

**PERKINS COIE ATTORNEYS' FEES SOUGHT
FOR WORKED PERFORMED RE PLAINTIFFS' MOTION FOR SANCTIONS**

Timekeeper Name	Date Worked Performed	Description	Time Billed	Billing Rate	Amount Billed
Gellert, Nicholas P.	3/21/2018	Consider strategy for sanctions motion;	0.30	\$ 630.00	\$ 189.00
Gellert, Nicholas P.	3/22/2018	Develop strategy for motion for sanctions and related issues;	1.20	\$ 630.00	\$ 756.00
Gellert, Nicholas P.	3/23/2018	Consider strategy for motion for sanctions, potential referral to magistrate, and discovery status generally;	0.60	\$ 630.00	\$ 378.00
Gellert, Nicholas P.	3/26/2018	Assist with strategy for motion for sanctions (.3);	0.3	\$ 630.00	\$ 189.00
Gellert, Nicholas P.	3/27/2018	Develop strategy for motion for sanctions and assist with preparation of same and supporting declarations;	2.20	\$ 630.00	\$ 1,386.00
Gellert, Nicholas P.	3/28/2018	Assist with strategy for and preparation of motion for sanctions and supporting materials;	1.50	\$ 630.00	\$ 945.00
Gellert, Nicholas P.	3/29/2018	Attend to final issues for motion for sanctions;	0.20	\$ 630.00	\$ 126.00
Gellert, Nicholas P.	4/9/2018	Review brief in opposition to motion for sanctions;	0.40	\$ 630.00	\$ 252.00
Gellert, Nicholas P.	4/10/2018	Review response and supporting declarations on motion for sanctions and outline issues for reply (.7);	0.70	\$ 630.00	\$ 441.00
Gellert, Nicholas P.	4/11/2018	Review and suggest revisions to draft reply brief on motions for sanctions (.5);	0.50	\$ 630.00	\$ 315.00
Gellert, Nicholas P.	4/12/2018	Review revisions to reply brief on sanctions motion (.2);	0.20	\$ 630.00	\$ 126.00
Gellert, Nicholas P. Timekeeper Total			8.10	\$ 630.00	\$ 5,103.00
Perez, David A.	3/7/2018	E-mail to team regarding sanctions motion (.8);	0.80	\$ 575.00	\$ 460.00
Perez, David A.	3/8/2018	E-mails with Perkins team regarding sanctions motion;	0.50	\$ 575.00	\$ 287.50
Perez, David A.	3/9/2018	Confer with L. Hennessey regarding sanctions motion (.5);	0.50	\$ 575.00	\$ 287.50
Perez, David A.	3/15/2018	Revise outline for sanctions motion (.7);	0.70	\$ 575.00	\$ 402.50

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Perez, David A.	3/16/2018	Review motion for over length brief in support of Sanctions Motion and e-mail to C. Sepe regarding same;	0.90	\$ 575.00	\$ 517.50
Perez, David A.	3/19/2018	Revise motion for sanctions;	4.30	\$ 575.00	\$ 2,472.50
Perez, David A.	3/20/2018	Correspondence regarding sanctions motion (1.0); revise sanctions motion (1.4);	2.40	\$ 575.00	\$ 1,380.00
Perez, David A.	3/21/2018	Continue reviewing motion for sanctions (2.2); revise proposed order regarding sanctions motion (.5); review court's order on page length and e-mails with N. Gellert and co-counsel regarding implications for sanctions motion (.5); telephone conference with co-counsel to discuss case strategy (.5);	3.70	\$ 575.00	\$ 2,127.50
Perez, David A.	3/22/2018	Telephone conference with Perkins team to discuss attorneys' fees petition (.5); review L. Ruben's edits to sanctions motion (.4);	0.90	\$ 575.00	\$ 517.50
Perez, David A.	3/26/2018	Review edits to motion for sanctions;	0.60	\$ 575.00	\$ 345.00
Perez, David A.	3/28/2018	Revise sanctions motion (.9); e-mails with co-counsel regarding requested relief for sanctions motion (.7);	1.60	\$ 575.00	\$ 920.00
Perez, David A.	4/6/2018	Telephone conference with government to discuss their filings in camera in response to sanctions motion;	0.50	\$ 575.00	\$ 287.50
Perez, David A.	4/10/2018	Review government's opposition to sanctions (1.0); telephone conference with co-counsel team regarding reply brief for sanctions (.5);	1.50	\$ 575.00	\$ 862.50
Perez, David A.	4/11/2018	Review government's response to sanctions motion (.4); revise reply brief on sanctions motion (1.0);	1.40	\$ 575.00	\$ 805.00
Perez, David A. Timekeeper Total			20.30	\$ 575.00	\$ 11,672.50

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Timekeeper Name	Date Worked Performed	Description	Time Billed	Billing Rate	Amount Billed
Hennessey, Laura K.	3/7/2018	Email regarding motion for sanctions (.6);	0.60	\$ 490.00	\$ 294.00
Hennessey, Laura K.	3/8/2018	Confer with C. Sepe and W. Hung regarding motion for sanctions (.5); review and outline facts for motion for sanctions (2.5);	3.00	\$ 490.00	\$ 1,470.00
Hennessey, Laura K.	3/9/2018	Confer with team and compile facts regarding motion for sanctions;	1.80	\$ 490.00	\$ 882.00
Hennessey, Laura K.	3/10/2018	Review discovery correspondence and pleadings and begin drafting fact section of Plaintiffs' omnibus motion for sanctions;	4.70	\$ 490.00	\$ 2,303.00
Hennessey, Laura K.	3/11/2018	Email regarding sanctions motion;	0.10	\$ 490.00	\$ 49.00
Hennessey, Laura K.	3/12/2018	Email regarding sanctions motion;	0.20	\$ 490.00	\$ 98.00
Hennessey, Laura K.	3/13/2018	Email regarding sancitons motion;	0.20	\$ 490.00	\$ 98.00
Hennessey, Laura K.	3/14/2018	Draft outline of motion for sanctions;	2.70	\$ 490.00	\$ 1,323.00
Hennessey, Laura K.	3/15/2018	Draft outline of motion for sanctions;	1.90	\$ 490.00	\$ 931.00
Hennessey, Laura K.	3/17/2018	Draft motion for sanctions;	4.60	\$ 490.00	\$ 2,254.00
Hennessey, Laura K.	3/18/2018	Draft omnibus motion for sanctions;	9.30	\$ 490.00	\$ 4,557.00
Hennessey, Laura K.	3/19/2018	Email regarding details for motion for sanctions (1.6); finalize and file motion for overlength brief (1.0); incorporate D. Perez edits into clean copy of motion for sanctions (1.5); email regarding attorney's fees calculations (.5);	4.60	\$ 490.00	\$ 2,254.00
Hennessey, Laura K.	3/20/2018	Edit motion for sanctions and accompanying declaration and proposed order (2.00); confer with T. Marino regarding motion for sanctions (0.50); review and edit time entries for monetary sanctions support (1.00);	4.00	\$ 490.00	\$ 1,960.00

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Hennessey, Laura K.	3/21/2018	Bi-monthly co-counsel call to discuss motion for sanctions (1.00); email regarding motion for sanctions and related documentation (1.50);	2.50	\$ 490.00	\$ 1,225.00
Hennessey, Laura K.	3/22/2018	Confer with Perkins team regarding sanctions motion (0.50); email and telephone conferences regarding motion for sanctions and edits to accompanying documents (2.50);	3.00	\$ 490.00	\$ 1,470.00
Hennessey, Laura K.	3/26/2018	Edit motion for sanctions and accompanying documentation;	3.30	\$ 490.00	\$ 1,617.00
Hennessey, Laura K.	3/27/2018	Team call to discuss motion for sanctions (.6); edit motion for sanctions and accompanying documents (3.1); email regarding attorneys fee declarations in support of motion for sanctions (.5); email regarding finalization of motion for sanctions (1.0);	5.20	\$ 490.00	\$ 2,548.00
Hennessey, Laura K.	3/28/2018	Finalize motion for sanctions and accompanying documents for filing;	3.90	\$ 490.00	\$ 1,911.00
Hennessey, Laura K.	3/29/2018	Finalize papers and oversee filing of motion for sanctions;	4.00	\$ 490.00	\$ 1,960.00
Hennessey, Laura K.	4/4/2018	Team call with co-counsel to discuss motion for sanctions reply and other issues;	0.60	\$ 490.00	\$ 294.00
Hennessey, Laura K.	4/5/2018	Confer with C. Sepe and W. Hung regarding sanctions reply brief (.6); confer with D. Perez regarding sanctions reply brief (.3); confer with S. Wyatt regarding sanctions reply brief (.3);	1.20	\$ 490.00	\$ 588.00
Hennessey, Laura K.	4/6/2018	Email regarding motion for sanctions reply brief and related meet and confers;	0.80	\$ 490.00	\$ 392.00

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Hennessey, Laura K.	4/10/2018	Review opposition brief and accompanying materials and draft reply brief in support of motion for sanctions (7.2); confer with co-counsel regarding reply brief in support of motion for sanctions (.5);	7.70	\$ 490.00	\$ 3,773.00
Hennessey, Laura K.	4/11/2018	Draft reply brief in support of motion for sanctions;	3.20	\$ 490.00	\$ 1,568.00
Hennessey, Laura K. Timekeeper Total			73.10	\$ 490.00	\$ 35,819.00
TOTAL			101.5		\$ 52,594.50