013	(LS) Preparation of Toni Templeton for her deposition; conduct legal research on qualifications as an expert; prepare communicate to Ms. Templeton with copies to Lindsey Gordon and Denise Pierce regarding qualification for testifying as an expert.	3.7
11/5/2013	(LS) Conduct mock deposition of Toni Templeton; preparation of Ms. Templeton for her deposition; work with Ms. Templeton on narrative in preparation for deposition.	5.2
11/6/2013	(RS) Receive and review narrative of Toni Templeton's proposed	0.1



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	deposition testimony drafted by Leonard Schwartz; prepare revisions and additions to same. (NO CHARGE)	
11/6/2013	(LS) Review Lynn Moak's report (Excel spreadsheet); forward same to Toni Templeton for review in preparation for her deposition.	0.3
11/6/2013	(LS) Review with Toni Templeton answers from mock deposition; assist Ms. Templeton in writing first draft of narrative for her deposition; review of Ms. Templeton's narrative; prepare communique to Bob Schulman forwarding narrative for review and comments; review response from Mr. Schulman's with edits to narrative; prepare communique to Ms. Templeton forwarding Mr. Schulman's comments and edits to narrative for review.	4.6
11/7/2013	(LS) Receive and review communique from Toni Templeton regarding P values in her data charts. (NO CHARGE)	0.1
11/7/2013	(LS) Final preparation of Toni Templeton for deposition.	6.7
11/8/2013	(LS) Prepare communique to Toni Templeton advising her to read American Statesman article on test scores (appeared in paper today).	0.1
11/8/2013	(RS) Receive and review update from Lindsey Gordon regarding Toni Templeton's deposition (NO CHARGE); conduct telephone conference with Ms. Templeton, Ms. Gordon and Leonard Schwartz reporting regarding same and other pertinent trial matters.	0.2
11/12/2013	(LS) Work with Toni Templeton on deposition strategy and questions for Moak.	4.6
11/13/2013	(LS) Continue working with Toni Templeton on deposition preparation for Lynn Moak; review Cortez report and discussion with Ms. Templeton on whether we need to attend Cortez deposition (based upon his report).	2.6
11/15/2013	(RS) Receive and review staff communiqué to Dr. Anthony Rolle regarding pre-deposition preparation. (NO CHARGE)	0.1
11/18/2013	(RS) Review Dan Casey trial testimony and prepare advisory communiqué to Leonard Schwartz regarding same.	0.2
11/18/2013	(LS) Review data submitted by Dr. Lisa Dawn-Fisher; review testimony previously given by David Dunn; review testimony given by Toni Templeton in her deposition.	4.2
11/18/2013	(LS) Multiple communique exchanges with counsel regarding deposition dates and Shelley Dahlberg's illness; communique exchanges with David Dunn regarding preparation for deposition; communique exchanges with Toni Templeton regarding preparation time for Dr. Anthony Rolle.	0.7
11/18/2013	(RS) Review communiqué from Edgewood ISD counsel regarding continuing validity of prior Rule 11 stipulations to be honored in David Dunn's deposition testimony; review Rule 11 and identify pertinent sections, forward same to litigation team with further advisory; communiqué exchange with Mr. Schwartz regarding same.	0.4
11/19/2013	(LS) Conference with David Dunn and Lindsey Gordon preparing David Dunn for his deposition.	2.5
11/19/2013	(LS) Work with Toni Templeton on preparations to prepare David	3.6



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	Dunn for his deposition.	
11/20/2013	(LS) Multiple communicate exchanges with Denise Pierce, Lindsey Gordon, Bob Schulman and Toni Templeton regarding having Dr. Anthony Rolle attend the deposition of Dr. Lisa Dawn-Fisher; multiple communicate exchanges with Ms. Pierce, Ms. Gordon, Mr. Schulman and Ms. Templeton regarding the number of days and when Dr. Rolle should come to Austin to prepare for his deposition.	0.8
11/20/2013	(LS) Conference with David Dunn, Lindsey Gordon, Denise Pierce and Toni Templeton to debrief David Dunn and discuss his deposition testimony.	0.9
11/20/2013	(LS) Conference with Toni Templeton regarding issues for Dr. Anthony Rolle and how to prepare for his deposition; conference with Ms. Templeton regarding Dr. Catherine Clark's report and preparation of deposition questions.	0.5
11/21/2013	(RS) Conduct telephone conference with staff regarding preparation of Dr. Anthony Rolle for deposition; receive and review staff response to Denise Pierce regarding same; conduct multiple communiqué exchanges with staff attorneys regarding Skype conference and in-person deposition preparation sessions for Dr. Rolle, preparation of Findings of Fact and Conclusions of Law by TCSA administrators, budget proposal, cost estimates and related issues.	0.2
11/21/2013	(LS) Complete preparation for deposition of Dr. Catherine Clark; review Dr. Clark's report; compare figures to those of Dr. Lisa Dawn-Fisher and Lynn Moak's.	3.4
11/21/2013	(LS) Conference with Toni Templeton on preparations for Dr. Anthony Rolle deposition and how to prepare him.	2.1
11/22/2013	(RS) Conduct communiqué exchanges with Denise Pierce and staff, and confer with staff, all regarding scheduling of deposition preparation sessions, preparation of Dr. Anthony Rolle for deposition, Skype conferences scheduled; review outline of anticipated deposition testimony prepared by Leonard Schwartz, Toni Templeton and Lindsey Gordon in preparation for Dr. Rolle's deposition; prepare communiqué to Ms. Templeton regarding Dr. Rolle's equity report prepared for TCSA in 2012 and information from same supporting inequity claims not in current expert report.	0.7
11/25/2013	(RS) Conduct telephone conference with Dr. Anthony Rolle regarding phone call briefing for deposition preparation and determination of costs.	0.2
11/26/2013	(RS) Participate in extended telephone conference (pre-deposition preparation) with Dr. Anthony Rolle.	0.8
11/1/2013	(RS) Receive and review communiqué from Denise Pierce regarding Dr. Lisa Dawn-Fisher deposition; prepare directive to Leonard Schwartz regarding same and previously prepared trial transcript memorandum regarding testimony to date relevant to Charter claims; direct staff regarding same.	0.3
11/5/2013	(LS) Receive documents from David Thompson's office to be used in deposition of Dr. Diane Frost; forwarded same to Toni Templeton	0.2



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	for review and to determine if anything in the budget, etc., would require us to attend the deposition and cross Dr. Frost.	
11/5/2013	(LS) Receive communique from David Hinojosa to Shelley Dahlberg inquiring about dates for deposition of Dr. Lisa Dawn-Fisher (her dates will be provided in conjunction with her expert report).	0.1
11/5/2013	(RS) Receive and review, from FBISD Plaintiffs' counsel, presentation and exhibits to be introduced at Dr. Diane Frost deposition. (NO CHARGE)	0.1
11/5/2013	(RS) Receive and review string of communiqués exchanged between counsel regarding scheduling of defense witness depositions. (NO CHARGE)	0.1
11/6/2013	(LS) Review Toni Templeton's job description; receive and review communique from Denise Pierce regarding Ms. Templeton's job description (with comment from Chris Busse (VP of Quality Initiatives)) stating it needs to be updated.	0.2
11/6/2013	(RS) Receive and review communiqué from Leonard Schwartz's regarding review of budget information and attendance at Dr. Diane Frost deposition; prepare advisory response to same. (NO CHARGE)	0.1
11/7/2013	(RS) Receive and review First Amended Notice scheduling Dr. Anthony Rolle's deposition. (NO CHARGE)	0.1
11/8/2013	(LS) Attend deposition of Toni Templeton.	5
11/10/2013	(RS) Receive and review communiqué from Leonard Schwartz concerning Lynn Moak deposition; review summaries of Moak deposition and trial testimony; prepare advisory correspondence and directive to Mr. Schwartz regarding same and offer received from Edgewood Plaintiffs' counsel.	0.3
11/11/2013	(RS) Receive and review communiqué from Lindsey Gordon concerning review of trial and deposition testimony of Lynn Moak to date; prepare advisory response to Ms. Gordon regarding same.	0.2
11/11/2013	(LS) Confer with Lindsey Gordon regarding transcript of depositions of Lynn Moak Deposition and Cortez trial testimony; review Moak transcript.	0.6
11/11/2013	(LS) Meet with Toni Templeton regarding upcoming depositions; preparation for upcoming deposition of Lynn Moak.	1.3
11/12/2013	(RS) Receive and review communiqué from Lindsey Gordon regarding Lynn Moak trial testimony excerpts provided to Leonard Schwartz. (NO CHARGE)	0.1
11/13/2013	(LS) Review Dan Casey's deposition (highlighted version by Lindsey Gordon); receive communique from Eric Vinson regarding Toni Templeton's data sets.	1.9
11/13/2013	(LS) Receive communique from Lindsey Gordon advising that we do not have the final deposition transcripts from the first trial from Rob Eissler, Bill Hammond, or Dr. Wayne Pierce. (NO CHARGE)	0.1
11/14/2013	(RS) Review FBISD Plaintiffs' Notice of Shirley Beaulieu deposition; forward same to Mr. Schwartz, Ms. Gordon, Ms. Pierce and Toni Templeton with advisory communiqué regarding same.	0.2



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11/14/2013	(RS) Review Edgewood Plaintiffs' Notice of Monica Martinez and Kent Grusendorf depositions; forward same to Leonard Schwartz, Denise Pierce and David Dunn with recommendation regarding same.	0.3
11/14/2013	(LS) Re-read Moak report and make notes; discuss Moak report with Toni Templeton with a view to drafting deposition questions; work with Ms. Templeton on deposition questions for Moak.	1.8
11/14/2013	(LS) Receive notice of deposition of Kent Greusendorf; receive Notice of Deposition of Shirley Beaulieu. (NO CHARGE)	0.2
11/15/2013	(LS) Attend deposition of Lynn Moak.	7.6
11/15/2013	(RS) Receive and review CCISD Plaintiffs' Notice for Shannon Housson deposition. (NO CHARGE)	0.1
11/18/2013	(RS) Review Defendants' Designation of Experts; direct staff in upload and sharing of Master Data Set of Dr. Lisa Dawn-Fisher to litigation team; review communiqué from Leonard Schwartz regarding Roberto Zamora deposition; prepare advisory response to same; communiqué exchanges with Denise Pierce concerning Zamora deposition; review Mr. Schwartz' response to Ms. Pierce regarding same; review notification from Attorney General's office of location change for Hammond deposition (NO CHARGE); review Edgewood Plaintiffs' Notice of John Merrifield deposition; review staff memo confirming times and locations of all depositions on November 20, 2013 (NO CHARGE).	0.4
11/18/2013	(LS) Multiple communicate exchanges with Denise Pierce, Bob Schulman and Toni Templeton regarding attending Zamora deposition in San Antonio, telephone conference with Ms. Templeton regarding attending Zamora deposition and strategy on how to handle his data at trial (assuming we do not attend deposition); prepare communicate to Ms. Pierce and Mr. Schulman advising them that we will not attend Zamora deposition.	0.8
11/18/2013	(LS) Telephone conference with Toni Templeton and Lindsey Gordon regarding David Dunn's deposition and handling the four depositions all scheduled for November 20th; receive response from Mr. Dunn agreeing to decision not to attend Hammond deposition; prepare communicate to team regarding Hammond deposition.	1.2
11/18/2013	(RS) Receive and review notification from Interveners' attorney de-designating Rob Eissler and canceling deposition; conduct communiqué exchange with Interveners' attorney regarding Bill Hammond's testimony with regard to Charter Plaintiffs; receive and conduct cursory review of Toni Templeton deposition transcript; receive and review communiqué from defense counsel regarding current Commissioner as witness and addressing notice of deposition to corporate representative; direct staff regarding same; receive and review communiqués canceling date Dan Casey deposition, to be rescheduled; direct staff regarding same.	0.3
11/19/2013	(RS) Receive and review communiqué from FBISD Plaintiffs' attorney with dates proposed for Dan Casey deposition; receive	0.2



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	and review Notice of Lisa Dawn-Fisher deposition; direct staff regarding same (NO CHARGE).	
11/20/2013	(LS) Preparation for Dr. Catherine Clark deposition; draft preliminary questions for Dr. Clark to discuss with Toni Templeton.	1.2
11/20/2013	(LS) Attend deposition of Bill Hammond.	0.9
11/20/2013	(LS) Attend deposition of David Dunn.	3.5
11/20/2013	(RS) Review Leonard Schwartz's communiqué to Denise Pierce regarding availability of Dr. Anthony Rolle for Dawn-Fisher deposition. (NO CHARGE)	0.1
11/21/2013	(LS) Receive Defendants' Second Amended Notice of Deposition of Daniel Casey; review same. (NO CHARGE)	0.1
11/21/2013	(LS) Prepare final draft of questions for Dr. Catherine Clark; conference with Toni Templeton to work on deposition questions for Dr. Clark.	4
11/21/2013	(LS) Prepare filing of charts prepared by David Dunn for his presentation to State Board of Education PSF's committee with his deposition.	0.2
11/21/2013	(RS) Receive and review Amended Notice scheduling Dan Casey deposition. (NO CHARGE)	0.1
11/21/2013	(RS) Receive and review Leonard Schwartz's directive to staff for filing of exhibits (PSF materials) referred to and introduced during Dunn deposition; prepare inquiry to Mr. Schwartz regarding disclosure of PSF materials in response to discovery request; receive and review response from Mr. Schwartz concerning same. (NO CHARGE)	0.1
11/22/2013	(CP) Prepare request to Leonard Schwartz regarding filing of exhibits (PPT files) requested by defense counsel at David Dunn's deposition (NO CHARGE); telephone conference with Mr. Schwartz concerning same (NO CHARGE); telephone conference with TSG Reporting regarding identity of Court Reporter; prepare communique to TSG representative forwarding PDF versions of PPT files for submission to Court Reporter.	0.1
11/22/13	(RS) Receive and review communiqué from defense counsel regarding production of spreadsheet prepared by and utilized by Toni Templeton in preparation of expert report; communiqué exchange with Leonard Schwartz concerning disclosure of same and response to defense counsel.	0.1
11/22/13	(LS) Attend deposition of Dr. Catherine Clark.	5.2
11/22/13	(RS) Receive and review communiqué from defense counsel regarding scheduling of Guy Sconzo deposition. (NO CHARGE)	0.1
11/23/13	(LS) Receive communique from Phillip Fraissinet regarding deposition time for Dr. Guy Sconzo (proposed Ft. Bend witness); receive communique from Shelley Dahlberg requesting date to take deposition of proposed Dr. Sconzo. (NO CHARGE)	1.1
11/25/2013	(CP) Telephone conference with Court Reporter regarding exhibit introduced by Charter School Plaintiffs, not contained in her data set; locate and forward same to Court Reporter.	0.1
11/25/2013	(RS) Review communiqué from defense counsel regarding	0.1



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	scheduling of Guy Sconzo deposition; review Notice scheduling Sconzo deposition. (NO CHARGE)	
11/26/2013	(LS) Attend deposition of Dr. Wayne Pierce.	7.5
11/5/2013	(LS) Review report by Dr. Albert Cortez and IDRA report (along with Final Master file).	0.3
11/6/2013	(RS) Receive and review FBISD Plaintiffs' back-up data for Lynn Moak report.	0.1
11/11/2013	(RS) Receive and review copy of back-up data for Dr. Albert Cortez's expert report provided by Edgewood ISD Plaintiffs' counsel; prepare request to Edgewood ISD counsel concerning Dr. Cortez's intention to offer testimony addressing charter to district funding; receive and review response to same; forward exchanges with Edgewood counsel to TCSA administrators and Leonard Schwartz; receive and review reply from Denise Pierce regarding witness's prior testimony; prepare advisory response to Ms. Pierce, Lindsey Gordon, Toni Templeton and Mr. Schwartz concerning same and general responses made to same at trial to date; receive and review multiple communiqués from FBISD Plaintiffs' counsel resubmitting Moak back-up data; direct staff regarding same.	0.4
11/12/2013	(RS) Review Edgewood Plaintiffs' Amended Second Requests for Production, Interrogatories and Requests for Production to Defendants correcting clerical error in interrogatory 9.	0.2
11/12/2013	(RS) Review defense counsel's notice of Rule 11 filing with accompanying exchange between counsel and Leonard Schwartz identifying Dr. Anthony Rolle, Toni Templeton and David Dunn as sole trial witnesses; prepare advisory communiqué to Mr. Schwartz regarding same.	0.1
11/15/2013	(RS) Receive and review FBISD, TTSFC and CCISD Plaintiffs' De-Designation of Curtis Culwell as Expert Witness.	0.1
11/20/2013	(RS) Review FBISD Plaintiffs' First Amended Fact Witness List substituting Klussman for Sconzo, and communiqué outlining dates for Sconzo's deposition.	0.1
11/22/2013	(RS) Receive and review communiqué from defense counsel's secretary advising of updated master data set prepared by Dr. Lisa Dawn-Fisher. (NO CHARGE)	0.1
11/25/13	(RS) Confer with and direct staff concerning data sheets provided by Ms. Templeton; review communiqué exchange between staff and Ms. Templeton confirming production of all Excel files reviewed	0.1
11/25/2013	(RS) Receive and review exchanges between staff and defense counsel objecting to Templeton data sets; confer with and direct staff concerning upload of documents for review by defense counsel and response to counsel regarding same; prepare communiques to defense counsel regarding same; receive and review reply from defense counsel regarding same; prepare response to defense counsel regarding same.	1.2
11/25/2013	(RS) Review updated report for Dr. Anthony Rolle to incorporate errors identified by defense counsel during Toni Templeton's deposition; review data sheets reviewed by Ms. Templeton in	0.1



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	preparation of expert report. (NO CHARGE)	
11/25/2013	(RS) Review staff communiques to TCSA administrators and Dr. Anthony Rolle regarding upload of updated dataset received from defendants' experts. (NO CHARGE)	0.1
11/26/2013	(RS) Receive and review communiques from Edgewood Plaintiffs' counsel's staff with attached data in support of Dr. Roberto Zamora's expert report; receive and review staff communiques requesting guidance on production of updated expert report received from Toni Templeton; prepare communiques to Leonard Schwartz for input concerning same, Ms. Templeton identified report as correcting errors identified by defense counsel during her deposition.	0.5
11/4/2013	(CP) Telephone conferences with Bob Schulman and Leonard Schwartz regarding discovery deadline and whether additional interrogatories or requests will be submitted to defendants or other parties. (NO CHARGE)	0.1
11/5/2013	(LS) Review CCISD Plaintiffs' Third Set of Interrogatories to Defendants.	0.2
11/12/2013	(RS) Review Defendants' Amended Responses to All Parties' Requests for Disclosures.	0.2
11/14/2013	(RS) Confer with and direct Leonard Schwartz regarding authority for State's request for spreadsheet prepared by Toni Templeton supporting expert report.	0.1
11/22/2013	(LS) Receive communique from defense counsel with revised data from TEA for FY 2012; review same.	0.3
11/22/2013	(LS) Respond to communique from Eric Vinson regarding Toni Templeton's data sets.	0.2
11/22/2013	(RS) Receive and review Response by ISD Plaintiffs to Emergency Motion for Relief.	0.1
11/25/2013	(CP) Multiple communique exchanges with Bob Schulman regarding sharing of Excel files to be included as an exhibit to Templeton deposition (NO CHARGE); multiple attempts to upload same onto Attorney General secure server site (NO CHARGE); prepare communique to defense counsel forwarding Excel files and explanation for delay in sharing same (unable to upload on FTP site); telephone call to defense counsel to confirm his receipt, left detailed message (NO CHARGE).	0.3
11/25/2013	(CP) Prepare Rule 11 agreement for approval by counsel authorizing admission of data set from Toni Templeton as a deposition exhibit; communique exchange with Ms. Templeton regarding same; forward draft letter to Leonard Schwartz for review.	0.2
11/25/2013	(CP) Conduct communique exchange with Leonard Schwartz regarding admission of data tabulation Excel file not labeled as an exhibit, but referenced during Templeton deposition	0.1
	telephone conference with TSG Reporting representative concerning same and deadline for return of Templeton signature page and errata sheet for deposition; prepare communique to Toni Templeton regarding deadline for return of	



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	same. (NO CHARGE)	
11/25/2013	(RS) Receive and review staff prepared Rule 11 agreement to counsel for inclusion of Toni Templeton's Excel files as exhibit to expert report.	0.1
11/10/2013	(RS) Receive and review Edgewood Plaintiffs' Second Request for Admission, Interrogatories and Requests for Production to Defendants; prepare directive to Leonard Schwartz regarding same along with Defendants' disclosures in response to Charter School Plaintiffs' discovery request.	0.3
11/4/13	(LS) Receive communique from Lindsey Gordon regarding the [REDACTED]	0.8
11/11/2013	(LS) Conduct legal research on what standards apply to motion for stay	0.7
11/18/2013	(MZ) Review Lynn Moak's deposition transcript for references to [REDACTED]	0.5
11/18/2013	(LS) Conduct legal research on [REDACTED]; prepare communique to Toni Templeton, Lindsey Jones and Denise Pierce forwarding analysis for review.	1.9
11/19/2013	(MZ) Review Lynn Moak deposition for references to [REDACTED]	0.5
11/20/2013	(MZ) Continue to review Lynn Moak deposition for [REDACTED]	0.5
11/21/2013	(LS) Telephone conference with Law Clerk and Paralegal to provide direction for research on [REDACTED]	0.3
11/21/2013	(MZ) Conference call with Leonard Schwartz and Law Clerk regarding [REDACTED]	0.2
11/23/2013	[REDACTED] (NO CHARGE)	
11/23/2013	(CP) Receive and review directive from Leonard Schwartz for information concerning charter school funding by donors referenced in deposition of David Dunn, et al. conduct review and search of deposition transcripts to locate same; prepare communique to Mr. Schwartz, provide requested data.	0.4
11/1/2013	(RS) Receive and review correspondence from defense counsel to Judge Dietz regarding entry of incorrect Scheduling Order, and attached proposed Amended Scheduling Order for Judge's review and execution.	0.2
11/5/2013	(LS) Receive and review Edgewood Plaintiffs' Notice of Appearance of Celina Moreno. (NO CHARGE)	0.1
11/7/2013	(RS) Receive and review Amended Scheduling Order entered by Judge Dietz; direct staff regarding same.	0.1
11/7/2013	(LS) Receive amended scheduling order from Stacey Rosen; review new scheduling order.	0.1



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11/13/2013	(RS) Receive and review communiqué from Denise Pierce [REDACTED], requesting scheduling of phone conference; direct staff regarding same; conduct communiqué exchange with Ms. Pierce and Leonard Schwartz regarding [REDACTED] [REDACTED] participate in strategy phone conference regarding same.	0.4
11/13/2013	(RS) Receive and review Denise Pierce's case structure outline proposal; receive and review corrected report of Dr. Albert Cortez; receive and review request from defense counsel for Toni Templeton's calculations spreadsheet; conduct telephone conference with Leonard Schwartz regarding same and production of same as a supplement to expert report.	0.3
11/13/2013	(LS) Receive and review communicate from Denise Pierce regarding [REDACTED] [REDACTED]	0.2
11/14/2013	(LS) Receive new pleadings from several parties. (NO CHARGE)	0.1
11/15/2013	(RS) Conduct communiqué exchange with Joe Hoffer regarding budget proposal and consideration of client-requested attendance by Leonard Schwartz at TCSA offices to prepare for depositions. (NO CHARGE)	0.2
11/18/2013	(CP) Multiple communicate exchanges with Leonard Schwartz and Receptionist/File Clerk regarding dates for depositions, confirming same, and securing copy of Toni Templeton deposition; confer with Receptionist/File Clerk regarding her exchanges with Legal Assistants for defense counsel, dates and times for depositions on November 20, as four have been scheduled for one day; telephone conferences with production department representative for court reporting firm regarding cost to obtain copy of Templeton deposition on a rush basis, and negotiation of charge for same (non-negotiable); confirm order, same will be e-mailed by 8 AM tomorrow; notify Mr. Schwartz order for rush deposition has been placed (NO CHARGE).	0.3
11/21/2013	(RS) Receive communiqué from staff with summaries of trial transcripts located in file materials.	0.1
11/21/2013	(RS) Receive and review staff communiqué to counsel forwarding notice and accompanying Fifth Amended Petition filed by Charter School Plaintiffs. (NO CHARGE)	0.1
11/25/2013	(RS) Review communiqué from Court Reporter with final trial transcripts for January 14 and 17, direct staff for upload of same. (NO CHARGE)	0.1
11/14/13	(LS) Attend court hearing on state's motion to strike witness.	1.7
11/5/2013	(LS) Review Ford Bend Plaintiffs' Response to Defendants' Motion to Strike Spring Branch Superintendent as a witness.	0.2
11/5/2013	(LS) Receive and review (forwarded copies to Bob Schulman, Denise Pierce and Lindsey Gordon) Notice under Rule 52.10(a) of the Texas Rules of Appellate Procedure that the Efficiency Interveners filed an Emergency Motion for Temporary Relief with	0.5



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11/5/2013	the Third Court of Appeals at Austin and the motion. (RS) Receive and review Emergency Motion for Temporary Relief (Motion to Stay) filed by Interveners; prepare advisory to Leonard Schwartz and TCSA administrators regarding Motion to Stay; receive and review Interveners' Petition for Writ of Mandamus and record filed with the Court of Appeals; forward same to Mr. Schwartz and TCSA administrators with commentary regarding argument presented by Interveners within same and participation by Charter School Plaintiffs.	0.3
11/6/2013	(LS) Review letter to Third Court of Appeals from Mark Trachtenberg regarding Interveners' Mandamus action. (NO CHARGE)	0.1
11/6/2013	(LS) Receive communique from Court asking whether TCSA would be filing motion to compel; review communique from Bob Schulman to Court stating that TCSA would not be filing motion to compel.	0.2
11/6/2013	(RS) Receive and review notice to the Court of Appeals by ISD Plaintiffs concerning Response to Interveners' Emergency Motion; receive and review Court Operations Office's notice regarding hearing on Motion to Strike Spring Branch Superintendent and status of Motions to Compel; receive and review communiqué exchanges between all counsel confirming no Motions to Compel will be filed; prepare Charter School Plaintiffs response to same.	0.3
11/7/2013	(RS) Receive and review notice from Court Operations Officer canceling settings on Motions to Compel and Motion to Strike. (NO CHARGE)	0.1
11/8/2013	(RS) Receive and review communiqué from Denise Pierce regarding phone conference and Interveners' mandamus proceeding filings; direct staff regarding same; prepare communiqué to Ms. Pierce regarding briefing file and mandamus reaction/response; confer with staff and locate summary of relevant testimony to date.	0.3
11/10/2013	(RS) Conduct extended teleconference with David Hinojosa, Edgewood Plaintiffs' attorney, proposing continuation of stipulated facts Rule 11 agreement and response to Interveners' Plea to the Jurisdiction.	0.5
11/11/2013	(RS) Review and analyze Interveners' Mandamus filing; engage in multiple communiqué exchanges, and telephone conferences with Leonard Schwartz considering preparation and filing of a severance motion; receive, review, and revise multiple drafts of same; receive and review communiqué from Denise Pierce regarding same; conduct telephone conference with Ms. Pierce and Mr. Schwartz concerning same; conduct telephone conference with Mr. Schwartz regarding same and other potential responses to Interveners' Mandamus; conduct follow-up telephone conference with Mr. Schwartz regarding same; conduct follow-up telephone conference with Mr. Schwartz regarding same; receive and review Mr. Schwartz's proposed response, prepare revisions and additions to same.	1.6



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11/11/2013	(LS) Conference with Denise Pierce, Lindsey Gordon regarding [REDACTED] meeting with Ms. Gordon, Ms. Pierce and David Dunn to review [REDACTED]; telephone conference with Bob Schulman (per Mr. Dunn's directive) to [REDACTED]	1.9
11/11/2013	(LS) Begin drafting Motion to Stay; prepare communique to Denise Pierce, Lindsey Gordon and Bob Schulman forwarding same for review.	3.5
11/11/2013	(RS) Receive and review ISD Plaintiffs' Joint Response to Interveners' Emergency Motion for Temporary Relief, forward same to Leonard Schwartz, Denise Pierce and Lindsey Gordon; [REDACTED]; confer with Mr. Schwartz regarding same.	1.1
11/12/2013	(RS) Review notice from Court Operations Officer rescheduling time for November 14 hearing on defense Motion to Strike Spring Branch ISD Superintendent; confer with Joe Hoffer and Leonard Schwartz regarding [REDACTED]	0.2
11/12/2013	(RS) Receive and review, from Denise Pierce, ([REDACTED]) conduct communiqué exchange with Ms. Pierce concerning same; receive and review inquiry from Ms. Pierce on status of the state's response to Interveners' Petition for Writ of Mandamus; prepare response to Ms. Pierce; receive and review [REDACTED]; receive and review Ms. Pierce's communiqué [REDACTED]	0.3
11/12/2013	(RS) Review [REDACTED]; telephone conference with Leonard Schwartz regarding same [REDACTED]	0.1
11/13/2013	(LS) Multiple meetings with Denise Pierce regarding [REDACTED]; telephone conference with Ms. Pierce, Lindsey Gordon and Bob Schulman to discuss [REDACTED]	3.2
11/14/2013	(CP) Prepare edits to Amended Petition, as directed by Leonard Schwartz; prepare communique to all counsel forwarding same with request for agreement to allow filing of same; receive and review responses from counsel approving of filing of unopposed Motion for Leave to file amended pleading.	0.2



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11/14/2013	(LS) Telephone conference with Paralegal regarding correction in paragraph 40 of Petition, dictate correction, provide directive on how to proceed with obtaining consent, filing of uncontested motion to amend and order allowing amendment. (NO CHARGE)	0.1
11/14/2013	(RS) Review Appellate Court's notice and Memorandum Opinion denying Interveners' Petition for Writ of Mandamus; forward same to Denise Pierce, David Dunn, Lindsey Gordon, and Leonard Schwartz; telephone conference with Interveners' counsel concerning same; review communiqué from Mr. Schwartz regarding same and further appellate efforts of Interveners; prepare advisory response to same.	0.3
11/14/2013	(RS) Review and approve staff-prepared communiqué to all counsel regarding leave to file Fifth Amended Petition by Charter School Plaintiffs; review responses from all counsel agreeing to same (excepting defense counsel's objections); confer with staff attorneys regarding same.	0.3
11/15/2013	(CP) Confer with Rick Lopez regarding TRCP and amendment of pleadings with leave of Court (NO CHARGE); prepare Unopposed Motion for Leave to File and proposed Order; prepare revisions to same, recommended by Mr. Lopez; prepare communiqué to Leonard Schwartz forwarding same for approval (NO CHARGE); receive and review reply from Mr. Schwartz concerning same (NO CHARGE)	0.7
11/15/2013	(CP) Prepare final revisions and conversion of Motion for Leave to File, Exhibit and Order; e-file same; prepare communicate to all counsel and Court Clerk forwarding a copy. (NO CHARGE)	0.2
11/15/2013	(RS) Telephone conference with Interveners' counsel and telephone conference with Denise Pierce regarding Interveners' mandamus proceeding and request for stay.	0.4
11/15/2013	(RS) Receive and review staff communiqué to all counsel and the court forwarding e-filed Unopposed Motion for Leave by Charter Plaintiffs to File Fifth Amended Petition and proposed Order. (NO CHARGE)	0.1
11/19/2013	(CP) Telephone conference with Court Clerk regarding status of Judge's entry of Order on Unopposed Motion for Leave to File Fifth Amended Petition.	0.1
11/20/2013	(AK) Telephone conference with Leonard Schwartz, receive directive to prepare Motion in Limine preventing State from mentioning charitable contributions to charter schools at trial. (NO CHARGE)	0.2
11/20/2013	(RS) Review communiqué from Interveners' counsel regarding and attaching Emergency Motion for Temporary Relief with Supreme Court of Texas; forward same to Leonard Schwartz and Joe Hoffer with summary analysis; review response from Mr. Schwartz regarding same and filing of a special appearance; review Petition for Writ of Mandamus filed by Interveners to the Supreme Court; prepare comments and follow-up advisory communiqués to Mr. Schwartz and Mr. Hoffer regarding same; review communiqué from	0.8



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11/20/2013	Interveners' counsel with amended mandamus filings. (LS) Receive interveners' Emergency Motion for Temporary Relief, Petition for Writ of Mandamus, and Sworn Exhibits in Support of Petition for Writ of Mandamus with the Supreme Court of Texas; review same; prepare communique to Denise Pierce, Lindsey Jones and Bob Schulman regarding petition and how we should react to it.	1.6
11/20/2013	(LS) Confer with Denise Pierce and Lindsey Gordon on [REDACTED]	0.5
11/20/2013	(RS) Review Order Granting Charter School Plaintiffs' Unopposed Motion to File Fifth Amended Original Petition entered by Judge Dietz.	0.1
11/21/2013	(AK) Begin outlining arguments [REDACTED].	0.5
11/21/2013	(RS) Receive and review ISD Plaintiffs' letter to the Supreme Court Clerk regarding joint preparation of response to emergency motion filed by Interveners; conduct telephone conference with Leonard Schwartz regarding same; receive and review communiqué from Denise Pierce regarding discussion with and recommendations by Jim Ho; prepare advisory communiqué to Ms. Pierce concerning same.	0.3
11/21/2013	(LS) Receive copy of letter filed by ISDs with Supreme Court regarding the Interveners' Petition for a Mandamus; review same; prepare communique to Denise Pierce, Lindsey Jones and Bob Schulman regarding filing with Court [REDACTED]	0.2
11/21/2013	(LS) Conference with Denise Pierce and Lindsey Gordon on [REDACTED]	0.5
11/22/2013	(AK) Telephone conference with Lindsey Gordon regarding [REDACTED]	2.2
11/22/2013	forward completed draft to Leonard Schwartz for review. (LS) Receive State's Petition for Writ of Mandamus and Partial Joinder of the Intervener's Petition for Writ of Mandamus; review same; prepare communique to Bob Schulman, Denise Pierce and Lindsey Gordon regarding State's Petition for Writ of Mandamus and Partial Joinder of the Intervener's Petition for Writ of Mandamus.	1.8
11/22/2013	(LS) Receive communique from Mark Trachenberg with attached Response to the Emergency Motion for Temporary Relief jointly filed by ISD Plaintiffs in the mandamus proceeding; review Response.	1.3
11/22/2013	(LS) Multiple communique exchanges with Denise Pierce and Lindsey Gordon regarding State's Petition for Writ of Mandamus and Partial Joinder of the Intervenor's Petition for Writ of Mandamus.	0.8



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11/22/2013	(RS) Receive and review State's Petition for Writ of Mandamus and Partial Joinder of Interveners' Amended Petition; conduct communiqué exchange regarding designation of Charter School Plaintiffs as a (Party of Interest) within same, and argument presented in State Defendants' mandamus proceeding concerning mootness of Charter School Plaintiffs' claims.	0.1
11/23/2013	(RS) Receive and review multiple communiqués between FBISD Plaintiffs' counsel and defense counsel on scheduling Guy Scornio deposition; receive and review communiqués from Denise Pierce regarding filing of response by Charter School Plaintiffs to Petition for Writ of Mandamus by State Defendants; conduct multiple communiqué exchanges with Leonard Schwartz and Joe Hoffer regarding brief in response; continue review and analysis of Petition filed by State Defendants; draft rough outline for response brief; conduct communiqué exchanges with Ms. Pierce concerning filing of response; prepare additions and revisions to outline for brief and forward to Mr. Schwartz for review and additions to same.	0.8
11/23/2013	(LS) Review transcripts of trial testimony and depositions to locate [REDACTED]; receive communicate from Denise Pierce directing to respond in Supreme Court to State's Petition for Writ of Mandamus and Partial Joinder of the Intervenor's Petition for Writ of Mandamus.	1.1
11/24/2013	(RS) Receive and review communiqué from Denise Pierce outlining observations and recommendations concerning filing of reply [REDACTED] (NO CHARGE)	0.1
11/25/2013	(AK) Incorporate Leonard Schwartz's suggested revisions to [REDACTED], forward to Bob Schulman for final review.	0.5
11/25/2013	(RS) Multiple telephone conference and communicate exchanges with Denise Pierce and Leonard Schwartz regarding preparation of response to State's Mandamus and Plea to the Jurisdiction, and Motion to Dismiss Charter School Plaintiffs' claims as moot; review state's Motion and relevant authorities; review counter authorities and statutes and prepare summary of Charter School Plaintiffs' opposition in letter form.	1.1
11/25/2013	(LS) Extended telephone conference with Bob Schulman, David Dunn and Denise Pierce regarding response to Mandamus action. (NO CHARGE)	0.5
11/25/2013	(RS) Receive and review redrafted Mandamus Petition to Supreme Court of Texas, prepared by defense counsel adding an appendix for compliance with TRAP 52.3(k); receive and review notification from Deputy Clerk, Supreme Court of Texas, of filing of Second Petition for Writ of Mandamus (by state defendants).	0.2
11/25/2013	(RS) Conduct extended teleconference with TCSA administrators and Leonard Schwartz regarding response to Mandamus; prepare	0.8



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	draft response; review communiqués exchanged between TCSA administrators and Jim Ho regarding response.	
11/25/2013	(RS) Review [REDACTED] prepared by Allen Keller. (NO CHARGE)	0.1
11/26/2013	(CP) Prepare revisions to letter from Bob Schulman to Court Clerk, Supreme Court of Texas on Charter School Plaintiffs' position in Mandamus proceeding; telephone conferences and communicate exchanges with Mr. Schulman regarding same (NO CHARGE); telephone conference with Deputy Clerk; e-file final version of letter; prepare communicate to all counsel forwarding a copy of letter e-filed.	0.2
11/26/2013	(RS) Prepare advisory to TCSA administrators, Leonard Schwartz and Jim Ho regarding state's attack of Charter School Plaintiffs' claims, joinder with ISDs in Response to Mandamus, prepare and provide draft letter/notice to the Supreme Court opposing same; receive and review response from Mr. Schwartz with recommended additions to letter/notice to the Court; engage in communiqué exchange with Mr. Ho regarding his recommendations for additions to the letter; receive and review letter revisions from Denise Pierce; direct staff for preparation in final, filing and distribution of same; receive and review notification of Supreme Court's rejection of Mandamus.	0.4
11/26/2013	(RS) Receive and review joint advisory to Court by ISD Plaintiffs regarding reservation of rights to file Response to the State's Mandamus Petition; prepare extensive file notes regarding response to Mandamus Petitions, summarize case law, key arguments and claims asserted by Charter School Plaintiffs in the state court proceeding.	0.5
11/27/2013	(RS) Engage in communiqué exchanges with Leonard Schwartz, Denise Pierce, Jim Ho and staff regarding Supreme Court ruling on Petitions for Writ of Mandamus; direct staff to contact the court to determine status; receive and review communiqué from staff advising per discussions with Deputy Clerk, both Petitions and Emergency Motion for Temporary Relief (Motion to Stay) and docket update on December 2 to clarify entry; receive and review communiqué from Supreme Court Clerk advising of denial of Petitions for Writ of Mandamus and Motion for Stay.	0.5
11/27/2013	(CP) Telephone conference with Deputy Clerk, Court of Appeals, clarifying docket entry notation of dismissal of mandamus proceeding; prepare communicate to Bob Schulman and Leonard Schwartz regarding same.	0.1
11/28/2013	(RS) Receive and review communiqué from staff confirming Supreme Court denial of Mandamus proceedings filed; engage in communiqué exchanges with Leonard Schwartz concerning same; direct staff regarding same.	0.2
12/3/2013	(RS) Prepare outline of proofs (Findings and Conclusions) to guide Charter Plaintiffs' in reopening of evidence; prepare advisory communiqué to Legal Team attaching same.	0.5



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12/30/2013	(RS) Receive and review communique from Dr. Anthony Rolle in response to request concernin [REDACTED]; prepare advisory response to Ms. Pierce (with copy to Leonard Schwartz, Toni Templeton, Lindsey Gordon and Dr. Rolle) concerning content of Dr. Lisa Dawn-Fisher's dissertation.	0.4
12/3/2013	(CP) Telephone conference with Deputy Clerk regarding denial of Petitions for Writ of Mandamus; prepare communique to Bob Schulman and Leonard Schwartz concerning same.	0.1
12/9/2013	(RS) Receive and review Defendants' Motion to Strike Charter School Plaintiffs' Fifth Amended Petition; forward same to Leonard Schwartz, Denise Pierce and Lindsey Gordon with communiqué regarding strategy for response to same; receive and review communiqué exchange between David Dunn, and Ms. Pierce concerning Motion (NO CHARGE); prepare reply to Mr. Dunn's inquiry regarding Courts consideration of Defendants' Motion.	0.4
12/18/2013	(RS) Engage in communique exchange with staff and TCSA administrators regarding preparation of response to Defendants' Motion to Strike; confer with Allen Keller concerning same; prepare detailed directive to Mr. Keller regarding information to review and research to conduct in drafting response to Motion.	0.4
12/19/2013	(LS) Receive and review summary of trial transcripts regarding adequacy and suitability from Lindsey Gordon; review communique from Denise Pierce regarding tasks for filing response to motion by state to limit TCSA's case.	0.4
12/19/2013	(LS) Receive and review filings by state defendants of trial exhibits.	0.8
12/19/2013	(RS) Receive and review communique from Denise Pierce [REDACTED]; prepare reply to Ms. Pierce concerning [REDACTED]; receive and review communique from Leonard Schwartz regarding [REDACTED]; prepare advisor response to Mr. Schwartz regarding same; receive and review Lindsey Gordon's summary of review of trial transcripts regarding adequacy and suitability; forward same to Allen Keller for review in preparation of Response to Motion to Strike	0.3
12/23/2013	(RS) Receive and review Defendants' Motion to Strike Edgewood Plaintiffs' expert, Dr. Roberto Zamora, and supporting exhibits.	0.3
12/24/2013	(RS) Receive and review State's Motion to Strike Charter Plaintiff's Experts and Reports; prepare advisory report and forward same to Leonard Schwartz regarding anticipated Motion to Strike Charter experts.	0.5
12/26/2013	(RS) Conduct two attorney conferences and work sessions with Allen Keller and direct Mr. Keller in preparation of Response to Defendants' Motion to Strike Charter School Plaintiffs' Fifth	1.5



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	Amended Petition.	
12/27/2013	(AK) Draft response to Defendants' Motion to Strike, including general overview of Plaintiffs' Fifth Amended Petition and the Motion to Strike; prepare argument that [REDACTED]; summarize Defendants' objections to Plaintiffs' pleadings raised at trial and court's prior ruling that Defendants were provided proper notice of Plaintiffs' adequacy, efficiency, and suitability claims; discuss [REDACTED].	6
12/27/2013	(AK) Attorney conference with Bob Schulman regarding Defendants' Motion to Strike.	0.2
12/27/2013	(RS) Conduct attorney conference with Allen Keller regarding responses to Defendants' Motion to Strike and provide further direction. (NO CHARGE)	0.2
12/30/2013	(AK) Complete initial draft of response to Motion to Strike; provide to Bob Schulman for review; incorporate Mr. Schulman's suggested revisions to same.	1.8
12/30/13	(RS) Review State's Motion to Strike Charter Plaintiffs' Experts and Reports; prepare revisions to Response to Defendants' Motion to Strike; engage in communicate exchange with Allen Keller regarding research results, addition and revisions to same; receive and from Mr. Keller; receive and review review draft Response communicate from Denise Pierce requesting status of Response and drafting Findings of Fact and Conclusions of Law; prepare advisory communicate to Ms. Pierce attaching current version of Response for review.	2.7
12/3/13	(RS) Receive and review communiqué from staff regarding Deputy Clerk, of Texas Supreme Court's confirmation that Order Denying Mandamus applies to Mandamus actions filed by Interveners and state Defendants and due dates for Motions for Rehearing to contest Order.	0.1
12/14/13	(RS) Receive and review communiqué exchange between Denise Pierce and Leonard Schwartz regarding Court's withdrawal of hearing date. (NO CHARGE)	0.1
12/16/2013	(RS) Receive and review Court directive for submitting proposed judgment and Findings of Fact and Conclusions of Law, and joint submission of revisions to Findings and Conclusions from first phase of trial; direct staff regarding same and forward to litigation team; receive and review Defendants' Motion to Strike Charter School Plaintiffs' Fifth Amended Petition; prepare notes and comments to same; forward to litigation team; direct staff regarding same.	0.7
12/23/2013	(CP) Telephone conference with Bob Schulman regarding Judge's confidential Findings/Conclusions and Judgment; prepare communicate to Mr. Schulman forwarding same; prepare communicate to Lindsey Gordon forwarding Defendants' prior	0.2



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	objection to Charter School Plaintiffs' pleading; prepare communiqué to Ms. Gordon forwarding Findings of Fact and Conclusions of Law filed by Charter School Plaintiffs. (NO CHARGE)	
12/25/2013	(RS) Engage in communiqué exchange with staff regarding request for copy of Judge's confidential Findings of Fact and Conclusions of Law for use in preparation of Charter School Plaintiffs' current version of same.	0.1
12/26/2013	(RS) Review Judge's confidential Findings of Fact and Conclusions of Law; direct staff to provide a Word version of the Judgment; receive and begin review of both documents in preparation of draft Findings of Fact and Conclusions of Law due on January 21; being preparation of same.	1
12/27/2013	(RS) Continue preparation of proposed Findings of Fact and Conclusions of Law for submission to the court.	1
12/29/2013	(RS) Continue preparation of proposed Findings of Fact and Conclusions of Law for submission to the court.	1.2
12/30/2013	(RS) Continue preparation of revised Findings of Fact and Conclusions of Law.	0.7
12/30/13	(RS) Review Judge Dietz's proposed Findings, Conclusions and Judgment; prepare advisory communiqué to Leonard Schwartz regarding Judge Dietz's confidential finding on funding received by charters versus funding to school districts and engage in communiqué exchange with Dr. Anthony Rolle regarding same.	1.2
12/31/13	(RS) Receive and review edits to second trial phase proposed Findings of Fact and Conclusions of Law from Lindsey Gordon; continue preparation of revision and additions.	1.2
12/3/2013	(CP) Conduct communiqué exchange with representative for TSG Reporting regarding delivery of original of Toni Templeton deposition; telephone conference with SLH Austin office management concerning same; prepare communiqué to Leonard Schwartz and Ramon Medina regarding delivery of same; prepare reminder to Ms. Templeton of deadline for return of original signature and errata pages from her deposition. (NO CHARGE)	0.3
12/4/2013	(RS) Receive and review Denise Pierce's status, task and scheduling memorandum; prepare response to Ms. Pierce with advisory communiqué concerning same, status of proposed budget and review of trial outline; receive and review reply from Ms. Pierce regarding same (NO CHARGE); conduct extended teleconference with Interveners' counsel regarding similarities and distinctions between Intervener's Mandamus Motion and anticipated trial proofs as to qualitative efficiency; engage in communiqué exchanges with staff regarding preparation of trial budget and preparation of advisory correspondence to Ms. Pierce concerning same; prepare correspondence to TCSA regarding same; forward same and proposed budget to Joe Hoffer for review; conduct telephone conference with Law Clerk directing research on [REDACTED].	1.4



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12/5/2013	(RS) Conduct telephone conference with expert, Dr. Anthony Rolle; direct staff to provide Dr. Rolle with outline of Charter School Plaintiffs' intended proofs; receive and review communiqué exchanges between counsel concerning the state's request for Rule 11 agreement to protect confidentiality of computer programs, backup files, and SAS or other computer programs utilized in preparation and analysis of expert witness data; forward string of communiqués to Toni Templeton, Dr. Rolle and Leonard Schwartz regarding [REDACTED]; receive and review Mr. Schwartz's advisory to all counsel for inclusion of Charter School Plaintiffs in Rule 11 agreement.	0.4
12/6/2013	(RS) Prepare advisory communiqué to Toni Templeton, Leonard Schwartz and Dr. Anthony Rolle reviewing Dr. Lisa Dawn-Fisher's backup data and conclusions addressing charter s.	0.3
12/8/2013	(RS) Receive and review communiqué from Dr. Anthony Rolle with list of seminal works in school finance; prepare directive to Leonard Schwartz regarding review of authorities and seminal works in school finance provided by Dr. Anthony Rolle controverting Defendant's approach to data calculations.	0.2
12/10/2013	(RS) Attend and participate in telephone conference with TCSA Litigation team.	1.5
12/19/2013	(RS) Engage in communicate exchange with Leonard Schwartz and staff regarding preparation of Rule 11 agreement for distribution of PowerPoint slides by testifying witnesses/experts 24 hours prior to testimony; review and engage in communicate exchanges between Denise Pierce and firm's staff regarding court reporter fees and cost-sharing with Interveners; prepare request to Interveners' counsel concerning same.	0.3
12/20/2013	(LS) Prepare communicate to Paralegal regarding return of executed depositions to court reporter.	0.1
12/20/2013	(RS) Receive and review communicate exchanges between counsel regarding Rule 11 agreement for exclusion of demonstrative exhibits from Court's January 6 scheduling order deadline; engage in communicate exchanges with Denise Pierce and Leonard Schwartz regarding items to be reviewed/discussed at December 23 litigation work session; receive and review final version of Rule 11 agreement filed with the Court; prepare internal memo to Mr. Schwartz with outline of witnesses to prepare and issues to address for each at December 23 work session; conduct extended teleconference with Mr. Schwartz regarding same.	0.7
12/23/2013	(RS) Travel to Austin to attend litigation preparation session at TCSA.	1.5
12/23/13	(RS) Attend litigation preparation session at TCSA; engage in communiqué exchange with Dr. Anthony Rolle regarding review of rough outline of charter school witnesses and amendment of Dr. Rolle's report; receive and review draft outline of direct testimony by Toni Templeton and David Dunn prepared by Ms. Templeton; receive, review and begin revision of Charter School Plaintiffs'	1.5



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	proposed Findings of Fact and Conclusions of Law.	
12/23/2013	(RS) Return travel from Austin. (NO CHARGE)	1.5
12/26/13	(RS) Receive and review final version of Rule 11 agreement regarding demonstrative exhibit deadline; confer with staff concerning Notice prepared and filing of same, relating to agreement to comply with protective order and FERPA protected confidentiality; direct filing of Notice.	0.2
12/27/13	(RS) Conduct lengthy teleconference with Dr. Anthony Rolle regarding his deposition and the reanalysis of expert report.	0.4
12/27/2013	(RS) Prepare request to Dr. Anthony Rolle for commentary on [REDACTED]; receive and review reply from Dr. Rolle [REDACTED].	0.2
12/28/2013	(RS) Receive and review Jim Ho's communiqué to Denise Pierce regarding his non-availability on January 2 for litigation work session (NO CHARGE); receive and review Ms. Pierce's communiqué requesting status of contact with Dr. Anthony Rolle; prepare advisory response to Ms. Pierce recapping discussion with Dr. Rolle.	0.3
12/29/2013	(RS) Engage in communiqué exchange with Leonard Schwartz regarding [REDACTED].	0.2
12/2/2013	(AB) Review deposition of Lynn Meak as requested by Leonard Schwartz; review [REDACTED].	2.1
12/3/2013	(AB) Continue to locate and review [REDACTED].	2.9
12/6/2013	(MZ) Research case law and expert witness reports regarding [REDACTED].	2.8
12/9/2013	(MZ) Prepare letter summarizing research concerning [REDACTED].	0.6
12/10/2013	(MZ) Finalize letter summarizing research concerning [REDACTED].	0.5
12/19/2013	(AK) Extended conference with Bob Schulman; receive directive to research [REDACTED].	0.5
12/23/2013	(AK) Continue researching case law discussing [REDACTED].	2
12/26/2013	(AK) Conference with Bob Schulman regarding [REDACTED] (NO CHARGE); receive directive to [REDACTED].	4.3



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	prepare response to Motion to Strike; review summary of trial testimony and Defendants' objections prepared by Lindsey Jones and Denise Pierce, noting those portions related to claims asserted in the Motion to Strike; begin outlining draft response.	
12/3/2013	(RS) Receive and review Defendants' Responses to Edgewood Plaintiffs' Amended Second Requests for Admissions, Interrogatories and Requests for Production; direct staff regarding same.	0.2
12/9/2013	(RS) Receive and review state defendants' Rule 11 agreement regarding computer program backup file disclosures, limiting use of same to current litigation and destruction following trial; receive and review communiqué exchanges between counsel regarding additions to same to expand terms of agreement between the parties; receive and review communiqué from Leonard Schwartz concerning proposed Rule 11 agreement and other pre-trial matters.	0.3
12/10/2013	(RS) Confer with Leonard Schwartz and staff regarding status of Rule 11 agreement; receive and review string of communiqué exchanges between counsel concerning edits requested by TTSFC counsel, as agreed upon by ISD Plaintiffs, and defense counsel's request for preparation of Protective Order for submission to Court; forward advisory and communiqué exchanges regarding Rule 11 agreement and preparation of proposed Protective Order to Leonard Schwartz, Denise Pierce and Lindsey Gordon for review; receive and review proposed Protective Order; direct staff regarding same; direct staff in research of [REDACTED]; receive and review staff research results; confer with and direct staff regarding preparation of research memorandum regarding same; receive and review same.	0.9
12/12/2013	(RS) Receive and review Defendants' Response to CCISD Plaintiffs' Third Set of Interrogatories and spreadsheet responsive to same. (NO CHARGE)	0.2
12/16/2013	(RS) Receive and review notice from Court's Staff Attorney regarding due date for submission of PowerPoint exhibits.	0.1
12/18/2013	(RS) Review communicate from Assistant Attorney General and attached revised data set for Dr. Lisa Dawn-Fisher; forward same to Leonard Schwartz for review; review Mr. Schwartz's communicate to TCSA administrators and experts forwarding Dawn-Fisher data sets receive and review Mr. Schwartz's communicate to Toni Templeton unequal variance in tables; review request from Denise Pierce for data on submission of Ms. Templeton's data sets; prepare directive to Mr. Schwartz regarding same; direct staff in preparation of chronology regarding same; prepare follow-up request to Mr. Schwartz for status report on his reply to Ms. Pierce's inquiry; conduct telephone conference with Mr. Schwartz concerning disclosure of Templeton data; engage in communicate exchanges with Joe Hoffer concerning discussion with Mr. Schwartz regarding	1.7



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	preparation of revised data sets and report for experts to correct conflicting information in current data sets, and offering of Ms. Templeton for a second deposition. (NO CHARGE)	
12/19/2013	(RS) Engage in communicate exchange with Joe Hoffer regarding response to Denise Pierce's request for report on production of Toni Templeton's data sets, and discussion with Leonard Schwartz concerning same. (NO CHARGE)	0.1
12/20/2013	(LS) Multiple communicate exchanges with counsel for the parties in an attempt to obtain Rule 11 agreement on submission of PowerPoints; prepare communicate to Toni Templeton, Denise Pierce, David Dunn, Dr. Anthony Rolle, Paralegal and Bob Schulman advising them of having obtained agreement for submission of PowerPoints.	0.5
12/26/2013	(RS) Receive and review Dan Casey's revised report and redlined document concerning revisions made; prepare advisory to Leonard Schwartz and TCSA administrators regarding data provided to Charter School Plaintiffs' and demonstration of no analysis comparing the cost of education in charters to ISDs as significant Trial issues.	0.3
12/28/13	(RS) Receive and review memo from Dr. Anthony Rolle with breakdown of key information provided by Dr. Lisa Dawn-Fisher and responses/analysis in reply; prepare advisory response to Dr. Rolle regarding same and incorporation of same in draft of proposed Findings of Fact.	0.3
12/29/2013	(RS) Receive and review communiqué from Dr. Anthony Rolle regarding status of revision of his report. (NO CHARGE)	0.2
12/31/2013	(RS) Receive and review WRA report addendum from Dr. Anthony Rolle and advisory regarding additional updates to be provided before January 6; receive and review communiqué from Toni Templeton listing Rolle report issues for consideration at next litigation work session; receive and review Leonard Schwartz's response to Ms. Templeton regarding same.	0.2
12/3/2013	(RS) Receive and review multiple communiqués from FBISD Plaintiffs' counsel and attached back-up data/documentation offered at Lynn Moak deposition, with Mr. Moak's revised expert report; forward same to Leonard Schwartz and conduct communiqué exchanges with and prepared directives to staff regarding non-receipt of FERPA protected information; confer with and direct staff regarding same; receive and review communiqué from Interveners' counsel regarding attached e-mail from Edgewood Plaintiffs' counsel to Interveners' counsel identifying documents to be produced at Monica Martinez deposition; review list of documents to be offered; conduct telephone conference with Mr. Schwartz regarding [REDACTED]; receive and review Mr. Schwartz's communiqué to Ms. Templeton regarding same (NO CHARGE); receive and review communiqué from Mr. Schwartz confirming attendance at Martinez deposition.	1



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12/4/2013	(LS) Attended deposition of Monica Martinez, TEA Director.	5.5
12/5/2013	(RS) Receive and review report from Leonard Schwartz regarding Monica Martinez's deposition testimony; prepare communiqué to Interveners' counsel regarding same; receive and review communiqué exchanges between counsel regarding rescheduling of start time for December 6 deposition of Joe Wisnowski (NO CHARGE); receive and review Amended Notice of Wisnowski deposition, resetting start time for same (NO CHARGE)	0.2
12/9/2013	(RS) Receive and review string of communiqué exchanges between counsel regarding substitution of exhibit to Monica Martinez deposition; review new exhibit provided; receive and review communiqué from Interveners' counsel de-designating expert (Merrifield) and canceling his deposition; receive and review communiqué exchanges between defense counsel and Edgewood Plaintiffs' counsel regarding additional back up data for Dawn-Fisher report and deposition; prepare advisory communiqué to Leonard Schwartz concerning same.	0.4
12/18/13	(RS) Prepare advisory to Leonard Schwartz regarding anticipated line of questioning by Assistant Attorney General during Rolle deposition; receive and review communicate from Edgewood Plaintiffs' counsel recommending print off of hard copy of Dawn-Fisher slides for her deposition; follow telephone conference with Mr. Schwartz regarding same.	0.4
12/18/2013	(LS) Attend deposition of Dr. Anthony Rolle.	6.8
12/18/13	(RS) Receive and review communicate from Denise Pierce regarding attendance at Dr. Anthony Rolle deposition; receive and review communicate from Leonard Schwartz identifying Assistant Attorney General attending Rolle deposition; prepare advisory response to Mr. Schwartz regarding same. (NO CHARGE)	0.1
12/19/13	(LS) Receive letter from Margaret Wills with changes and errata to Shirley Beaulieu deposition; review changes and errata to Beaulieu deposition.	0.2
12/19/2013	(LS) Attend deposition of Dr. Lisa Dawn-Fisher.	7.3
12/20/2013	(RS) Receive and review witness Dan Casey's revised report provided by FBISD Plaintiffs' counsel.	0.3
12/27/13	(RS) Receive and review communiqué from TSG Court Reporters with link to exhibits for Dawn-Fisher deposition; perform cursory review of same.	0.3
12/30/2013	(RS) Receive and review communiqué exchanges between counsel regarding Edgewood Plaintiffs' request for extension of deadline to submit final errata and signature pages from Cavazos and Cortez depositions. (NO CHARGE)	0.1
12/31/2013	(RS) Receive and review communicate exchanges between counsel and court reporting firm regarding submission of final signature and errata pages for Wayne Pierce deposition. (NO CHARGE)	0.1
12/2/2013	(RS) Receive and review slides to be introduced at Joe Wisnoski deposition and direct examination at trial from FBISD Plaintiffs; receive and review Edgewood ISD Plaintiffs' counsel's request for	0.5



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Excel spreadsheets updating same; forward slides to Leonard Schwartz, recommending deposition inquiries of Wisnoski on

[REDACTED] receive and review exhibits for

Shirley Beaulieu deposition from defense counsel; receive and review communique from Edgewood ISD Plaintiffs' counsel regarding exhibits to be offered at Monica Martinez deposition; receive and review communiqués from counsel regarding attendance at Martinez deposition; receive and review deposition exhibits for direct examination of Julio Cavazos, from Edgewood ISD Plaintiffs' counsel.

12/3/2013 (LS) Conference via SKYPE with Dr. Anthony Rolle, Linsey Gordon, Bob Schulman, and Toni Templeton preparing Dr. Rolle for his deposition. 3.5

12/3/2013 (RS) Conference via SKYPE with Dr. Anthony Rolle, Lindsey Gordon, Toni Templeton and Leonard Schwartz preparing for Dr. Rolle's deposition. (NO CHARGE) 3.5

12/3/2013 (RS) Receive and review, proposed outline for Dr. Anthony Rolle pre-deposition preparation sessions from Toni Templeton; receive and review follow-up communiqué from Ms. Templeton regarding documents for Rolle deposition preparation; direct staff regarding same. 0.1

12/4/2013 (RS) Receive and review staff communiqué regarding process for disclosure of Excel data spreadsheets and calculations supporting expert reports as provided by Toni Templeton; prepare advisory response and directives to staff regarding same. 0.2

12/6/2013 (RS) Receive and review string of communiqué exchanges between counsel, forward same to Leonard Schwartz, regarding rescheduling of start time for Wisnoski deposition due to weather conditions. (NO CHARGE) 0.1

12/12/2013 (LS) Review [REDACTED] in preparation for deposition of Dr. Lisa Dawn-Fisher; review [REDACTED]

[REDACTED]

12/13/2013 (LS) Review of materials on school finance to assist in preparation of deposition of Dr. Lisa Dawn-Fisher; [REDACTED] 3.1

[REDACTED]

12/15/2013 (LS) Review of Dr. Lisa Dawn-Fisher's previous trial and deposition testimony; review of [REDACTED] 3.6

[REDACTED]

12/16/2013 (LS) Prepare draft questions for Dr. Lisa Dawn-Fisher's deposition; 5.1



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12/16/2013	review of Dr. Dawn-Fisher's previous deposition and trial testimony. (LS) Multiple meetings with staff of TCSA regarding depositions of Dr. Anthony Rolle and Dr. Lisa Dawn-Fisher; multiple meetings with Lindsey Gordon, Toni Templeton, Dr. Rolle, Bob Schulman and Denise Pierce preparing for Dr. Rolle's deposition; multiple meetings with Ms. Gordon, Ms. Templeton, Dr. Rolle, Mr. Schulman and Ms. Pierce preparing for Dr. Dawn-Fisher's deposition.	7.8
12/16/2013	(RS) Confer with Leonard Schwartz and TCSA staff and prepare Dr. Anthony Rolle for deposition.	4
12/16/2013	(RS) Receive and review data from Dr. Anthony Rolle on Texas school funding. (NO CHARGE)	0.4
12/17/2013	(LS) Continue preparation for Dr. Lisa Dawn-Fisher's deposition; multiple meetings with Lindsey Gordon and Toni Templeton regarding Dr. Anthony Rolle's testimony; multiple meetings with Bob Schulman and Dr. Rolle to assist in preparing Dr. Rolle for deposition; multiple meetings with Ms. Templeton regarding preparing for deposition of Lisa Dawn-Fisher; telephone call with Stacey Rosen inquiring about the meaning of the scheduling order and submission of witness PowerPoints; [REDACTED]	9
12/17/2013	(RS) Travel to Austin to attend deposition preparation session with Dr. Anthony Rolle.	1.5
12/17/2013	(RS) Participate in deposition preparation with Dr. Anthony Rolle.	5.5
12/17/2013	(RS) Return travel from Austin. (NO CHARGE)	1.5
12/17/2013	(RS) Receive and review exhibits provided by FBISD Plaintiffs' counsel to be introduced during December 18 deposition of Guy Sconzo; receive and review communiqué from Dr. Anthony Rolle and begin review of [REDACTED]; receive and review FBISD Plaintiffs' counsel's communiqué to Edgewood Plaintiffs' counsel and accompanying back-up for Wisnoski ASTAR calculations data; receive and review Leonard Schwartz's communiqué to TCSA administrators and Dr. Rolle requesting Dr. Rolle's review of same (NO CHARGE); conduct telephone conference with Mr. Schwartz regarding same.	0.7
12/18/2013	(LS) Continue preparation for deposition of Dr. Lisa Dawn-Fisher; review [REDACTED]	5.2
2/18/13	(LS) Meeting with Lindsey Gordon, Dr. Anthony Rolle and Toni Templeton regarding errors in the data sheets and how to remedy problems.	1.8
12/19/2013	(LS) Conference with Toni Templeton to prepare for Dr. Lisa	1.5



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	Dawn-Fisher's deposition, review questions prepared by Lindsey Gordon and Ms. Templeton for appropriateness; review Dr. Dawn Fisher's previous and current data sets, and current summaries	
12/19/2013	(LS) Communique exchange with Denise Pierce regarding David Dunn's and Toni Templeton's depositions.	0.1
12/19/2013	(LS) Meeting with Lindsey Gordon, Denise Pierce and Toni Templeton to discuss Dr. Lisa Dawn-Fisher's deposition; telephone conference with Dr. Anthony Rolle, Ms. Templeton and Ms. Gordon regarding revised data sets and what could (and could not) be included.	1.1
12/31/2013	(LS) Receive and review communique from Toni Templeton regarding data sets; prepare communique to Lindsey Gordon, Bob Schulman, Dr. Anthony Rolle, Denise Pierce and Ms. Templeton regarding which data set to submit.	0.6

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Date	Description	Hrs.
1/19/2014	(LS) Participate in telephone conference with Dr. Anthony Rolles and Bob Schulman concerning Rolles deposition (NO CHARGE), receive and review communiqués exchanged between Denise Pierce and Court Reporter regarding need for a reporter to cover expert witness depositions and preparation of expedited transcript.	1
1/20/2014	(LS) Engage in communiqués exchanges with defense counsel regarding scheduling of Rolles and Templeton depositions; receive and review communiqué from Bob Schulman with recommended response to defense counsel's demand for date to schedule expert witness depositions; confer with Mr. Schulman and Toni Templeton concerning date for expert depositions.	2.5
1/21/2014	(LS) Engage in communiqué exchanges with defense counsel confirming scheduling of Rolles and Templeton depositions on January 27; receive and review Defendants' Second Notice scheduling Rolles and Templeton depositions; receive and review communiqués exchanged between Denise Pierce and court reporting firm confirming scheduling of depositions; prepare communiqué to court reporting firm advising SLH is responsible for costs involved; prepare communicate to Bob Schulman with daily schedule for trial; receive and review Wisnoski and Casey presentations.	3.5
1/23/2014	(LS) Work with Toni Templeton and Denise Pierce on [REDACTED]	1.2
1/23/2014	(LS) Work on direct testimony of David Dunn.	1.5
1/24/2014	(LS) Preparation of direct testimony with Toni Templeton; review of Dr. Anthony Rolles's deposition for use in preparing him for deposition; prepare preparation of outline of direct testimony of David Dunn.	11

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/3/2014	(RS) Receive and review errata and signature pages for deposition of Shannon Housson. (NO CHARGE)	0.1
1/7/2014	(CAP) Confer with ISD Plaintiff counsel's Paralegal regarding deposition exchanges (Clark and Casey); prepare notice to Bob Schulman and Leonard Schwartz of availability of same in Dropbox and on the network (NO CHARGE).	0.1
1/14/2014	(CAP) Telephone conference with Leonard Schwartz regarding deadline for return of original Rolle deposition. (NO CHARGE)	0.1
1/17/2014	(RS) Receive and review communique from Leonard Schwartz to defense counsel regarding date for scheduling expert depositions; receive and review communique exchanges between Mr. Schwartz and staff concerning production of e-mails requested by defense counsel during Rolle deposition; receive and review staff communique to all counsel regarding same. (NO CHARGE)	0.1
1/19/2014	(RS) Conduct telephone conference with Dr. Anthony Rolle regarding deposition preparation; conduct telephone conference with Dr. Rolle and Leonard Schwartz concerning same (NO CHARGE); receive and review communiqués exchanged between Denise Pierce and Court Reporter regarding need for a reporter to cover expert witness depositions and preparation of expedited transcript. (NO CHARGE)	0.5
1/20/2014	(RS) Receive and review communiqués exchanged between defense counsel and Leonard Schwartz regarding scheduling of Rolle and Templeton depositions (NO CHARGE); prepare proposed response to defense counsel's demand for date to schedule expert witness depositions; prepare advisory communiqué to Mr. Schwartz regarding same; conduct telephone conference with Mr. Schwartz and Ms. Templeton concerning expert depositions.	0.1
1/22/2014	(RS) Engage in communiqué exchanges with Rick Lopez and Leonard Schwartz regarding attendance at expert depositions on January 27, preparation of experts for same, and trial attendance logistics. (NO CHARGE)	0.2

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/23/2014	(CAP) Engage in communicate exchange with Paralegal for Edgewood ISD Plaintiffs' counsel regarding deposition of Dr. Anthony Rolle; confer with Bob Schulman concerning same; obtain permission for release of a copy; forward copy to EISD Plaintiffs' counsel's Paralegal for their file; search for signature/data pages from Dr. Rolle, save same in network folder; prepare communicate to Dr. Rolle requesting a copy of his signature page (notarized) and confirmation of return to court reporter. (NO CHARGE)	0.2
1/25/2014	(RS) Travel to Austin.	1.5
1/25/2014	(RS) Attend pre-deposition preparation session with Dr. Anthony Rolle at his hotel; attend follow-up pre-deposition preparation session with Dr. Rolle, Toni Templeton, Leonard Schwartz and TCSA staff at TCSA offices; begin private deposition preparation with Dr. Rolle at TCSA offices; confer with Mr. Schwartz and TCSA staff regarding same; confer with Mr. Schwartz regarding same; prepare comprehensive report and directive to Rick Lopez regarding defense of Dr. Rolle at deposition; engage in communiqué exchange with Mr. Lopez regarding attendance by Mr. Lopez at deposition or trial; engage in communiqué exchange with Mr. Schwartz regarding introduction of Ms. Templeton's slides derived from state expert's deposition testimony.	4
1/25/2014	(RS) Receive and review Leonard Schwartz's directive to TCSA staff for print out of data attached in preparation for Rolle and Templeton depositions; direct staff to provide Denise Pierce's deposition from first phase of trial; receive and review same (NO CHARGE); review first Second Phase deposition of Dr. Anthony Rolle with Dr. Rolle and continue preparation of Dr. Rolle for upcoming deposition and trial testimony; confer with Mr. Schwartz and TCSA staff regarding same.	4.5
1/25/2014	(RS) Return travel. (NO CHARGE)	1.5
1/26/2014	(RS) Travel to Austin	1.3

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Date	Description	Hrs.
1/26/2014	(RS) Attend deposition conference with Dr. Anthony Rolle; confer with TCSA team regarding same; review Leonard Schwartz's directive to Russell Wilson for preparation of legal memo to the court on Response to Objection to admission of PowerPoint as an exhibit; review Mr. Wilson's request to Mr. Schwartz for information regarding data saved by TCSA from TEA's website; review memorandum of law prepared regarding withdrawal of testifying witness during trial, potential for proffer of withdrawn expert's deposition testimony by the defense, and other matters (NO CHARGE); confer with Mr. Schwartz regarding same; conduct telephone conference with David Dunn concerning Rolle testimony; conduct telephone conference with Assistant Attorney General regarding same; confer with team and continue preparation of witness testimony; re-confer with team regarding de-designation of Dr. Rolle; prepare communiqué to defense counsel regarding de-designation of Dr. Rolle as Charter School Plaintiffs' expert.	6
1/26/2014	(RS) Return travel. (NO CHARGE)	1.2
1/31/2014	(LS) Deposition of Dr. Catherine Clark on TEA's new output statistics (joined in progress by Toni Templeton); debriefing with Denise Pierce and Ms. Templeton.	5

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/1/2014	(RS) Prepare advisory communiqué to Dr. Anthony Rolle and Toni Templeton regarding expert report revisions and explanations for necessity for same.	0.3
1/2/2014	(LS) Receive and review Denise Pierce's draft of proposed pre-trial designations due on January 6; prepare communiqués to Bob Schulman concerning addition of Rolle study.	0.5
1/3/2014	(CAP) Confer with Paralegal regarding identification of witnesses designated by the parties in first phase of trial; download all witness designations and provide to Paralegal.	0.1
1/3/2014	(LS) Receive and review Denise Pierce's draft Designation of Witnesses and Exhibits identifying additional exhibits offered for evidence; prepare communiqué to Toni Templeton and Bob Schulman regarding increase in WADA gap in FY 2013; receive and review Ms. Templeton's brief reply (need to discuss at length) and attached near-final version of report; receive and review communiqué from Mr. Schulman with link to TEA web page regarding adjustment to regular program factor (RPAF) affecting reduction of funding received by districts; prepare communiqué to Allen Keller and Mr. Schulman regarding recommended additions to Response to Motion to Strike Fifth Amended Petition.	4.6
1/3/2014	(RS) Engage in communicate exchange with Denise Pierce and Leonard Schwartz regarding inclusion of [REDACTED] [REDACTED] review first phase expert report; prepare advisory to Mr. Schwartz, Ms. Pierce and Lindsey Gordon regarding same; receive and review response from Ms. Pierce regarding same; receive and review communicate from Toni Templeton regarding preparation of second phase expert report, updates to same and data sources for same; review data updates, as identified.	0.8
1/5/2014	(RS) Participate in extended telephone conference with TCSA staff, Leonard Schwartz and Jim Ho.	1.5

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Date	Description	Hrs.
1/5/2014	(RS) Receive and review Excel file proposed exhibit from Dr. Anthony Rolle; review FSP revenue data involved; receive and review communicate from defense counsel regarding deadline for supplementation of exhibits; receive and review proposed template for master deposition exhibit list from Michelle Jacobs; receive and review similar schools analysis data and Dr. Dawn-Fisher data on FSP revenue comparisons from Toni Templeton; receive and review second communicate from Ms. Templeton regarding submission of pre-trial exhibits.	0.1
1/5/2014	(RS) Receive and review communicate from Denise Pierce regarding appellate advice from Jim Ho and comparison of school district and charter school comparison methodologies; prepare advisory response to Ms. Pierce, Leonard Schwartz, and TCSA staff concerning same and proposed telephone conference with Dr. Craig Wood regarding methodologies utilized as basis for prior Supreme Court decisions; receive and review communicate exchanges between counsel regarding defense counsel's request for supplemental exhibit identification for exhibits offered during depositions.	0.2
1/6/2014	(CAP) Work on preparation of Designations due today (experts, witnesses and exhibits); telephone conferences and communicate exchanges with Leonard Schwartz, Bob Schulman, Denise Pierce and Lindsey Gordon regarding documents to be filed; prepare edits to final draft of Designations prepared by Ms. Pierce, Ms. Gordon and Mr. Schwartz; organize exhibits for file; upload same in Dropbox and share link to exhibits and Designations with all counsel; prepare communicate to all counsel with copy of Designations.	4.5
1/6/2014	(CAP) Telephone conference with Leonard Schwartz regarding inability to upload exhibits due to their size; share link to folder containing same in Dropbox with Judge Dietz and his administrators. (NO CHARGE)	0.2

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Date	Description	Hrs.
1/7/2014	(LS) Review communiqué from Interveners' counsel and attached amendment to pre-trial designation of trial witnesses, depositions and exhibits; review communiqué exchanges between counsel regarding non-opposition to Interveners' amendment of pre-trial designation; review communiqué from Bob Schulman concerning designation of Charter School Plaintiffs' expert on attorneys' fees; prepare reply to Mr. Schulman confirming designation; review communiqué from TTSFC Plaintiffs' counsel's Paralegal regarding issues with CDs mailed to the parties that included exhibits disclosed on January 6, and upload of same in Dropbox to replace CD version; review communiqué from Michele Jacobs and attached Amended Master Deposition List to clarify minor errors in original filing; review second communiqué from Ms. Jacobs to court's staff attorney regarding delay in e-filing of CCISD Plaintiffs' pre-trial designation of trial exhibits, witnesses and depositions.	5.3
1/8/2014	(CAP) Upload new scanned version of Dr. Anthony Rolle's resume; prepare communicate to all counsel and the court forwarding same to replace exhibit 9068.	0.1
1/8/2014	(RS) Receive and review legislative summary and communiqué from Denise Pierce inquiring regarding disclosures; prepare advisory response to Ms. Pierce concerning same; receive and review communicate from Leonard Schwartz and Schwartz/staff communiqué exchanges regarding same (NO CHARGE); engage in communicate exchanges with staff and provide direction in submission of updated resume for Dr. Anthony Rolle; receive and review communiqué from Mr. Schwartz regarding same (NO CHARGE).	0.1
1/9/2014	(CAP) Prepare request to counsel to allow substitution of correct version of Rolle resume as an exhibit; receive, review and reply to confirmatory responses (NO CHARGE); prepare request to Court Operations Clerk for input on necessity filing of an unopposed/agreed motion to authorize same.	0.1

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/10/2014	(CAP) Prepare follow-up request to counsel for TTSFC Plaintiffs regarding submission of substitute resume for Dr. Anthony Rolle by agreement; receive and review reply agreeing to same; prepare follow-up request to Court's staff attorney on whether a motion for leave to file same will be required.	0.1
1/13/2014	(LS) Receive defense counsel's request for Charter School Plaintiffs' designation of sequence of trial witnesses, prepare response to defense counsel to read prior filing that designated expert witnesses; receive and review Edgewood ISD Plaintiffs' Response to Defendants' Motion to Strike Expert Zamora and supporting exhibits; receive and review Order signed by Judge Dietz authorizing admission of amended pre-trial filing by Interveners; prepare notes and observations for preparation of Response to Defendants' Motion to Strike Templeton and Rolle; receive and review Lindsey Gordon's edits to notes; receive and review Bob Schulman's edits to notes regarding Response to Motion to Strike; review Denise Pierce's communique to Dr. Anthony Rolle regarding Motion to Strike for review, and requesting Dr. Rolle to review his deposition (being forwarded by e-mail and overnight delivery) (NO CHARGE); work on Response to Motion to Strike.	3.5
1/13/2014	(RS) Receive and review ISD Plaintiffs' designation of anticipated sequence of witness testimony for trial.	0.1
1/14/2014	(CAP) Communique exchange with Bob Schulman and Leonard Schwartz regarding data requested by Toni Templeton (Rolle expert data). (NO CHARGE)	0.1

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Date	Description	Hrs.
1/17/2014	(LS) Receive and review communiqué from staff on decision on filing of Motion in Limine; confer with staff regarding designation by Interveners for witness sequence; receive and review communiqué from staff regarding discussion with counsel for Interveners concerning same; receive and review Denise Pierce's reply inquiring as to status of Defendants' same data; receive and review CCISD Plaintiffs' Objections to Defendants' Witness List, Trial Exhibits and Deposition Designations; receive and review Edgewood ISD Plaintiffs' Objections to Trial Exhibits and attachments.	2
1/22/2014	(LS) Receive and review Edgewood ISD Plaintiffs' Response to Defendants' Objections to Deposition Designations; receive and review CCISD Plaintiffs' Objections to Counter-Deposition Designations; prepare communiqué to Bob Schulman regarding preparation of Response to Defendants' Objections to Charter School Plaintiffs' Deposition/Witness/Exhibits Designations.	1
1/23/2014	(LS) Receive and review EISD Plaintiffs' Third Supplemental Deposition Designations for Julio Cavazos and Notice of Rule 11 Agreement; receive and review corrected slides for Wisnoski presentation; receive and review Cavazos deposition excerpts and EISD Plaintiffs' Exhibit 4337 on Harlingen CISD proffer of evidence provisionally admitted today.	1
1/23/2014	(LS) Prepare communiqué to defense counsel and EISD Plaintiffs' counsel requesting stipulation on Zamora testimony regarding effects of HB5 on ISDs as applicable to charters too; receive and review defense counsel's objection to such stipulation; prepare updates to Bob Schulman on Zamora's testimony supporting charters; engage in communiqué exchange with Mr. Schulman regarding [REDACTED] prepare draft of David Dunn slides and questions for direct testimony, forward to Mr. Schulman.	1.5

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Date	Description	Hrs.
1/24/2014	(LS) Engage in communiqué exchange with Bob Schulman regarding discussions with Denise Pierce on de-designation of Rolle and decision (NO CHARGE); prepare revised questions for Dunn direct testimony, forward to Mr. Schulman; receive and review additions by Mr. Schulman concerning same.	1
1/26/2014	(LS) Receive and review communiqués exchanged between Bob Schulman and defense counsel regarding decision to de-designate Dr. Anthony Rolle as Charter School Plaintiffs' expert and withdraw his report (NO CHARGE); prepare directive to staff regarding same; receive and review staff-prepared communiqué to all counsel and the court de-designating Dr. Rolle as an expert witness, canceling January 27 deposition, and withdrawing his current report as an exhibit; receive and review corrected version of Catherine Clark trial presentation.	1.5
1/27/2014	(CAP) Telephone conference with Leonard Schwartz regarding amendment of Designation of fact and expert witnesses, depositions and exhibits (NO CHARGE); prepare Amended Designations; follow-up telephone conference with Mr. Schwartz concerning same (NO CHARGE).	0.2
1/27/2014	(RS) Receive and review staff inquiry on amendment of witness designations; receive and review request from staff on status of amended designations. (NO CHARGE)	0.1
1/28/2014	(LS) Multiple communiqué exchanges and discussion with staff regarding amended designations to de-designate Rolle as a witness and withdraw his exhibit; prepare communiqué to Bob Schulman concerning same; participate in debriefing on trial.	2.5
1/28/2014	(RS) Multiple communicate exchanges and discussion with staff regarding amended designations to de-designate Rolle as a witness and withdraw his exhibit; receive and review communicate from Leonard Schwartz concerning same; receive, review and revise amended designation pleading and direct staff regarding same.	0.8
1/29/2014	(CAP) Telephone conference with Leonard Schwartz and Toni Templeton regarding missing exhibit, Ms. Templeton will upload same in Dropbox for access. (NO CHARGE)	0.1

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Date	Description	Hrs.
1/29/2014	(LS) Engage in multiple communiqués with Toni Templeton and review attached revised versions of Dunn and Templeton slide presentations; receive and review communiqué from Bob Schulman with comments on slides and general thoughts concerning offer of same; prepare reply regarding same; receive and review updated Dunn presentation from Denise Pierce.	0.7
1/29/2014	(RS) Receive and review multiple "report on trial" communiqués from Bob Schulman (Clark and Pierce trial testimony commentary); engage in communiqué exchanges with staff, and TCSA team regarding amended designation of exhibits, language to include in pleading to apprise all parties of reasons for amendment and wording of e-mail from staff to the parties (and the court) forwarding amendment; receive and review Mr. Schulman's advisory communiqués concerning explanatory e-mail regarding amendment and upload of exhibits for review prior to presentation of Charter School Plaintiffs' case tomorrow.	2.2
1/30/2014	(LS) Receive and review communicate from Bob Schulman regarding questioning and testimony of Wayne Pierce including ISD facility needs and funding; strategize on line of questions for Dr. Lisa Dawn-Fisher concerning same; receive and review internal memo from Mr. Schulman regarding re-emphasis by David Dunn in testimony on stringent accountability standards set for charters compared to districts; engage in communiqué exchange with defense counsel concerning objection to exhibits; receive and review CCISD Plaintiffs' updated list of exhibits; receive and review state Defendants' corrected Exhibit 11366 (PDF and Excel versions) and Updated Cumulative Results and all Tests Taken Exhibit (PDF and Excel versions); receive and review FBISD Plaintiffs' First Amended Supplemental Exhibit List and List of Exhibits to be Admitted; receive and review EISD Plaintiffs' Notices of Intent to Take Zyskowski and Clark deposition.	2.5

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Date	Description	Hrs.
1/2/2014	(LS) Receive and review communiqué exchanges between counsel and staff regarding preparation of master exhibit list for trial exhibits (deposition exhibit numbers to remain as labeled), to be updated by Michelle Jacobs; prepare with Denise Pierce requests to staff for data regarding Flores Plaintiffs' exhibits; receive and review staff replies concerning same; receive and review communiqué from Ms. Jacobs requesting input on master deposition exhibit list; receive and review communiqué from Bob Schulman concerning same.	1.5
1/3/2014	(LS) Engage in communiqué exchange with Denise Pierce and Bob Schulman regarding [REDACTED] [REDACTED] receive and review communiqué from Mr. Schulman with observations regarding [REDACTED] [REDACTED]; receive and review response from Ms. Pierce [REDACTED]; receive and review communiqué exchange between Ms. Pierce and Jim Ho regarding factual finding needed to overrule Judge's potential Finding against charters on appeal to the Supreme Court of Texas; receive and review response from Ms. Pierce requesting scheduling of phone conference to discuss same with Mr. Ho; receive and review communiqué from Mr. Schulman concerning January 21 deadline for submission of Findings, Conclusions and proposed judgment.	2.9

Unofficial Analysis of District Court Judge Valva L. Price

**517 Soledad Street  
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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/3/2014	(LS) Receive and review Edgewood Plaintiffs' master deposition exhibit list for trial; receive and review communiqué from Toni Templeton and attached Reworked Charts file prepared by Ms. Templeton from data tables and reports compiled by Dr. Lisa Dawn-Fisher; receive and review second communiqué from Ms. Templeton and attached Range Analysis of Foundation School Program Funding prepared by Dr. Dawn-Fisher, with request for inclusion of same as an exhibit; receive and review reply from Denise Pierce requesting advice on submission of data tables in pre-trial disclosure and graphs during direct testimony; prepare response to Ms. Pierce regarding same; receive and review Bob Schulman's reply to Ms. Pierce concerning same; engage in communiqué exchange with Ms. Pierce, Ms. Templeton and Mr. Schulman regarding same; receive and review third communiqué from Ms. Templeton regarding further analysis supporting High Island exhibit to show funding levels.	2.1
1/3/2014	(RS) Receive and review Edgewood Plaintiffs' master deposition exhibit list for trial and direct staff regarding same.	0.1
1/5/2014	(LS) Receive and review communiqué with attached Excel file from Dr. Anthony Rolle for potential submission as exhibit; receive and review communiqué from defense counsel recommending deadline for supplementation of exhibits, either by agreement of the parties or with leave of court; receive and review reply from Michelle Jacobs with recommended wording to include in template for master deposition exhibit list; receive and review communiqué from Toni Templeton and attached file of similar schools analysis data; prepare communiqué and attached chart of reworked Dawn-Fisher data on RSP revenue comparison data to Bob Schulman; receive and review second communiqué from Ms. Templeton regarding upload of files recommended for submission with pre-trial exhibits due tomorrow.	1.8

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Date	Description	Hrs.
1/5/2014	(LS) Receive and review communiqué from Denise Pierce regarding her discussion with Jim Ho and request for input on validation of the per-district average methodology being used by the Charter School Plaintiffs' experts; receive and review advisory response from Bob Schulman concerning same and upcoming phone conference with Dr. Craig Wood to discuss the issue further; receive and review communiqué exchanges between counsel regarding defense counsel's request to include supplemental exhibit date, as same pertains only to exhibits offer during depositions; participate in telephone conference with TSCA staff and Bob Schulman.	2
1/6/2014	(LS) Meetings with Toni Templeton and Denise Pierce to prepare for trial; receive and review final version of Response to Defendants' Motion to Strike Fifth Amended Petition, e-filed with the court; receive and review near-final version of designation of trial witnesses, depositions and exhibits.	6.2
1/6/2014	(LS) Review Defendants' documents responsive to CCISD Plaintiffs' Third Set of Interrogatories; engage in communiqué with Bob Schulman and staff regarding Master Deposition Master Exhibits List compiled by the parties and inclusion of data for Charter School Plaintiffs in same; review communiqué from staff with e-mails received to date referring to Master Exhibits List for review and determination of response, if necessary; review communiqué from Michelle Jacobs to all counsel citing revised opening language to Master Deposition List; review current resume for David Dunn, to be included in Charter School Plaintiffs' pre-trial exhibits due today; review Interveners' pre-trial designation of trial witnesses, depositions and exhibits and attached exhibits; review staff request regarding current bio for Dr. Anthony Rolle and availability of same; review communiqué from Lindsey Gordon requesting Dr. Rolle's bio; prepare response to staff directing submission of current version of bio.	4.5

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/6/2014	(RS) Receive and review communiqués from Richard Gray and updated spreadsheets containing corrected data for Dr. Wayne Pierce.	0.1
1/8/2014	(LS) Receive and review communiqué from Denise Pierce and attached legislative summary, inquiring as to whether same should be disclosed in amended pre-trial disclosure; receive and review Bob Schulman's response to Ms. Pierce regarding same; prepare communiqué to Mr. Schulman advising portions of summary will be included in David Dunn's trial presentation; engage in communiqué exchanges with staff regarding witness testimony sequence due on January 13, same was already provided in discovery response prepared on October 1, 2013, submitted to the parties; receive and review staff communiqué requesting assistance in submission of updated resume for Dr. Anthony Rolle, prepare response directing submission of same to all counsel with request for objection to substitution of same.	8
1/9/2014	(LS) Receive and review staff communiqué to all counsel regarding substitution of correct version of Rolle resume for document provided in pre-trial disclosures on January 6; receive and review replies from counsel agreeing to same; receive and review Intervenors' Motion for Leave to file Amended Pre-Trial Filing and proposed Order granting motion.	1
1/12/2014	(LS) Work on Rolle deposition transcript; draft proposed areas for correction by Toni Templeton and multiple communicate exchanges regarding how to rehabilitate Rolle; prepare communiqués to stakeholders regarding Rolle and his use as an expert; receive and review proposed Findings and Conclusions drafted by ISD Plaintiffs and Defendants jointly, submitted to the court in March 2013.	6
1/13/2014	(LS) Work on proposed testimony of Dr. Anthony Rolle; work with Toni Templeton on data sets and Dr. Lisa Dawn-Fisher's excel spreadsheet and charts.	8

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Date	Description	Hrs.
1/14/2014	(LS) Work on proposed Findings of Fact and Conclusions of Law; work on cross-examinations of proposed witnesses for other Plaintiff groups; review deposition of Dr. Anthony Rolle; review deposition of Lynn Moak; review notes from other depositions.	9
1/15/2014	(LS) Discussion with Denise Pierce and staff regarding issue of filing of revised expert report and incorporation of data into Response to Motion to Strike Experts; receive and review communiqué exchanges between counsel confirming exhibit objection deadline (January 17); receive and review Bob Schulman's communiqué with e-mail from Dr. Anthony Rolle and attached data in support of his deposition testimony, used in preparation of expert report; receive and review Dr. Rolle's notes to Defendants' Motion to Strike Rolle and Templeton; prepare communiqué to Mr. Schulman forwarding draft Response to Motion to Strike; receive and review communiqués from Lindsey Gordon with comments to and recommended edits to Response.	4
1/16/2014	(LS) Receive and review communique from Assistant Attorney General inquiring about copy protection on files we submitted; short conference with Toni Templeton regarding copy protection on Excel spreadsheets, direct her to provide password to unlock spreadsheets.	0.2
1/16/2014	(LS) Prepare letter to all counsel regarding outdated report and data sheets utilized during Rolle deposition, forward updated data for review, offer Rolle and/or Templeton for deposition to address same; receive and review reply from Assistant Attorney General requesting further clarification regarding same; receive and review errata sheet from Dr. Anthony Rolle for his deposition.	1
1/17/2014	(LS) Receive and review communique from Dr. Anthony Rolle asking where he should send errata sheet; prepare response to Dr. Rolle.	0.1

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Date	Description	Hrs.
1/18/2014	(LS) Receive and review communique to opposing counsel from Bob Schulman regarding date for scheduling expert depositions (NO CHARGE); engage in communiqué exchanges with staff concerning production of e-mails requested by defense counsel during Rolle deposition; receive and review staff communiqué to all counsel with subject e-mails attached.	1.5
1/22/2014	(LS) Extended teleconference with Dr. Anthony Rolle and Bob Schulman regarding de-designation of Dr. Rolle as an expert witness (NO CHARGE); receive and review affidavit of Gloria Zyskowski and exhibits on STAAR Passing Rates data; receive and review communiqué from Edgewood ISD Plaintiffs' counsel concerning admission on January 23 of exhibits (numbers 4288-4291, 4293-4296 and 20151-20153); receive and review communiqué from Toni Templeton with notes on items to discuss from Rolle deposition; receive and review updated version of Dan Casey presentation for trial testimony on January 23.	1.5
1/22/2014	(RS) Receive and review Edgewood ISD Plaintiffs' Response to Defendants' Objections to Deposition Designations; receive and review CCISD Plaintiffs' Objections to Counter-Deposition Designations; receive and review communiqué from Leonard Schwartz regarding preparation of Response to Defendants' Objections to Charter School Plaintiffs' Deposition/Witness/Exhibits Designations; engage in communiqué exchange with Mr. Schwartz concerning same.	0.2
1/27/2014	(RS) Receive and review Defendants' Supplemental Objections and Response to FBISD Plaintiffs' Fourth Request for Production and link to FERPA protected data; direct staff to download FERPA protected files on network.	0.1

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Date	Description	Hrs.
1/29/2014	(CAP) Multiple telephone conferences with Leonard Schwartz and communicate exchanges with Mr. Schwartz and Bob Schulman regarding preparation of final edits to Amended Disclosures and designations for trial and communicate to all counsel and the court forwarding same; review, relabeling, edit and conversion of exhibits to save in Dropbox for distribution to counsel and the court; review court docket to determine status of filing of exhibits by other parties to the case. (NO CHARGE)	2
1/29/2014	(LS) Receive and review CCISD Plaintiffs' list identifying exhibits to be presented for admission on January 30; receive and review final version of Dunn PowerPoint with notes incorporating changes made earlier today; receive and review final version of Templeton PowerPoint presentation; receive and review FBISD Plaintiffs' First Supplemental Exhibit List, exhibits to be admitted, and accompanying documentation; receive and review communiqué from staff to counsel and the court confirming upload of Dunn and Templeton presentations in Dropbox and on Attorney General's secure server site for review/download; receive and review FBISD Plaintiffs' revised list of exhibits to be admitted and summary of previously circulated exhibits; receive and review signed Orders on Defendants' Motion to Strike Charter School Plaintiffs' Fifth Amended Pet	2
1/31/2014	(LS) Receive and review communiqué from Court Reporter regarding preparation of separate volumes for demonstrative exhibits and non-admitted exhibits in appellate record.	0.2

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Date	Description	Hrs.
1/6/2014	(RS) Receive and review Defendants' documents responsive to CCISD Plaintiffs' Third Set of Interrogatories; engage in communicate exchange with Leonard Schwartz and staff regarding Master Deposition Exhibits List and inclusion of data for Charter School Plaintiffs in same; direct staff regarding same; receive and review communicate from Michelle Jacobs revising description for Master Deposition List.	0.2

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Date	Description	Hrs.	
1/4/2014	(AB) Continue exploring [REDACTED]	4	
1/4/2014	(AB) Finalize research on [REDACTED]	2	
1/16/2014	(MZ) Research and summarize case law regarding [REDACTED]	1.6	
1/23/2014	(RW) Conference with Bob Schulman regarding issue of attempting to withdraw expert witness between first and second of trial.	4.6	
1/23/2014	(RS) Direct Russell Wilson on research into [REDACTED]; receive and review report from Mr. Wilson regarding same, and offer of proof and bill of exceptions.	0.5	
1/23/2014	(RS) Receive and review communiqué from Russell Wilson requesting clarification on research inquiries concerning [REDACTED]; prepare comprehensive response and further directives to Mr. Wilson concerning same.	0.6	
1/24/2014	(RW) Continue expert research; expand research to include all federal cases and cases in states whose rules of evidence are, like Texas', based on the Federal Rules of Evidence; prepare communicate to Bob Schulman requesting clarifications.	2.1	
1/24/2014	(RS) Receive and review communiqué from Russell Wilson requesting clarification on research inquiries concerning [REDACTED]; prepare comprehensive response and further directives to Mr. Wilson concerning same.	0.6	
1/25/2014	(RW) Receive and review communicate from Bob Schulman affirming research is on point; finalize legal research; prepare legal memorandum to Mr. Schulman.	2.6	
1/25/2014	(LS) Prepare research memo to Bob Schulman regarding admissibility of charts and diagrams supporting testimony.	2	50.00

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Date	Description	Hrs.
1/25/2014	(RS) Receive and review research report from Russell Wilson of [REDACTED]; prepare communiqué to Mr. Wilson regarding same; receive and review Mr. Wilson's legal memorandum; receive and review research memo from Leonard Schwartz regarding admissibility of charts and diagrams supporting testimony.	0.4
1/26/2014	(RW) Review case law and other materials sent by Leonard Schwartz; legal research into present law pertaining to [REDACTED]; prepare communicate to Mr. Schwartz and Bob Schulman seeking copies of materials to be offered for admission.	2.1
1/26/2014	(RW) Receive and review communicate from Leonard Schwartz seeking assistance with Charter School Plaintiffs' Response to Objection to PowerPoint Slides Admission as Exhibit; prepare responsive communicate. (NO CHARGE)	0.1
1/27/2014	(RW) Receive and review responsive communicate from Leonard Schwartz; prepare reply communicate; receive and review current pleading from Paralegal for template; prepare rough draft of Response to Objections; prepare communicate to Mr. Schwartz; prepare communicate to Paralegal seeking exhibit numbers of evidentiary items; receive communicate with data from Paralegal and incorporate into Response.	3.6
1/27/2014	(RW) Receive and review communicate from Leonard Schwartz that trial judge is using 197.3 Texas Rules of Civil Procedure to allow Defendants to use their own discovery responses as evidence against another party; research rules and case law; prepare communiqués to Mr. Schwartz and Bob Schulman attaching case law that confirms that such a ruling by the trial judge is erroneous.	0.7

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Date	Description	Hrs.
1/28/2014	(RW) Prepare communique to Leonard Schwartz seeking precise example of webpages at TEA from which data included in expert's reports and opinions has been downloaded; receive and review communique from Toni Templeton with links to TEA webpages; online research at TEA webpage and exchange to communiqués with Ms. Templeton to verify [REDACTED]	2.8
1/28/2014	[REDACTED] revise Response to Objections; prepare transmittal communique to Mr. Schwartz. (RW) Telephone conference with Leonard Schwartz about using live witnesses, and not affidavits, to prove bona fides of documents under the business records exception (NO CHARGE); legal research into Texas Rules of Civil Evidence and case law; prepare extensive communique to Mr. Schwartz with arguments and authorities that live witnesses may be used to the same extent as affidavits.	1
1/29/2014	(RW) Finalize brief on preserving evidence and errors on appeal through offers of proof and bills of exception; prepare one page trial checklists for both offers of proof and bills of exception; prepare communique to Leonard Schwartz and Bob Schulman.	1.2

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Date	Description	Hrs.
1/2/2014	(RS) Receive and review supplemented report by Dr. Wayne Pierce and explanatory communique from Richard Gray regarding revisions to same; receive and review follow-up communique from Mr. Gray with District-by-District (FY 13, 14 and 15) related to revised Pierce report; receive and review communique from Leonard Schwartz forwarding supplemental report to TCSA administrators (NO CHARGE); receive and review Denise Pierce's draft of proposed pre-trial designations due on January 6; [REDACTED]	0.6
1/2/2014	(RS) Receive and review communique exchanges between counsel and staff regarding preparation of master exhibit list for trial exhibits; receive and review Denise Pierce and Leonard Schwartz's requests to staff for [REDACTED]; receive and review staff replies concerning same; receive and review communique from [REDACTED] confer with Mr. Schwartz concerning same.	0.5
1/3/2014	(NO CHARGE) (CAP) Telephone conference with Court Operations Clerk regarding deadline for submission of proposed Findings of Fact and Conclusions of Law.	0.1
1/3/2014	(RS) Conduct telephone conference with Leonard Schwartz regarding [REDACTED]	0.2
1/3/2014	(RS) [REDACTED] (NO CHARGE)	0.2

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Date	Description	Hrs.
1/5/2014	(LS) Extended telephone conference with Bob Schulman, Jim Ho, Denise Pierce and Lindsey Gordon regarding Findings of Fact and Conclusions of Law; discuss numerous other trial matters.	1.5
1/8/2014	(RM) Review communique from Bob Schulman regarding TEC 42.102 and 19 TAC 203.25 regarding cost of education index requirements; review TEC 42.102 including legislative history and 19 TAC 203; reply to Mr. Schulman responsive to his inquiry.	0.4
1/10/2014	(LS) [REDACTED]	8.5
1/10/2014	(RS) Receive and review Rule 11 agreement regarding expert program files disclosure/confidentiality. (NO CHARGE )	0.1
1/11/2014	(CAP) Receive and review Leonard Schwartz's e-mail to all counsel regarding objection to Dawn-Fisher edited data; save in Word document and convert to PDF; forward copy to all counsel for review. (NO CHARGE)	0.1
1/11/2014	(LS) [REDACTED]	4.2
1/13/2014	(RS) Receive and review Rule 11 agreement between ISD Plaintiffs and Defendants regarding data correction by Dr. Wayne Pierce; receive and review communique from Toni Templeton concerning ASATR formulas for ISDs as compared to charters.	0.2
1/15/2014	(RS) [REDACTED]	0.3
1/16/2014	(LS) [REDACTED] (NO CHARGE)	0.1
	[REDACTED] (NO CHARGE)	

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Date	Description	Hrs.
1/16/2014	(LS) Receive and review errata sheet and signature pages for Dr. Lisa Dawn-Fisher deposition; prepare communique to Assistant Attorney General regarding rescheduling of expert depositions; receive and review reply requesting removal of password protected cells from Excel data file prepared by Charter School Plaintiffs' experts; prepare directive to Toni Templeton forwarding defense counsel's request for removing password from cells in Excel file.	1.5
1/17/2014	(LS) Receive and review Denise Pierce's (final version) of communiqué to Dr. Anthony Rolle explaining outcome of January 16 hearing, scheduling of depositions and strategy for his deposition and trial testimony; receive and review, from Court Reporter, rough draft of January 16 hearing; receive and review Defendants' Supplement to Motion to Strike Edgewood ISD Plaintiffs' Expert Zamora; receive and review FBISD Plaintiffs' Objections to Exhibits and Deposition Designations and Second Supplemental Deposition Designations; receive and review Defendants' Rule of Evidence 104 Motion and Objections with attachments.	2
1/21/2014	(CAP) Confer with e-file vendor representative regarding entry of list of contacts for e-service. (NO CHARGE)	0.1
1/21/2014	(LS) Receive and review communiqué from Toni Templeton in response to [REDACTED]; prepare advisory to Bob Schulman regarding rulings on expert reports and PowerPoints in light of objections; receive and review Mr. Schulman's response concerning same; prepare request to Mr. Schulman for [REDACTED]; receive and review reply from Mr. Schulman concerning same.	1
1/22/2014	(LS) Meeting with Toni Templeton and Denise Pierce debriefing.	1

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Date	Description	Hrs.
1/22/2014	(RS) Conduct extended teleconference with [REDACTED]; receive and review affidavit of Gloria Zyskowski and exhibits on STAAR Passing Rates data; receive and review communiqué from Edgewood ISD Plaintiffs' counsel concerning exhibit admissions; receive and review communiqué from Toni Templeton addressing [REDACTED]; receive and review updated version of Dan Casey trial presentation; receive and review communiqué from Denise Pierce to Joe Hoffer and Paul King regarding [REDACTED]; confer with Mr. Hoffer regarding same receive and review Mr. King's response (and accompanying documents) concerning same; receive and review Mr. Hoffer's reply to Mr. King regarding same.	1.1
1/23/2014	(CAP) Receive and review directive from Leonard Schwartz to submit Zamora PowerPoint to news reporter; review network folder for current presentation by Zamora; prepare request to Mr. Schwartz to provide additional information regarding same. (NO CHARGE)	0.1
1/23/2014	(LS) Debrief at TCSA after court session.	1.5
1/23/2014	(RS) Receive and review updates from Leonard Schwartz on trial testimony supporting charters; engage in communiqué exchange with Mr. Schwartz regarding withdrawal of Wisnoski PowerPoint, presentation and Rolle report as documentary evidence in favor of introduction as demonstrative trial exhibits; receive and review Mr. Schwartz's draft of David Dunn trial slides and questions for direct testimony	0.7
1/24/2014	(LS) Begin work on memo regarding [REDACTED]; found important case and forward copy to Denise Pierce, Bob Schulman and Russell Wilson.	3.5

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Date	Description	Hrs.
1/24/2014	(RS) Engage in communiqué exchange with Leonard Schwartz regarding [REDACTED] (NO CHARGE); continue review and prepare revisions, additions and comments to [REDACTED]; prepare advisory correspondence to Mr. Schwartz concerning same.; engage in communiqué exchange with [REDACTED]	0.8
1/25/2014	(RS) Receive and review Court Reporter's request for submission of exhibits on USB drive for her convenience; confer with staff regarding same. (NO CHARGE)	0.1
1/27/2014	(LS) Work with [REDACTED]	12
1/28/2014	(RS) Prepare advisory to staff regarding Rule 11 agreement inquiry [REDACTED]; receive and review request from Denise Pierce for status of submission of exhibits to Court Reporter; prepare reply to Ms. Pierce regarding same; receive and review staff response concerning same; participate in debriefing on trial conference with Leonard Schwartz, Ms. Pierce, Toni Templeton and David Dunn.	0.2
1/30/2014	(RS) Confer with Court Reporter regarding cost issues in preparation of appellate record; prepare communiqué to Denise Pierce and David Dunn concerning same; receive and review communiqué from Court Reporter recapping procedure for compilation of appellate record; review January 29 trial transcript rough draft; prepare advisory communiqué to Leonard Schwartz and TCSA staff forwarding rough draft of January 29 trial transcript referencing key points.	1
1/31/2014	(LS) Debriefing with Denise Pierce and Toni Templeton after Clark deposition [REDACTED].	1.2

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Date	Description	Hrs.
1/1/2014	(LS) Research legal issues necessary for preparation of Findings of Fact and Conclusions of Law; receive and review Bob Schulman's internal memo regarding draft of Findings prepared by Lindsey Gordon and [REDACTED]. [REDACTED] engage in communiqué exchanges with Mr. Schulman concerning same; receive and review Mr. Schulman's memo to Dr. Anthony Rolle, litigation staff and TCSA administrators regarding [REDACTED].	3.4
1/1/2014	(RS) Review and prepare revisions and comments to first draft, second phase Findings of Fact and Conclusions of Law; prepare advisory communiqué to Leonard Schwartz and Joe Hoffer regarding same and revisions required to conform to Court advisories and limitations placed on second phase trial arguments and evidence; engage in communiqué exchanges with Mr. Schwartz concerning same.	0.8
1/1/2014	(RS) Continue review and preparation of revisions and comments to second phase Findings of Fact and Conclusions of Law from first phase of trial; prepare advisory correspondence to TCSA attorney, Lindsey Gordon regarding and forwarding same.	4.6
1/1/2014	(RS) Prepare second phase [REDACTED].	0.8
1/2/2014	(LS) Work session at TCSA with Lindsey Gordon, Denise Pierce and Bob Schulman on FOF/COL; continue to work on FOF/COL (at home).	9.6
1/2/2014	(LS) Continue to prepare research memo with authorities for use in preparation of Response to Motion to Strike.	3.5

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Date	Description	Hrs.
1/2/2014	(RS) Prepare communiqués to Lindsey Gordon, Denise Pierce and Toni Templeton with current draft of Findings of Fact and Conclusions of Law for review (NO CHARGE); [REDACTED] receive and review staff response with attached document and relevant excerpts from ISD Plaintiffs' and the Court's proposed Findings of Fact; prepare further directives to staff regarding relevant [REDACTED]; receive and review staff report and response to same; receive and review request from Ms. Gordon regarding testimony and evidence from trial transcript in preparation of Findings and Conclusions.	0.4
1/3/2014	(MZ) Review trial transcripts and expert witness dispositions for supporting testimony to Findings of Fact.	0.5
1/3/2014	(CAP) Conduct review of trial transcripts and download and print out excerpts of [REDACTED] for preparation of Findings of Fact and Conclusions of Law.	4
1/3/2014	(LS) Continue work on proposed Findings of Fact and Conclusions of Law.	2.3
1/3/2014	(RS) Direct staff in review of trial transcripts and Court's proposed Findings, Conclusions of Law and Judgment as requested by Lindsey Gordon; engage in communicate exchange with staff regarding same; receive and review staff communicate exchanges regarding same (NO CHARGE); prepare advisory response to Ms. Pierce concerning same and agenda for scheduled conference with Jim Ho; receive and review response from Ms. Pierce regarding same; receive and review communiqué from Ms. Gordon's [REDACTED]; review ISD Plaintiffs' proposed Findings and Conclusions regarding same; prepare advisory communicate to Ms. Gordon concerning same, attaching relevant sections from ISD Plaintiffs' Findings and Conclusions.	0.4

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Date	Description	Hrs.
1/3/2014	(RS) Receive and review current set of revisions and additions to Findings and Conclusions from Lindsey Gordon identifying areas to be completed; prepare advisory response to Ms. Gordon concerning same; confer with and direct staff regarding deadline for filing revised first phase and proposed second phase Findings, Conclusions and Judgment; prepare advisory communique to TCSA staff and Mr. Schwartz concerning same.	0.5
1/5/2014	(RS) Engage in communique exchange with Leonard Schwartz, Jim Ho, and TCSA staff confirming scheduling of teleconference today. (NO CHARGE)	0.1
1/8/2014	(LS) Engage in communiqué exchanges with TCSA staff and Bob Schulman regarding revisions to current versions of Findings of Fact and Conclusions of Law and meeting on January 9 at TCSA to work on same; research FOF/COL; receive and review Mr. Schulman's research memo regarding [REDACTED]	3.6
1/8/2014	(RS) Engage in communique exchanges with TCSA staff and Leonard Schwartz regarding revisions to current version of Findings of Fact and Conclusions of Law and plan for completion of same; receive and review Lindsey Gordon's most current version of Findings and Conclusions; direct staff regarding same; engage in communique exchange with Denise Pierce regarding parties to attend next litigation team work session at TCSA; conduct research on Cost of Education Index (CEI) for inclusion in Findings and Conclusions; direct staff in review of Phase I trial transcripts identifying testimony pertaining to CEI; receive and review data compiled regarding same; engage in communique exchange with Ramon Medina regarding CEI methodology; prepare advisory report on CEI with excerpts to CEI data; prepare revisions and comments to Findings and Conclusions; prepare advisory communique to Ms. Jones regarding same.	2.1
1/9/2014	(CAP) Conduct review of trial transcripts for references to cost-of-education index issues; forward same to Bob Schulman for review in preparation for meeting at TCSA today.	1.2

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/9/2014	(CAP) Continue review of trial transcripts and preparation of cites to transcripts regarding testimony on facilities funding, student population, revenue received by ISDs, increased education costs, charter alternative education populations vs. ISDs, and cost of education data for Charter School Plaintiffs' proposed Findings of Fact and Conclusions of Law.	6
1/9/2014	(LS) Attend work session at TCSA in preparation of Findings of Fact and Conclusions of Law.	8
1/9/2014	(LS) Continue to work on FOF/COL.	2.9
1/9/2014	(RS) Travel to Austin for meeting at TCSA.	1.5
1/9/2014	(RS) Return travel from Austin. (NO CHARGE)	1.5
1/9/2014	(RS) Attend work session at TCSA in preparation of Findings of Fact and Conclusions of Law.	5
1/10/2014	(CAP) Continue review of trial transcripts for key issues regarding "charters" and preparation of summary of same with cite to date, page(s) and line(s) for each day of testimony; prepare edits to proposed Findings and Conclusions data addressing testimony requested by TCSA; forward current draft of same to Bob Schulman for review.	2.4
1/10/2014	(CAP) Locate and organize all exhibits admitted on November 15, 2012 for Baker trial testimony; prepare communique to Leonard Schwartz forwarding same with trial transcript. (NO CHARGE)	0.3
1/10/2014	(RS) Receive and review staff report with data compilation regarding Findings of Fact and Conclusions of Law; forward same to Lindsey Gordon.	0.3
1/11/2014	(RS) Prepare file notes for additions to Findings of Fact and Conclusions of Law.	0.1

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Date	Description	Hrs.
1/12/2014	(RS) Engage in communiqué exchange with staff regarding state Defendants' Findings and Conclusions previously submitted to the court; review Phase I proposed Findings and Conclusions drafted by ISD Plaintiffs and Defendants jointly; continue preparation of revised Phase I Findings and Conclusions for Flores et al. Plaintiffs (edited version and new versions); review court's proposed Findings and Conclusions; prepare advisory communiqué to Leonard Schwartz regarding same; continue review of court's proposed findings and conclusions and prepare revisions and additions to current version of Charter Plaintiff's proposed Findings and Conclusions with comments to Lindsay Gordon regarding same.	1.7
1/13/2014	(RS) Conduct telephone conference with Denise Pierce regarding Findings of Fact and Motion to Strike filed by state Defendants; continue edits to same and prepare advisory communique to TCSA staff and Leonard Schwartz forwarding edited draft of Findings and Conclusions.	0.4
1/14/2014	(RS) Prepare advisory communiqué to Toni Templeton regarding preparation of Finding of Fact on ASATR formula research data.	0.2
1/15/2014	(LS) Work on proposed Findings of Fact/Conclusions of Law; research issues surrounding Motion to Exclude Witness due to Failure to Timely Designate; draft Response to Motion to Strike Witnesses; review second draft prepared by Lindsey Gordon; communicate exchanges with Ms. Gordon regarding second draft of Response to Motion to Strike Witnesses; numerous telephone conferences with Bob Schulman regarding drafts of Response.	8
1/15/2014	(RS) Receive and review communiqué from Lindsey Gordon regarding statutory reference to CEI study; review relevant statutes and regulations and prepare advisory response to Ms. Gordon regarding same, history of studies and phase 1 testimony addressing same; receive and review reply from Ms. Gordon regarding same.	0.4

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Date	Description	Hrs.
1/17/2014	(LS) Work with Denise Pierce, Toni Templeton, Lindsey Gordon, and Bob Schulman on Findings of Fact/Conclusions of Law, communicate exchange with Assistant Attorney General on scheduling Toni Templeton and Dr. Anthony Rolle depositions; communicate exchanges with Toni Templeton and Dr. Rolle on deposition schedule; numerous communicate exchanges with Bob Schulman, Ms. Templeton, Ms. Pierce and Lindsey Gordon regarding issues in case, especially related to the preparation of the Findings of Fact/Conclusions of Law; telephone conference with Dr. Rolle setting time and date for deposition (and additional days for preparation); prepare communicate to Mr. Schulman, Ms. Templeton and Ms. Pierce suggesting that we present Ms. Templeton on January 23 and Dr. Rolle on the following Monday.	9.2
1/17/2014	(RS) Work on Findings of Fact and Conclusions of Law; prepare memo to Lindsey Gordon with suggestions/propositions to address at meeting in drafting Findings and Conclusions.	1.3
1/17/2014	(RS) Attend conference with TCSA staff and Leonard Schwartz in preparation of Findings of Fact and Conclusions of Law.	5
1/17/2014	(RS) Travel to Austin/TCSA.	1.5
1/19/2014	(RS) Prepare revisions and addition to Findings and Conclusions; forward same to Leonard Schwartz, Denise Pierce and Toni Templeton; receive and review communiqué from Mr. Schwartz's regarding preparation of final draft edits and deadline for same; receive and review proposed first phase Findings and Conclusions as edited by Ms. Pierce; direct staff regarding formatting of same; receive and review proposed second phase Findings and Conclusions from Ms. Templeton; review both first and second phase findings and conclusions and proposed judgment from trial court and draft Charter School Plaintiffs' proposed judgment; engage in communiqué exchanges with staff and issue directives regarding filing of Findings and Conclusions; prepare additional edits to Findings of Fact Conclusions of Law and Proposed Judgment.	7.1

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Date	Description	Hrs.
1/20/2014	(CAP) Prepare communique to Paralegal for Edgewood ISD Plaintiffs' counsel regarding most current version of pleading filed by their office; telephone call to Paralegal to discuss same. (NO CHARGE)	0.1
1/20/2014	(CAP) Line-by-line review and revision of edited Findings and Conclusions from Phase I of trial (prior to legislative changes), and review and revision of Phase II Findings and Conclusions (post-83rd legislature); multiple communique exchanges and telephone conferences with Denise Pierce concerning revisions to same; multiple telephone conferences and communique exchanges with Bob Schulman regarding revisions to Findings/Conclusions and Judgment; conduct line-by-line review of Judgment, prepare revisions to same; prepare communique to Judge and his staff forwarding PDF files of Findings/Conclusions (both versions) and Judgment; discussion with Mr. Schulman regarding need to submit tracked version of revised Findings/Conclusions (NO CHARGE); prepare and edit tracked version; forward same to Mr. Schulman for review/approval.	9
1/20/2014	(LS) Receive and review communiqué from Bob Schulman with revised version of Findings and Conclusions for review and comment; receive and review communiqué from Mr. Schulman for feedback on finalizing current version of proposed judgment; receive and review memo from Mr. Schulman of last-minute proposed additions to Findings and Conclusions and judgment for consideration; edit FOF/COL as directed by Mr. Schulman; receive and review reply from Denise Pierce advising same are already included in Findings and Conclusions; receive and review follow-up communiqué from Ms. Pierce on status of Findings/Conclusions (old and new) and Judgment.	2.8

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Date	Description	Hrs.
1/20/2014	(RS) Continue preparation of final draft of proposed Judgment; forward same to staff for inclusion of sections on equal protection and charter school cap from Phase I version submitted; review edits to Judgment prepare by staff; prepare communiqué to Leonard Schwartz and TCSA regarding same; engage in communiqué exchange with Denise Pierce concerning same; prepare communiqué to Mr. Schwartz and TCSA staff regarding same; receive and review proposed additions/edits to same from Ms. Pierce; review advisory communicate from Toni Templeton regarding finalization of same; prepare memorandum proposing additions to Findings and Conclusions and Judgment; forward same to Mr. Schwartz and TCSA; receive and review reply from Ms. Pierce regarding incorporation of same; receive and review follow-up communiqué from Ms. Pierce on status of Findings/Conclusions (old and new) and Judgment (NO CHARGE); confer with and staff in final edits to Phase 1 Findings and Conclusions of Law.	7.3
1/20/2014	(RS) Direct staff in submission of PDF version of Phase 1 and 2 proposed Findings of Fact and Conclusions of Law; confer with staff regarding Court's directive to provide tracked and color-coded versions of Phase I revised Findings and Conclusion; confer with and direct staff regarding preparation of tracked version and clean version; prepare advisory and explanatory correspondence to Court regarding same; direct staff in preparation of Word version of color-coded proposed Findings/Conclusions; receive and review communiqué from Denise Pierce regarding same; prepare advisory response to Ms. Pierce regarding same.	0.9
1/21/2014	(CAP) Receive and review communicate from Edgewood ISD Plaintiffs' counsel's Paralegal regarding most current version of pleading filed by their office (data correct in proposed Judgment submitted yesterday). (NO CHARGE)	0.1
1/21/2014	(CAP) Multiple communicate exchanges with Bob Schulman regarding letter to Judge Dietz forwarding tracked, clean and edited version of Findings and Conclusions. (NO CHARGE)	1
1/21/2014	(RS) Engage in communiqué exchange and confer with staff directing revisions to advisory letter to Judge Dietz enclosing tracked and version of Findings/Conclusions; receive and review final clean, final tracked version and color-coded version of Findings and Conclusions; prepare revisions to letter to Judge Dietz enclosing same.	1

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Date	Description	Hrs.
1/8/2014	(RS) Receive and review communique from defense counsel regarding her discussion with Judge's staff attorney confirming pre-trial conference and hearings on pre-trial motions on January 16-17, and set up for technology needs the afternoon of January 17; receive and review communique exchanges from counsel agreeing to court's schedule for such matters starting in the afternoon on the 16th; receive and review confirmation from Judge's Court Operations Officer resetting start time for hearings to 1 PM on January 16; engage in communique exchange with Leonard Schwartz concerning technology needs for trial, and attendance at hearing on January 16th motions (to strike Charter School Plaintiffs' Fifth Amended Petition and Experts).	0.1
1/16/2014	(LS) Court hearing on Motion to Strike Pleadings and Motion to Strike Witnesses.	4
1/16/2014	(LS) Meeting with Denise Pierce, Lindsey Gordon and Bob Schulman (by phone) debrief on court hearing.	1
1/16/2014	(LS) Participate in telephone conference with Bob Schulman and TCSA administrators regarding outcome of hearing on Defendants' Motions to Strike Fifth Amended Petition and Experts; receive and review Denise Pierce's draft advisory communique to Dr. Anthony Rolle regarding Judge's order for re-do of depositions (Dr. Rolle and Toni Templeton) and points to be addressed in his deposition testimony supporting the Charter School Plaintiffs' claims.	2.5
1/16/2014	(LS) Debrief stakeholders on outcome of hearing and what needs to be done for second depositions of Dr. Anthony Rolle and Toni Templeton; meeting with Ms. Templeton regarding preparation of Dr. Rolle for his next deposition and how he can answer questions about the "mistakes" defense counsel claims occurred in data sets.	2

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/1/2014	(LS) Work on research memo with authorities for response to motion to strike.	4
1/2/2014	(RS) Return travel from Austin. (NO CHARGE)	2
1/2/2014	(RS) Receive and review Leonard Schwartz's research memorandums with authorities in preparation of Charter School Response to Motion to Strike.	0.2
1/3/2014	(AK) Review recommended revisions to Response to Motion to Strike prepared by Denise Pierce; incorporate revisions and revise Response to include additional details to summary of Defendants' trial objections to Plaintiffs' Fifth Amended Petition and summary of trial testimony regarding Plaintiffs' adequacy, efficiency, and suitability claims; include additional authorities demonstrating these issues were tried by consent; provide revised draft to Bob Schulman and Leonard Schwartz for review.	3.8
1/3/2014	(CAP) Research Judge's confidential Findings of Fact and Conclusions of Law to obtain data requested by Lindsey Gordon in preparation of Charter School Plaintiffs' draft Findings and Conclusions, as directed by Bob Schulman; download information from Department of Education web site regarding same; prepare two communiqués to Ms. Gordon with data obtained from DoE site; confer with Paralegal concerning transcript and document review to obtain information needed by Ms. Gordon (NO CHARGE).	0.6
1/3/2014	(RS) Conduct telephone conference with Allen Keller regarding Response to Motion to Strike (NO CHARGE); receive and review communique from Denise Pierce and attached draft Response to Motion to Strike Fifth Amended Petition with TCSA comments to same; receive and review reply from Leonard Schwartz to Ms. Pierce regarding revision of Response to include objection to timing of the state's Motion; receive and review communique from Mr. Keller and attached revised Response to Motion to Strike; prepare revisions to Response; forward revised Response to Mr. Keller for final review; receive and review near final draft Response and communique from Mr. Keller to Mr. Schwartz requesting final edit and approval.	1.3

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Date	Description	Hrs.
1/3/2014	(RS) Receive and review communiqué from Toni Templeton revised charts, data tables and reports based on expert report and deposition testimony of Dr. Lisa Dawn-Fisher; receive and review Range Analysis of Foundation School Program Funding prepared by Dr. Dawn-Fisher, with second communiqué from Ms. Templeton, regarding relevance of same to charter case; receive and review response and communiqué from Denise Pierce concerning pre-trial disclosure exhibits and slide presentations through direct testimony; prepare advisory response to Ms. Pierce regarding same; receive and review Leonard Schwartz's reply to Ms. Pierce concerning same (NO CHARGE); engage in communiqué exchange with Ms. Pierce, Ms. Templeton and Mr. Schwartz regarding same; receive and review third communiqué from Ms. Templeton regarding further data analysis supporting High Island Charter School exhibit comparing funding levels of similar sized charter schools to ISDs.	0.9
1/3/2014	(RS) Receive and review draft Designation of Witnesses and Exhibits from Denise Pierce; receive and review Leonard Schwartz's communiqué to Toni Templeton regarding increase in WADA gap in FY 2013; receive and review Ms. Templeton's response regarding same and report; prepare advisory communiqué to Mr. Schwartz regarding adjustment to regular program factor (RPAF) affecting reduction of funding received by districts; receive and review Mr. Schwartz's communiqué regarding additions to Response to Motion to Strike Fifth Amended Petition.	0.5
1/4/2014	(LS) Review draft Response to Motion to Strike Plaintiffs' Fifth Amended Petition; edit same and forward comments and revisions to Allen Keller.	2.6

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/4/2014	(LS) Work on Denise Pierce's draft Designation of Witnesses and Exhibits identifying additional exhibits offered for evidence; numerous communicate exchanges with Toni Templeton (with copies to Bob Schulman and Ms. Pierce) regarding increase in WADA gap in FY 2013; continue review and conduct communicate exchanges with Ms. Templeton regarding near-final version of report; preparation of additions to Response to Motion to Strike Fifth Amended Petition.	3
1/6/2014	(CAP) Line-by-line review and edit of Response to Motion to Strike Fifth Amended Petition (NO CHARGE); confer with Allen Keller regarding exhibits to Response; label exhibits; e-file Response and supporting exhibits; prepare communicate to all counsel forwarding a copy of Response and exhibits.	0.6
1/6/2014	(RS) Receive and review final version of Charter School Plaintiffs' Response to Defendants' Motion to Strike Fifth Amended Petition, e-filed with the court; receive and review most current version of Charter School Plaintiff's designation of trial witnesses, depositions and exhibits. (NO CHARGE)	0.2
1/6/2014	(RS) Receive and review current resume for David Dunn to be offered as trial exhibit; receive and review Interveners' pre-trial designation of trial witnesses, depositions and exhibits and attached exhibits; receive and review staff request to TCSA staff and Leonard Schwartz regarding current bio for Dr. Anthony Rolle and availability of same; receive and review communicate from Lindsey Gordon requesting Dr. Rolle's current bio; prepare reply to Ms. Gordon concerning same; direct staff for inclusion of current version of Dr. Rolle's bio to be supplemented upon receipt of updated version; receive and review Mr. Schwartz's response to staff directing submission of bio in file and substitution (NO CHARGE).	0.4
1/7/2014	(RS) Receive and review Amended Master Deposition List; receive and review second communicate from Michelle Jacobs to court regarding delay in e-filing of CCISD Plaintiffs' pre-trial designation of trial exhibits, witnesses and depositions (NO CHARGE).	0.1

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/7/2014	(RS) Receive and review amendment to pre-trial designation of trial witnesses, depositions and exhibits; receive and review communicate exchanges between counsel regarding same; prepare directive to staff concerning designation of Charter School Plaintiffs' expert on attorneys' fees; receive and review communiqué from Leonard Schwartz regarding same; receive and review communiqué from TTSFC Plaintiffs'.	0.1
1/8/2014	(CAP) Conduct telephone conferences (three) with Paralegal from Attorney General's office regarding upload of pre-trial exhibits to secure server site for access; same are not accessible in Dropbox; upload documents and confirm accessibility to same.	0.3
1/9/2014	(RS) Review and approve communiqué to all counsel regarding substitution of Rolle resume as pre-trial disclosures; receive and review replies from counsel regarding same (NO CHARGE); receive and review Interveners' Motion for Leave to file Amended Pre-Trial Filing and proposed Order granting Motion.	0.1
1/10/2014	(LS) Receive and review file-marked copy of Rule 11 agreement regarding expert program files disclosure/confidentiality; receive and review Notice scheduling hearing on Defendants' Motion to Strike Charter School Plaintiffs' Fifth Amended Petition and Edgewood Plaintiffs' Expert, Dr. Roberto Zamora; receive and review communiqué and updated report for Dan Casey from FBISD Plaintiffs' counsel; receive and review communiqué from Assistant Attorney General to FBISD Plaintiffs' counsel concerning retention of potential objections to Casey report.	1
1/10/2014	(RS) Receive and review Notice for hearing on Defendants' Motion to Strike Charter School Plaintiffs' Fifth Amended Petition and Edgewood Plaintiffs' Expert, Dr. Roberto Zamora; direct staff regarding same; receive and review communiqué and updated report for Dan Casey from FBISD Plaintiffs' counsel; receive and review communiqué from Assistant Attorney General to FBISD Plaintiffs' counsel concerning objections to same.	0.1

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1/13/2014	(LS) Receive and review communiqué from defense counsel regarding filing of Motion to Strike Experts Templeton and Rolle; engage in communiqué exchange with Bob Schulman concerning same and filing of Motion to Strike Dawn-Fisher; receive and review Motion filed by Defendants to Strike Charter School Plaintiffs' experts; begin research for purposes of response to Motion to Strike Experts.	4.5
1/13/2014	(RS) Receive and review communique from defense counsel announcing filing of Motion to Strike Experts Templeton and Rolle; engage in communique exchanges with Leonard Schwartz concerning same and consideration of counter Motion to Strike Dr. Dawn-Fisher; receive and review Motion to Strike Charter School Plaintiffs' experts; engage in communique exchanges and conduct telephone conference with Interveners' counsel regarding submission of attorneys' fees motions and procedure; confer with and direct staff regarding participation in Phase 1 Rule 11 regarding attorney fee affidavits; receive and review staff report concerning same.	1.3
1/14/2014	(CAP) Telephone conference with Leonard Schwartz regarding references in Rolle deposition to continuation of Templeton deposition (NO CHARGE); review depositions and prepare advisory to Mr. Schwartz concerning same.	0.2
1/14/2014	(LS) Work on Response to Motion to Strike.	2.5
1/14/2014	(RS) Receive and review advisory communiqué from Leonard Schwartz regarding preparation of Response to Defendants' Motion to Strike Charter School Plaintiffs' Expert Witnesses, Templeton and Rolle; receive and review follow-up advisory communiqué from Lindsey Gordon concerning same; prepare edits and comments regarding same and to Mr. Schwartz's observations; prepare advisory communique to Mr. Schwartz and TCSA staff forwarding same.	0.7

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Date	Description	Hrs.
1/16/2014	(CAP) Conduct multiple telephone conferences with Bob Schulman and Leonard Schwartz regarding revisions to Response to Defendants' Motion to Strike Experts, suggested revisions, additions, edits, and citations to include within same; discussion with Mr. Schulman regarding required notice period under the Rules for notice to opposing counsel of hearing date; line-by-line review of Response and revisions to same; convert, upload and e-file Response; prepare communique to all counsel, Judge Dietz and the court staff forwarding a copy of same. (NO CHARGE)	4
1/16/2014	(LS) Edit draft Response to Motion to Strike Expert Witnesses, revised by TCSA administrators; forward same to Bob Schulman for review; attorney conference with Mr. Schulman regarding research requested in support of Response and authority for allowing scheduling of additional depositions of experts (NO CHARGE); engage in telephone and communique exchanges with staff, Mr. Schulman and TCSA administrators regarding same, research and presentation; participate in telephone conferences with Mr. Schulman concerning same (NO CHARGE).	1
1/16/2014	(RS) Receive and review Response to Motion to Strike Expert Witnesses; prepare revisions to Response; direct staff in research on issues addressed in same; engage in telephone and communique exchanges with staff, Leonard Schwartz and TCSA administrators regarding same, research and presentation; conduct telephone conferences with Mr. Schwartz concerning same; conduct telephone conference with Leonard Schwartz and TCSA regarding results of hearing on Defendants' Motions to Strike Charter School Plaintiffs' Fifth Amended Petition and Experts (NO CHARGE).	1.2
1/17/2014	(LS) Receive Edgewood Plaintiffs Objection to Exhibit; review same.	0.4
1/17/2014	(LS) Receive Defendants' Objection to Exhibit and review same; communique exchange with Bob Schulman regarding filing by the State.	0.6

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Date	Description	Hrs.
1/17/2014	(LS) Receive Calhoun County ISD Plaintiffs Objection to Exhibit and review same.	0.4
1/17/2014	(LS) Receive Fort Bend ISD Plaintiffs' Objection to Exhibit, review same.	0.3
1/17/2014	(LS) Review proposed [REDACTED]; discuss same with Bob Schulman (NO CHARGE); [REDACTED]	0.2
1/17/2014	(RS) Receive and review Denise Pierce's proposed communique to Dr. Anthony Rolle regarding results of court hearing, scheduling of depositions and preparation for deposition and trial testimony (NO CHARGE); review rough draft of January 16 hearing transcript; receive and review Defendants' Supplement to Motion to Strike Edgewood ISD Plaintiffs' Expert Zamora; receive and review FBISD Plaintiffs' Objections to Exhibits and Deposition Designations and Second Supplemental Deposition Designations; receive and review Defendants' Rule of Evidence 104 Motion and Objections with attachments; forward same to TCSA staff and Leonard Schwartz; review communique from staff regarding proposed Motion in Limine; confer with and direct staff regarding designation of witness sequence by Interveners; receive and review communique from staff with report on Interveners proposed order; prepare communique to Leonard Schwartz and TCSA regarding same.	1.4
1/19/2014	(LS) Receive and review ISD Plaintiffs' Response to Defendants' Motion to Exclude Evidence Related to 2012-13 School Year; work on opening statement PowerPoint presentation and accompanying slide notes; receive and review communiqué from Bob Schulman, with copy to Denise Pierce, provide suggested edits to slide notes page; receive and review communiqué from Mr. Schulman inquiring as to how tax rates impact charter income.	2.5
1/20/2014	(RS) Receive and review ISD Plaintiffs' Response to Defendants' Motion to Exclude Evidence Related to 2012-13 School Year.	0.1

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Date	Description	Hrs.
1/27/2014	(LS) Prepare directive to Russell Wilson for preparation of legal memo to the court on Response to Objection to admission of PowerPoint as an exhibit; receive and review Mr. Wilson's request for information regarding data saved by TCSA from TEA's website; receive and review final version of memo prepared by Mr. Wilson on [REDACTED] and other matters; confer with Mr. Schulman regarding same.	3.5
1/27/2014	(RS) Return travel. (NO CHARGE)	2
1/27/2014	(RS) Receive and review Response to Defendants' Objections to Admission of Charter School Plaintiffs' PowerPoint Slides as an Exhibit; prepare edits and forward to Leonard Schwartz.	0.6
1/28/2014	(CAP) Multiple communicate exchanges with Leonard Schwartz and Bob Schulman regarding Amended Pre-trial Disclosures and information to be included as exhibits identified in same; telephone conference with Mr. Schulman concerning same and non-response by Mr. Schwartz to request for assistance in identifying appropriate exhibits; telephone call to Mr. Schwartz to discuss same, as he requested e-filing today; left detailed message (NO CHARGE).	2.4
1/29/2014	(CAP) Receive and upload PowerPoint presentations for David Dunn and Toni Templeton; relabel same and upload into Dropbox folder and on Attorney General secure server site for access by all counsel; conduct telephone conference with Leonard Schwartz regarding upload and distribution of PPTs to all counsel; prepare communicate to all counsel advising of upload of PPTs to be offered as evidence on January 30.	0.2
1/29/2014	(RS) Receive and review signed Orders on Defendants' Motion to Strike Charter School Plaintiffs' Fifth Amended Petition and Defendants' Objections and Rule of Evidence Motion to Exclude Evidence related to 2012-13 School Year. (NO CHARGE)	0.2
1/30/2014	(CAP) Receive and review request from Michelle Jacobs for copy of Dunn and Pierce PowerPoint presentations; prepare reply to Ms. Jacobs same will be sent to all counsel by separate e-mail. (NO CHARGE)	0.1

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Date	Description	Hrs.
1/30/2014	(CAP) Receive and review Bob Schulman's communique regarding Assistant Attorney General's complaint she has no access to Dropbox; compress PDF PowerPoint files containing Dunn and Templeton presentations; prepare communique to Assistant Attorney General, with copy to all counsel forwarding compressed files and reminding that my e-mail notified them of accessibility to files in Dropbox and on the Attorney General secure server site; prepare communique to Legal Assistants for Attorney General's office reminding them all exhibits have been uploaded on secure server site for download and distribution to Assistant Attorneys General; receive and review reply from Legal Assistant at Attorney General's office confirming receipt.	0.3
1/20/2014	(RW) Receive and review communique from Paralegal forwarding State Defendants' Motion to Strike Rolle and Templeton as Experts. (NO CHARGE)	0.1
1/22/2014	(LS) Attend afternoon session of trial.	4.5
1/22/2014	(LS) Attend morning session of trial (Lynn Moak cross).	2
1/23/2014	(LS) Attend morning session of trial; cross-examination of Dr. Roberto Zamora.	2
1/23/2014	(LS) Attend afternoon session of trial	4
1/29/2014	(RS) Attend morning session of trial; attend lunch briefing with litigation staff; prepare multiple "report on trial" advisory communiqués to Leonard Schwartz and TCSA staff (Clark and Pierce trial testimony commentary); attend afternoon session of trial.	7
1/29/2014	(RS) Travel time for travel to Austin	1.8
1/29/2014	(RS) Return from Austin following trial. (NO CHARGE)	2
1/30/2014	(LS) Attend trial.	4
1/30/2014	(RS) Travel to Austin to attend trial.	1.8
1/30/2014	(RS) Attend trial, morning session; prepare advisory communiqués to Leonard Schwartz and TCSA staff regarding questioning and testimony of Wayne Pierce including ISD facility needs and funding; strategize on [REDACTED]; prepare internal memo to Mr. Schwartz regarding re-emphasis by David Dunn in testimony on stringent accountability standards set for charters compared to districts.	4
1/30/2014	(RS) Return travel. (NO CHARGE)	2

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/2/2014	(RS) Travel to Austin; attend litigation preparation session at TUSA.	6
1/3/2014	(LS) Telephone conference with Bob Schulman regarding 2014 Rolle report for use as evidence, proposed Findings of Fact and Conclusions of Law, and preparation of trial exhibits; prepare advisory to Dr. Anthony Rolle and Toni Templeton regarding preparation for in-court testimony; prepare proposed cross-examination questions for Dr. Rolle based upon previous depositions.	6
1/5/2014	(LS) Extended telephone conference with Bob Schulman regarding trial tactics and our presentation. (NO CHARGE)	0.5
1/7/2014	(LS) Work with Toni Templeton in preparation for trial; work on direct testimony for Dr. Anthony Rolle, Ms. Templeton and David Dunn; prepare Ms. Templeton and Dr. Rolle for deposition and trial.	8
1/15/2014	(LS) Preparation for Court hearing/trial.	3.2
1/16/2014	(LS) Preparation for court hearing/trial.	5
1/18/2014	(LS) Prepare for start of trial.	6
1/18/2014	(LS) Receive and review communiqué from Dr. Anthony Rolle confirming arrival in Austin on January 24 to prepare for deposition on the 27th (NO CHARGE); engage in communiqué exchanges with staff on objections by Edgewood ISD Plaintiffs to Defendants' failure to authenticate exhibits and whether depositions offered as exhibits require authentication; work on upcoming depositions of Toni Templeton and Dr. Rolle; work on upcoming trial opening and initial presentations; work on cross for first Plaintiffs' witnesses at opening of trial.	5.9
1/20/2014	(LS) Work on draft of opening statement; construct PowerPoint for opening statement; work on proposed Findings of Fact/Conclusions of Law; conferences with Toni Templeton and Bob Schulman regarding date for depositions of Ms. Templeton and Dr. Anthony Rolle; multiple communicate exchanges with Assistant Attorney General regarding date for depositions; review Moak presentation (forward same to Denise Pierce, Dr. Rolle and Ms. Templeton to obtain comments).	8
1/20/2014	(LS) Review opening statement and practice same.	2.9

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<b>Date</b>	<b>Description</b>	<b>Hrs.</b>
1/20/2014	(RS) Receive and review proposed opening statement and PowerPoint presentation; draft edits to same; prepare communiqué to Leonard Schwartz regarding same; prepare communiqué to TCSA administrators and Mr. Schwartz regarding tax rate impact on charter revenues.	0.4
1/21/2014	(LS) Review filings by Plaintiffs groups in preparation for trial (day 2).	2
1/21/2014	(RS) Receive and review advisory communiqué from Toni Templeton regarding tax rate impact on charter school revenue stream; receive and review communicate from Leonard Schwartz regarding Defendants' objections to expert reports and PowerPoints; prepare advisory response to Mr. Schwartz concerning same; receive and review response from Mr. Schwartz regarding comparison of charter school to school district performance with economically disadvantaged students; prepare response to Mr. Schwartz concerning same.	0.4
1/25/2014	(LS) Preparation of direct testimony with Toni Templeton; research on issue of using slides for exhibit; direct to Russell Wilson to prepare Response to Objection to Slides; preparation of second draft of outline of direct testimony of David Dunn; continued to work with Ms. Templeton on direct testimony of Mr. Dunn and Ms. Templeton.	12
1/26/2014	(LS) Preparation of direct testimony of Toni Templeton and David Dunn; conferences regarding problems with scheduling Dr. Anthony Rolle and making a determination as to whether or not to de-designate him as a witness; multiple communicate exchanges with Assistant Attorney General regarding Dr. Rolle; telephone conference with Denise Pierce, Bob Schulman and Mr. Dunn regarding Dr. Rolle; telephone conversation with Mr. Dunn authorizing release of Dr. Rolle as an expert witness; preparation of Dr. Rolle for his deposition (prior to determination not to use him); preparation of Ms. Templeton for her deposition.	10

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Date	Description	Hrs.
1/26/2014	(LS) Receive and review communiqué from Bob Schulman directing review of Zamora testimony in preparation of David Dunn for trial, with recommendations on elaborating Mr. Dunn's experience as a lobbyist on testimony regarding impact of legislative changes and related matters; engage in communiqué exchange with Mr. Schulman regarding introduction of Toni Templeton's slides derived from Dawn-Fisher data during her upcoming deposition; prepare directive to TCSA staff for print out of data attached in preparation for Rolle and Templeton depositions, forward to Mr. Schulman.	1.2
1/26/2014	(LS) Engage in communiqué exchange with Bob Schulman and staff regarding request to obtain excerpts from Wayne Pierce deposition (NO CHARGE); receive and review current version of PPT slide presentation for David Dunn; receive and review communiqué from Mr. Schulman regarding assistance I need with reference to edits/additions to same; prepare reply; prepare response to Mr. Schulman requesting designation of specific slides to review in addressing concerns.	0.7
1/26/2014	(RS) Engage in communiqué exchange with Leonard Schwartz and staff regarding Wayne Pierce deposition; receive and review current version of PowerPoint slide presentation for David Dunn; prepare edits/additions to same; prepare advisory communiqué to Mr. Schwartz regarding edits/additions to same; receive and review response from Mr. Schwartz's; prepare response identifying specific relevant slides.	1.1
1/27/2014	(RS) Attend trial, attend lunch meeting with TCSA staff; confer with Leonard Schwartz on presentment of Charter School Plaintiffs' case without expert Rolle; prepare notes from discussions with Dr. Anthony Rolle and Toni Templeton on January 25 and forward same to Ms. Templeton, Mr. Schwartz and Denise Pierce; review revised report of Albert Cortez; forward same to litigation team for review as an example of a bar graph demonstrating a "gap"; prepare communiqué to Ms. Templeton regarding labeling for similar schools analysis in her presentation materials; confer with TCSA staff regarding witness preparation; prepare advisory memorandum to Mr. Schwartz and Russell Wilson regarding Judge's use of Rule 197.3 to allow defense counsel to produce and use a document disclosed by Defendants in discovery in cross-examination of Albert Cortez; review lengthy response citing relevant authorities from Mr. Wilson; receive and review Mr. Wilson's second response concerning same.	7

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Date	Description	Hrs.
1/27/2014	(RS) Travel to Austin.	1.9
1/28/2014	(LS) Prepare for trial.	4.8
1/28/2014	(LS) Work with Toni Templeton and Denise Pierce on direct testimony by Ms. Templeton and David Dunn; practice direct with Ms. Templeton; practice direct with Mr. Dunn; work on possible cross with Ms. Pierce, Ms. Templeton and Mr. Dunn; debrief on trial in conference with Bob Schulman, Ms. Pierce, Ms. Templeton and Mr. Dunn.	8
1/28/2014	(RW) Receive and review communique from Leonard Schwartz requesting review of Charter School Plaintiffs' designation of experts and witnesses. (NO CHARGE)	0.1
1/28/2014	(RS) Receive and review Russell Wilson's communique to Toni Templeton regarding brief he is preparing on admissibility of PowerPoint slides requesting draft of same; receive and review Ms. Templeton's reply and attached PPT presentations for Ms. Templeton and David Dunn; receive and review communique exchanges between Mr. Wilson and Ms. Templeton regarding same; receive and review multiple communiqués from Ms. Templeton and Leonard Schwartz and attached revised versions of Dunn and Templeton slide presentations; prepare comments and revisions to same; prepare advisory communique to Mr. Schwartz regarding same; receive and review advisory response from Mr. Schwartz; receive and review revised Dunn presentation from Denise Pierce; prepare advisory communique to Ms. Pierce regarding admission of PPT presentations for Dunn and Templeton.	0.9
1/29/2014	(LS) Prepare for trial by reviewing Toni Templeton's PowerPoint and making notes on exhibits; research on admission of evidence and hearsay evidence rules.	3.2
1/29/2014	(RS) Prepare advisory communique to Leonard Schwartz and TCSA staff concerning discussion with defense counsel, while attending trial; prepare follow-up advisory communiqué on adequacy as presented in Phase 1 of trial for Dunn/Templeton testimony.	0.5
1/30/2014	(LS) Receive and review communiqué from Bob Schulman with rough draft of January 29 trial transcript, referencing key points in same for review.	0.5

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Date	Description	Hrs.
1/17/2014	(CAP) Review pre-trial submissions by ISD Plaintiffs and Charter School Plaintiffs; telephone conferences with Amy Sabonian and Chris Diamond concerning Interveners' witnesses, as sequence designation was not received; prepare sequence of witnesses to be called at trial; receive and review request from Bob Schulman for Defendants' data; review scheduling order to confirm due date for same; prepare reply to Mr. Schulman and Leonard Schwartz regarding January 27 deadline for Defendants to submit data, or identify same seven days prior to testimony.	0.3

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