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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HAZEL MCMILLON; GENE
STRICKLAND; TRUDY
SABALBORO; KATHERINE
VAIOLA; and LEE SOMMERS, each
individually and on behalf of a class
of present and future residents of
Kuhio Park Terrace and Kuhio Homes

CIVIL NO. CV 08-00578 LEK
Civil Rights Action
Class Action

**PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES
AND COSTS; MEMORANDUM IN**

who have disabilities affected by architectural barriers and hazardous conditions,

Plaintiffs,

vs.

STATE OF HAWAII; HAWAII PUBLIC HOUSING AUTHORITY; REALTY LAUA LLC, formerly known as R & L Property Management LLC, a Hawaii limited liability company,

Defendants.

STATE OF HAWAII; HAWAII PUBLIC HOUSING AUTHORITY,

Third-Party Plaintiffs,

vs.

URBAN MANAGEMENT CORPORATION DBA URBAN REAL ESTATE COMPANY, DOES 1-20,

Third-Party Defendants.

SUPPORT OF MOTION;
DECLARATION OF JASON H. KIM; EXHIBITS 1-2;
DECLARATION OF M. VICTOR GEMINIANI; EXHIBITS 3-4;
DECLARATION OF CLAUDIA CENTER; EXHIBITS 5-6;
CERTIFICATE OF SERVICE

TRIAL: June 7, 2011

PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND COSTS

Plaintiffs HAZEL MCMILLON, TRUDY SABALBORO,

KATHERINE VAIOLA, and LEE SOMMERS, by and through their counsel,

Alston Hunt Floyd & Ing, Lawyers for Equal Justice, and Legal Aid Society –

Employment Law Center, move this Court for an award of attorneys' fees and costs to be paid from the settlement fund established by the settlement in this matter.

Specifically, Plaintiffs request an award of \$ 365,000 in attorneys' fees and costs.

This Motion is made pursuant to Rules 7, 23(h)(1), and 54 of the Federal Rules of Civil Procedure, Local Rule 54.3, and 42 U.S.C. § 12205 and is supported by the attached Memorandum, Declarations, and Exhibits, as well as the pleadings and files in this action.

DATED: Honolulu, Hawai`i, January 19, 2010.

/s/ Jason H. Kim

PAUL ALSTON

JASON H. KIM

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HAZEL MCMILLON; et al.,
Plaintiffs,

vs.

STATE OF HAWAII; et al.,
Defendants.

STATE OF HAWAII; et al.,

Third-Party Plaintiffs,

vs.

URBAN MANAGEMENT
CORPORATION DBA URBAN
REAL ESTATE COMPANY, et al.,

Third-Party
Defendants.

CIVIL NO. CV 08-00578 LEK
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Class Action

**MEMORANDUM IN SUPPORT
OF MOTION**

MEMORANDUM IN SUPPORT OF MOTION

I. INTRODUCTION

This action brought by HAZEL MCMILLON, TRUDY SABALBORO; KATHERINE VAIOLA; and LEE SOMMERS (“Named Plaintiffs”) alleges violations of the Americans with Disabilities Act (“ADA”), Section 504 of the Rehabilitation Act of 1973 (“Section 504”) and the Fair Housing Act Amendments regarding physical access for persons with disabilities

at Kuhio Park Terrace (KPT) and Kuhio Homes and the failure to provide reasonable accommodations. It is a companion case with *McMillon v. State of Hawaii*, Civil No. 08-1-2608-12, in the Circuit Court of the First Circuit for the State of Hawai`i. The class was certified in this action on October 29, 2009.

After over a year of settlement discussions facilitated by Magistrate Judge Leslie E. Kobayashi and mediator Keith Hunter, Defendants STATE OF HAWAII (“State”) and HAWAII PUBLIC HOUSING AUTHORITY (“HPHA”) (collectively, “State Defendants”) and Named Plaintiffs entered into a Settlement Agreement. This Court has preliminarily approved the settlement and the final fairness hearing is set for February 1, 2011.

Under the Settlement Agreement, the State Defendants agreed to an award of attorneys' fees and costs in the total amount of \$365,000. This amount is reasonable and fair to the class in light of: (1) the actual attorney time and expenses reasonably and necessarily expended in this matter, which far exceed \$365,000; and (2) the relief obtained for the benefit of the class.

II. BACKGROUND

A. Procedural History

On December 18, 2008, Named Plaintiffs commenced a class action against the State Defendants and REALTY LAUA LLC (“Realty Laua”), alleging discrimination in violation of the ADA, Section 504, and the Fair Housing Act

Amendments regarding physical access for persons with disabilities at Kuhio Park Terrace (KPT) and Kuhio Homes and the failure to provide reasonable accommodations.

On March 31, 2009, the State Defendants filed a Motion to Dismiss Plaintiffs' Complaint and/or for Summary Judgment (Motion to Dismiss, Doc. 23). On April 1, 2009, Realty Laua filed its Answer and Crossclaim against State Defendants, (Defendant Realty Laua LLC's Answer and Crossclaim, Doc. 25), and on April 15, 2009, joined State Defendants' Motion to Dismiss (Motion for Joinder re Motion to Dismiss, Doc. 38). In an Order dated June 19, 2009, the Court denied State Defendants' Motion for Summary Judgment and dismissed Plaintiffs' Fair Housing Act Amendments claims against the State Defendants, but Plaintiffs' claims pursuant to Title II and Section 504 against the State Defendants and all claims against Realty Laua remained. (Order Re State of Hawaii's and HPHA's Motion to Dismiss, Doc. 87 at 31-32).

On October 29, 2009, the District Court entered an Order certifying the following class in this action:

All present and future residents of KPT and Kuhio Homes who are eligible for public housing, who have mobility impairments or other disabling medical conditions that constitute "disabilities" or "handicaps" under federal disability nondiscrimination laws, and who are being denied access to the facilities, programs, services, and/or activities of the Defendants, and/or discriminated against, because of the architectural

barriers and/or hazardous conditions described in the Complaint.

(Order Re Class Certification, Doc. 120 at 30-31.)

On December 16, 2009, Plaintiffs filed their Motion for Preliminary Injunction (MPI) (Plaintiffs' Motion for Preliminary Injunction and supporting documents, Doc. 126-136); however, due to the progression of settlement discussions, Plaintiffs withdrew their MPI on February 17, 2010 (Plaintiffs' Withdrawal of MPI, Doc. 174).

From late 2009 through early 2010, the parties met several times with Mr. Hunter and Judge Kobayashi to discuss settlement. The parties came to an agreement, as set forth in the Settlement, Release, Indemnification, and Assignment Agreement attached as Exhibit "1" to the Declaration of Jason Kim submitted in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, filed November 5, 2010 (Doc. 249).

The material terms of the settlement are as follows:

- The State Defendants have implemented and will comply with improved policies and forms for requests for reasonable accommodations and transfers to accessible housing units;
- The State Defendants have committed to deadlines for responding to and implementing requests for reasonable accommodations and transferring disabled tenants to accessible units;
- The State Defendants have, and will, make certain improvements and modifications to the KPT and Kuhio Homes premises and grounds to improve access for individuals with disabilities;

- The State Defendants shall contract with a nationally-recognized organization with experience in accessible housing to monitor compliance with the ADA and Section 504, review policies and procedures, perform a physical site assessment of KPT and Kuhio Homes, and provide training to the State Defendants' employees and contractors;
- The State Defendants shall pay to Plaintiffs a total of \$610,000, to be disbursed as follows: (1) \$45,000 to the Named Plaintiffs; (2) \$200,000 for the beginning of a fund to distribute among class members; and (3) \$365,000 in attorneys' fees and costs;
- The State Defendants shall assign all claims against Realty Laua and Urban relating to the class actions to the Named Plaintiffs, who shall prosecute these claims for the benefit of the Class; and
- The Named Plaintiffs and the Class shall release and dismiss all claims against the State Defendants alleged in this action and the Circuit Court action.

On December 16, 2010, this Court entered its Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (Doc 259). Notice of the settlement has been provided to the class and the final fairness hearing is set for February 1, 2011.

B. Attorneys' Fees Incurred in Various Stages of the Case

Class counsel incurred attorneys' fees as set forth below during the following stages of this action:

<u>Primary Activities</u>	<u>Dates</u>	<u>AHFI Fees</u>	<u>LEJ Fees</u>	<u>LAS-ELC Fees</u>	<u>Total</u>
Pre-Complaint Investigation and Preparing Complaints	up to 12/31/08	\$15,759.16	\$73,941.50	\$23,069.85	\$112,770.51
Preliminary Settlement	1/1/09 – 3/31/09	\$34,797.89	\$55,335.00	\$14,906.85	\$105,039.74

Discussions and Preparation for Discovery					
Motions and Discovery	4/1/09 – 10/31/09	\$65,276.41	\$107,872.25	\$62,824.20	\$235,972.86
Preliminary Injunction and Settlement	11/1/09 – 2/28/10	\$31,236.64	\$46,414.00	\$40,353.80	\$118,004.44
Negotiate Settlement, Finalize Settlement Agreement, and Motions for Approval	3/1/10 – 12/31/10	\$42,603.12	\$32,367.75	\$3,943.35	\$78,914.22
Total		\$189,673.22	\$315,930.50	\$145,098.05	\$650,701.77

III. ARGUMENT

A. Class Counsel Are Entitled to an Award of Their Reasonable Attorneys' Fees and Costs.

Plaintiffs' counsel are entitled to an award of their reasonable fees and costs in this action, both under the terms of the Settlement Agreement and under the applicable substantive law. *See* FRCP Rule 23(h) (“In a certified class action, the court may award reasonable attorney’s fees and non-taxable costs that are authorized by law or by the parties’ agreement.”) The parties agreed that the State Defendants would pay \$365,000 to class counsel for their attorneys' fees and costs. Ex. “1” to Motion for Preliminary Approval of Class Action Settlement.

Furthermore, the Plaintiffs brought and settled claims under Title II of the Americans With Disabilities Act. A prevailing party under the ADA is entitled to a "reasonable attorney's fee, including litigation expenses and costs." 42 U.S.C. § 12205. A party that obtains a settlement agreement that grants enforceable relief

is a “prevailing party” for purposes of fee-shifting statutes. *See Jankey v. Poop Deck*, 537 F.3d 1122, 1130 (9th Cir. 2008) (“A settlement agreement meaningfully alters the legal relationship between parties [so as to support an award of attorneys’ fees] if it allows one party to require the other party to do something it otherwise would not be required to do.”) (Internal quotation omitted.)

B. The Fees and Expenses Incurred by Class Counsel Were Reasonable.

In statutory fee shifting cases, a reasonable attorneys’ fee is determined by multiplying the hours reasonably expended times a reasonable hourly rate. *Blum v. Stenson*, 465 U.S. 886, 888, 104 S. Ct. 1541, 1544 (1984). This “lodestar” amount is presumed to be the reasonable fee to which counsel is entitled. *Id.* at 897, 104 S. Ct. at 1548.

As demonstrated in the table above and the attached Exhibits "1" "3," and "5," \$365,000 is a reasonable attorneys' fee and costs award in light of the time and expenses "reasonably incurred" by class counsel. As the Court is aware, this was a complex case that involved substantial motions practice and months of settlement negotiations.

Indeed, the attorneys' fees sought by this Motion are substantially less than the actual attorneys' fees reasonably incurred by class counsel. Multiplying the actual time reasonably incurred by hourly rates yields a total of \$650,701.77. Even if this total is reduced by one-third to reflect time incurred in pursuing the

class's claims against Realty Laua, it is clear that the amount requested by this Motion represents a substantial discount from the attorneys' fees actually incurred and thus a benefit to the class.

An award of \$365,000 in attorneys' fees and costs is also reasonable when measured against the total relief obtained for the class. Class counsel obtained \$200,000 in cash for the class to begin a settlement fund, as well as an assignment of claims potentially worth several hundreds of thousands of dollars. More importantly, class counsel obtained substantial injunctive relief that will improve the quality of life and safety for residents at KPT and Kuhio Homes, especially disabled residents.

Even if the injunctive relief obtained for the class were not so substantial, a full award of Plaintiffs' attorneys' fees and costs would be appropriate without regard to the amount of damages awarded to the class. The purpose of the fee shifting provisions in federal civil rights laws is to encourage plaintiffs to bring lawsuits to vindicate important statutory rights, regardless of the amount at stake. *See Pennsylvania v. Delaware Valley Citizens' Council for Clean Air*, 478 U.S. 546, 564, 106 S. Ct. 3088, 3098 (9th Cir. 1986) (purpose of federal fee shifting statutes is to "enable private parties to obtain legal help in seeking redress for injuries resulting from the actual or threatened violation of specific federal laws"); *Anderson v. AB Painting and Sandblasting Inc.*, 578 F.3d 542, 545

(7th Cir. 2009) (district court erred by reducing attorney fee award to be proportionate with the damages: part of the purpose of fee shifting statutes is to “discourage petty tyranny” and it is therefore “no surprise that the cost to pursue a contested claim will often exceed the amount in controversy”).

The amount sought by this Motion is an eminently reasonable award of attorneys' fees and costs given the hours actually expended by class counsel, the complexity of this case, and the relief obtained for the class. This Court should therefore approve an award of attorneys' fees and costs in the amount of \$365,000, as agreed upon by the Named Plaintiffs and the State Defendants.

C. Litigation Expenses, Including Expert Witness Fees, are Recoverable Under the ADA.

The ADA authorizes a court to award "litigation expenses and costs" in addition to attorneys' fees. 42 U.S.C. § 12205 and 28 C.F.R. § 35.175.

Congress included the term "litigation expenses" to broadly authorize a court to shift costs "such as expert witness fees, travel expenses, and the preparation of exhibits." *Lovell v. Chandler*, 303 F.3d 1039, 1058 (9th Cir. 2002), quoting H.R. Rpt. No. 101-485(III) at 73. 42 U.S.C. § 12205 therefore authorizes an award of litigation expenses, including expert witness fees, to class counsel.

Plaintiffs incurred the following litigation expenses and costs, as further itemized in Exhibits "2," "4," and "6":

AHFI	LEJ	LAS-ELC	TOTAL
\$34,400.24	\$7,363,94	\$3,893.38	\$45,750.62

IV. CONCLUSION

For the reasons set forth above, Plaintiffs respectfully request that the Court approve an award of \$365,000 to class counsel for their reasonable attorneys' fees and costs as set forth in the Settlement Agreement.

DATED: Honolulu, Hawai`i, January 19, 2011.

/s/ Jason H. Kim
PAUL ALSTON
JASON H. KIM
Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HAZEL MCMILLON; et al.,
Plaintiffs,

vs.

STATE OF HAWAII; et al.,
Defendants.

STATE OF HAWAII; et al.,
Third-Party Plaintiffs,

vs.

URBAN MANAGEMENT
CORPORATION DBA URBAN
REAL ESTATE COMPANY, et al.,
Third-Party
Defendants.

CIVIL NO. CV 08-00578 LEK
Civil Rights Action
Class Action

**DECLARATION OF JASON H.
KIM**

DECLARATION OF JASON H. KIM

Pursuant to 28 U.S.C. § 1746, I declare that:

1. I am an attorney with the law firm of Alston Hunt Floyd & Ing (“AHFI”), counsel for Plaintiffs and the class herein.

2. I make this declaration based on my personal knowledge and am competent to testify as to the matters set forth herein.

3. Attached as Exhibit "1" is a true and correct itemization of the attorneys' fees incurred by the law firm of Alston Hunt Floyd & Ing in this action. These fees were reasonable incurred. The time entries in Exhibit "1" were entered into this firm's electronic time keeping software contemporaneously with the work described by the entries.

4. In calculating the appropriate hourly rates for the time keepers reflected in Exhibit "1," I used the hourly rates previously approved by this Court in its Order Granting Plaintiffs' Motion for Attorneys' Fees in *Blake, et al. v. Nishimura, et al.*. Civ. No. 08-00281 LEK.

5. In Exhibit "1," PA refers to Paul Alston (40 years experience), JHK refers to Jason H. Kim (12 years experience), KKMG refers to paralegal Kelly Guadagno, fka Kelly Muller, JB refers to document analyst Jya-Ming Bunch, SWL refers to document analyst Samson W. Lee, and GKTP refers to document analyst Gail K. T. Pang. These same time keepers were also involved in the *Blake* action.

6. In Exhibit "1," MLC refers to Maren Calvert. Ms. Calvert graduated from law school in 2001 and has approximately ten years of experience as an attorney.

7. The other initials in Exhibit "1" refer to various law clerks who were temporarily employed by this firm.

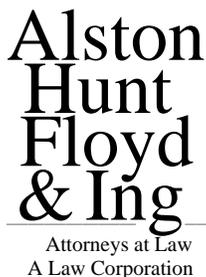
8. Attached as Exhibit "2" is a true and correct listing of the out-of-pocket expenses incurred by this firm in this action. These costs were entered into the firm's billing system contemporaneously, are the types of costs typically billed to fee-paying clients, and were recorded, documented, and calculated in the same way as for fee-paying clients.

9. My co-counsel, Legal Aid Society-Employment Law Center, provided copies of its billing records for this matter, which are attached as Exhibit "E" to the Declaration of Claudia Center. I calculated the value of the attorney and paralegal time reflected in those records based on rates previously approved by the Court. I used the same rate for Ms. Center (\$285) as this Court has previously approved for Victor Geminiani, the same rate for Jinny Kim (\$240) as this Court has previously approved for me, and the same rate for paralegal Mary Broughton (\$70) as this Court has previously approved for Ms. Guadagno.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Honolulu, Hawai'i on January 19, 2010.

/s/ Jason H. Kim
JASON H. KIM



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LEWERS FALETOGO et al

DATE 01/17/11

INVOICE NO. 297489

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FOR LEGAL SERVICES RENDERED THROUGH: DECEMBER 2008

Federal I.D.# 99-0287757
Hawaii I.D.# 10438996

RE: KUHIO PARK TERRACE - PUBLIC HOUSING CONDITIONS
(9372-1)

<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
10/10/08	1.00	JHK	team conference call re preparations for filing complaint
10/17/08	1.00	JHK	team conference call re preparation for filing complaint; review materials in advance of call
10/28/08	1.10	PA	Prepare for and participate in conference call; review emails minutes
10/28/08	1.80	JHK	team conference call; review documents in preparation for call; email to D. L'Heure re same
10/29/08	0.10	PA	email from and to J. Kim
10/29/08	0.70	JHK	prepare retention letters
11/03/08	0.20	PA	review and revise discovery requests; email from and to J. Kim
11/05/08	0.20	PA	review agenda and follow up memorandum for conference call
11/05/08	0.50	JHK	team conference call; review documents for call
11/09/08	0.20	PA	email from and to V. Geminiani re video tapes
11/11/08	0.10	PA	email from and to E. Dunne re conference call
11/12/08	1.50	JHK	team conference call; review documents for call; emails to E. Dunne re new clients

EXHIBIT 1

Alston Hunt Floyd & Ing

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Invoice No.: 297489

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
11/19/08	0.20	PA	multiple emails re state claims and 11th indemnity amendment
11/19/08	1.30	JHK	team conference call; research re Eleventh Amendment issues
11/21/08	2.00	JHK	research re Eleventh Amendment issues and need for separate state court proceeding
11/25/08	0.10	PA	review and respond to email re conference call agenda
11/25/08	1.70	JHK	team conference call; review materials for call; email to E. Dunne re separate circuit court complaint; email to P. Alston re potential experts
12/01/08	3.70	JHK	review HUD information re status of project; research re state law causes of action
12/02/08	2.40	JHK	call with E. Dunne re state court complaint; draft same
12/04/08	4.20	JHK	team conference call; review and comment on draft federal complaint; research re same; call with P. Alston re discovery issue
12/05/08	0.50	JHK	review research re unfair trade practices claims against state; email to E. Dunne re federal complaint
12/05/08	3.40	TMA	research on Unfair Competition and Trade Practices
12/10/08	3.20	JHK	research re causes of action for state complaint; review corporate records re Realty Laua; email to E. Dunne re same; review and revise press release
12/11/08	0.30	PA	review and revise press release and email to J. Kim; multiple emails from and to C. Center re comments on press release; multiple emails from and to V. Geminiani re strategy; research re work product; review and respond to email from J. Kim re state law complaint
12/11/08	5.80	JHK	draft circuit court complaint; review contracts and management agreements re same; conference with P. Alston re discovery issues; email to P. Obstler re same; email to team re press release
12/12/08	0.90	PA	Prepare for and attend conference with V. Geminiani; Prepare for and attend conference call

Alston Hunt Floyd & Ing

LEWERS FALETOGO et al
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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
12/12/08	3.60	JHK	team conference call; revise state court complaint; review federal complaint and comment re same
12/14/08	0.10	PA	review retainer agreement
12/14/08	0.10	PA	from and to V. Geminiani re follow up on litigation strategy
12/15/08	0.40	PA	review and respond to email from V. Geminiani re scheduling and press conference; review and respond to email from C. Center re co-counsel agreement; email to and from J. Kim re HHDC
12/15/08	2.90	JHK	review pro hac vice admissions procedures; draft motions for pro hac vice admission for state and federal actions; emails to E. Dunne re complaints and class definition
12/16/08	0.20	PA	review email from Delia L'Heureux; email from and to Peter Obstler re query
12/16/08	0.30	PA	work on strategic issues; telephone conference with V. Geminiani
12/16/08	0.20	JHK	email to OMM attorneys re pro hac vice applications
12/17/08	0.30	PA	email from and J. Kim re work on complaints
12/17/08	3.00	JHK	revise, revise, and finalize federal and state complaints and documents to file with complaints; call with E. Dunne re same
12/18/08	2.00	PA	prepare for and attend meeting at site; follow up meeting with cocounsel re strategy for injunction motions
12/18/08	6.20	JHK	travel to and attend press conference; team meeting re strategy; work on discovery plan and identifying experts
12/21/08	0.10	PA	email from and to V. Geminiani re articles
12/23/08	0.50	PA	call re "Hope 6" funding
12/23/08	0.30	JHK	call with E. Dunne re discovery; review materials received from LEJ
12/26/08	3.00	JHK	review documents received from LEJ

Alston Hunt Floyd & Ing

LEWERS FALETOGO et al
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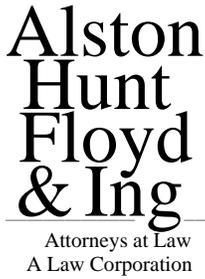
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<u>BY</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
PA	350.00	7.40	\$ 2,590.00
JHK	240.00	50.50	\$ 12,120.00
TMA	100.00	3.40	\$ 340.00
TOTALS:		61.30	\$ 15,050.00

LEGAL SERVICES	\$ 15,050.00
STATE EXCISE TAX	709.16
INVOICE TOTAL	15,759.16

PAYABLE UPON RECEIPT

*This invoice may not include some expenses (telephone, copying, depositions, etc.) for which we have not yet been billed.
Delinquent accounts will be charged interest at the maximum legal rate.
Prior unpaid balance is for this matter only.*



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LEWERS FALETOGO et al

DATE 01/17/11

INVOICE NO. 297490

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FOR LEGAL SERVICES RENDERED THROUGH: MARCH 2009

Federal I.D.# 99-0287757
Hawaii I.D.# 10438996

RE: KUHIO PARK TERRACE - PUBLIC HOUSING CONDITIONS
CONTINGENCY OF STATUTORY ATTORNEYS'
FEES/PERCENTAGE OF RECOVERY
(9372-1)

<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
01/02/09	0.20	PA	review and respond to email from E. Dunne re summary of strategy session
01/05/09	2.50	JHK	identify potential experts; emails to E. Dunne re same
01/06/09	0.20	PA	email from and to E. Dunn re Laua
01/06/09	0.30	JHK	email to E. Dunne re experts; email to P. Obstler and D. Lash re e-room
01/08/09	0.20	PA	email re meeting with M. Bennett re mediation
01/08/09	0.10	JHK	email to team re meeting with L. Ginoza
01/09/09	0.10	PA	review and respond to email re stipulation to extend time to answer complaint
01/09/09	0.10	JHK	email to E. Dunne re meeting with L. Ginoza
01/10/09	0.10	PA	email to L. Ginoza re scheduling
01/10/09	0.20	PA	telephone call from L. Ginoza re meeting to discuss settlement
01/12/09	3.00	JHK	research preliminary injunction issues for state case

Alston Hunt Floyd & Ing

LEWERS FALETOGO et al
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Invoice No.: 297490

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
01/13/09	0.20	PA	review and respond to emails from V. Geminiani and E. Lee re DVD
01/13/09	0.50	JHK	emails with team re meeting with Attorney General re settlement; call with public housing tenant re conditions
01/14/09	0.80	PA	participate in conference call with Elizabeth Dunn, Amy Laurendeau, Claudia Center, Delia L'Heureux, Jason Kim, Peter Obstler, V. Geminiani and William Durham; email re KPT documentary
01/14/09	1.00	JHK	team conference call re meeting with Attorney General
01/15/09	0.30	PA	review and respond to email from E. Carson re draft public housing bill; review and resopnd to emails from D. L'Heureux and E. Lee re DVD
01/15/09	1.00	JHK	prepare for and attend meeting with Attorney General re settlement
01/16/09	1.10	PA	email from and to Delia L'Heureux re transcription of DVD; Prepare for and attend meeting with M. Bennett
01/16/09	0.50	JHK	review documents re service on Realty Laua to prepare default motion; review class certification research and email to E. Dunne re same
01/19/09	2.50	JHK	review complaints and documents to prepare for settlement meeting
01/20/09	0.20	PA	review and respond to email from J. Kim re summary of meeting; review and respond to emails re property manager at KPT
01/20/09	4.70	JHK	prepare for and attend meeting re settlement; follow up on action items from meeting; email to team re same
01/21/09	3.70	JHK	research re federal and state regulations for reasonable accommodations; email to E. Dunne re same

Alston Hunt Floyd & Ing

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Client: 9372-1
Invoice No.: 297490

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
01/22/09	0.50	PA	review and respond to email/letter from S. Monet and email to J. Kim
01/22/09	0.80	JHK	call with Management Inc. re procurement issues; review letter from S. Monet re conditions at KPT; email to team re same; email to K. Muller re preparing default; email to J. Wong re regulations
01/22/09	0.30	KKMG	work on preparing motions for entry of default against Realty Laua LLC for state and federal court actions
01/23/09	3.80	JHK	meeting with T. Lilly re consultant retention; call with D. Knox re expert retention; attend hearing at Legislature re KPT
01/24/09	0.30	PA	review correspondence and email to J. Kim
01/24/09	4.00	JHK	draft document requests to defendants
01/26/09	1.80	JHK	review materials sent by J. Wong re accomodation policies; email to team re update and preparation for meeting; email to D. Knox re expert retention
01/27/09	0.80	JHK	meeting with T. Lilly re property management consulting; review background materials re same
01/28/09	0.20	JHK	emails with E. Dunne and V. Geminiani re meeting
01/28/09	0.60	KKMG	work on drafting requests for entry of default against defendant Realty Laua LLC in circuit and federal court matters
01/29/09	0.60	JHK	review research re procurement issues and information re clients' requests for accomodations
01/30/09	4.70	JHK	review notes and documents to prepare for meeting; meeting with E. Dunne and V. Geminiani; meeting with attorney general's office; review documents received from attorney general; calls with experts
01/30/09	0.30	KKMG	review complaints; prepare instruction to have case binders prepared

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
02/02/09	3.20	JHK	research re standing to seek injunctive relief if class representative settles; emails to E. Dunne re follow-up from settlement meeting
02/03/09	0.20	PA	review letter from J. Buna re request for documentation of reasonable accommodations
02/03/09	1.70	JHK	email to D. Knox re expert retention; assemble materials re potential experts and email to E. Dunne re same; review additional research re standing issues; team conference call re experts and settlement
02/04/09	3.60	JHK	research and draft letter re settlement and discovery; attend legislative hearings; email to D. Knox re retention
02/05/09	0.20	PA	review and respond to email from J. Kim re letter re discovery and settlement
02/05/09	1.70	JHK	revise letter to defendants re settlement and discovery; call with E. Dunne re preparation for meeting; email to E. Dunne re same
02/06/09	2.70	JHK	prepare for and attend meeting with Attorney General's office re settlement; meeting with E. Dunne re same; email to D. Knox re expert retention
02/10/09	0.10	PA	review and respond to email from E. Lee re film
02/10/09	3.30	JHK	research re settlement terms for rent abatement, attorneys' fees, and other remedial issues; email to team outlining same; call with D. Knox re retention and estimate of fees; email to OMM team re Knox proposal and background materials
02/10/09	1.20	JB	(FCC) work on preparing case, substantive pleadings, and discovery binder; work on updating substantive pleadings binder
02/10/09	1.20	JB	(USDC) work on preparing case, substantive pleadings, and discovery binder; work on updating substantive pleadings binder

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
02/11/09	0.30	PA	review and respond to multiple emails from W. Dunham re proposed terms re abatement, compensatory damages, medical monitoring, and attorneys fees; review and respond to emails re settlement proposal; email to J. Kim re formula
02/11/09	2.80	JHK	review and revise statement re reasonable accomodations requested by clients; emails to J. Cregor and C. Tasaka re mediation; email to J. Wong re stipulation to extend time to answer; review stipulation; call with E. Dunne re settlement proposal; review emails from team re settlement terms; research re rent abatement formulas
02/12/09	0.20	PA	review and respond to emails re settlement issues
02/12/09	2.80	JHK	revise settlement proposal letter; emails to J. Wong and G. Playdon re stipulations to extend time for answer
02/13/09	0.20	PA	email from and to E. Dunne re statute of limitations
02/13/09	1.30	JHK	review final settlement proposal letter; emails to E. Dunne re settlement issues; research re same; email to T. Lewis re stipulations
02/17/09	0.60	PA	review correspondence re negotiations; review third stipulation to extend time for State to answer complaint; review and respond to email from E. Lee and V. Geminiani re video
02/17/09	1.70	JHK	prepare for and attend status conferece; conference with E. Dunne re expert retention and preliminary injunction; email to counsel re stipulation to extend answers for state complaint; prepare for mediation pre-hearing
02/18/09	1.20	JHK	prepare for and attend pre-mediation conference; follow-up from conference
02/19/09	2.70	JHK	email to D. Knox re retention; letter to D. Knox re terms of retention; email to OMM team re pro hac vice materials; email with E. Dunne re client medical

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			records; emails with E. Dunne and B. Kaneko re lobbying; review film re conditions at KPT; conference with P. Alston re same
02/20/09	0.10	PA	review invoices re medical records
02/20/09	0.50	JHK	review response to settlement proposal; email to P. Obstler re D. Knox retention
02/23/09	0.30	JHK	emails to E. Dunne re settlement and experts
02/24/09	4.50	JHK	meeting with opposing counsel re settlement; meetings with E. Dunne and V. Geminiani re same
02/25/09	0.20	PA	review and respond to email from J. Kim re Angela Daily
02/25/09	2.10	JHK	call with E. Dunne re settlement and experts; call with D. Knox re scope of inspection; email to opposing counsel re inspection; work on settlement proposal
02/25/09	0.30	JHK	(Dailey): emails to V. Geminiani and P. Alston re retention
02/26/09	0.20	PA	telephone calls from and to K. Hunter re mediation
02/26/09	1.20	JHK	(Dailey) emails to V. Geminiani re representation; review file; research re basis for appeal
02/26/09	1.00	JHK	call with J. Wong re information requested; call with E. Dunne re settlement and experts; emails with D. Knox re inspection
02/27/09	3.40	JHK	team conference call re settlement; prepare for and attend meeting with D. Knox re property inspection; email to opposing counsel and DPR re mediation agreement; conference with E. Dunne re settlement strategy; email to P. Alston re settlement conditions; email to P. Obstler and E. Dunne re same
02/27/09	3.00	JHK	(Dailey) interview with A. Dailey; revise retention agreement; research re governing statutes and

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			regulations
02/28/09	7.80	JHK	(Dailey) research and draft notice of appeal, statement of the case, motion to stay, ex parte motion to shorten time, and declarations supporting same
03/02/09	2.60	JHK	meeting with Attorney General's office re settlement and follow-up from meeting; review contracts received; email to P. Alston re settlement; call with G. Playdon re inspection
03/03/09	0.20	PA	email from and to J. Kim re meeting with Peter Obstler / Angella Daily
03/03/09	7.40	JHK	draft mediation statement; meeting with P. Obstler, V. Geminiani, and E. Dunne re settlement demand and preparing for mediation; review and comment on tenant survey; conference with P. Alston re settlement demand; review and analyze applicable insurance policies; review information re other ADA housing settlements
03/04/09	1.00	JHK	call with E. Dunne re settlement demand; call with P. Obstler re mediation; finalize pro hac applications
03/05/09	0.30	PA	review letter from Linda Sarson re reimbursement; email from and to J. Kim re update on mediation
03/05/09	6.80	JHK	mediation; meeting with team to prepare for same; draft email to team re follow-up; emails to P. Alston and C. Center re status of mediation
03/06/09	0.40	JHK	email to K. Hunter re mediation
03/07/09	0.40	JHK	organize documents and information received during settlement negotiations
03/11/09	0.50	JHK	call with E. Dunne re settlement and discovery; meeting with V. Geminiani re same
03/12/09	0.50	JHK	email to E. Dunne re class certification motion; email to defense counsel re Rule 26 meeting

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
03/12/09	1.30	KKMG	work on preparing draft requests for production of documents in the federal and state cases; discuss same with J. Kim
03/13/09	0.20	PA	review and respond to email from J. Kim re discovery meeting
03/13/09	3.50	JHK	email to defense counsel re Rule 26 meeting; prepare for and attend same; email to team summarizing meeting; review documents received at meeting; team conference call re preliminary injunction and settlement issues
03/17/09	0.60	JHK	review objection to pro hac motion; review and respond to team members re same
03/18/09	0.30	JHK	review and respond to emails re discovery issues and opposition to pro hac vice motion
03/19/09	0.30	JHK	review and respond to emails re discovery issues; call with E. Dunne re same
03/19/09	0.20	KKMG	review email communication regarding obtaining 1993 asbestos survey at the department of accounting and general services; discuss same with J. Kim
03/23/09	1.70	JHK	draft Rule 26(f) report; emails to co-counsel re reply re pro hac vice motion
03/24/09	0.20	PA	review and revise reply re admission pro hac vice; email to J. Kim
03/24/09	3.20	JHK	review and comment on draft reply re pro hac motion; call with E. Dunne re preliminary injunction motion; emails to E. Dunne re same; research re class certification issues for class certification motion; email to E. Dunne summarizing same
03/25/09	0.10	PA	review and revise reply memo in support of pro hac vice motion
03/25/09	1.70	JHK	revise and finalize reply for pro hac vice motion; draft declaration re same; conference call re experts

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
03/25/09	0.20	KKMG	telephone call to Scott Ojiri re 1993 State asbestos survey; discuss same with J. Kim
03/27/09	0.20	PA	email from and to V. Geminiani re coverage by Olelo and public television
03/27/09	1.50	JHK	review and comment on declarations for motion for preliminary injunction
03/30/09	1.60	JHK	draft scheduling conference statement and review statements from other parties
03/31/09	2.20	JHK	prepare for and attend motion for pro hac vice admission; draft order re same; emails to E. Dunne re preliminary injunction motion; review State's motion to dismiss

<u>BY</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
PA	350.00	7.90	\$ 2,765.00
JHK	240.00	125.60	\$ 30,144.00
KKMG	70.00	2.90	\$ 203.00
JB	50.00	2.40	\$ 120.00
TOTALS:		138.80	\$ 33,232.00

LEGAL SERVICES	\$ 33,232.00
STATE EXCISE TAX	1,565.89
INVOICE TOTAL	34,797.89
PRIOR UNPAID BALANCE	15,759.16
TOTAL AMOUNT DUE	\$ 50,557.05



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FOR LEGAL SERVICES RENDERED THROUGH: OCTOBER 2009

Federal I.D.# 99-0287757
Hawaii I.D.# 10438996

RE: KUHIO PARK TERRACE - PUBLIC HOUSING CONDITIONS
CONTINGENCY OF STATUTORY ATTORNEYS'
FEES/PERCENTAGE OF RECOVERY
(9372-1)

<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
04/01/09	0.20	PA	review State's motions to dismiss; review answer to complaint; review and respond to email from Claudia Center re opposition to motion to dismiss; review and respond to email re deadline to file reply
04/01/09	0.70	JHK	emails with co-counsel re declarations, motions, and obtaining client files
04/02/09	0.20	PA	emails to and from J. Kim re information about ADA violations
04/02/09	1.80	JHK	conference call with co-counsel re motion for preliminary injunction; emails to co-counsel re asbestos reports
04/02/09	5.90	KKMG	telephone call to Scott Ojiri at Department of Accounting and General Services re review of 1993 State of Hawaii Asbestos Survey; attend document review of same and work on identifying and scanning all documents and information relating to Kuhio Park Terrace and Kuhio Homes
04/03/09	0.10	PA	review Realty Laura's requests for discovery; review answer to complaint

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
04/03/09	1.10	JHK	arrange for uploading asbestos reports and email to all co-counsel re same; emails to E. Dunne re medical records and documents needed for preliminary injunction
04/03/09	5.80	KKMG	work on conforming selected documents and reports obtained from Department of Accounting and General Services; discuss same with J. Kim; work with H. Chun on preparing PDF files for access by parties using internet site; work on identifying and preparing additional documents for uploading to website; categorize various client documents received from Lawyers for Equal Justice re plaintiffs to prepare for anticipated initial disclosure and document production
04/06/09	2.80	JHK	attend scheduling conference; conference and call with E. Dunne re discovery issues and inspection; obtain and review documents for initial disclosures; email to team re asbestos reports
04/07/09	3.40	JHK	draft document requests; emails to team re same; work on collecting documents for initial disclosures; email to J. Kim re pro hac vice applications
04/07/09	0.50	KKMG	review discovery requests to plaintiffs by Laua Realty; work on compiling substantive pleadings and discovery to have case binders updated; prepare instruction to J. Bunch re same;
04/07/09	2.00	JB	work on production of plaintiffs' files received from Lawyers for Equal Justice
04/08/09	0.30	PA	review letter from G. Playdon re contact with Realty Laua; email to and from J. Kim re communication; review and respond to multiple emails re new lawsuit
04/08/09	1.20	JHK	call with E. Dunne re inspection of property; email to E. Dunne re house rules; email to D. L'Heureux re medical records; email to K. Muller re same; review documents for initial disclosures
04/08/09	0.20	JB	(1CC) work on updating substantive pleadings binder

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
04/09/09	0.20	PA	email from and to V. Geminiani and E. Dunne re new lawsuit
04/09/09	1.00	JHK	call with E. Dunne re discovery; revise document requests
04/09/09	2.00	JB	(USDC) work on updating substantive pleadings and discovery binder
04/10/09	2.30	JHK	research re access to tenant files and communication with employees of party; revise plaintiff declarations for opposition to motion to dismiss
04/13/09	0.30	JHK	call with E. Dunne re discovery and expert issues; email to K. Muller re same
04/14/09	4.50	JHK	research for opposition to motion to dismiss; research re ability to contact employees of State and email to E. Dunne re same; email to counsel re hearing on motion to dismiss; review and finalize pro hac vice motions
04/14/09	3.30	KKMG	review client documents and medical records to identify documents requested by J. Kim to be uploaded to internal website for co-counsel and other related parties; email discussions with J. Kim re interview notes with plaintiffs; review additional medical records received from Lawyers for Equal Justice re Plaintiff McMillion; prepare same for cataloging and potential production
04/14/09	1.70	SWL	work on preparing/processing medical records and docs (A000001 - A000893)
04/15/09	3.70	JHK	research re applicable health and safety regulations for opposition to motion to dismiss; email to E. Dunne re accessing KPT premises; email to J. Cregor re hearing on motion to dismiss; emails with K. Muller re collecting documents for experts and scanning medical records; conference with P. Alston re opposition to motion to dismiss
04/15/09	5.10	KKMG	continue review client notes and medical records;

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			prepare same for initial disclosures; work with J. Bunch to identify and prepare selected documents and photographs for uploading to extranet for access by co-counsel; review photographs received from Elizabeth Dunne, Esq. re Kuhio Park Terrace; work on preparing same for production and disbursement to mainland counsel; discuss same with J. Kim; work on preparing draft responses to defendant Realty Laua's request for answers to interrogatories and requests for production of documents to plaintiffs
04/15/09	1.20	JB	work on preparing clients' medical records and notes for extranet access
04/16/09	0.70	JHK	conference with K. Muller re sending documents to fire expert; review documents re same; email to D. L'Heureux re management company contact; email to J. Cregor re hearing date
04/16/09	6.00	KKMG	work on identifying, compiling and preparing documents and photographs for expert witness Manny Muniz; prepare transmittal to same; work on compiling and preparing additional potential initial disclosure documents and potential documents for production; prepare Bates number category system; discuss same with J. Kim; work on uploading additional selected documents and photographs to website for co-counsel access; review plaintiffs' discovery requests to defendants; prepare communications to Claudia Center, Esq. and Jee Young You, Esq. transmitting photographs of Kuhio Park Terrace and Kuhio Homes; review motion to dismiss
04/16/09	0.70	JB	work on processing documents from Honolulu Fire Department; work on preparing file for documents from Honolulu Fire Department obtained through FOIA request
04/17/09	0.40	JHK	conference with E. Dunne re experts and motions
04/17/09	1.70	KKMG	work on cataloging and organizing client documents and other documents obtained from third parties to prepare

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			for potential production
04/19/09	0.10	PA	review objections to pro hac vice motion
04/20/09	0.50	JHK	email to E. Dunne re management contract and fire alarm system contract; email to opposing counsel re discovery meeting
04/20/09	1.20	KKMG	continue work on preparing draft responses to defendant Realty Laua's requests for production of documents and for answers to interrogatories
04/21/09	0.30	JHK	review and comment on draft of response re opposition to pro hac vice motion; email to J. Kim re same
04/22/09	3.80	JHK	research and draft opposition to motion to dismiss; revise and finalize response to pro hac vice opposition
04/23/09	0.50	PA	review and revise opposition to motion to dismiss; email to J. Kim
04/23/09	9.10	JHK	prepare for and attend meet and confer re discovery; draft email to co-counsel re same; research and draft opposition to motion to dismiss
04/23/09	0.20	SWL	work on updating discovery binder
04/24/09	2.40	JHK	revise and finalize opposition to motion to dismiss; draft declaration and prepare exhibits for same
04/24/09	0.30	JB	work on preparing expert witness file for Manny Muniz; work on preparing file for client documents and medical records; work on preparing file for documents and photographs (on CD) sent to expert witness Manny Muniz on 4/16/09
04/27/09	0.30	PA	review plaintiffs' memorandum in opposition to defendants' motion to dismiss complaint
04/27/09	0.20	PA	review letter from A. Creps confirming discovery deadlines; review letter from J. Cregor to Judge Kobayashi re discovery issues

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
04/27/09	1.50	JHK	call with E. Dunne re discovery issues; review letter from A. Creps re discovery agreement; draft reply to same; review emails re hearing on motion to dismiss; call with J. Wong re same; emails to K. Muller re responses to interrogatories and request for production and initial disclosures; review documents for initial disclosures
04/28/09	0.70	JHK	email to K. Muller re initial disclosures; email to E. Dunne re discovery agreement; email to J. Albertson re medical records
04/28/09	0.30	KKMG	review email from J. Kim re initial disclosure documents; work on same
04/29/09	2.50	JHK	meeting and emails with K. Muller re initial disclosures; revise initial disclosures; emails to co-counsel and opposing counsel re discovery
04/29/09	6.00	KKMG	review client documents to identify privileged and/or confidential documents; prepare non-privileged documents for initial disclosure production to parties; discuss same with J. Kim; draft Plaintiffs' Initial Disclosures
04/29/09	0.40	JB	(ICC) work on updating discovery binder
04/29/09	0.10	JB	(USDC) work on updating substantive pleadings binder
04/29/09	3.60	SWL	work on preparing file re Client Documents from LEJ re Hazel McMillion on 4/14/09 (Original Copy) Note: Copy made and stamped (A000852 - A000893)(0.1hrs); work on preparing/processing initial disclosure documents for production (A100078 - A102793; A000894 - A000902)(3.5hrs)
04/30/09	2.40	JHK	review documents re initial disclosures; conference with E. Dunne re discovery and motions; revise and finalize letter to defendants re discovery agreement
04/30/09	5.50	KKMG	continue work on preparing initial disclosure documents

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			for production; work on draft initial disclosure; finalize same; draft and finalize letter to counsel re initial disclosure document production; compare and conform document production; prepare instruction to S. Lee to organize document production; review additional photographs provided by Elizabeth Dunn, Esq.; work with H. Chun re printing with noted descriptions; telephone call to Lawyers for Equal Justice to discuss same
04/30/09	3.40	SWL	continue working on preparing/processing initial disclosure documents for production (A100078 - A102793; A000894 - A000902)
04/30/09	1.50	GKTP	work on preparing/processing documents for initial disclosure production (A100001 - A102793)
05/01/09	0.30	JHK	call with E. Dunne re discovery responses; conference with K. Muller re same and photographs to attach to declarations; review photographs
05/01/09	1.50	KKMG	discussions with J. Kim re plaintiffs McMillion's, Somers', Sabalbora's, and Strickland's draft discovery responses; review and work on same; discussions with H. Chun re border text for KPT photographs to be used as potential exhibits to upcoming filing
05/04/09	2.50	JHK	review, revise, and finalize answers to interrogatories and response to document requests; emails to K. Muller re same; email to A. Creps re extension; email to D. L'Heureux re photographs for declaration
05/04/09	4.50	KKMG	work on plaintiffs' draft responses to defendant Laua Realty LLC's First Request for Answers to Interrogatories and Responses to First Request for Production of Documents; review, incorporate, and compare and conform responses received from Lawyers for Equal Justice; compare and conform cites with initial drafts; prepare documents received from Plaintiff Strickland for production
05/04/09	0.30	JB	work on preparing file for September 1993 asbestos

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			reports re Kuhio Park Terrace and Kuhio Homes prepared for Department of the AG Asbestos Litigation Unit; work on updating substantive pleadings binder
05/05/09	0.30	JHK	emails to E. Dunne and K. Muller re discovery
05/05/09	2.50	KKMG	assist in finalizing Plaintiffs' discovery responses; review initial disclosure documents produced by Realty Laua; meeting with S. Lee to discuss preparing same for J. Kim; work with Z. Kawahakui on preparing Realty Laua initial disclosures for uploading to the website for access by relevant parties; prepare communication to opposing counsel re objection and signature pages to discovery responses; discuss same with J. Kim
05/05/09	4.60	SWL	work on preparing/processing documents by Realty Laua on 5/1/09 via CD
05/06/09	0.10	PA	review multiple answers to requests for answers to interrogatories and production of documents
05/06/09	3.20	JHK	review tenant files; email to E. Dunne and D. L'Heureux re same; email to C. Center re pro hac vice application; research re state laws regarding reasonable accomodations and email to E. Dunne re same
05/06/09	1.20	JB	work on updating discovery binder
05/08/09	0.10	PA	review State's reply memo re motion to dismiss
05/08/09	2.40	JHK	review HPHA's initial disclosures and documents; email to team re same; review email from E. Dunne re status of tasks; call with E. Dunne re same; email to D. L'Heureux and E. Dunne re requests for accommodations in tenant files
05/11/09	3.00	JHK	prepare for and attend hearing on motion to dismiss
05/11/09	0.50	KKMG	review initial disclosure documents produced by Hawaii Public Housing Authority; prepare instruction to have file prepared re same; work on master document index

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
05/11/09	0.70	SWL	work on preparing file re HPHA's Initial Disclosure Documents Produced on 5/8/09 (HPHA00001 - HPHA00470); and work on updating substantive pleadings & discovery binder
05/12/09	0.10	PA	review Realy Lau's responses to production of documents; review State's post hearing response to court's question; review State's response to request for production of documents
05/13/09	0.10	PA	review and respond to V. Geminiani re DVD
05/13/09	0.70	JHK	calls with Judge McKenna's chambers re federal complaint; review State's supplemental filing and cases cited therein
05/14/09	0.50	JHK	revise letter re initial disclosure and review motion to dismiss in federal case re supporting facts for same
05/15/09	0.30	PA	review order granting/denying in part motion to dismiss; review email re third party complaint; email to J. Kim; telephone calls from and to J. Kim
05/15/09	1.50	JHK	review order re motion to dismiss; review and revise memorandum in opposition to motion to dismiss
05/18/09	0.20	JB	(ICC) work on updating discovery binder
05/18/09	0.20	JB	(USDC) work on updating discovery binder
05/19/09	0.10	PA	email from and to C. Center re opposition; email from and to J. Kim re same
05/19/09	0.70	JHK	call with T. Lilly re management at KPT; review letters from T. Lilly re same; emails to E. Dunne re same
05/20/09	0.10	PA	review and respond to email from C. Center re opposition
05/20/09	3.60	JHK	revise opposition to motion to dismiss; emails with co-counsel re same

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
05/21/09	4.20	JHK	revise and finalize opposition to motion to dismiss and assemble declarations and exhibits; emails to co-counsel re same
05/26/09	0.10	PA	review State's errata to motion to dismiss complaint
05/27/09	4.80	JHK	revise motion for class certification; research re same; call with E. Dunne re pending motions and discovery
05/29/09	2.40	BMK	research re appropriation of HPHA and caselaw
05/29/09	2.10	DDD	research and draft document about injunctions re environmental conditions with disparate impacts on the disabled
05/29/09	6.30	DDD	continue research and create document about injunctions re environmental conditions with disparate impacts on the disabled
06/01/09	1.50	JHK	work on motion for class certification; emails to D. Day re research for preliminary injunction motion; review same; review reply memorandum in support of motion to dismiss
06/01/09	8.50	DDD	research and draft memos on court orders changing organizational/state policy and on the budgetary condition of the HPHA in 2009
06/02/09	0.40	JHK	review revisions to class certification motion; email to co-counsel re same
06/02/09	0.50	DDD	follow-up on budgetary analysis
06/03/09	0.30	PA	review and revise declaration; review and respond to email re press release
06/03/09	1.80	JHK	revise and finalize motion for class certification and supervise filing of same
06/04/09	0.10	PA	review motion for class certification
06/05/09	0.30	JHK	assemble additional exhibit to Muniz declaration for

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			filing in opposition to motion to dismiss and to support motion for class certification
06/08/09	0.10	PA	email from and to J. Kim re press release
06/08/09	2.50	JHK	prepare for and attend hearing on motion to dismiss; call with J. Cregor re status conference; review settlement correspondence in preparation for status conference
06/09/09	0.20	PA	review State's third party complaint against Urban; review State's answer to complaint and cross-claim against Realty Laua
06/09/09	1.50	JHK	prepare for and attend status conference; conference with E. Dunne re follow-up; email to team re same
06/09/09	0.20	SWL	work on updating case, substantive pleadings & discovery binder (1st Circuit Court Case)
06/10/09	0.30	JHK	call with A. Creps and G. Playdon re response to interrogatories and depositions of plaintiffs
06/10/09	0.80	KKMG	review State's third party complaint against urban management corporation dba real estate company; prepare documents to have substantive pleadings binders in state and federal cases updated; work on discovery logs
06/10/09	0.20	SWL	work on updating case, substantive pleadings & discovery binder (1st Circuit Court Case)
06/11/09	2.80	JHK	review client medical records for production; email to K. Muller re preparing protective order
06/12/09	0.10	PA	email from and to J. Kim re article
06/12/09	1.80	JHK	research re medicare subrogation; emails to team re same; email to team re retaliation claim
06/14/09	0.20	PA	review and respond to email from V. Geminani
06/15/09	0.20	PA	review and respond to email from E. Dunne

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
06/15/09	3.60	JHK	research re production of medical records and categories of medical records that require higher showing of relevance; review plaintiffs' medical records for production
06/15/09	0.50	KKMG	work on preparing draft stipulated protective order
06/16/09	0.20	PA	email from and to V. Geminiani; letter to M. Bennett
06/16/09	2.20	JHK	review and comment on demand letter re preliminary injunction; draft protective order
06/17/09	0.40	JHK	emails with co-counsel re stipulated protective order and plaintiff depositions; email to J. Cregor re depositions; emails with K. Muller re production of medical records
06/17/09	0.60	KKMG	discussions with J. Kim re production of medical records to defendants; review files re same; discussions re protected health information
06/18/09	0.20	PA	email from and to V. Geminiani re Strickland letter
06/18/09	1.70	JHK	emails with co-counsel re depositions and discovery; work on preparing plaintiffs for depositions
06/19/09	0.20	PA	review Realty Laua's motion for summary judgment
06/19/09	1.80	JHK	work on assembling materials for deposition preparation of clients and emails to E. Dunne and K. Muller re same; review Realty Laua's motion for summary judgment and email to team re opposition to same; review order re motion to dismiss
06/19/09	6.40	KKMG	work on identifying and compiling documents and information to assist in preparing reference documents and materials to prepare plaintiffs for depositions; discuss same with J. Kim
06/19/09	3.90	SWL	work on preparing selected documents to be used for deposition of deponents

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
06/22/09	1.10	JHK	revise proposed protective order and email to defense counsel re same; email to E. Dunne re plaintiff depositions
06/22/09	2.50	KKMG	assist in preparing for plaintiffs depositions; review plaintiffs medical records for production
06/23/09	2.90	JHK	review documents to prepare for deposition; conference with E. Dunne re deposition preparation and motions; review and comment on revisions to protective order; emails to E. Dunne re settlement conference statement; email to M. Calvert re defending depositions of plaintiffs and assemble background materials for same
06/24/09	0.20	PA	review defendants and third-party plaintiffs State of Hawaii and Hawaii Public Housing's first amended third-party complaint against Urban Management Corporation, review defendant Realy Laua's answer to defendants State of Hawaii and Hawaii Public Housing Authority's cross-claim
06/24/09	2.80	JHK	review documents to prepare for plaintiff deposition; review amended interrogatory response of T. Sabalboro; emails and calls with K. Muller re same; emails with M. Calvert re deposition of K. Vaiola
06/24/09	4.30	KKMG	work on preparing supplemental interrogatory responses for plaintiff Sabalboro; research re queen's medical center oncologist Dr. David Carney; review plaintiff Sabalboro's medical records for treatment history; discuss findings and supplemental responses with J. Kim; work on preparing medical records for production; work on compiling and comparing additional documents requested by J. Kim for plaintiffs' depositions
06/25/09	3.40	JHK	travel to and defend deposition of T. Sabalboro; meet with T. Sabalboro to prepare for deposition; email to K. Muller re production of medical records
06/25/09	0.40	MLC	prepare for deposition
06/25/09	5.60	MLC	prepare K. Viaola for her deposition; attend and defend

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			K. Vaiola deposition
06/25/09	1.00	KKMG	continue work on preparing medical records for production
06/25/09	2.00	GKTP	work on processing Client Documents and Medical Records (A000001 - A000902) and Medical records of Lee Sommers and Trudy Sabalbor (A000903 - A001915)
06/26/09	2.80	JHK	emails to co-counsel re depositions and settlement conference; work on motion for class certification in state case
06/26/09	0.10	MLC	follow up with E. Dunne re deposition rescheduling
06/26/09	0.10	MLC	discuss K. Vaiola deposition with J. Kim; coordinate next depositions with J. Kim and E. Dunne
06/26/09	1.30	KKMG	discussions with J. Kim re production of protected health information; continue work on preparing medical records for production
06/26/09	2.00	GKTP	continue working on processing Client Documents and Medical Records (A000001 - A000902) and Medical records of Lee Sommers and Trudy Sabalbor (A000903 - A001915)
06/29/09	0.30	JHK	emails to co-counsel re settlement conference and discovery
06/29/09	0.10	MLC	review and forward documents gathered/created during Viola deposition to E. Dunne and J. Kim
06/30/09	7.00	JHK	prepare for and attend settlement conference; meetings with co-counsel re same; email to K. Muller re revised interrogatory responses
06/30/09	2.00	KKMG	review plaintiffs' medical records to identify information and treatment re substance abuse, HIV infections and mental health illness

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
07/02/09	2.50	KKMG	continue review of client documents and medical records to identify discussions re HIV, infections, substance abuse and mental health illnesses
07/02/09	0.20	JB	(USDC) work on updating discovery binder
07/02/09	0.30	JB	(1CC) work on updating substantive pleadings and discovery binder
07/06/09	0.30	JHK	emails to M. Calvert and E. Dunne re reviewing plaintiffs' deposition transcripts
07/06/09	4.60	KKMG	continue review of client documents and medical records to identify discussions re HIV, infections, substance abuse and mental health illnesses
07/07/09	0.80	JHK	call with E. Dunne re discovery and settlement; review and comment on letter to Defendants re discovery
07/07/09	2.20	KKMG	continue review of client documents and medical records to identify discussions re HIV, infections, substance abuse and mental health illnesses; work on loading plaintiffs deposition transcripts on to summation; discuss formatting with Z. Kawahakui
07/09/09	0.10	JHK	email to K. Muller re plaintiffs' deposition transcripts
07/09/09	0.20	KKMG	email from J. Kim re plaintiffs Sabalboro and Vaila oral deposition transcripts; discuss same with G. Rufo
07/10/09	0.10	JHK	email to D. L'Heureux re plaintiffs' depositions
07/13/09	0.10	PA	review Urban's answer to third-party complaint
07/14/09	0.30	JHK	call with E. Dunne re motions, discovery, and amended declarations
07/14/09	1.40	JB	[USDC] work on preparing oral deposition files for Trudy-Ann Sabalboro (6/25/09) and Katherine Vaiola (6/25/09); work on preparing/updating condensed deposition and deposition exhibits binder

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
07/15/09	7.70	JHK	research and draft opposition to Realty Laua's motion for summary judgment
07/15/09	0.30	JB	[USDC] continue work on updating condensed deposition and deposition exhibits binder
07/16/09	2.20	JHK	draft opposition to Realty Laua's motion for sumamry judgment; emails to team re same; call with A. Creps; emails to defense counsel re continuing hearing
07/17/09	0.10	PA	review Urban's counterclaim against State
07/20/09	0.10	PA	review HPHA's answer to complaint
07/20/09	0.10	JHK	email to W. Patross re deposition exhibits
07/21/09	0.10	JHK	email to D. L'Heureux re amended declarations
07/22/09	0.30	JHK	email to W. Patross re survival of claims; research re same
07/24/09	1.30	JHK	emails to E. Dunne and D. L'Heureux re amended declarations and survivorship issues; review oppositions to motions to class certification
07/27/09	0.10	PA	review oppositions re motion for class certification
07/27/09	0.80	JHK	work on reply memorandum re motion for class certification and emails to co-counsel re same; email to co-counsel re preliminary injunction to prevent evictions
07/28/09	2.30	JHK	prepare for and attend settlement conference; emails to co-counsel re same
07/29/09	4.50	JHK	research and outline reply memorandum re motion for class certification; email to co-counsel re same
07/30/09	9.20	JHK	draft reply memorandum re motion for class certification
07/31/09	4.70	JHK	revise and finalize reply memorandum re motion for class certification; draft declaration and assemble

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			exhibits re same; email to co-counsel re same
08/01/09	0.10	JHK	email to E. Dunne re status conference
08/03/09	0.20	PA	review combined reply memorandum in support of motion for class certification
08/03/09	0.90	JHK	attend status conference; conference with E. Dunne re settlement proposal
08/04/09	0.70	JHK	work on settlement proposal response
08/05/09	0.20	JHK	emails to D. L'Heureux and K. Muller re deposition changes
08/06/09	0.20	JHK	email to E. Dunne re meet and confer; review and respond to emails from co-counsel re settlement proposal
08/11/09	0.20	JHK	review and respond to emails re discovery meeting
08/13/09	0.50	JHK	review and comment on settlement proposal
08/14/09	0.10	PA	review Urban's answer to third party complaint; conference with J. Kim re S. Monet deposition/declaration
08/14/09	1.20	JHK	prepare for and attend discovery conference; conference with E. Dunne re mediation proposal
08/17/09	0.10	PA	review Realty Laua's answer to State's cross-claim
08/17/09	3.70	JHK	work on settlement response; review and respond to emails re same; draft pretrial statement for state case; call with potential witness
08/18/09	1.60	JHK	revise and finalize pretrial statement; call and emails with E. Dunne re settlement response; review final settlement response
08/20/09	0.10	JHK	email to A. Creps re motion for summary judgment

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
08/21/09	4.60	JHK	review RFP and responsive bid re KPT management contract; draft memorandum in opposition to Realty Laua's motion for summary judgment re same
08/24/09	1.60	JHK	revise and finalize opposition to Realty Laua's motion for summary judgment; assemble and highlight exhibits to same; process document productions by Realty Laua
08/25/09	0.10	JHK	email to E. Dunne re rent abatement expert
08/25/09	0.10	JB	(ICC) work on updating substantive pleadings binder
08/25/09	0.60	JB	(USDC) work on updating substantive pleadings and discovery binders
08/26/09	0.30	PA	review plaintiff's memorandum in opposition to Realty Laua's motion for summary judgment; review third-party defendant Urban Management's joinder to defendant Realty Laua's motion for summary judgment
08/26/09	0.60	KKMG	review documents produced by Realty Laua (Fire Watch Logs); work on document production log; prepare request to J. Bunch to verify bates numbers and prepare file
08/31/09	0.20	PA	review defendant Realty Laua's reply memorandum in support of motion for summary judgment; telephone conference with K. Hunter
08/31/09	3.50	JHK	review reply memorandum re Realty Laua's motion for summary judgment; research new issues raised in same; prepare for oral argument
09/01/09	2.60	JHK	prepare for, travel to, and attend hearing on Realty Laua's motion to dismiss; draft order re same; emails to co-counsel re hearing and settlement; call with P. Alston re same
09/02/09	0.30	JHK	review and respond to emails with co-counsel re settlement
09/03/09	2.60	JHK	review and respond to co-counsel emails re settlement;

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			draft settlement agreement
09/04/09	0.30	PA	telephone calls from and to J. Kobayashi re settlement issues; conference with J. Kim re settlement issues
09/04/09	3.20	JHK	meet with co-counsel re status conference; prepare for and attend same; email to court and counsel re same; conference with P. Alston re same; draft settlement agreement
09/04/09	0.10	JB	work on preparing file for documents produced by Realty Laua on 8/21/09 via pdf and hard copy
09/09/09	1.70	JHK	review and analyze previous settlement agreements with State for models; compile information for settlement; email to co-counsel re same
09/10/09	4.40	JHK	prepare for and attend settlement conference; email to J. Kim re same; review information and research to evaluate proposals raised in settlement conference
09/14/09	0.50	JHK	research re tax and benefit implications of settlement
09/16/09	0.30	JHK	review and respond to emails from E. Dunne re substitution of parties and status of settlement
09/18/09	0.20	JHK	call with E. Dunne re revised interrogatories and declarations for preliminary injunction motion
09/21/09	0.50	JHK	review and respond to email from L. Kobayashi re settlement; emails to co-counsel re same
09/26/09	0.10	PA	review and respond to email from J. Kim re rent increase
09/27/09	0.10	PA	review Urban's answer and amended answer to third party complaint and counterclaim against Hawaii Public Housing Authority; review letter from J. Cregor re settlement counter offer
10/07/09	0.30	JHK	review and respond to emails from E. Dunne re status of settlement and discovery

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
10/08/09	0.30	PA	telephone calls from and to M. Bennett re settlement
10/09/09	0.20	JHK	call with P. Alston re settlement
10/12/09	0.20	PA	telephone calls from and to M. Bennett re settlement
10/12/09	2.50	JHK	call with J. Cregor re hearing on motion for class certification; prepare for same
10/13/09	0.20	PA	email from and to J. Kim re postponement of class certification hearing; telephone call to J. Kim re same; conference with M. Bennett re same
10/13/09	1.00	JHK	prepare for and attend hearing on motion for class certification; calls and email with P. Alston re settlement
10/14/09	0.20	PA	email from and to E. Dunne re delay; email to V. Geminiani
10/15/09	0.20	PA	review and respond to email from V. Geminiani; email to K. Hunter
10/15/09	0.20	JHK	emails with co-counsel re status of settlement
10/16/09	0.10	PA	review and respond to emails re settlement; telephone call to M. Bennett
10/17/09	0.10	PA	email from and to K. Hunter re follow up
10/19/09	0.30	PA	telephone calls from and to M. Bennett re KPT settlement; follow up
10/20/09	0.10	PA	review Urban's responsive pretrial statement; review and respond to emails re update
10/20/09	2.60	JHK	email to co-counsel re status of settlement; draft letter to L. Kobayashi and K. Hunter re same
10/21/09	0.40	JHK	revise letter to L. Kobayashi and K. Hunter and email to co-counsel re same

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
10/22/09	0.10	PA	review correspondence re scheduling
10/22/09	0.20	JHK	revise and finalize letter re settlement
10/23/09	0.30	PA	telephone calls from and to M. Bennett and follow up
10/23/09	0.20	JHK	call with G. Padayhag re further settlement conference; email to co-counsel re same
10/26/09	0.40	JHK	call with Judge Seabright's chambers re motion for summary judgment and email to E. Dunne re same; review emails re settlement conference
10/27/09	1.60	PA	prepare for and attend further settlement conference; email from and to E. Dunn re follow up re settlement conference
10/27/09	3.30	JHK	prepare for and attend settlement conference; draft matrix of settlement terms for same; review and respond to emails from co-counsel re follow-up items from same
10/29/09	0.20	PA	review order granting McMillion, et al.'s motin for class certification; email fto M. Bennett re rent abatement
10/29/09	0.20	JHK	review order granting motion for class certification

<u>BY</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
PA	350.00	10.80	\$ 3,780.00
JHK	240.00	199.50	\$ 47,880.00
MLC	210.00	6.30	\$ 1,323.00
KKMG	70.00	79.80	\$ 5,586.00
BMK	100.00	2.40	\$ 240.00
DDD	100.00	17.40	\$ 1,740.00
GKTP	50.00	5.50	\$ 275.00
JB	50.00	11.80	\$ 590.00
SWL	50.00	18.50	\$ 925.00
TOTALS:		352.00	\$ 62,339.00

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LEGAL SERVICES	\$ 62,339.00
STATE EXCISE TAX	2,937.41
INVOICE TOTAL	65,276.41
PRIOR UNPAID BALANCE	50,557.05
TOTAL AMOUNT DUE	\$ 115,833.46

PAYABLE UPON RECEIPT

*This invoice may not include some expenses (telephone, copying, depositions, etc.) for which we have not yet been billed.
Delinquent accounts will be charged interest at the maximum legal rate.
Prior unpaid balance is for this matter only.*



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DATE 01/17/11

INVOICE NO. 297492

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FOR LEGAL SERVICES RENDERED THROUGH: FEBRUARY 2010

Federal I.D.# 99-0287757
Hawaii I.D.# 10438996

RE: KUHIO PARK TERRACE - PUBLIC HOUSING CONDITIONS
CONTINGENCY OF STATUTORY ATTORNEYS'
FEES/PERCENTAGE OF RECOVERY
(9372-1)

<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
11/04/09	3.20	JHK	prepare for and attend settlement conference and attend to follow-up items from settlement conference
11/05/09	1.00	JHK	review and comment on proposed class notice drafts; emails to co-counsel and opposing counsel re same
11/08/09	0.10	JHK	email to E. Dunne re class notice
11/10/09	0.10	PA	review and respond to email re further settlement conference scheduling
11/10/09	0.10	JHK	email to P. Alston re settlement conference
11/11/09	3.20	JHK	research re settlements and judgments in ADA housing actions for settlement demand
11/17/09	0.40	JHK	review and comment on proposed class notice
11/20/09	0.10	PA	reviwe stipulation and order re proposed notice to potential class members
11/23/09	0.30	JHK	emails to L. Yoshimoto and E. Dunne re delivery of class notices
11/24/09	0.30	JHK	coordinate delivery of class notice

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
11/25/09	0.40	JHK	emails to L. Yoshimoto and E. Dunne re delivery of class notices
11/29/09	1.00	JHK	review and comment on motion for preliminary injunction
11/30/09	0.40	JHK	review revised motion for preliminary injunction and comment on same
12/01/09	0.10	JB	(ICC) work on updating substantive pleadings binder
12/02/09	1.30	JHK	prepare for and attend conference call re motion for preliminary injunction
12/07/09	0.30	JHK	review and respond to emails re class certification in state case and request for accommodations of named plaintiffs
12/09/09	0.20	PA	review letter from J. Cregor re response to demand
12/09/09	2.20	JHK	review and comment on declarations for preliminary injunction motion; meeting with T. Lilly re retention as testifying or consulting expert
12/10/09	0.40	PA	email from and to E. Dunne re status; review email from J. Cregor; email to and from E. Dunne re follow up; email from and to J. Kim re accommodations; email from and to E. Dunne re motion for preliminary injunction; review and revise motion
12/10/09	0.60	JHK	review and respond to emails from co-counsel re plaintiffs' request for reasonable accommodations and filing of motion for preliminary injunction
12/11/09	2.40	JHK	review and revise motion for preliminary injunction; emails to E. Dunne re same
12/14/09	1.30	JHK	review and revise motion for preliminary injunction; email to E. Dickey re motion for class certification
12/15/09	5.80	JHK	revise and finalize motion for preliminary injunction;

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			assemble and prepare exhibits and declarations re same; conference with E. Dunne re same
12/15/09	2.80	TFM	check citations in motion for preliminary injunction memo in support
12/16/09	1.20	JHK	supervise filing of preliminary injunction motion and all declarations and exhibits; revise memorandum in support to comply with word limit
12/18/09	0.20	PA	review multiple pleadings re preliminary injunction
12/18/09	0.60	JHK	review and respond to emails from co-counsel re discovery; arrange for publication of class notice
12/21/09	0.40	JHK	emails to co-counsel and Honolulu Advertiser re publication of class notice; review proof of notice
12/23/09	0.10	JHK	email to E. Dunne re discovery meet and confer
12/28/09	0.20	JHK	emails to E. Dunne re delivery of class notices
12/29/09	0.30	JHK	emails to E. Dunne re preliminary injunction hearing and delivery of class notices
12/31/09	0.20	JHK	call with A. Creps re class notice; email to E. Dunne re hearing for preliminary injunction
01/04/10	0.70	JHK	conference call re preparation for preliminary injunction hearing; email to E. Dunne following up from same
01/06/10	0.20	PA	telephone calls from and to G. Playdon re settlement and followup
01/06/10	0.10	JHK	review and respond to email from E. Dunne re protective order issues
01/08/10	0.40	JHK	final arrangments re delivery of class notice; email to A. Creps re same
01/10/10	0.10	JHK	email to co-counsel re production of expert witness files

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
01/12/10	0.10	PA	review and respond to emails re scheduling litigation meeting
01/12/10	0.40	JHK	call with Judge Seabright's chambers re status conference; email to co-counsel re same; email to E. Dunne re discovery issues
01/13/10	0.50	JHK	emails to E. Dunne re discovery issues; email to P. Alston re preliminary injunction status conference; process renewal of P. Obstler pro hac vice application
01/14/10	1.00	JHK	meeting with co-counsel re strategy, preliminary injunction hearing, and discovery
01/15/10	0.20	PA	review confidential settlement conference statement
01/15/10	0.50	JHK	revise and finalize settlement conference statement and assemble exhibits for same
01/18/10	0.20	PA	review and respond to email from J. Kim re damages demand letter
01/18/10	4.40	JHK	research and draft damages demand letter; email to co-counsel re same
01/19/10	0.20	PA	review and respond to email from J. Kim re litigation update
01/19/10	4.20	JHK	prepare for and attend status conference re preliminary injunction hearing; conference with E. Dunne and J. Kim re same; follow-up on issues from status conference; work on supplement to interrogatories and email to E. Dunne re same; work on privilege log; revise settlement demand letter; email to co-counsel re same; research re applicable statute of limitations; research re potential liability of Urban Management
01/19/10	1.30	KKMG	review email from J. Kim re documents produced by plaintiffs; review notes re plaintiffs' production of documents and review document production; prepare email to J. Kim re findings; review email from J. Kim re preparing draft supplemental responses

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
01/20/10	0.20	PA	review and respond to email from J. Kim re damages demand letter
01/20/10	1.70	JHK	revise damages demand letter; email to co-counsel re same; email to E. Dunne re discovery issues; emails with S. Monet re potential testimony and meeting
01/21/10	0.30	PA	review and respond to email from J. Kim re damages demand letter; email to and from J. Kim re telephone conference with M. Bennett
01/21/10	3.10	JHK	meeting with co-counsel to prepare for settlement conference and preliminary injunction hearing; revise damages demand letters; call with M. Bennett re settlement; emails to S. Monet re meeting
01/21/10	2.60	KKMG	review discovery binder re plaintiffs' interrogatory responses; work on preparing supplemental interrogatory responses for plaintiffs Vaiola, Sommers, Sabalboro and McMillion; work on identifying documents withheld; discuss same with J. Kim
01/22/10	3.80	JHK	attend settlement conference; conference with co-counsel re same
01/22/10	5.90	KKMG	work on preparing privilege log; review documents withheld from plaintiffs' production, prepare brief summary for withholding as privilege
01/23/10	0.50	JHK	email to P. Alston re status of settlement and strategy going forward
01/23/10	0.20	JHK	emails re videoconferencing facilities for expert witnesses
01/25/10	3.70	KKMG	continue reiew of privileged documents; work on preparing privilege log; telephone call to and from Esquire Court Reporting to discuss video conferencing capabilities for expert witnesses residing in San Diego, California and Lander, Wyoming; prepare summary of discussions and rates for J. Kim, Esq.

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01/26/10	2.40	JHK	review and process expert invoices for payment; review and revise Muniz disclosure; review and revise disclosure re non-retained witnesses; email to team re settlement and outcome of meeting with S. Monet; draft supplemental interrogatory responses
01/26/10	0.70	KKMG	continue review of privilege documents withheld from production; prepare summary and privilege log for same
01/27/10	4.90	KKMG	review email from J. Kim re expert and non-retained expert disclosures and researching information about Wanaluna Street clinic visited by Trudy Sabalboro; review interrogatory responses and medical file of same; telephone call to and from Jinny Kim, Esq. re Trudy Sabalboro's physicians; email from Jinny Kim, Esq. re Trudy Sabalboro medical information contained in interrogatory responses; prepare email to J. Kim re discussions with same; continue review of privileged documents, summarize and prepare privilege log; review email from Elizabeth Dunne, Esq. re Patti Miyamoto; work on performing various online searches to obtain information re same to ascertain whereabouts; prepare email to J. Kim, Esq. and Elizabeth Dune, Esq. summarizing findings
01/27/10	2.50	TFM	read Fair Housing Act and case and annotations; read A. D. A. Title V and case annotations
01/28/10	0.20	PA	review and respond to emails re settlement strategy
01/28/10	1.20	JHK	emails to co-counsel re settlement; call with Judge Kobayashi re same; review and comment on draft expert witness disclosures
01/28/10	2.50	TFM	read statutes similar to A.D.A section 12203, annotations, and six cases on elements of an intent required to prove housing discrimination under the Fair Housing Act
01/29/10	0.80	JHK	review and comment on draft expert witness disclosures

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
01/29/10	3.30	TFM	continue to read related statutes, annotations, and six cases on elements of an intent required to prove housing discrimination under the FHA
02/01/10	1.70	JHK	review oppositions to motion for preliminary injunction and supporting materials; call with E. Dunne re pending discovery issues; finalize expert witness disclosures
02/01/10	0.40	KKMG	review letter and documents produced R. Aaron Creps, Esq. on behalf of Realty Laua; review documents previously produced by Realty Laua to confirm duplicative bates numbering on different documents; prepare email to J. Kim advising him of same; catalog document production
02/01/10	2.30	TFM	analysis re elements of a claim under the Americans with Disabilities Act, section 12203(b)
02/01/10	2.40	TFM	analysis re elements of a Fair Housing Act claim
02/02/10	0.20	PA	review and respond to email from C. Center re settlement strategy
02/02/10	2.50	JHK	conference call with co-counsel re preparing reply for motion for preliminary injunction; call with J. Bunda and A. Creps re stipulations; review and finalize supplemental Scofield disclosure
02/02/10	3.80	KKMG	review email from J. Kim re compiling exhibits for preliminary injunction hearing; work on compiling exhibits; comparing and conforming same with affidavits and preparing exhibit list
02/02/10	0.80	TFM	prepare insert re elements of a claim under the A.D.A. for settlement negotiations with the State
02/02/10	3.70	TFM	prepare insert re elements of a Fair Housing Act section 804(f) claim
02/03/10	0.10	PA	review State's opposition to motion for preliminary injunction

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
02/04/10	0.80	PA	prepare for and attend further settlement conference; review declaration re opposition to Motion for Preliminary Injunction
02/04/10	3.60	JHK	prepare for and attend settlement conference (1.5); email to co-counsel re same (.3); revise stipulations for motion for preliminary injunction (1.4); finalize supplement answers to interrogatories and arrange for service (.4)
02/04/10	2.90	KKMG	email discussions and meeting with J. Kim to discuss proposed exhibit list and exhibits; continue work on same; review email from Erica Dickey, Esq. at Lawyers for Equal Justice re additional exhibits for preliminary injunction hearing; work on compiling same with S. Lee
02/04/10	2.90	TFM	continue preparing insert re elements of a claim under the Fair Housing Act and A.D.A.
02/04/10	1.50	SWL	work on preparing selected documents re L. Sommers, H. McMillon, T. Sabalboro and K. Vaiola to be used as exhibits
02/05/10	0.20	PA	review amended expert designation of expert and multiple designation of experts; review opposition to Motion for Preliminary Injunction
02/05/10	2.20	JHK	team conference call re acceptance of State's settlement offer (1.2); email and call with P. Alston re same (.3); email to AGs and call with J. Cregor re same (.3); meet with S. Monet re documents (.4)
02/05/10	3.20	KKMG	continue working on compiling exhibits and preparing exhibit list for preliminary injunction hearing; work on exhibit list and conforming same with exhibits; review email from J. Kim, Esq. re plaintiffs first supplemental answers to interrogatories; review drafts from Lawyers for Equal Justice; work with G. Rufo on finalizing same
02/05/10	3.00	SWL	work on cataloging potential selected documents to be used as exhibits
02/06/10	5.40	JHK	research and draft portion of reply memorandum for

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			motion for preliminary injunction (3.8); revise exhibit list for preliminary injunction hearing (1.6)
02/08/10	3.60	JHK	revise and finalize reply memorandum re motion for preliminary injunction and assemble exhibits for same; email to co-counsel re same; review and execute stipulation re uncontested facts; emails to K. Muller re witness and exhibit lists; email to opposing counsel re stipulation
02/08/10	4.90	KKMG	review emails from J. Kim re exhibit list, exhibits, and witness list; work on preparing witness list; review email communication from Lawyers for Equal Justice re additional exhibits; work on incorporating same and discuss additional exhibits with J. Kim, Esq.; compare and conform exhibits with exhibit list; review telephone voice mail from Nora at Judge Seabright's chambers re identifying exhibits and preparing same for the court; work on finalizing exhibits, exhibit list and witness list for service on opposing parties; telephone call to the Attorney General's office re exchange of same
02/08/10	4.50	SWL	continue preparing selected documents to be used as trial exhibits
02/09/10	0.50	JHK	emails to K. Muller and opposing counsel re submission of exhibits to court; emails to E. Dunne re discovery
02/09/10	1.60	KKMG	discussions with Judge Seabright's clerk re presentation of exhibits to the court; prepare email to J. Kim, Esq. re same; provide instruction to S. Lee re preparing exhibits for court as requested; monitor and assist in preparing same; review defendants exhibit and witness list; discuss same with J. Kim, Esq.; review email from J. Kim re reformatting exhibit list; discuss same with G. Rufo
02/09/10	7.00	SWL	continue preparing selected documents to be used as trial exhibits (P1 - P120)
02/10/10	0.30	PA	review multiple first supplemental answers to request for answers to interrogatories and responses to production of documents; review State's witness and

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			exhibit lists for motion for preliminary injunction; review combined reply memo re motion for preliminary injunction
02/10/10	0.70	JHK	review and respond to emails from E. Dunne re settlement and moving preliminary injunction hearing; emails to K. Muller re exhibit and witness lists; call with J. Kobayashi re settlement
02/10/10	0.60	KKMG	additional discussions with J. Kim re exhibit and witness list formatting; discuss same with G. Rufo; review USDC court website for court forms re same; discussions with S. Lee re missing exhibit from defendants; discussions with S. Lee re status of preparing exhibit binders for preliminary injunction hearing
02/10/10	5.90	SWL	continue preparing selected documents to be used as Plaintiff's trial exhibits (P1 - P120)
02/11/10	1.30	JHK	emails to K. Muller re obtaining insurance information; prepare filing of direct testimony and emails to E. Dunne re same; emails to J. Buna and A. Creps re filing direct testimony; email to J. Cregor re settlement
02/11/10	0.10	KKMG	telephone call to Marnie at Attorney General's office re missing state's exhibit
02/12/10	1.30	JHK	call with J. Cregor re settlement and email to co-counsel re same; emails to K. Muller re filing exhibits with court; finalize filing of direct testimony declarations
02/12/10	3.90	KKMG	review emails from J. Kim re initial disclosures, insurance policies and management contracts re Realty Laua; review documents produced by same to compile requested information; review parties initial disclosures; discuss findings with J. Kim; follow up telephone call to Marnie at Attorney General's office re state's missing exhibit; work on preparing documents requested by Lawyers for Equal Justice; telephone call to Judge Seabright's chambers re submitting court's exhibits

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
02/15/10	0.20	PA	email from and to J. Kim re scheduling
02/15/10	0.20	JHK	emails to E. Dunne and P. Alston re settlement conference
02/16/10	1.30	PA	prepare for and attend further settlement conference; email from and to J. Kim re Urban policy; telephone calls from and to M. Bennett
02/16/10	1.00	JHK	meeting with deputy attorney generals re settlement
02/16/10	2.20	JHK	prepare for and attend settlement conference and follow-up from same
02/16/10	0.50	JHK	review and comment on email re summary of settlement terms
02/17/10	1.50	JHK	settlement conference and status conference
02/17/10	0.20	JHK	review and revise notice re withdrawal of motion and email to D. Ahuna re same
02/17/10	0.10	JHK	email to K. Muller re picking up documents from Judge Seabright
02/17/10	0.30	JHK	emails to M. Tom and K. Muller re initial disclosures
02/17/10	0.50	KKMG	review email from J. Kim re producing plaintiffs' initial disclosure documents to Michael Tom, Esq.; work on compiling and preparing same for production
02/17/10	1.20	SWL	work on preparing documents for attorney review (A000001; A000900 and A200001 - A200191)
02/18/10	0.50	KKMG	discussions with S. Lee re status of preparing initial disclosure documents for production; provide instruction to G. Rufo re copying charges for same; prepare transmittal to Michael Tom, Esq. re document production; review email from J. Kim from Elizabeth Dunne, Esq. requesting discovery responses; work on compiling same

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
02/18/10	4.50	SWL	continue working on preparing documents for attorney review (A100001 - A102795)
02/19/10	0.10	PA	review withdrawal of motion for preliminary injunction; conference with J. Kim re strategy
02/19/10	0.20	KKMG	work on compiling discovery responses requested by Elizabeth Dunne; prepare email to same
02/20/10	0.10	PA	review initial disclosure documents
02/23/10	0.50	JHK	review draft stipulated judgment and email to co-counsel re same
02/24/10	0.30	JHK	conference with E. Dunne re settlement agreement
02/24/10	0.30	KKMG	reviews supplemental documents produced by state defendants; prepare instruction to have documents cataloged and files prepared; review email from S. Tannenbaum re Akusotino Pelefoti and preparing for deposition of same
02/25/10	3.60	JHK	draft provisions of settlement agreement re monetary relief, assignment, and indemnity and review and revise provisions of settlement agreement re injunctive relief; email to co-counsel re same
02/26/10	0.40	PA	review defendant Realty Laua's responses to plaintiff's first request for answers to interrogatories; email to J. Kim with revisions to settlement agreement
02/26/10	0.40	JHK	review comments to settlement agreement from P. Alston and email to E. Dunne re same
02/26/10	1.80	JB	(USDC) work on updating substantive pleadings and discovery binders
02/28/10	0.10	PA	email from and to J. Kim re fees

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<u>BY</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
PA	350.00	6.40	\$ 2,240.00
JHK	240.00	86.90	\$ 20,856.00
KKMG	70.00	42.00	\$ 2,940.00
TFM	100.00	23.20	\$ 2,320.00
JB	50.00	1.90	\$ 95.00
SWL	50.00	27.60	\$ 1,380.00
TOTALS:		188.00	\$ 29,831.00

LEGAL SERVICES	\$ 29,831.00
STATE EXCISE TAX	1,405.64
INVOICE TOTAL	31,236.64
PRIOR UNPAID BALANCE	115,833.46
TOTAL AMOUNT DUE	\$ 147,070.10

PAYABLE UPON RECEIPT

*This invoice may not include some expenses (telephone, copying, depositions, etc.) for which we have not yet been billed.
Delinquent accounts will be charged interest at the maximum legal rate.
Prior unpaid balance is for this matter only.*



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FOR LEGAL SERVICES RENDERED THROUGH: DECEMBER 2010

Federal I.D.# 99-0287757
Hawaii I.D.# 10438996

RE: KUHIO PARK TERRACE - PUBLIC HOUSING CONDITIONS
CONTINGENCY OF STATUTORY ATTORNEYS'
FEES/PERCENTAGE OF RECOVERY
(9372-1)

<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
03/01/10	0.30	JHK	call with E. Dunne re settlement agreement
03/01/10	0.50	JB	(USDC) continue work on updating substantive pleadings and discovery binders
03/02/10	2.70	JHK	revise settlement agreement and call with J. Cregor re same
03/02/10	0.20	KKMG	work on compiling documents to have case binder updated
03/02/10	0.30	SWL	work on preparing and organizing pleadings documents in preparation to update discovery binder
03/04/10	1.20	JHK	prepare for, travel to, and attend settlement conference
03/04/10	0.20	SWL	work on updating discovery binder (USDC)
03/08/10	0.20	JHK	review emails from E. Dunne re settlement and expert discovery
03/10/10	0.30	JHK	review proposed protective order and local rule and email to E. Dunne re same
03/15/10	0.10	JHK	email to E. Dunne re settlement

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
03/16/10	0.20	JHK	conference with E. Dunne re settlement
03/22/10	0.70	JHK	review State's comments to settlement agreement and email to co-counsel re same
03/22/10	0.20	JHK	review and respond to emails from E. Dunne re motion to compel discovery
03/22/10	2.80	KKMG	analyze and review additional documents for privilege and confidential information for privilege log
03/23/10	0.20	JHK	email to E. Dunne re settlement agreement
03/23/10	1.00	KKMG	continue to analyze and review additional documents for privilege log
03/24/10	1.40	JHK	prepare for, travel to, and attend status conference and conference with co-counsel re same
03/25/10	0.30	JHK	review and respond to emails from E. Dunne re conference call and expert costs; review proposed discovery letter
03/26/10	1.50	JHK	conference call with co-counsel re strategy for proceeding against management company defendants; review research re same
03/29/10	0.70	JHK	attend status conference
03/29/10	0.30	JHK	review and respond to emails from E. Dunne re discovery and settlement agreement
03/29/10	0.10	JHK	call with J. Wong re settlement agreement
03/30/10	0.80	JHK	prepare for and attend meeting with AGs re settlement agreement
03/30/10	0.50	JHK	analyze revisions to settlement agreement
03/31/10	0.30	JHK	review and respond to emails from E. Dunne re settlement agreement and discovery

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04/01/10	0.90	JHK	review and revise document requests to Realty Laua and Urban Management and emails to E. Dunne re same
04/05/10	1.00	JHK	prepare for and attend status conference re settlement
04/05/10	0.60	JHK	conference with E. Dunne re settlement agreemeent and review emails from E. Dunne re same
04/05/10	0.30	JHK	conference with E. Dunne re discovery and review email from E. Dunne re same
04/06/10	1.60	JHK	research re preclusive effect of class action settlements
04/07/10	0.50	JHK	revise interrogatories to Realty Laua and Urban Management
04/07/10	1.80	JHK	draft proposed revisions to settlement agreement and email to J. Wong and J. Cregor re same; review research re same
04/07/10	0.30	JB	[USDC] work on updating discovery binder
04/09/10	0.20	JHK	conference with K. Guadagno re revising interrogatories
04/09/10	0.40	JHK	review research memorandum from D. McDonell and email re follow up for same
04/09/10	2.40	KKMG	review draft interrogatory request prepared by Lawyers for Equal Justice; work on preparing draft for service upon Realty Laua and Urban Managment; discuss formatting issues with T. Miyashiro; discussions with J. Kim re preparing separate requests to parties and revising interrogatories accordingly; work on same
04/12/10	0.30	JHK	review and respond to email from D. McDonnell re statute of limitations issues
04/13/10	0.30	JHK	review and finalize interrogatories to management companies
04/13/10	0.30	JHK	review and respond to email from D. McDonnell re

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			statute of limitations issues
04/13/10	0.30	JHK	review materials re disabled tenant waiting lists received from J. Wong
04/13/10	0.60	KKMG	continue work on preparing first requests for answers to interrogatories to Urban Management and second request for answers to interrogatories to Realty Laua; finalize same for service
04/14/10	0.10	PA	review requests for answers to interrogatories to Realty Laua and Urban Management
04/14/10	0.30	JHK	review memorandum from re statute of limitations issues
04/16/10	0.10	JHK	email to V. Geminiani re meeting
04/16/10	0.20	JB	(USDC) work on updating case and discovery binder
04/20/10	0.10	PA	review Urban's corporate disclosure statement and initial disclosures
04/20/10	0.30	KKMG	review Urban Management's Corporate Disclosure Statement and Initial Disclosures; prepare instruction to have substantive pleadings binder updated
04/21/10	0.70	PA	attend meeting V. Geminiani, J. Kim and others
04/21/10	1.00	JHK	meeting with V. Geminiani, E. Dunne, and P. Alston re claims against management companies
04/21/10	0.30	JHK	review and respond to emails re settlement agreement and mediation
04/22/10	0.30	JHK	review emails from E. Dunne and J. Wong re settlement agreement
04/23/10	0.80	JHK	review latest draft of settlement agreement; email to J. Wong and J. Cregor re language of release
04/26/10	0.10	JHK	email to E. Dunne re settlement conference

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
04/27/10	0.20	JHK	review and respond to emails re settlement
04/27/10	1.00	KKMG	work on privilege log
04/27/10	0.10	JB	(USDC) work on updating substantive pleadings binder
04/28/10	0.40	JHK	review and respond to emails re settlement and discovery
04/28/10	1.40	KKMG	work on privilege log
04/29/10	0.30	JHK	review and respond to emails re settlement
04/30/10	1.40	JHK	research re attorneys fees for enforcing settlement
05/04/10	0.10	PA	review Urban's requests for production of documents, admissions and interrogatories
05/04/10	2.70	JHK	review management contract documents, pleadings, and legal memoranda to prepare for settlement conference re management companies
05/04/10	0.30	JHK	review and respond to emails from J. Wong and E. Dunne re settlement
05/04/10	0.40	JHK	review discovery requests from Urban Management and email to K. Guadagno re response to same
05/05/10	3.20	JHK	prepare for and attend settlement conference
05/05/10	2.30	JHK	draft outline re factual and legal issues to develop for claims against management companies
05/05/10	0.10	JHK	email to K. Guadagno re documents produced by defendants
05/06/10	0.40	KKMG	review, research and respond to email from J. Kim re documents produced by defendants
05/10/10	0.20	JHK	review emails re settlement

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
05/10/10	2.60	KKMG	review third party defendant Urban Management's first request for admissions, production of documents, and answers to interrogatories; compare and conform same; work with G. Rufo on preparing draft responses; work on compiling discovery requests to have case discovery binder and logs updated
05/11/10	0.20	JHK	review emails re settlement
05/12/10	0.50	JHK	review revised settlement agreement and emails re same
05/13/10	0.30	JHK	review Realty Laua's response to document request and email to E. Dunne re same
05/13/10	0.10	JHK	review and respond to emails re further settlement conference
05/14/10	0.50	JHK	review discovery responses from Realty Laua and Urban Management
05/14/10	0.30	JHK	review and respond to emails re settlement
05/15/10	0.10	JHK	conference with P. Alston re status of settlement negotiations
05/17/10	0.20	PA	review Urban Management's responses to discovery requests; review Realty Laua's responses to production of documents
05/17/10	3.20	JHK	prepare for and attend status conference re settlement conference, conference with E. Dunne re same, and follow-up items from same
05/17/10	0.40	JHK	review and respond to emails re discovery issues
05/17/10	0.20	JB	(USDC) work on updating case binder
05/18/10	0.10	PA	review stipulation re accommodations for plaintiffs
05/18/10	0.70	JHK	finalize stipulation re accommodations and call with J. Wong re same; review emails re outstanding issues for settlement agreement

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
05/18/10	2.20	JHK	review draft settlement agreements and prior correspondence to identify outstanding settlement issues
05/18/10	0.80	JB	(USDC) work on updating discovery binders
05/19/10	0.30	JHK	review draft responses to Urban Management discovery requests
05/20/10	3.70	JHK	draft letter to J. Cregor and J. Wong re settlement outstanding issues and review prior correspondence and drafts of settlement agreement re same
05/21/10	1.20	JHK	revise responses to Urban Management's discovery requests
05/21/10	0.20	JHK	call with KPT tenant re settlement status
05/21/10	0.20	JHK	review and respond to emails from E. Dunne re status of settlement
05/21/10	0.30	JHK	review occupancy regulations for settlement discussions
05/21/10	0.40	JB	work on updating case and discovery binders
05/24/10	0.20	PA	review stipulation re accommodations for plaintiffs; review letter to J. Cregor re outstanding issues
05/25/10	0.30	JHK	review letter from State re outstanding settlement terms and email to J. Wong and J. Cregor re same
05/27/10	0.30	PA	review letter from J. McCregor re settlement issues; conference with J. Kim re status and strategy
05/28/10	0.20	JHK	review emails from E. Dunne re settlement issues
05/29/10	0.20	JHK	review and respond to email from E. Dunne re transfers
05/30/10	2.30	JHK	revise and develop outline re factual and legal issues re claims against management companies
06/01/10	0.50	JHK	call with E. Dunne re outstanding settlement issues and

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			email to J. Wong re same
06/02/10	3.30	KKMG	review email communications from Elizabeth Dunne, Esq. and Erica Dickey, Esq. re drafting plaintiffs' responses to Urban Management's discovery request for admissions, answers to interrogatories; compare and conform drafts from Lawyers for Equal Justice with original drafts; work on draft responses and finalizing same for service upon parties; discussions with J. Kim re clarification of responses from Lawyers for Equal Justice
06/03/10	0.20	PA	review multiple responses to requests for production of documents and admissions; email from and to V. Geminiani re transfer of case from E. Dunne
06/03/10	3.60	JHK	prepare for and attend meeting with J. Wong re settlement; email to J. Wong summarizing meeting; emails to co-counsel re meeting and status of settlement
06/08/10	1.20	JHK	conference call with co-counsel re settlement and discovery
06/11/10	0.10	JHK	review and respond to email from J. Wong re meeting with Honolulu Fire Department
06/14/10	0.30	JHK	review and respond to email from E. Dunne re reasonable accommodation process
06/15/10	0.10	JHK	email to J. Wong re meeting with Honolulu Fire Department
06/17/10	2.50	JHK	prepare for and attend meeting with Honolulu Fire Department and follow-up from same
06/23/10	0.10	PA	review Hawaii Public Housing Authority's response to request for admissions; conference with J. Kim re status
06/23/10	0.50	JB	(USDC) work on updating case and discovery binders
06/24/10	0.50	JHK	review status of open discovery issues

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
06/25/10	0.30	JHK	emails to M. Tom and A. Creps re discovery issues
06/26/10	0.10	JHK	email to A. Creps and M. Tom re discovery meeting
06/28/10	0.50	JHK	email with E. Dunne re pending discovery issues and review draft of motion to compel
06/29/10	2.30	JHK	call with E. Dunne re outstanding discovery issues; prepare for and attend meet and confer with maangement companies' counsel re same; follow-up from same
06/30/10	0.20	JHK	review and reply to email from J. Wong re settlement
07/01/10	0.30	JHK	review and finalize document requests to Realty Laua and Urban Management
07/01/10	0.30	KKMG	work on preparing first request for production of documents to Urban Development and second request for production of documents to Realty Laua; discuss same with G. Rufo
07/06/10	0.10	PA	review second request for production of documents to Realty Laua
07/08/10	0.20	PA	review Urban Management's motion for partial summary judgment re applicability of statute of limitations; review separate concise statement
07/08/10	0.40	JHK	review Urban's motion for summary judgment, email to C. Center re same, and call with P. Alston re same
07/08/10	0.10	JHK	email to A. Creps re Realty Laua depositions
07/08/10	0.20	KKMG	work on compling circuit court discovery to have discovery binder and logs updated; prepare instruction to S. Lee re same
07/09/10	0.40	JHK	call with A. Creps re depositions; email to co-counsel re same; email to K. Guadagno re same
07/09/10	0.30	KKMG	review email communications between counsel re oral

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			depositions; work on preparing oral deposition notice for Shareen Dumlao and Pita Sala (USDC case)
07/12/10	0.10	PA	review notice of taking oral depositions re Pita Sala and Shareen Dumlao
07/12/10	0.30	JHK	call with E. Dickey and email to K. Guadagno re preparation for depositions
07/12/10	0.20	JHK	call with J. Cregor re settlement issues
07/12/10	0.30	SWL	work on updating case, substantive pleadings and discovery binder
07/13/10	0.30	JHK	emails to K. Guadagno and E. Dickey re documents for depositions
07/13/10	4.10	KKMG	review email from J. Kim re preparing for deposition of Realty Laua employees; work on compiling documents to prepare for same; work with Erica Dickey in preparing for oral depositions; work on compiling additional documents produced by Realty Laua and comparing and confirming duplicative bates numbers with different documents; review notes re same and discuss with J. Kim
07/13/10	3.80	SWL	work on preparing files re documents produced by State Defendants on 2/4/10 (200001 - 200807, 300001 - 300719, 400001 - 400440, 700001 - 700049, 800001 - 800035, 200803(108 pages), 200809(259 pages) and 200810(915 pages); work on preparing documents from cd rom to be processed (K000002995 - K000004089)
07/14/10	3.50	JHK	review documents to prepare for depositions; draft outlines re same
07/14/10	1.20	KKMG	continue assisting Erica Dickey, Esq. in preparing for oral depositions of Realty Laua employees; discussions with J. Kim re additional bates number duplication
07/14/10	0.50	SWL	work on re organizing of client documents in preparation to be produced

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
07/15/10	3.80	JHK	prepare for and take depositions of P. Sala and S. Dumlao
07/15/10	0.20	JHK	conference with A. Creps re settlement
07/16/10	0.30	JHK	review Urban Management discovery requests to the State of Hawaii
07/20/10	1.00	JHK	revise settlement agreement
07/21/10	0.20	JHK	email to K. Guadagno re document productions
07/21/10	1.70	SWL	work on organizing original documents to respective files selected by and reviewed by Realty Laua for depo prep
07/22/10	2.30	JHK	revise settlement agreement and email to co-counsel re same
07/26/10	2.80	JHK	draft proposed revisions to settlement agreement
07/27/10	1.60	JHK	draft proposed revisions to settlement agreement
07/27/10	0.80	JB	(USDC) work on updating case and discovery binders
07/28/10	0.60	JHK	review and respond to emails from J. Cregor re settlement agreement and A. Creps re settlement conference
08/05/10	0.10	JHK	call with J. Cregor re status of settlement
08/06/10	0.10	JHK	review and respond to email from Judge Kobayashi re settlement demand
08/07/10	0.10	PA	email to M. Bennett re follow up on draft
08/07/10	0.10	JHK	email to V. Geminiani re status of settlement
08/09/10	0.20	PA	email from and to M. Bennett re complaints; email to J. Kim re follow up

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
08/09/10	0.40	JHK	call with P. Alston re status of settlement and calls with J. Cregor re same
08/10/10	0.20	PA	email from and to J. Kim re status of negotiations
08/10/10	2.70	JHK	prepare for and attend meeting re settlement agreement and call with P. Alston re same
08/11/10	1.00	JHK	draft responses to Urban's discovery requests and call with J. Cregor re same
08/11/10	0.60	KKMG	discussions with J. Kim re discovery request from Urban Development to State of Hawaii; work with G. Rufo to prepare responses and finalize same
08/12/10	0.10	JHK	email to M. Tom re documents requested
08/15/10	1.20	JHK	revise settlement agreement
08/16/10	4.80	JHK	research and draft opposition to Urban's motion for summary judgment
08/16/10	0.30	JHK	revise settlement agreement
08/16/10	0.10	JHK	email to M. Tom and A. Creps re settlement agreement
08/17/10	0.60	JHK	revise and finalize opposition to Urban's summary judgment motion and calls and emails with J. Cregor re filing of same
08/18/10	0.20	PA	review opposition re motion for partial summary judgment; email to J. Kim re joinder/supplemental memo on statute of limitations
08/18/10	0.60	JHK	review and respond to email from P. Alston re opposition to Urban's summary judgment motion and research re State's immunity from statute of limitations
08/18/10	1.50	JHK	review documents to reference in demand letters to Urban and Realty Laua
08/19/10	0.50	JHK	review and respond to emails re continuing Urban's

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			motion for summary judgment
08/19/10	1.80	JHK	review documents for reference in demand letters
08/21/10	0.20	PA	review State's opposition to Urban's motion for partial summary judgment
08/21/10	5.50	JHK	draft demand letters to Urban and Realty Laua
08/23/10	0.20	PA	review order re Urban's withdrawal of its motion for partial summary judgment; email to J. Kim re follow up
08/23/10	0.20	PA	conference with J. Kim re motion strategy
08/23/10	0.10	JHK	call with P. Alston re Urban's withdrawal of motion
08/23/10	0.80	JHK	revise demand letters to Urban and Realty Laua
08/24/10	0.40	JHK	finalize demand letters to Urban and Realty Laua
08/25/10	0.20	PA	review correspondence re settlement demand
08/25/10	1.20	JHK	prepare for and attend conference call among co-counsel re settlement and email to V. Geminiani re documents for same
08/25/10	0.20	JHK	review and respond to emails re production of attorney fee invoices
08/25/10	0.30	JB	[USDC] work on updating case and discovery binder
08/26/10	0.80	JHK	review invoices from AGs office; emails to J. Cregor and K. Guadagno re same; review requests for admissions to State
08/26/10	1.60	JHK	review and analyze contracts, laws, and regulations re dispute resolution procedures for state contracts
08/26/10	0.50	JHK	draft motion to approve settlement (federal)
08/26/10	0.10	JHK	review and respond to emails re settlement conference

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
08/26/10	0.20	KKMG	meeting with J. Kim re producing state documents to defendants Urban Management; review discovery requests re same
08/27/10	0.10	JHK	review emails re settlement conference
08/27/10	0.20	JHK	emails and call with K. Guadagno re production of AG's timesheets
08/27/10	1.50	KKMG	work on preparing documents responsive to defendant Urban Development's first request for production of documents to State of Hawaii; emails to and from J. Kim re production details
08/27/10	0.40	JB	(USDC) work on processing State defendants' documents for production
08/28/10	0.20	JHK	review and respond to emails re production of AG's time sheets
08/30/10	0.30	JHK	review documents re attorney fee invoices and email to M. Goo and J. Cregor re same
08/31/10	0.10	PA	review Urban's response to production of documents
08/31/10	0.40	JHK	review and respond to email from J. Wong re settlement agreement; call with V. Geminiani re status of settlement; review and respond to emails from V. Geminiani re call with P. Obstler
09/01/10	0.10	PA	review notice of taking 30(b)(6) deposition re Hawaii Public Housing Authority
09/01/10	1.00	JHK	review detailed attorney time invoices and prepare same for production; email to M. Tom re same
09/01/10	0.40	KKMG	discussions with J. Kim re preparing additional documents from the State defendants for production to defendant Urban Development and Realty Laua (.1); compare and conform same with prior production to confirm valid time period (.2); discuss production with J. Bunch (.1)

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
09/02/10	1.00	JHK	revise settlement agreement
09/02/10	0.50	JHK	review and respond to email from M. Tom re production of invoices; call with K. Guadagno re same; review and respond to email from V. Geminiani re deposition; review third request for admissions by Urban and draft note re response to same
09/02/10	0.20	KKMG	telephone call from J. Kim re status of document production; provide instruction to G. Rufo to prepare transmittals and prepare documents for production
09/02/10	0.70	JB	(USDC) work on processing State defendant's supplemental documents for production; work on preparing file for State defendant's documents produced on 8/27/10 responsive to Urban's first request for production of documents; work on preparing file for State defendant's supplemental documents produced on 9/2/10 responsive to Urban's first request for production of documents
09/03/10	0.20	JHK	review and respond to emails re discovery issues
09/07/10	0.10	PA	review Urban Management's third request for admissions to State
09/08/10	0.20	JHK	call with P. Alston and J. Wong re settlement
09/09/10	0.30	JHK	calls and email to P. Alston re settlement status
09/10/10	0.70	JHK	call with P. Obstler re settlement
09/10/10	0.20	JHK	review motions for approval of settlement and email to E. Dickey re same
09/13/10	0.50	JHK	revise settlement agreement and emails to Victor Geminiani and J. Wong re same
09/14/10	0.20	JB	(USDC) work on updating case and discovery binder
09/15/10	0.10	JHK	call with J. Cregor re settlement

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
09/15/10	0.10	JHK	email to A. Creps re ADA claims
09/16/10	0.20	PA	conference with J. Kim re settlement status and planing
09/16/10	0.30	JHK	calls with P. Alston, J. Wong, and J. Cregor re status of settlement agreement
09/17/10	1.30	JHK	work on motions for approval of settlement
09/20/10	0.80	JHK	emails re settlement agreement and work on motion to approve settlement
09/22/10	0.10	JHK	email to M. Tom re confidentiality agreement
09/22/10	0.10	JHK	email to V. Geminiani re settlement
09/22/10	0.10	KKMG	email to J. Kim re upcoming deadline for discovery responses
09/23/10	1.00	SWL	work on updating case, substantive pleadings and discovery binders re 1st Circuit Court and USDC
09/24/10	0.30	JHK	review and respond to emails from A. Creps and M. Tom re discovery
09/24/10	0.30	JHK	draft, review and respond to emails to M. Tom and A. Creps re discovery
09/24/10	0.10	KKMG	email to J. Kim re status of responses to Realty Laua's discovery requests
09/27/10	0.10	JHK	review and respond to emails re settlement conference
09/27/10	0.10	KKMG	email discussions with J. Kim re status of discovery responses
09/30/10	0.20	JHK	call with V. Geminiani re settlement
10/04/10	0.20	JHK	call with A. Creps re discovery and email to counsel re same

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
10/13/10	1.20	JHK	draft response to requests for admissions and call with J. Cregor re same
10/13/10	0.20	KKMG	assist J. Kim in preparing discovery requests
10/14/10	0.20	JHK	call with J. Cregor re outstanding discovery and review email from J. Wong re same
10/15/10	0.70	JHK	revise and finalize responses to requests for admissions and email to J. Cregor re same
10/15/10	0.30	JHK	email to M. Tom re extension and basis of dispute with Urban
10/18/10	0.20	PA	review State's discovery responses
10/18/10	0.10	JHK	conference with P. Alston re status of settlement
10/18/10	0.10	JHK	email to J. Wong and J. Cregor re status of settlement
10/19/10	0.10	PA	review discovery responses
10/19/10	0.10	JHK	email to M. Tom re admissions
10/20/10	0.50	JHK	attend status conference re settlement and pretrial deadlines
10/23/10	4.80	JHK	revise motions for preliminary approval of settlements and for class certification
10/25/10	0.20	JHK	email to M. Tom re dismissal of management companies
10/26/10	0.10	PA	review order granting motion to amend scheduling order
10/26/10	0.10	JHK	email to V. Geminiani re motions to approve settlement
10/27/10	1.10	JHK	revise class notice and motion for class certification and preliminary approval
10/27/10	0.20	JHK	emails to J. Cregor re settlement and consent to jurisdiction by a magistrate judge

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
10/28/10	0.10	JHK	email to V. Geminiani re motions to approve settlement
10/28/10	0.20	JB	(1CC) work on updating case and discovery binder
10/28/10	0.20	JB	(USDC) work on updating case and discovery binder
10/29/10	0.10	JHK	email to V. Geminiani re motions to approve settlement
11/01/10	0.10	PA	review notice re transfer of case to Judge Kobayashi
11/01/10	0.20	JHK	review and respond to email from V. Geminiani re motion for approval of settlement
11/04/10	0.20	JHK	review settlement agreemeent and email to V. Geminiani re same
11/05/10	2.20	JHK	revise and finalize motion for approval of settlement and motion for class certification and assemble exhibits and declarations re same
11/08/10	0.50	JHK	call with J. Wong re settlement; email to V. Geminiani re same; revise signature page
11/09/10	0.10	PA	review motion for preliminary approval of class action settlement and motion for class certification
11/12/10	0.10	JHK	email to D. Ahuna re continuing hearing on motion for preliminary approval of settlement
11/16/10	0.10	JHK	review and execute stipulation re continuing hearing on motion for preliminary approval of settlement
11/24/10	0.30	JHK	review oppositions re motions for class certification and to approve settlement
11/24/10	0.20	JHK	review and respond to email from J. Wong re HUD conditions to settlement
11/26/10	0.10	JHK	review and respond to email from M. Tom re admissions
11/29/10	0.20	PA	review stipulation to continue hearing on motion for class certification; review State's statement of no

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
			opposition; conference with J. Kim re settlement terms and indemnity issues; conference with V. Geminiani re same; review reply memo in support of motion for preliminary approval of class action settlement
11/29/10	0.10	JHK	conference with V. Geminiani and P. Alston re settlement status
11/29/10	1.40	JHK	research and draft reply memorandum for motion to approve settlement (federal)
11/30/10	1.80	JHK	research and draft reply memorandum re motion for approval of settlement and to certify class
12/01/10	0.30	PA	review multiple pleadings re motion for class certification and preliminary approval of class settlement
12/01/10	0.50	JHK	revise and finalize reply memorandum re motion for class certification and to approve settlement (state)
12/01/10	0.10	JHK	call with J. Wong re Urban's admissions
12/01/10	1.50	SLM	(USDC) work on preparing oral deposition files for D. Dumlao (7/15/10) and S. Sala (7/15/10); work on work on updating condensed deposition and deposition exhibits binder
12/02/10	0.30	PA	review Urban's opposition to motion for preliminary approval of class action settlement; review Realty Laua's joinder in opposition
12/02/10	0.60	JHK	revise and finalize State's response to Urban's 3rd request for admissions and emails to J. Wong re same
12/02/10	1.80	SLM	(USDC) continue work on updating condensed deposition and deposition exhibits binder; continue work on updating condensed deposition and deposition exhibits binder
12/03/10	0.10	JHK	email to V. Geminiani re mediation with management companies

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<u>DATE</u>	<u>TIME</u>	<u>BY</u>	<u>DESCRIPTION</u>
12/06/10	3.20	JHK	prepare for and attend hearing re motion for class certification and approval of settlement (state); draft order granting same; revise class notice
12/06/10	0.60	SLM	(USDC) continue work on updating condensed deposition and deposition exhibits binder
12/09/10	0.10	JHK	review email from M. Tom re comments to proposed order re class certification and approval of settlement
12/13/10	1.30	JHK	prepare for and attend hearing re motion to approve settlement; arrange of submittal of class notice re same; email to V. Geminiani re same
12/14/10	0.10	PA	review notice of settlement of class action
12/14/10	5.00	JHK	prepare for and attend settlement conference
12/16/10	0.10	PA	review order granting plaintiff's motion for preliminary approval of class action settlement
12/16/10	0.30	JHK	conference with P. Alston re settlement conference; call to K. Hunter re same
12/17/10	0.10	PA	review order granting plaintiffs' motion for class certification and preliminary approval of class settlement
12/17/10	0.10	JHK	email to V. Geminiani re settlement
12/21/10	0.40	JHK	review and respond to emails from V. Geminiani and D. Lash re OMM attorney fees; obtain information re hourly rates allowed by federal court
12/21/10	0.30	JHK	arrange for service of class notices
12/22/10	0.60	JHK	emails to J. Wong and J. Cregor re class notice; arrange for posting of documents on website; email to V. Geminiani re same
12/29/10	0.20	JHK	review email from J. Wong re class notice and

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conference with P. Alston re status of same

<u>BY</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
PA	350.00	6.20	\$ 2,170.00
JHK	240.00	149.40	\$ 35,856.00
KKMG	70.00	25.50	\$ 1,785.00
SLM	50.00	3.90	\$ 195.00
SWL	50.00	7.80	\$ 390.00
JB	50.00	5.80	\$ 290.00
TOTALS:		198.60	\$ 40,686.00

LEGAL SERVICES	\$ 40,686.00
STATE EXCISE TAX	1,917.12
INVOICE TOTAL	42,603.12
PRIOR UNPAID BALANCE	147,070.10
TOTAL AMOUNT DUE	\$ 189,673.22

PAYABLE UPON RECEIPT

*This invoice may not include some expenses (telephone, copying, depositions, etc.) for which we have not yet been billed.
Delinquent accounts will be charged interest at the maximum legal rate.
Prior unpaid balance is for this matter only.*



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FOR COSTS INCURRED THROUGH: JANUARY 2011

Federal I.D.# 99-0287757
Hawaii I.D.# 10438996

RE: KUHIO PARK TERRACE - PUBLIC HOUSING CONDITIONS
CONTINGENCY OF STATUTORY ATTORNEYS'
FEES/PERCENTAGE OF RECOVERY
(9372-1)

<u>DATE</u>	<u>COST ADVANCED</u>	<u>AMOUNT</u>
	COPIES	3,785.50
	MESSENGER	375.00
	POSTAGE	39.06
11/21/08	WESTLAW RESEARCH	21.64
12/01/08	WESTLAW RESEARCH	648.76
12/17/08	FILING FEES First Circuit Court re Complaint	275.00
12/17/08	FILING FEES USDC re Complaint	350.00
12/18/08	FILING FEES First Circuit Court re Demand for Jury Trial	200.00
12/23/08	SHERIFF/SERVICE Service of Complaint on State of Hawaii; Hawaii Housing and Realty Laua	172.00
01/22/09	WESTLAW RESEARCH	39.61
02/02/09	WESTLAW RESEARCH	449.66
02/12/09	REPORTS Pacific Eye Surgery Center, Inc., M. Pierre Pang, M.D. re Medical Records of Hazel McMillan	104.71
02/14/09	REPORTS Erlinda M. Cachola, M.D. re Medical Records of Gene Strickland	25.00
02/21/09	REPORTS Nada, Ono & Ka'anehe, LLP re Medical Records on Katherine Vaiola	104.71
03/02/09	WESTLAW RESEARCH	1,154.34
03/03/09	MEDIATION FEE Dispute Prevention & Resolution re Initial Deposit for Mediation	2,000.00
03/04/09	LONG DISTANCE TELEPHONE	0.51
04/08/09	REPORTS Kapolei Family Medical Center, Inc. re Medical Records Release for Hazel McMillon	35.00
04/14/09	WESTLAW RESEARCH	2,237.53

Alston Hunt Floyd & Ing

LEWERS FALETOGO et al
 Client: 9372-1
 Invoice No.: 297494

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<u>DATE</u>	<u>COST ADVANCED</u>	<u>AMOUNT</u>
04/16/09	COURIER	5.95
04/17/09	COURIER	18.53
04/17/09	COURIER	18.53
04/20/09	REPORTS Medical records information at Kaiser Permanente re Lee Sommers	185.86
04/20/09	REPORTS Medical records information at Kaiser Permanente re Trudy Sabalboro	384.29
04/29/09	DOCUMENT PRODUCTION O'Connor Playdon & Guben LLP re CD of all documents produced by Realty Launa	26.17
05/11/09	WESTLAW RESEARCH	773.80
05/29/09	LEXIS RESEARCH	937.58
05/29/09	LEXIS RESEARCH	216.38
06/01/09	WESTLAW RESEARCH	191.68
06/23/09	MISCELLANEOUS 2 Ideal 5780 selk-inking stamps	29.63
06/25/09	LUNCH MEETING Lunch for M. Calvert, Elizabeth Dunne & Whitney during depositions	17.56
06/25/09	DEPOSITIONS Katherine Vaiola	214.60
06/25/09	DEPOSITIONS Trudy-Ann Sabalboro	202.77
07/01/09	DEPOSITIONS Gene Strickland, and Lee Summers	681.26
07/09/09	DEPOSITIONS Hazel McMillan	554.45
07/15/09	WESTLAW RESEARCH	1,421.21
08/24/09	CONSULTANT Manny Muniz Associates, LLC re Professional Services re Evacuation plan for buildings A and B at Kuhio Park Terrace	962.50
12/11/09	CONSULTANT Manny Muniz Associates, LLC re Professional Sercives from 10/22/09 to 12/9/09	4,400.00
12/15/09	WESTLAW RESEARCH	478.24
12/17/09	COLOR COPIES/PRINTING	23.00
12/18/09	COLOR COPIES/PRINTING	93.50
01/04/10	CONSULTANT Facility Access Consulting, Inc. re Interim Injunctive Relief Project	578.00
01/14/10	CONFERENCE CALL J. Kim conference call re strategy, preliminary injunction hearing, and discovery	11.85
01/14/10	SHERIFF/SERVICE Service of Notices to 650 residential units	650.00
01/18/10	WESTLAW RESEARCH	21.19
01/18/10	WESTLAW RESEARCH	253.41
01/22/10	DINNER MEETING JHK re Dinner meeting with Employment Law Center attorneys - Claudia Center & Jinny Kim	50.00
01/25/10	LUNCH MEETING JHK re Lunch meeting with witness Sam Monet	48.88
01/25/10	USB drive for documents from Sam Monet	11.51
01/27/10	LEXIS RESEARCH	137.25

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LEWERS FALETOGO et al
 Client: 9372-1
 Invoice No.: 297494

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<u>DATE</u>	<u>COST ADVANCED</u>	<u>AMOUNT</u>
01/31/10	LEGAL NOTICES The Honolulu Advertiser re KPT Class Action Notice	3,159.68
02/01/10	LEXIS RESEARCH	288.71
02/06/10	WESTLAW RESEARCH	826.10
02/08/10	COLOR COPIES/PRINTING	264.00
02/09/10	DOCUMENT PRODUCTION Realty Laua's Document Production	26.18
02/12/10	COLOR COPIES/PRINTING	64.00
02/17/10	DOCUMENT PRODUCTION Copies of Depositions -originals provided by Marnie Goo @ Attorney General's office	580.92
03/12/10	DOCUMENT PRODUCTION Transfer H18 to DVD re 1/25/10 Hearing B	28.06
03/25/10	MEDIATION FEE Dispute Prevention & Resolution, Inc. re Balance of our 1/3 Share for Mediation Services re 09-0073-M	879.58
04/08/10	WESTLAW RESEARCH	142.77
07/15/10	DEPOSITIONS Pita Sala and Shareen Dumlao	806.31
08/17/10	WESTLAW RESEARCH	451.09
08/25/10	CONFERENCE CALL JHK - conference call among co- counsel re settlement	11.30
09/10/10	LONG DISTANCE TELEPHONE	2.79
11/30/10	WESTLAW RESEARCH	109.35
12/01/10	WESTLAW RESEARCH	45.99
12/22/10	COURT/REGULATORY DOCUMENTS HIDC	4.56
TOTAL COST *		\$ 33,309.00
* 23,158.79 TAXABLE + 10,150.21 NON-TAXABLE		
STATE EXCISE TAX		1,091.24
		34,400.24
INVOICE TOTAL		34,400.24
PRIOR UNPAID BALANCE		189,673.22
TOTAL AMOUNT DUE		\$ 224,073.46

PAYABLE UPON RECEIPT

*This invoice may not include some expenses (telephone, copying, depositions, etc.) for which we have not yet been billed.
 Delinquent accounts will be charged interest at the maximum legal rate.
 Prior unpaid balance is for this matter only.*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HAZEL MCMILLON; et al.,

Plaintiffs,

vs.

STATE OF HAWAII; et al.,

Defendants.

STATE OF HAWAII; et al.,

Third-Party Plaintiffs,

vs.

URBAN MANAGEMENT
CORPORATION DBA URBAN
REAL ESTATE COMPANY, et al.,

Third-Party
Defendants.

CIVIL NO. CV 08-00578 LEK

Civil Rights Action

Class Action

**DECLARATION OF M. VICTOR
GEMINIANI**

DECLARATION OF M. VICTOR GEMINIANI

Pursuant to 28 U.S.C. § 1746, I declare that:

1. I am an attorney with Lawyers for Equal Justice (“LEJ”),
counsel for Plaintiffs and the class herein.

2. I make this declaration based on my personal knowledge and
am competent to testify as to the matters set forth herein.

3. LEJ keeps timesheets in the ordinary course of business.

Attached as Exhibit "3" is a true and correct itemization of the attorneys' fees incurred by LEJ in this action for the following time periods:

- a. Beginning of matter through December 31, 2008;
- b. January 1, 2009 through March 31, 2009;
- c. April 1, 2009 through October 31, 2009;
- d. November 1, 2009 through February 28, 2010;
- e. March 1, 2010 to the present

These fees were reasonable incurred. The time entries in Exhibit "1" were entered into this firm's electronic time keeping software contemporaneously with the work described by the entries.

4. The following is a brief description of the relevant qualifications, experience, contributions and hourly rates of each attorney referenced in Exhibit "3" for whom fees are claimed in this brief:

a. **M. Victor Geminiani. ("MVG")** Mr. Geminiani has been practicing law since 1969 and is currently a member of the Bars of Georgia, California and Hawaii. His exclusive area of practice has been in poverty law with emphasis on federal litigation involving issues that affect the low income population including voting rights enforcement, jail reform, constitutionality of state statutes, enforcement of ADA/504 requirements and utility subsidy entitlements for low income tenants. Mr. Geminiani's hourly rate of \$285 in this matter is well within the range for attorneys with similar experience in this community.

b. **Elizabeth M. Dunne. ("EMD")** Ms. Dunne has been admitted to practice since 2001 and have approximately 9 years of litigation experience. She has been admitted to practice in the State of Hawai'i and before this Court since 2009. In addition to Hawaii, Ms. Dunne is currently a member of the Florida and Washington D.C. bars. Her hourly rate of

\$225.00 in this matter is well within the range of rates for attorneys with similar experience in this community.

c. **William Durham. (“WD”)** Mr. Durham has been admitted to practice in the State of Hawai`i and before this Court since 2004 and has 6 years of litigation experience. His hourly rate of \$225.00 in this matter is well within the range of rates for attorneys with similar experience in this community.

d. **Jennifer Albertson. (“JRA”)** Ms. Albertson has been admitted to practice in Missouri since 2007 and has 2 years litigation experience. She has been admitted to practice in the State of Hawai`i and before this Court since 2009. Her hourly rate of \$125.00 in this matter is well within the range of rates for attorneys with similar experience in this community.

e. **Erica Jeung Dickey. (“EGJD”)** Ms. Dickey has been admitted to practice in Wisconsin since 2007 and has 2 years litigation experience. Ms. Dickey is an AmeriCorps Attorney and is not admitted to practice in the State of Hawai`i. Her hourly rate of \$125.00 in this matter is well within the range of rates for experienced paralegals in this community.

f. **Delia L’Heureux. (“DCL”)** Ms. L’Heureux has been admitted to practice in Hawai`i and before this Court since 2008. She has 1.3 years litigation experience. Her hourly rate of \$100.00 in this matter is well within the range of rates for experienced paralegals in this community.

g. **Deja Marie Ostrowski. (“DMO”)** Ms. Ostrowski recently graduated with her J.D. She is an AmeriCorps member and is not admitted to practice in the State of Hawai`i. Her hourly rate of \$75.00 in this matter is well within the range of rates for experienced paralegals in this community.

5. Attached as Exhibit "4" is a true and correct listing of the out-of-pocket expenses incurred by LEJ in this action. These costs were entered into the firm’s billing system contemporaneously.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Honolulu, Hawai'i on January 19, 2010.

/s/ Victor Geminiani

M. VICTOR GEMINIANI

**ITEMIZATION OF WORK PERFORMED AND DESCRIPTION OF SERVICES
RENDERED AS REQUIRED BY L.R. 54.3(d)(1) AND (2)**

RE: *McMillon, et al. v. State of Hawaii, et al.*, Case No. 08-00578 JMS-LEK

**I. Pre-Complaint Investigation and Preparing Complaint
i. Beginning of matter through December 31, 2008;**

<u>Litigation Phase</u>	<u>Date</u>	<u>Attorney</u>	<u>Brief Description of Activity</u>	<u>Time</u>	<u>Attorney Rate</u>	<u>Fees</u>
Case development, background investigation, and case administration	1/7/2008	EMD	Email Bruce Clark re ADA access issues	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	1/8/2008	EMD	Conference call with Bruce Clark re ADA access issues	1.2	\$225.00	\$270.00
	1/8/2008	MVG	MFH Survey of elderly and disabled needs in Hawaii in HPHA	0.6	\$285.00	\$171.00
	1/15/2008	MVG	Tour KPT and meet with Lewers Faletogo	2.3	\$285.00	\$655.50
	2/4/2008	MVG	Team Call	0.7	\$285.00	\$199.50
	3/21/2008	MVG	Obtain incident reports at Fire dept.	0.7	\$285.00	\$199.50
	3/26/2008	MVG	Review Fire Incident reports	3.4	\$285.00	\$969.00
	4/1/2008	MVG	Tour KPT, meet with tenants and Pact staff	5	\$285.00	\$1,425.00
	4/1/2008	WD	Call Gavin	0.10	\$225.00	\$22.50
	4/1/2008	WD	Travel to KPT (18 Miles)	0.50	\$225.00	\$112.50

	4/1/2008	WD	Inspecting Units; Meeting with PACT folks; meeting with potential clients; TRAVEL back	4.50	\$225.00	\$1,012.50
	4/3/2008	MVG	Talk to Will D.re case strategy	0.3	\$285.00	\$85.50
	4/3/2008	WD	Notes on KPT	0.60	\$225.00	\$135.00
	4/3/2008	WD	Call with Victor	0.10	\$225.00	\$22.50
	4/7/2008	WD	KPT Memo on Conditions	1.80	\$225.00	\$405.00
	4/8/2008	WD	Public Housing Conditions Memo	2.00	\$225.00	\$450.00
	4/9/2008	WD	Draft Conditions Memo	0.20	\$225.00	\$45.00
	4/9/2008	WD	Draft Conditions Memo	0.80	\$225.00	\$180.00
	4/12/2008	MVG	Read draft memo re conditions and law	1	\$285.00	\$285.00
	4/12/2008	WD	Draft Conditions Memo	3.30	\$225.00	\$742.50
	4/12/2008	WD	Draft Conditions Memo	3.70	\$225.00	\$832.50
	4/13/2008	WD	Edit Conditions Memo	1.20	\$225.00	\$270.00
	4/14/2008	WD	PH Memo	3.00	\$225.00	\$675.00
	4/15/2008	MVG	Evaluate Elevator maintenance reports	2.6	\$285.00	\$741.00
	4/15/2008	WD	Call Potential Client	0.20	\$225.00	\$45.00
	4/17/2008	MVG	Meeting with Gain Thornton and Will Durham re case	0.5	\$285.00	\$142.50

			strategy			
	4/17/2008	WD	Call with Victor	0.30	\$225.00	\$67.50
	4/18/2008	WD	Draft/Revise PH Conditions Memo	1.10	\$225.00	\$247.50
	4/18/2008	WD	PH Conditions Memo	0.90	\$225.00	\$202.50
	4/24/2008	MVG	Call with Will D. re Mootness	0.5	\$285.00	\$142.50
	4/24/2008	WD	Call with Victor/Dan re: Mootness standards	0.30	\$225.00	\$67.50
	4/25/2008	MVG	Meet with Chad taniguchi, head of HPHA	3	\$285.00	\$855.00
	4/25/2008	MVG	Meet with Lewers Falletogo, possible plaintiff	1	\$285.00	\$285.00
	4/25/2008	MVG	Discussed strategy with Jay Koslovski and his interest in co-counseling	0.7	\$285.00	\$199.50
	4/25/2008	MVG	Strategy meeting with staff	1	\$285.00	\$285.00
	4/25/2008	WD	Meeting with Tanaguchi	2.20	\$225.00	\$495.00
	4/25/2008	WD	Meeting with Lewers (Client)	1.00	\$225.00	\$225.00
	4/25/2008	WD	Litigation Strategy Meeting	1.00	\$225.00	\$225.00
	4/25/2008	WD	Travel for Meeting	0.20	\$225.00	\$45.00
	4/28/2008	MVG	Talk to Will D.re case	0.1	\$285.00	\$28.50

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			strategy			
	4/28/2008	WD	Call with Victor	0.10	\$225.00	\$22.50
	4/28/2008	WD	Draft Retainer	0.40	\$225.00	\$90.00
	4/29/2008	WD	Email to Brill re: co-counselling	0.30	\$225.00	\$67.50
	4/30/2008	MVG	Meet with Will re case strategy	0.1	\$285.00	\$28.50
	4/30/2008	MVG	Call with Disability Rights in SF about disability issues and possible partnering	0.7	\$285.00	\$199.50
	4/30/2008	WD	TCT: Victor re: retainer	0.10	\$225.00	\$22.50
	5/1/2008	MVG	Talk with Will re Lewers Dec.	0.3	\$285.00	\$85.50
	5/1/2008	WD	Meet with Victor	0.20	\$225.00	\$45.00
	5/2/2008	MVG	Talk to Pact office	0.3	\$285.00	\$85.50
	5/5/2008	WD	Looking for Lewer's Docs	0.40	\$225.00	\$90.00
	5/5/2008	WD	Draft Lewers Decl.	0.60	\$225.00	\$135.00
	5/8/2008	MVG	Draft Lewers F. Dec.	1	\$285.00	\$285.00
	5/8/2008	MVG	Confer with Lewers F.	0.5	\$285.00	\$142.50
	5/8/2008	MVG	Call to Will D.	0.2	\$285.00	\$57.00
	5/8/2008	WD	Call Victor re: KPT	0.20	\$225.00	\$45.00
	5/12/2008	MVG	Review draft re conditions and law	0.6	\$285.00	\$171.00
	5/13/2008	MVG	Emails on Medical issues from KKV meeting	0.4	\$285.00	\$114.00
	5/15/2008	WD	Email to Gavin re: KPT	0.10	\$225.00	\$22.50

Exhibit "3"

	5/17/2008	MVG	Email on Medical issues from KKV	0.2	\$285.00	\$57.00
	5/17/2008	MVG	Review material on HPHA website re facilities, board meeting discussions etc	1.3	\$285.00	\$370.50
	5/19/2008	WD	Review KPT Memo	0.20	\$225.00	\$45.00
	5/22/2008	WD	Call with R. Brill (Wallace and Schneider) re: setting up a conference call	0.20	\$225.00	\$45.00
	5/23/2008	MVG	Call with Lit team	0.6	\$285.00	\$171.00
	5/23/2008	WD	Email Victor re: Conference Call	0.10	\$225.00	\$22.50
	5/23/2008	WD	Call Victor re: K	0.50	\$225.00	\$112.50
	5/23/2008	WD	Draft Lewers Declaration	0.20	\$225.00	\$45.00
	5/23/2008	WD	Email Rachel Brill	0.10	\$225.00	\$22.50
	6/1/2008	MVG	Call with Will D. re case	0.2	\$285.00	\$57.00
	6/1/2008	WD	Email to Brill re: Phone Conference	0.10	\$225.00	\$22.50
	6/1/2008	WD	Email Victor re: Moving the Case Forward	0.10	\$225.00	\$22.50
	6/2/2008	WD	Edit Lewers Affidavit	0.30	\$225.00	\$67.50
	6/4/2008	WD	Review and Edit KPT Memo; Send to Wallace and Schneider	0.40	\$225.00	\$90.00
	6/5/2008	MVG	Call with Team	0.4	\$285.00	\$114.00

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	6/5/2008	MVG	Visit KPT to interview PACT staff re disability issues	1.7	\$285.00	\$484.50
	6/5/2008	WD	Call with Victor	0.60	\$225.00	\$135.00
	6/6/2008	MVG	Call on ADA issues with Guy Wallace, and Will D.	1.4	\$285.00	\$399.00
	6/6/2008	WD	Draft Targeted Mailing	0.40	\$225.00	\$90.00
	6/6/2008	WD	Call with Victor, Guy Wallace, Rachel Brill re: ADA Claims	1.40	\$225.00	\$315.00
	6/8/2008	WD	Email re: ADA requirmenets with Victor and KPT personnel	0.10	\$225.00	\$22.50
	6/9/2008	MVG	Targeted mailing review	0.6	\$285.00	\$171.00
	6/9/2008	MVG	Discuss Mailing and letter with ODC	0.5	\$285.00	\$142.50
	6/9/2008	WD	Call with Victor re: Targetted Mailing	0.60	\$225.00	\$135.00
	6/9/2008	WD	Targeted Mailing Envelopes	0.30	\$225.00	\$67.50
	6/9/2008	WD	Review Targeted Mailing re: ADA	0.20	\$225.00	\$45.00
Case development	6/10/2008	DCL	Meeting with Victor Re: Client Outreach and scheduling client visits	0.5	\$125.00	\$62.50

Exhibit "3"

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Case development	6/10/2008	DCL	Read through docs (Will's memo, etc.) from meeting with Victor to familiarize myself with KPT	0.2	\$125.00	\$25.00
Case development	6/10/2008	DCL	Made list of clients to call from Victor's notes and tried to get contact info for each	0.3	\$125.00	\$37.50
Case development	6/10/2008	DCL	L/M with Melissa Chun Re: calling/scheduling meetings with residents	0.1	\$125.00	\$12.50
Case development	6/10/2008	DCL	Hayley called on behalf of Melissa Re: calling/scheduling meetings with residents	0.1	\$125.00	\$12.50
Case development	6/10/2008	DCL	Put together a document with all the residents we already have scheduled and dates/times to schedule more	0.2	\$125.00	\$25.00
	6/10/2008	MVG	Meet with Delia re client visits	0.5	\$285.00	\$142.50
	6/10/2008	MVG	Meet with Hayley at PACT re KPT	1.3	\$285.00	\$370.50
	6/10/2008	WD	Memo on Cell Towers	0.90	\$225.00	\$202.50
Case development	6/11/2008	DCL	Read through emails and attachments from Will and Victor	0.2	\$125.00	\$25.00

Exhibit "3"

Case development	6/11/2008	DCL	Called Carrie Hyman at Biopro Re: Cell Towers at KPT	0.2	\$125.00	\$25.00
Case development	6/11/2008	DCL	Spoke with Gregory Franklin via email about meeting on the 23rd or 24th	0.1	\$125.00	\$12.50
Case development	6/11/2008	DCL	Called Stacy, Hazel, and Trudy to set up appointments	0.1	\$125.00	\$12.50
	6/11/2008	WD	Add to Memo issues about cell tower	0.20	\$225.00	\$45.00
Case development	6/12/2008	DCL	Meeting with Victor RE: documenting conditions at KPT and meeting with residents	0.2	\$125.00	\$25.00
Case development	6/12/2008	DCL	Calls to residents (Hazel, Trudy, Gregory, Terri, Stacy, Shari, Ifamy, Milly)	0.2	\$125.00	\$25.00
Case development	6/12/2008	DCL	Meeting with Victor RE: mailing to KPT residents	0.2	\$125.00	\$25.00
	6/12/2008	MVG	Meet with delia re meetings with clients	0.2	\$285.00	\$57.00
	6/12/2008	MVG	Meet with PACT staff to discuss problems at KPT	1.2	\$285.00	\$342.00
	6/12/2008	WD	Review Paul's Email; Email Victor	0.10	\$225.00	\$22.50

Case development	6/13/2008	DCL	Follow up calls to 8 clients RE: scheduling meetings	0.2	\$125.00	\$25.00
Case development	6/13/2008	DCL	Meeting with Victor RE: co-counsel, photographer, and approval from ODC for mailing	0.2	\$125.00	\$25.00
Case development	6/16/2008	DCL	Spoke with Hayley at PACT RE: scheduled clients	0.2	\$125.00	\$25.00
Case development	6/16/2008	DCL	Mailing for Tower A	1.5	\$125.00	\$187.50
	6/16/2008	MVG	Mailings to tower A	1.5	\$285.00	\$427.50
	6/16/2008	WD	Call R. Brill re: Co-Counsel	0.20	\$225.00	\$45.00
	6/16/2008	WD	Research ACC Claims	0.40	\$225.00	\$90.00
Case development	6/17/2008	DCL	Mailing for Tower B	1.8	\$125.00	\$225.00
Case development	6/17/2008	DCL	Updated KPT schedule and sent to Hayley, along with a copy of the mailing	0.1	\$125.00	\$12.50
	6/17/2008	MVG	Mailings to TowerB	1.6	\$285.00	\$456.00
	6/17/2008	WD	Research viability of ACC claims	2.40	\$225.00	\$540.00
	6/17/2008	WD	Email Cathie Bishop re: model complaints	0.10	\$225.00	\$22.50
Case development	6/18/2008	DCL	Made an intake sheet and checklist of common issues	0.5	\$125.00	\$62.50

Case development	6/18/2008	DCL	Spoke with Neor Eter (B-1006) about conditions at KPT and set up an appt to meet	0.2	\$125.00	\$25.00
Case development	6/18/2008	DCL	Spoke with Moana Enele (A-605) about conditions at KPT and her father's disability, set up appt to meet	0.2	\$125.00	\$25.00
Case development	6/18/2008	DCL	Coordinated with Hayley at PACT RE: appts with residents	0.2	\$125.00	\$25.00
Case development	6/19/2008	DCL	Spoke with Hayley about checklist and confirmed appointments for the day	0.1	\$125.00	\$12.50
Case development	6/19/2008	DCL	L/M with Gene Strickland at KPT (response to mailing)	0.1	\$125.00	\$12.50
Case development	6/19/2008	DCL	Spoke with Corrina Grace (A-1116)	0.7	\$125.00	\$87.50
Case development	6/19/2008	DCL	Updated KPT Visits Schedule	0.1	\$125.00	\$12.50
Case development	6/19/2008	DCL	Spoke with Hayley about new appointments and where to meet today	0.2	\$125.00	\$25.00
Case development	6/19/2008	DCL	Victor, Hayley, and Delia met with Karl Mariboho (B-403)	1	\$125.00	\$125.00

Case development	6/19/2008	DCL	Victor, Hayley, and Delia met with Lewers Faletogo (A-211), spoke with management on his behalf	1.5	\$125.00	\$187.50
Case development	6/19/2008	DCL	Victor and Delia met with Tonis and Mideko (B-609)	1	\$125.00	\$125.00
Case development	6/19/2008	DCL	Victor, Hayley, and Delia met and spoke about strategy/planning appointments for the next couple weeks	0.5	\$125.00	\$62.50
	6/19/2008	MVG	Meet with tenants and Pact staff	6	\$285.00	\$1,710.00
	6/19/2008	MVG	Review retainer	0.5	\$285.00	\$142.50
	6/19/2008	WD	Researching A.C.C. Claims	1.30	\$225.00	\$292.50
	6/19/2008	WD	Email Victor re; ACC Issues	0.30	\$225.00	\$67.50
	6/19/2008	WD	Draft Retainer	0.20	\$225.00	\$45.00
Case development	6/20/2008	DCL	Spoke with Glenda Smyth (A1703)	0.3	\$125.00	\$37.50
Case development	6/20/2008	DCL	Conference Call with Will, Victor, and Delia	1	\$125.00	\$125.00
Case development	6/20/2008	DCL	Created spreadsheet to track photos	0.1	\$125.00	\$12.50
Case development	6/20/2008	DCL	Types up notes from phone calls and yesterday's meetings/Organized files	1	\$125.00	\$125.00

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Case development	6/20/2008	DCL	Spoke with Lee Sommer (B210)	0.2	\$125.00	\$25.00
Case development	6/20/2008	DCL	Updated schedule and client info for KPT visits	0.1	\$125.00	\$12.50
Case development	6/20/2008	DCL	Typed up meeting minutes from conference call	0.1	\$125.00	\$12.50
Case development	6/20/2008	DCL	Put together notes on each resident we are meeting with on Monday and sent to Victor	0.2	\$125.00	\$25.00
Case development	6/20/2008	DCL	Looked through the documents given to us by Karl B403	0.3	\$125.00	\$37.50
	6/20/2008	MVG	Meeting with lit team	0.1	\$285.00	\$28.50
	6/20/2008	WD	Reviewing Smith v. HCDCH pleadings on ACC breach	0.30	\$225.00	\$67.50
	6/20/2008	WD	Conference Call with Victor and Delia	1.00	\$225.00	\$225.00
	6/21/2008	MVG	Reviewed Draft notes re interviews	0.7	\$285.00	\$199.50
	6/21/2008	MVG	Meet with Micronesians United to discuss problems at KPT	1.6	\$285.00	\$456.00
	6/22/2008	WD	Adding to-do to calendar	0.10	\$225.00	\$22.50

Exhibit "3"

Case development	6/23/2008	DCL	Victor and Delia met with Neor and Euleulania Eter (B-1006)	1	\$125.00	\$125.00
Case development	6/23/2008	DCL	Victor, Delia, and Hayley (PACT) met with Hazel McMillon (A-803)	1	\$125.00	\$125.00
Case development	6/23/2008	DCL	Victor, Delia, and Hayley waited for Raily K. to come to appt (no show) so we went to her apartment - unavailable to meet and will reschedule	0.5	\$125.00	\$62.50
Case development	6/23/2008	DCL	Delia, Victor, and Hayley brainstormed for the week's appointments	0.5	\$125.00	\$62.50
Case development	6/23/2008	DCL	Typed up/organized notes from interviews	0.5	\$125.00	\$62.50
Case development	6/23/2008	DCL	Spoke with Lisa Lofland (B-1703) and set up appointment for 6/25	0.2	\$125.00	\$25.00
	6/23/2008	MVG	Meet with tenants for individual interviews and Pact staff	4	\$285.00	\$1,140.00
Case development	6/24/2008	DCL	Spoke with Resceoe Koni (A-1612) about KPT - unavailable to meet now	0.2	\$125.00	\$25.00

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Case development	6/24/2008	DCL	Returned an anonymous call in response to our mailing - no response	0.1	\$125.00	\$12.50
Case development	6/24/2008	DCL	Delia, Victor, and Hayley met with Angela Dailey (B-905)	1	\$125.00	\$125.00
Case development	6/24/2008	DCL	Delia and Hayley waited for 230 appointment (no show) while Victor took video	0.7	\$125.00	\$87.50
Case development	6/24/2008	DCL	Confirmed appointments at KPT for tomorrow	0.2	\$125.00	\$25.00
Case development	6/24/2008	DCL	typed up/organized notes	0.5	\$125.00	\$62.50
	6/24/2008	MVG	Tour KPT, Meet tenants and Take pictures	4	\$285.00	\$1,140.00
	6/24/2008	WD	Draft Co-Counsel Agreement	0.50	\$225.00	\$112.50
	6/24/2008	WD	Email Paul re: 2 cases or 1 case	0.30	\$225.00	\$67.50
Case development	6/25/2008	DCL	Delia, Victor, and Hayley met with the Enele Family (A-605)	0.5	\$125.00	\$62.50
Case development	6/25/2008	DCL	11 am appointment was a no show - Victor called our next two appointments to move them forward	0.2	\$125.00	\$25.00

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Case development	6/25/2008	DCL	Delia and Victor met with Gene Strickland (A-1001)	1	\$125.00	\$125.00
Case development	6/25/2008	DCL	Delia, Victor, and Hayley met with Lisa Lofland (B-1703)	1	\$125.00	\$125.00
Case development	6/25/2008	DCL	Put together notes/memos on all the clients we met with at KPT	1	\$125.00	\$125.00
	6/25/2008	MVG	Meet with Tenants and take photos	4	\$285.00	\$1,140.00
	6/26/2008	MVG	Email from Will D. on ADA and 1983 claims and ACC issue	0.4	\$285.00	\$114.00
	6/27/2008	WD	Rev: Victor's Changes to Co-Counsel Agreement	0.10	\$225.00	\$22.50
	6/28/2008	MVG	Review FOIA	0.2	\$285.00	\$57.00
	6/28/2008	MVG	Call with jay Koslofski re conditions cases ojn mainland	1	\$285.00	\$285.00
	6/28/2008	WD	Research APA Claim	1.00	\$225.00	\$225.00
	6/28/2008	WD	Draft FOIA request re: Inspections	0.20	\$225.00	\$45.00
	6/28/2008	WD	Email Jim Grow re: advice	0.10	\$225.00	\$22.50
	6/30/2008	WD	Email Rachel Brill	0.10	\$225.00	\$22.50

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Case development	7/2/2008	DCL	Email from Will re: Jim Grow - scanned HUD regs from green book and emailed to Will and Victor	0.2	\$125.00	\$25.00
	7/2/2008	WD	Email from Jim Grow; Rachel Brill	0.30	\$225.00	\$67.50
	7/2/2008	WD	Email Victor re: Memo	0.10	\$225.00	\$22.50
	7/3/2008	MVG	Call with Will D. re co-counsel	0.3	\$285.00	\$85.50
	7/3/2008	WD	Email Guy re: His interest	0.10	\$225.00	\$22.50
	7/3/2008	WD	Looking at Rachel's new law firm	0.10	\$225.00	\$22.50
	7/3/2008	WD	Call with Victor re: Co-counsel	0.30	\$225.00	\$67.50
	7/3/2008	WD	D/I Delia's memo; calendar time to review	0.10	\$225.00	\$22.50
	7/4/2008	WD	Memo re: KPT Substantive Claims	1.20	\$225.00	\$270.00
	7/4/2008	WD	Memo: re Litigation plans	0.80	\$225.00	\$180.00
	7/4/2008	WD	Edit Memo on Substantive Issues	0.70	\$225.00	\$157.50
	7/6/2008	WD	Edit Memo on Substantive Issues	0.50	\$225.00	\$112.50
	7/6/2008	WD	Edit Memo on Resources	0.20	\$225.00	\$45.00
	7/6/2008	WD	Research on Authenticating Pictures by Co-counsel	0.20	\$225.00	\$45.00

	7/6/2008	WD	Review Client Stories Memo	0.10	\$225.00	\$22.50
	7/8/2008	MVG	Finish client description memo	0.7	\$285.00	\$199.50
	7/8/2008	WD	Draft Complaint	1.00	\$225.00	\$225.00
	7/12/2008	WD	Call R. Brill	0.10	\$225.00	\$22.50
	7/12/2008	WD	Edit Subst. Memo; Redact Client Memo; for R. Brill	0.50	\$225.00	\$112.50
	7/14/2008	WD	Draft Complaint	0.90	\$225.00	\$202.50
	7/15/2008	MVG	Review draft complaint	1.5	\$285.00	\$427.50
	7/17/2008	WD	Draft Class Action Allegations section of Complaint	0.30	\$225.00	\$67.50
	7/18/2008	WD	Call Rachel Brill re: Co-counselling	0.30	\$225.00	\$67.50
	7/21/2008	WD	Draft Complaint	1.10	\$225.00	\$247.50
	7/21/2008	WD	call with Victor re: HUD FOIA	0.10	\$225.00	\$22.50
	7/22/2008	WD	Emails with Victor re Fire Code	0.10	\$225.00	\$22.50
	7/23/2008	WD	Review Paul's Email re: Videotaping	0.10	\$225.00	\$22.50
	7/26/2008	WD	Review HUD FOIA Reesponse	0.60	\$225.00	\$135.00
	7/26/2008	WD	Scan Documents for Team	0.30	\$225.00	\$67.50
Case development	8/1/2008	DCL	Scanned Fire incident reports for Will and emailed	0.5	\$125.00	\$62.50
	8/1/2008	WD	Call Rachel	0.30	\$225.00	\$67.50

Case development	8/4/2008	DCL	Emailed Edgy notes re: KPT client interviews - which would she like to film?	0.1	\$125.00	\$12.50
Case development	8/4/2008	DCL	Spoke with Jeff re: clients at KPT, accessing the premises, what he needs from me	0.3	\$125.00	\$37.50
Case development	8/4/2008	DCL	Received documents from Will's FOIA request, reviewed, scanned, and emailed to Will and Victor	3	\$125.00	\$375.00
	8/4/2008	WD	Setting up Tasklist	0.10	\$225.00	\$22.50
Case development	8/5/2008	DCL	Email to Melissa Chun re: Food bank at KPT and elevator waits	0.1	\$125.00	\$12.50
	8/5/2008	MVG	Conference call with ADA experts on Mainland in Disability Rights	0.7	\$285.00	\$199.50
	8/5/2008	WD	Conference Call with Mainland Firm / R. Brill	0.70	\$225.00	\$157.50
	8/5/2008	WD	Call with Victor	0.10	\$225.00	\$22.50
	8/7/2008	WD	Call Victor re: co-counsel	0.20	\$225.00	\$45.00
	8/7/2008	WD	Email Executive Director of DRA re: Co-counseling case	0.20	\$225.00	\$45.00

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Case development	8/12/2008	DCL	Called Rebecca at KKV about food bank and elevator waits	0.2	\$125.00	\$25.00
	8/12/2008	WD	Draft Complaint	2.00	\$225.00	\$450.00
	8/12/2008	WD	Draft Complaint	1.80	\$225.00	\$405.00
	8/12/2008	WD	Edit Complaint	0.30	\$225.00	\$67.50
Case development	8/14/2008	DCL	Scanned sampling of fire incident reports and emailed to Will	0.5	\$125.00	\$62.50
	8/14/2008	MVG	Review and comment on draft complaint	1.2	\$285.00	\$342.00
	8/14/2008	WD	Edit Complaint	0.70	\$225.00	\$157.50
Case development	8/15/2008	DCL	Email Will re: fire incidents	0.1	\$125.00	\$12.50
Case development	8/15/2008	DCL	Email Will re: Lexis	0.1	\$125.00	\$12.50
	8/15/2008	MVG	Email Will D. re fire reports	0.2	\$285.00	\$57.00
	8/15/2008	WD	Fire Incidents: Review	0.10	\$225.00	\$22.50
	8/15/2008	WD	Review Fire Incident Reports	0.80	\$225.00	\$180.00
	8/15/2008	WD	Email Delia re: Fire Incidents - need more	0.10	\$225.00	\$22.50
	8/15/2008	WD	Email Delia: Lexis PW	0.10	\$225.00	\$22.50
	8/16/2008	WD	Review Fire Incidents	0.50	\$225.00	\$112.50
	8/17/2008	WD	Review Fire Incidents	0.10	\$225.00	\$22.50
	8/17/2008	WD	Review Fire Incidents	0.10	\$225.00	\$22.50

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Case development	8/18/2008	DCL	Entered Fire Incident reports into spreadsheet for KPT	2	\$125.00	\$250.00
Case development	8/19/2008	DCL	Spoke with EMT Chief (Donny Gates) about their incident reports - he said it contained personal information and they could not copy them for us without releases	0.2	\$125.00	\$25.00
	8/19/2008	WD	Review Fire Incidents	0.20	\$225.00	\$45.00
Case development	8/20/2008	DCL	Email Will re: FOIA request for EMT reports	0.1	\$125.00	\$12.50
	8/20/2008	WD	Email Delia re: FOIA	0.10	\$225.00	\$22.50
	8/21/2008	MVG	Conference call with LAS-ELC	0.9	\$285.00	\$256.50
	8/21/2008	WD	Conference Call with Legal Aid Society: Employment Law Center	0.90	\$225.00	\$202.50
Case development	8/22/2008	DCL	Emails with Jeff and Edgy about filming of KPT tenants - who Jeff filmed and who he couldn't	0.1	\$125.00	\$12.50
Case development	8/22/2008	DCL	Housing Committee Meeting at the Leg with Victor	2	\$125.00	\$250.00

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	8/22/2008	MVG	Hearing at legislature on Housing issues including KPT	2	\$285.00	\$570.00
	8/25/2008	WD	Review case on conditions	0.10	\$225.00	\$22.50
Case development	8/26/2008	DCL	Drafted FOIA request and mailed to Donny Gates	0.3	\$125.00	\$37.50
Case development	8/28/2008	DCL	Spoke with Donny Gates about the FOIA request. He explained he had to pass it along to his attorney at Corp Counsel and I should deal with her from now on	0.2	\$125.00	\$25.00
Case development	8/29/2008	DCL	Email from Claudia about co-counseling and bringing in OMM	0.1	\$125.00	\$12.50
	8/29/2008	MVG	Call with Will D. re co-counsels	0.2	\$285.00	\$57.00
	8/29/2008	WD	Review Woods v. Alexandria in Lexis	0.20	\$225.00	\$45.00
	8/29/2008	WD	Call from Victor re: Co-counsel	0.20	\$225.00	\$45.00
Case development	9/16/2008	DCL	Tenant meeting at KPT organized by FACE	2	\$125.00	\$250.00

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Case development	9/18/2008	DCL	Spoke with Hayley at PACT re: issues faced by KPT tenants, any suggestions for things to address with Chad in our meeting	0.7	\$125.00	\$87.50
Case development	9/18/2008	DCL	Discussed with Victor and Drafted Agenda for 9/19/2008 meeting with Chad Taniguchi	0.2	\$125.00	\$25.00
Case development	9/19/2008	DCL	Delia and Victor met with Chad Taniguchi to discuss problems out at KPT	1.5	\$125.00	\$187.50
	9/19/2008	MVG	Meet with Chad Taniguchi	2.5	\$285.00	\$712.50
	9/19/2008	MVG	Meet at KKV with Director re disability requests	1.7	\$285.00	\$484.50
Case development	9/24/2008	DCL	Researched HPHA eviction policies - particularly eviction board requirements	0.3	\$125.00	\$37.50
Case development	9/26/2008	DCL	Review of Documents sent via email by Will	0.2	\$125.00	\$25.00

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Case development	9/26/2008	DCL	Reviewed HUD Reports re: KPT and HPHA as a whole - created chart for 10 worst projects in the state for last 5 years	0.7	\$125.00	\$87.50
	9/26/2008	WD	Email over all docs to C. Center and Paul Alston	0.20	\$225.00	\$45.00
	9/29/2008	WD	Email Paul Alston re: HPHA Scoring	0.20	\$225.00	\$45.00
Case development	10/1/2008	DCL	Email with Hayley at PACT re: all elevators in tower B (including freight) are down	0.1	\$125.00	\$12.50
Case development	10/2/2008	DCL	Call with Jeff Mueller re: his filming today out at KPT	0.3	\$125.00	\$37.50
Case development	10/2/2008	DCL	Email to Victor and Will re: Jeff's comments about KPT film	0.2	\$125.00	\$25.00
	10/3/2008	WD	Review Email on Documentary	0.10	\$225.00	\$22.50
	10/6/2008	WD	Emails with Victor	0.20	\$225.00	\$45.00
Case development	10/10/2008	DCL	Conference Call	0.9	\$125.00	\$112.50
Case development	10/10/2008	DCL	Call with Will and Victor re: to do list	0.3	\$125.00	\$37.50
	10/10/2008	MVG	Review draft complain	0.7	\$285.00	\$199.50

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	10/10/2008	MVG	Call with Delia and Will to coordinate research	0.3	\$285.00	\$85.50
	10/10/2008	MVG	Research security issue for possible inclusion	1.6	\$285.00	\$456.00
	10/10/2008	MVG	Lit. Team call	0.9	\$285.00	\$256.50
	10/10/2008	MVG	Edit retainer	0.5	\$285.00	\$142.50
	10/10/2008	WD	Conference Call: Alston, O'Melviny, LAS-ELC	0.90	\$225.00	\$202.50
	10/10/2008	WD	Call With Victor/Delia re: To Do	0.30	\$225.00	\$67.50
	10/11/2008	MVG	Review 6 exhibits	0.8	\$285.00	\$228.00
	10/11/2008	MVG	Meet with Doctors at KPHC re problems at KPT	1.3	\$285.00	\$370.50
Case development	10/12/2008	DCL	Review/Edit of Retainer Agreement for KPT clients	0.3	\$125.00	\$37.50
	10/12/2008	MVG	Work on budget for discovery and experts	0.7	\$285.00	\$199.50
	10/12/2008	MVG	Work on retainer	0.4	\$285.00	\$114.00
	10/12/2008	MVG	Work on Co-Counsel agreement	0.8	\$285.00	\$228.00
	10/12/2008	WD	Review To-Do List	0.10	\$225.00	\$22.50
	10/12/2008	WD	Edit Retainer	0.10	\$225.00	\$22.50
	10/12/2008	WD	Review Contact List	0.10	\$225.00	\$22.50
	10/12/2008	WD	Draft Budget (without numbers)	0.40	\$225.00	\$90.00

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	10/12/2008	WD	Review Co-Counsel Agreement	0.10	\$225.00	\$22.50
	10/12/2008	WD	Edit Retainer	0.40	\$225.00	\$90.00
	10/13/2008	WD	Review Budget	0.10	\$225.00	\$22.50
Case development	10/15/2008	DCL	Drafted memo on the KPT residents interested in being plaintiffs and circulated to team	0.5	\$125.00	\$62.50
	10/15/2008	MVG	Review tenants facts memo	0.8	\$285.00	\$228.00
	10/16/2008	MVG	Set agenda and email team	0.4	\$285.00	\$114.00
	10/16/2008	MVG	Talk to Bruce Clark about qualifications and interest	0.8	\$285.00	\$228.00
	10/16/2008	WD	Review Cases for Victor	0.10	\$225.00	\$22.50
Case development	10/17/2008	DCL	Call with Will	0.1	\$125.00	\$12.50
	10/17/2008	MVG	Team call	0.6	\$285.00	\$171.00
	10/17/2008	WD	Call with Delia	0.10	\$225.00	\$22.50
	10/17/2008	WD	Agenda to Team	0.10	\$225.00	\$22.50
	10/17/2008	WD	Team Call	0.70	\$225.00	\$157.50
Case development	10/21/2008	DCL	Call with KPT resident (Barbara Coon) Re: lack of hot water at KPT	0.2	\$125.00	\$25.00
Case development	10/21/2008	DCL	Arrangements with Gregory Franklin for KPT filming	0.2	\$125.00	\$25.00
Case development	10/24/2008	DCL	Email will re: Agenda for conference call	0.1	\$125.00	\$12.50
	10/24/2008	WD	Email Delia re: Agenda	0.10	\$225.00	\$22.50

Case development	10/25/2008	DCL	Agenda for Team Conference Call	0.2	\$125.00	\$25.00
	10/26/2008	MVG	Set agenda and email team	0.4	\$285.00	\$114.00
	10/26/2008	MVG	Meet with Hazel, Gene and trudy, our 3 plaintiffs	3.4	\$285.00	\$969.00
Case development	10/27/2008	DCL	Call with Jeff Mueller re: difficulties in scheduling last tenants for film	0.2	\$125.00	\$25.00
Case development	10/28/2008	DCL	Team Conference Call	1.4	\$125.00	\$175.00
	10/28/2008	MVG	Lit Team Call re startegy	1.4	\$285.00	\$399.00
	10/28/2008	WD	Conference Call	1.40	\$225.00	\$315.00
Case development	10/29/2008	DCL	Emails to/from Jason Kim re: Retainer for KPT clients	0.1	\$125.00	\$12.50
Case development	10/29/2008	DCL	Meeting with representatives from FACE about organizing tenants at KPT	1	\$125.00	\$125.00
	10/29/2008	MVG	Meet with FACE and Jun re tenant council status and support	1.3	\$285.00	\$370.50
	10/29/2008	MVG	Talk to Bob Nakata at FACE re Tenant council	0.6	\$285.00	\$171.00

Case development	10/30/2008	DCL	Reviewed Will's proposed KPT budget, made additions, forwarded to Victor	0.2	\$125.00	\$25.00
	11/1/2008	WD	Preparing disc of case	0.40	\$225.00	\$90.00
	11/3/2008	MVG	Meet with Suda at Micronesians United and their members re problems at KPT	1.5	\$285.00	\$427.50
	11/3/2008	MVG	Set agenda and email team	0.4	\$285.00	\$114.00
	11/3/2008	MVG	Draft Client retainer	0.9	\$285.00	\$256.50
Case development	11/4/2008	DCL	Agenda for Team conference call - attached relevant docs and sent to team	0.2	\$125.00	\$25.00
Case development, background investigation, and case administration	11/5/2008	EMD	Review agenda for Team conference call	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	11/5/2008	EMD	Review and revise client retainer	0.3	\$225.00	\$67.50
Pleadings	11/5/2008	DCL	Team Conference Call	0.5	\$125.00	\$62.50
	11/5/2008	MVG	Litigation team conference call re strategy	0.5	\$285.00	\$142.50
	11/5/2008	MVG	Lit team call	0.8	\$285.00	\$228.00

	11/5/2008	WD	Call with O'Melviny, LAS, and Alston Hunt	0.50	\$225.00	\$112.50
Case development	11/6/2008	DCL	Coordinated signing of engagement letters by KPT clients for AHFI with Donna	0.2	\$125.00	\$25.00
Case development, background investigation, and case administration	11/6/2008	EMD	Team Conference Call	0.5	\$225.00	\$112.50
Pleadings	11/7/2008	EMD	Conduct additional research re potential causes of action	0.8	\$225.00	\$180.00
	11/7/2008	WD	Reviewing O'Melviny memos on 1983 and Injunctive Relief	0.20	\$225.00	\$45.00
Pleadings	11/8/2008	EMD	Draft federal complaint	2.2	\$225.00	\$495.00
Pleadings	11/9/2008	EMD	Research ADA Title V claim for interference	1.5	\$225.00	\$337.50
Pleadings	11/10/2008	EMD	Review case law sent by Claudia re: State law Claims	0.3	\$225.00	\$67.50
Case development	11/12/2008	JRA	Team Conference Call	0.5	\$125.00	\$62.50
	11/12/2008	WD	Team Call: O'Melviny, Alston, LAS	0.50	\$225.00	\$112.50
	11/13/2008	MVG	Meet with Greg Franklin at KPT	1.1	\$285.00	\$313.50

	11/13/2008	MVG	Visit with clients and sign retainers	4.8	\$285.00	\$1,368.00
	11/13/2008	MVG	Meet with Paul Sheriff re qualifications and interest	0.5	\$285.00	\$142.50
	11/13/2008	MVG	Review Paul Sheriff's material	0.4	\$285.00	\$114.00
Case development, background investigation, and case administration	11/14/2008	EMD	Meet with clients at KPT and get signed retainers	4.8	\$225.00	\$1,080.00
	11/14/2008	MVG	Meet with Greg Franklin at KPT re retainer	1.4	\$285.00	\$399.00
	11/14/2008	MVG	Draft Postcard mailing	1	\$285.00	\$285.00
	11/16/2008	WD	Draft press release on complaint	0.80	\$225.00	\$180.00
	11/17/2008	MVG	take pictures at KPT and catalogue in computer	3.5	\$285.00	\$997.50
	11/18/2008	MVG	Prepare and mail postcard mailing to tenants at KPT	2.6	\$285.00	\$741.00
	11/18/2008	WD	Print out docs for tomorrow's call	0.10	\$225.00	\$22.50
Case development	11/19/2008	JRA	Team Conference Call	0.5	\$125.00	\$62.50
Pleadings	11/19/2008	DCL	Reviewed case law sent by Claudia re: State law Claims	0.3	\$125.00	\$37.50
	11/20/2008	MVG	meet with Kathy Vaiola	1.9	\$285.00	\$541.50

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	11/20/2008	WD	Mass Mailing	0.10	\$225.00	\$22.50
	11/20/2008	WD	Research on State Sovereignty	0.10	\$225.00	\$22.50
Case development, background investigation, and case administration	11/21/2008	EMD	Meet with plaintiff Kathy Vaiola at KH	1.9	\$225.00	\$427.50
	11/21/2008	MVG	review drafts and client facts	1.2	\$285.00	\$342.00
Pleadings	11/24/2008	DCL	Reviewed Claudia's Final Draft Complaint - provided comments to Elizabeth	1	\$125.00	\$125.00
	11/24/2008	MVG	Finalize postcard, prepare mailing labels, mail and connect with ODC	3.5	\$285.00	\$997.50
Case development	11/25/2008	DCL	Postcard mailing to KPT tenants	2	\$125.00	\$250.00
Case development	11/25/2008	DCL	Team Conference Call	0.5	\$125.00	\$62.50
Case development	11/25/2008	JRA	Team Conference Call	0.5	\$125.00	\$62.50
Pleadings	11/25/2008	EMD	Review Claudia's revisions to draft complaint	0.5	\$225.00	\$112.50
	11/25/2008	MVG	Review Manny Muniz's qualifications	0.4	\$285.00	\$114.00
	11/25/2008	MVG	Lit team conference call	0.6	\$285.00	\$171.00
	11/25/2008	MVG	Review Creak report on elevator	0.4	\$285.00	\$114.00

Exhibit "3"

			conditions			
Case development, background investigation, and case administration	11/26/2008	EMD	Team Conference Call	0.5	\$225.00	\$112.50
Pleadings	11/26/2008	EMD	Email with Jason Kim re draft state court complaint and case strategy	0.4	\$225.00	\$90.00
Pleadings	11/26/2008	EMD	Continue revising draft complaint	0.7	\$225.00	\$157.50
Pleadings	11/27/2008	EMD	Revise fact section of federal complaint	2.3	\$225.00	\$517.50
Pleadings	11/27/2008	EMD	Email with Claudia Center re draft complaint	0.3	\$225.00	\$67.50
Case development	12/3/2008	DCL	Drafted Factual Statements to be included in KPT DVD	0.4	\$125.00	\$50.00
Case development	12/4/2008	DCL	Drafted text for the individuals filmed in the KPT DVD	0.3	\$125.00	\$37.50
Case development	12/4/2008	DCL	Team Conference Call	1.5	\$125.00	\$187.50
Case development	12/4/2008	JRA	Team Conference Call	1.5	\$125.00	\$187.50
	12/4/2008	MVG	Team call	1.5	\$285.00	\$427.50
	12/4/2008	MVG	Meet with Lee Sommers	2.3	\$285.00	\$655.50
	12/4/2008	WD	Conference Call	1.50	\$225.00	\$337.50

Case development, background investigation, and case administration	12/5/2008	EMD	Team Conference Call	1.5	\$225.00	\$337.50
Case development, background investigation, and case administration	12/5/2008	EMD	Meet with plaintiff Lee Sommers at KPT	2.3	\$225.00	\$517.50
Case development	12/8/2008	JRA	Organize/copy all retainers. Return to clients.	1.5	\$125.00	\$187.50
Case development	12/9/2008	DCL	Reviewed Elizabeth's draft press release and made edits/comments	0.3	\$125.00	\$37.50
Case development	12/9/2008	JRA	Request OMM signature on retainers	0.2	\$125.00	\$25.00
Case development	12/9/2008	JRA	Creating individual client files	1	\$125.00	\$125.00
Case development	12/10/2008	DCL	Meeting with McNeil Wilson re: Press coverage for filing	2	\$125.00	\$250.00
Case development	12/10/2008	DCL	Sent needed documents to McNeil for press packet	0.2	\$125.00	\$25.00
Case development, background investigation, and case administration	12/10/2008	EMD	Draft press release	1.2	\$225.00	\$270.00

	12/10/2008	MVG	Meet with all six plaintiffs to discuss case and steps of their involvement. Prepare them for press contacts.	5.6	\$285.00	\$1,596.00
	12/10/2008	MVG	Set agenda for call	0.4	\$285.00	\$114.00
Case development, background investigation, and case administration	12/11/2008	EMD	Meeting with McNeil Wilson re: Press coverage for filing	2	\$225.00	\$450.00
	12/11/2008	WD	Press Release	0.10	\$225.00	\$22.50
Case development	12/12/2008	DCL	Team Conference Call	0.7	\$125.00	\$87.50
Case development	12/12/2008	DCL	Coordinated with Darcy at McNeil Wilson for needed documents, pictures, and edits	1	\$125.00	\$125.00
Case development	12/12/2008	JRA	Team Conference Call	0.7	\$125.00	\$87.50
	12/12/2008	MVG	Team Call	0.7	\$285.00	\$199.50
	12/12/2008	WD	Conference Call	0.70	\$225.00	\$157.50
Case development, background investigation, and case administration	12/13/2008	EMD	Team Conference Call	0.7	\$225.00	\$157.50
Case development	12/15/2008	DCL	Spoke with KPT client's doctors about using accommodation letters in press kit	0.3	\$125.00	\$37.50

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Case development	12/16/2008	DCL	Edited Victor's Op-Ed piece for the Honolulu Advertiser	1	\$125.00	\$125.00
	12/16/2008	MVG	Write Op Ed Piece for Advertiser	4	\$285.00	\$1,140.00
Case development, background investigation, and case administration	12/17/2008	EMD	Revisions to Victor Geminiani's Op-Ed piece for the Honolulu Advertiser	0.6	\$225.00	\$135.00
Case development	12/18/2008	DCL	KPT Press Conference re: filing/Tour of facilities	3	\$125.00	\$375.00
Case development	12/18/2008	DCL	Team meeting/conference call after KPT press conference	1.5	\$125.00	\$187.50
	12/18/2008	MVG	Call with Will	0.1	\$285.00	\$28.50
	12/18/2008	MVG	Press Conference and tour facilities	3	\$285.00	\$855.00
	12/18/2008	MVG	Meet with team to discuss strategy, responsibilities and timing	1.8	\$285.00	\$513.00
	12/18/2008	WD	Call with Victor	0.10	\$225.00	\$22.50
	12/18/2008	WD	Team Call on How to proceed	0.90	\$225.00	\$202.50
Case development, background investigation, and case administration	12/19/2008	EMD	KPT Press Conference re: filing/Tour of facilities	3	\$225.00	\$675.00

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Case development, background investigation, and case administration	12/19/2008	EMD	Team meeting/conference call after KPT press conference	1.5	\$225.00	\$337.50
Case development	12/22/2008	DCL	Conference Call with McNeil Wilson re: ed board meeting tomorrow	0.3	\$125.00	\$37.50
Case development	12/23/2008	DCL	Meeting with Advertiser Ed Board	0.5	\$125.00	\$62.50
Case development, background investigation, and case administration	12/24/2008	EMD	Meeting with Advertiser Ed Board	0.5	\$225.00	\$112.50
	12/29/2008	WD	Call with DAG, John Wong	0.20	\$225.00	\$45.00
	12/29/2008	WD	Email to DAG re: Stip to 20 day additional time to answer	0.10	\$225.00	\$22.50
	12/31/2008	MVG	read emails	0.3	\$285.00	\$85.50
	TOTAL			323.5		\$73,941.50

Exhibit "3"

**II. Preliminary Settlement Discussions and Preparation for Discovery
i. January 1, 2009 through March 31, 2009;**

<u>Litigation Phase</u>	<u>Date</u>	<u>Attorney</u>	<u>Brief Description of Activity</u>	<u>Time</u>	<u>Attorney Rate</u>	<u>Fees</u>
Case development	1/5/2009	DCL	Spoke with KPT tenant Melissa Boswell re: status of the case	0.3	\$125.00	\$37.50
	1/5/2009	MVG	talk with Bruce Clark as possible ADA expert	0.8	\$285.00	\$228.00
Case development	1/6/2009	DCL	emailed Jenn sample declaration and discussed its use KPT clients	0.2	\$125.00	\$25.00
Pleadings	1/6/2009	JRA	Begin drafting client declarations	1	\$125.00	\$125.00
Pleadings	1/7/2009	JRA	Work on declarations	0.5	\$125.00	\$62.50
	1/7/2009	MVG	Review papers in Pittsburg Housing Authority case	0.9	\$285.00	\$256.50
	1/8/2009	MVG	Review HPHA draft transition plan and ADA needs in state	0.5	\$285.00	\$142.50

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Case development	1/9/2009	DCL	Put together retainer agreements with signature pages for all clients, copied, delivered to Donna Ahuna at AHFI	0.3	\$125.00	\$37.50
Pleadings	1/9/2009	JRA	Finish declarations	1.5	\$125.00	\$187.50
	1/12/2009	MVG	review email on research and possible injunctive relief issues	0.4	\$285.00	\$114.00
	1/12/2009	MVG	Review DC and Model application including ADA requiremnts	0.3	\$285.00	\$85.50
	1/12/2009	MVG	Review elizabeth's email and attachments on research issues	1.4	\$285.00	\$399.00
Case development	1/13/2009	DCL	Mailing to OMM, LAS-ELC, and AHFI re: press coverage DVD	0.3	\$125.00	\$37.50
Case development	1/13/2009	DCL	Coordinated with Edgy and AHFI to transcribe DVD	0.3	\$125.00	\$37.50

Exhibit "3"

Case development, background investigation, and case administration	1/13/2009	EMD	Draft housing bill.	0.2	\$225.00	\$45.00
Case development	1/14/2009	DCL	Team Conference Call	0.5	\$125.00	\$62.50
	1/14/2009	MVG	Meet with Paul sherrif Re ADA study	1	\$285.00	\$285.00
	1/14/2009	MVG	Team call	0.7	\$285.00	\$199.50
	1/14/2009	MVG	Mediation meeting with AG's office	1.8	\$285.00	\$513.00
	1/14/2009	MVG	Claudia's response to issues on research and Injunctive relief	0.3	\$285.00	\$85.50
	1/14/2009	MVG	Shaun's research re injunctive relief prior to class cert.	0.3	\$285.00	\$85.50
Case development, background investigation, and case administration	1/15/2009	EMD	Team Conference Call	0.5	\$225.00	\$112.50

Case development	1/18/2009	DCL	Emails between Victor, Elizabeth, and me about structure for mediation meeting with AG	0.2	\$125.00	\$25.00
	1/20/2009	MVG	Meeting with AG's office	1.6	\$285.00	\$456.00
Case development	1/21/2009	DCL	Discussion with filmmaker re: lack of hot water at KPT	0.2	\$125.00	\$25.00
Case development	1/23/2009	DCL	Hearing at the Capitol re: problems at KPT and KH	2	\$125.00	\$250.00
	1/23/2009	MVG	Legislative hearing on repairs at KPT	1.5	\$285.00	\$427.50
	1/23/2009	MVG	Review House Rules for KPT	0.5	\$285.00	\$142.50
	1/26/2009	MVG	Review Kaiser memo on procurement issues re emergencies	0.3	\$285.00	\$85.50
	1/26/2009	MVG	Review Jason's email on issues on experts, whistleblower etc.	0.4	\$285.00	\$114.00

	1/26/2009	MVG	Talked to each Plaintiff about accomodations needs for response to state	1.4	\$285.00	\$399.00
Case development	1/29/2009	DCL	Conversation with KPT Tenant (Trudy) re: changes to her apartment that would make her life easier	0.2	\$125.00	\$25.00
Case development, background investigation, and case administration	1/30/2009	EMD	Prepare for and participate in informal mediation discussions. Draft email to litigation team regarding mediation and next steps. Prepare list of possible experts. Telephone conference with Jinny Kim regarding fire expert and fire evacuation plan.	7.2	\$225.00	\$1,620.00
	1/30/2009	MVG	Meeting with AG staff for mediation	2	\$285.00	\$570.00

	2/1/2009	MVG	Work on list of accommodations for plaintiffs	0.3	\$285.00	\$85.50
Case development, background investigation, and case administration	2/2/2009	EMD	Review letter from Jarod Buna regarding clients' request for reasonable accommodations; review client files regarding reasonable accommodations requests; work on list of experts; review resume of potential mold/hazardous conditions expert; draft email to John Wong, John Gregory, and Jarod Buna regarding client files and requests for accommodations; call with Ellen Carson regarding preparing proposed settlement agreement regarding percentage of ADA accessible units; call with potential industrial hygienist expert.	4.4	\$225.00	\$990.00
Pleadings	2/2/2009	JRA	Compiling client accommodation requests(call all clients)	1.5	\$125.00	\$187.50
	2/2/2009	MVG	Review Bart Ashley proposal for environmental study	0.5	\$285.00	\$142.50

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Case development	2/3/2009	DCL	Team Conference Call	0.5	\$125.00	\$62.50
Case development	2/3/2009	DCL	Reviewed/edited Elizabeth's testimony	0.3	\$125.00	\$37.50
Case development	2/3/2009	DCL	Reviewed complaints of no hot water from my notes on KPT and compiled a list of tenants who have complained for AG negotiations	0.5	\$125.00	\$62.50

Exhibit "3"

Case development, background investigation, and case administration	2/3/2009	EMD	Prepare agenda for and participate in conference call re mediation status, expert needs, class certification, and preliminary injunction motion; call with Peter Obstler regarding experts; Coordinate contacting clients' regarding requests for reasonable accommodations; work on drafting notice to tenants regarding requests for reasonable accommodations; call with Jinny Kim regarding revising HPHA reasonable accommodations policy; Gather information regarding possible experts; review proposal by industrial hygienist expert; Draft email to litigation team regardign possible experts; review email from John Cregor regarding hot water at KPT.	3.6	\$225.00	\$810.00
Pleadings	2/3/2009	JRA	Finish document of all acc.requests/dates/form filed	1	\$125.00	\$125.00
	2/3/2009	MVG	Creiger email on hot water	0.1	\$285.00	\$28.50

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	2/3/2009	MVG	Emails on Policies for reasonable accommodations and hot water clarification from state	0.4	\$285.00	\$114.00
Case development	2/4/2009	DCL	Team Conference Call	0.5	\$125.00	\$62.50
Case development, background investigation, and case administration	2/4/2009	EMD	Draft and send email to KPT litigation team re list of possible experts; draft email to John Wong, Esq. in response to email regarding availability of hot water at KPT, proposed notice of reasonable accommodations form, proposed revisions to housing application and other litigation related issues.	2.2	\$225.00	\$495.00
Pleadings	2/4/2009	JRA	Team Conference Call	0.5	\$125.00	\$62.50

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Case development	2/5/2009	DCL	Spoke to Lynne Vasquez (former KPT tenant) about her experiences at KPT - very active in testifying before the leg and in the community about problems in public housing	0.3	\$125.00	\$37.50
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Exhibit "3"

Case development, background investigation, and case administration	2/5/2009	EMD	Conference call with KPT litigation team regarding experts; review HPHA's reasonable accommodation policy and request for reasonable accommodation form; correspondence with Jinny Kim, Esq. re proposed changes to HPHA's reasonable accommodations policy; review proposed ADA settlement; revise plaintiff's requests for reasonable accommodations.	3.4	\$225.00	\$765.00
	2/5/2009	MVG	Team call	1	\$285.00	\$285.00
	2/5/2009	MVG	Review Jason's letter to state re class cert, discovery planning etc.	0.4	\$285.00	\$114.00
	2/5/2009	MVG	Email stream re statewide accommodations capacity	0.4	\$285.00	\$114.00

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Case development, background investigation, and case administration	2/6/2009	EMD	Attend meeting with opposing counsel re settlement; conference with Jason Kim re litigation strategy.	1.7	\$225.00	\$382.50
Motions practice	2/6/2009	JRA	Contact clients about signing HIPAA release	0.5	\$125.00	\$62.50
	2/6/2009	MVG	email on special master appointment in DC	0.2	\$285.00	\$57.00
Case development	2/9/2009	DCL	Reviewed Elizabeth's draft testimony/made edits	0.2	\$125.00	\$25.00
Motions practice	2/9/2009	JRA	Begin mailing out medical records requests	1.5	\$125.00	\$187.50
Motions practice	2/10/2009	JRA	Finish mailing out medical record requests	1	\$125.00	\$125.00
	2/10/2009	MVG	Schedule settlement conference	0.2	\$285.00	\$57.00
	2/10/2009	MVG	Jason's email on damages, rent abatement etc	0.4	\$285.00	\$114.00

Exhibit "3"

Case development, background investigation, and case administration	2/11/2009	EMD	Review documents re contracts for repairs at KPT; review case law regarding rent abatement for public housing tenants; draft email to litigation team re issues for settlement; draft letter to opposing counsel re settlement negotiations; work on drafting settlement proposal; review email re scheduling of mediation conference; revise settlement proposal re Section 504 compliance	5.2	\$225.00	\$1,170.00
	2/11/2009	MVG	Rent abatement and damages discussion with team	0.4	\$285.00	\$114.00
	2/11/2009	MVG	Review List of accomodations requests	0.5	\$285.00	\$142.50

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	2/11/2009	WD	Research and Email on Calculating Proposal for Settlement Damages	0.30	\$225.00	\$67.50
Case development	2/12/2009	DCL	Drafted letter to AG for settlement proposals/reviewed Elizabeth's list of issues/commented	0.5	\$125.00	\$62.50
Case development	2/12/2009	DCL	Lunch with Legal Aid to discuss KPT case and how they may be able to help on a case by case basis	1.5	\$125.00	\$187.50
Case development, background investigation, and case administration	2/12/2009	EMD	Review relevant docs provided by defendants re status of repairs to KPT; draft list of issues to facilitate settlement discussions.	8.3	\$225.00	\$1,867.50
Motions practice	2/12/2009	JRA	Team Conference Call	0.5	\$125.00	\$62.50

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Motions practice	2/12/2009	JRA	Lunch with Legal Aid to discuss KPT case and how they may be able to help on a case by case basis	1.5	\$125.00	\$187.50
	2/12/2009	MVG	Memo's and email on settlement proposals, accomodations requests, and cover letter	1.1	\$285.00	\$313.50
	2/12/2009	MVG	Review settlement memo	0.6	\$285.00	\$171.00

Exhibit "3"

Case development, background investigation, and case administration	2/13/2009	EMD	Review and finalize cover letter, list of issues for settlement, and clients' reasonable accommodation requests; review proposals from building and industrial hygienist experts; draft email to litigation team regarding settlement; call with Mike Kaiser, Esq. regarding case law research in preparation for mediation and preliminary injunction.	3.3	\$225.00	\$742.50
	2/13/2009	MVG	emails on settlement position	0.4	\$285.00	\$114.00
Case development	2/17/2009	DCL	Review of rough cut of KPT DVD and provided comments for editing	0.7	\$125.00	\$87.50

Case development, background investigation, and case administration	2/17/2009	EMD	Review and revise HPHA reasonable accommodation request policy; review agenda for HPHA board meeting and proposed action to authorize RFP for mixed income/mixed finance redevelopment; call with plaintiff Hazel McMillion re correspondence from manangement company re her request for accommodations.	1.6	\$225.00	\$360.00
	2/17/2009	MVG	Settlement conference with Judge Kopbayashi	1	\$285.00	\$285.00
	2/17/2009	WD	Emails On Injunction of Evictions	0.20	\$225.00	\$45.00

Case development, background investigation, and case administration	2/18/2009	EMD	Attend pre-mediation meeting. Work on proposed Section 504/ADA accessibility settlement; call with Peter Obstler, Esq. regarding experts and preliminary injunction motion; call with Jason Kim, Esq. re retaining building code expert; draft email to litigation team with status update.	2.9	\$225.00	\$652.50
	2/18/2009	MVG	Pre mediation meeting with state AG's office	1	\$285.00	\$285.00
	2/19/2009	MVG	Attend HPHA board meeting	1.2	\$285.00	\$342.00
	2/20/2009	MVG	Review State's response to settlement offer	1	\$285.00	\$285.00

Case development, background investigation, and case administration	2/23/2009	EMD	Review state's initial response to settlement proposal and email litigation team regarding same.	1.2	\$225.00	\$270.00
Case development, background investigation, and case administration	2/24/2009	EMD	Prepare for and attend settlement meeting with opposing counsel; follow up on settlement issues ; call with plaintiff Hazel McMillion re request for reasonable accommodations.	6.2	\$225.00	\$1,395.00
	2/24/2009	MVG	attend settlement meeting with the state AG's office	2.2	\$285.00	\$627.00

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Case development, background investigation, and case administration	2/25/2009	EMD	Call lwith potential expert Bart Ashley; call with Peter Obstler, Esq. regarding experts and case status; draft email to KPT litigation team regarding case status and to schedule a conference call; call with Jason Kim re preparation of mediation statement and calculation of damages.	2.6	\$225.00	\$585.00
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Case development, background investigation, and case administration	2/26/2009	EMD	Meeting with members of FACE regarding formation of tenant's association at KPT and Kuhio Homes; draft email to opposing counsel regarding repair survey and to follow up on mediation discussions.	3.2	\$225.00	\$720.00
	2/26/2009	WD	Calculate Hours for Fee	0.10	\$225.00	\$22.50
	2/26/2009	WD	Calculate Hours for Fee	0.20	\$225.00	\$45.00
Case development	2/27/2009	DCL	Team Conference Call	1	\$125.00	\$125.00

Exhibit "3"

Case development, background investigation, and case administration	2/27/2009	EMD	Conference call regarding KPT litigation with KPT team; discuss litigation strategy, mediation, drafting of preliminary injunction; conference call with Jee You, Esq. and Mike Kaiser, Esq. regarding drafting of preliminary injunction; prepare list of possible injunctive relief and identify evidence needed in support; meet with building code expert David Knox; review email from John Wong regarding additional documents; call with potential consultant Bart Ashley regarding availability; work on preliminary injunction motion.	7.2	\$225.00	\$1,620.00
	2/27/2009	MVG	Review mediation agreement contract	0.3	\$285.00	\$85.50
	2/27/2009	MVG	Read brief, PI motion and Class cert order in SF case	2.3	\$285.00	\$655.50
	2/27/2009	MVG	Team Call	1	\$285.00	\$285.00
	2/27/2009	WD	Conference Call	0.40	\$225.00	\$90.00

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Case development, background investigation, and case administration	2/28/2009	EMD	Call with Peter Obstler, Esq. regarding mediation strategy	1.2	\$225.00	\$270.00
Case development, background investigation, and case administration	3/1/2009	EMD	Call with environmental health consultant Bart Ashley regarding initial investigation of conditions at KPT.	1.5	\$225.00	\$337.50

Exhibit "3"

Case development, background investigation, and case administration	3/2/2009	EMD	Prepare for and attend informal mediation meeting with opposing counsel; meeting with executive director of Kokua Kalihi Valley Clinic regarding medical conditions of Reputations; review rules regarding HUD's oversight over PHA litigation; strategy discussion with litigation team regardign damages.	6.8	\$225.00	\$1,530.00
	3/2/2009	MVG	drafted requests for maintenance survey	0.9	\$285.00	\$256.50
	3/2/2009	MVG	Meet with Rose Carnizo at KPT re accommodations request	1.2	\$285.00	\$342.00

Case development, background investigation, and case administration	3/3/2009	EMD	Draft email to Jun Yung at FACE re proposal for tenant organizing at KPT and Kuhio Homes; onsite visit to KPT with litigation consultants Bart Ashley David Knox; mediation preparation and strategy meeting with litigation team.	10.8	\$225.00	\$2,430.00
Case development	3/4/2009	DCL	Meeting with McNeil Wilson to discuss PR	1	\$125.00	\$125.00
Case development	3/4/2009	DCL	Review of Mediation Statement for Federal Case	0.3	\$125.00	\$37.50
Case development	3/4/2009	DCL	Review/Edits of Litigation Demand letter	0.1	\$125.00	\$12.50

Case development, background investigation, and case administration	3/4/2009	EMD	Conference call with Claudia Center, Esq. and Jinny Kim, Esq. regarding ADA and Section 504 issues; prepare demand letter to opposing counsel regarding monetary damages; call with litigation team regarding mediation.	7.4	\$225.00	\$1,665.00
	3/4/2009	MVG	Finalize settlement offer	1.4	\$285.00	\$399.00
	3/4/2009	MVG	Meet with Wilson Mcneil re public strategy	1	\$285.00	\$285.00
Case development, background investigation, and case administration	3/5/2009	EMD	Prepare for and attend mediation with Keith Hunter.	6.5	\$225.00	\$1,462.50
	3/5/2009	MVG	Mediation meeting	6	\$285.00	\$1,710.00
	3/5/2009	MVG	Settlement clarification emails	0.3	\$285.00	\$85.50

	3/6/2009	MVG	Settlement clarification emails	0.3	\$285.00	\$85.50
	3/12/2009	MVG	KPT tenants meeting	3.2	\$285.00	\$912.00
	3/13/2009	MVG	Review KPT training material on FH and accommodations log	0.7	\$285.00	\$199.50
Case development, background investigation, and case administration	3/16/2009	EMD	Review email from Keith Hunter regarding mediation; draft response regarding plaintiff's settlement demands; draft and submit testimony in support of SCR 31; call with environmental consultant Bart Ashley regarding review and respond to email from Jason Kim, Esq. regarding Rule 26 scheduling conference; review training documents and chart of reasonable accommodations requests provided by HPHA.	4.5	\$225.00	\$1,012.50
	3/16/2009	MVG	Discovery emails	0.2	\$285.00	\$57.00

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	3/16/2009	MVG	Tenant association meeting at KPT	2.3	\$285.00	\$655.50
	3/16/2009	MVG	Hearing on management audit at KPT	1.2	\$285.00	\$342.00
	3/16/2009	MVG	Research on voluntary cessation and PI	0.5	\$285.00	\$142.50
Case development, background investigation, and case administration	3/17/2009	EMD	Draft and send email to Dr. David Denuaf regarding patient's reasonable accomodation requests.	0.5	\$225.00	\$112.50

Exhibit "3"

Case development, background investigation, and case administration	3/17/2009	EMD	Review and respond to email from Keith Hunter regarding settlement discussions; review and respond to email from Jinny Kim, Esq. regarding ADA program access issues; continue reviewing HPHA's log of reasonable accommodations requests; review opposition to pro hac vice motion and email with litigation team regarding response; discuss strategy regarding outreach to clients in need of reasonable accommodations.	3.2	\$225.00	\$720.00
Case development	3/18/2009	DCL	Review/Discussion of Demands for mediation	0.3	\$125.00	\$37.50

Case development, background investigation, and case administration	3/18/2009	EMD	Conduct fact investigation for preliminary injunction motion; email Keith Hunter regarding settlement discussions; call with William Patterson regarding review of KPT building plans and ADA issues; research methods for past extermination; begin drafting letter to tenants regarding case status and needs for reasonable accomodations; work on discovery requests.	4.4	\$225.00	\$990.00
	3/18/2009	MVG	Elevator broken in tower A email	0.1	\$285.00	\$28.50
	3/18/2009	MVG	discussion about ADA expert selection	0.4	\$285.00	\$114.00

	3/18/2009	MVG	Meet with Ms. Akiona and Mr. Kelly at KPT about possible declarations for ADA request for accommodations	0.5	\$285.00	\$142.50
Case development, background investigation, and case administration	3/19/2009	EMD	Begin drafting motion for class certification in federal case; contact tenants regarding information for preliminary injunction motion; email Jason regarding KPT building plans; call Keith Hunter regarding settlement status.	3.8	\$225.00	\$855.00
	3/19/2009	WD	PHV Research	0.20	\$225.00	\$45.00
Case development	3/23/2009	DCL	Compiled list/made chart of KPT tenants who may be interested in providing declarations	0.3	\$125.00	\$37.50

Case development, background investigation, and case administration	3/23/2009	EMD	Work on motion for class certification; identify potential tenants to provide declarations.	4.2	\$225.00	\$945.00
Motions practice	3/23/2009	JRA	Calls to set up interviews	0.5	\$125.00	\$62.50
	3/23/2009	MVG	Meeting at KPT with tenants in group meeting	2.4	\$285.00	\$684.00
Case development, background investigation, and case administration	3/24/2009	EMD	Interview KPT tenants regarding housing conditions and disabilities; begin drafting declarations re same; conduct fact investigation regarding other KPT tenants; review and analyze research regarding appointment of special master.	5.6	\$225.00	\$1,260.00
Motions practice	3/24/2009	JRA	Out to KPT	3	\$125.00	\$375.00

	3/24/2009	MVG	Meet with Csii Tuia at her apartment about a declaration	1	\$285.00	\$285.00
	3/24/2009	MVG	Meet with Mr. Silva regarding a possible declaration on ADA request	0.4	\$285.00	\$114.00
	3/24/2009	MVG	Discussion about securing additional declarants	0.6	\$285.00	\$171.00
Case development, background investigation, and case administration	3/25/2009	EMD	Fact investigation regarding HPHA's failure to comply with disabilities laws; call with Jinny Kim, Esq. and Jason kim, Esq. regarding PI motion; drafting declarations in support of class certification and PI motion; review and analyze case law regarding appointment of special master.	5.2	\$225.00	\$1,170.00

Motions practice	3/26/2009	EMD	Draft tenant declarations in support of preliminary injunction and class certification motions.	5.4	\$225.00	\$1,215.00
Case development, background investigation, and case administration	3/27/2009	EMD	Draft tenant declarations in support of motions for preliminary injunction and class certification; draft email to team regarding case status; call with Jason Kim; Esq. regarding ADA expert and evidentiary issues; meeting with providers at Kokua Kalihi Valley Clinic to conduct fact investigation.	6.8	\$225.00	\$1,530.00
Case development	3/30/2009	DCL	Meeting with McNeil Wilson to discuss PR	1.8	\$125.00	\$225.00

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Case development, background investigation, and case administration	3/30/2009	EMD	Meet with McNeil Wilson regarding public relations.	1.8	\$225.00	\$405.00
	3/30/2009	MVG	Scheduling conference statements	0.4	\$285.00	\$114.00
	3/30/2009	MVG	Meeting with David Wilson and John Williamson re public strategy	1.2	\$285.00	\$342.00
Case development, background investigation, and case administration	3/31/2009	EMD	Review client declarations and identify areas needing additional information.	1.7	\$225.00	\$382.50
	3/31/2009	MVG	Review state's motion to dismiss and affidavits	4	\$285.00	\$1,140.00
	3/31/2009	MVG	email discussion re PI relief for helth and safety issues	0.5	\$285.00	\$142.50
	3/31/2009	MVG	Read declaration drafts and comments	1.3	\$285.00	\$370.50
	TOTAL			241.4		\$55,335.00

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III. Motions and Discovery

i. April 1, 2009 through October 31, 2009;

<u>Litigation Phase</u>	<u>Date</u>	<u>Attorney</u>	<u>Brief Description of Activity</u>	<u>Time</u>	<u>Attorney Rate</u>	<u>Fees</u>
Case development	4/1/2009	DCL	Reviewed the state's motion to dismiss in state case	0.3	\$125.00	\$37.50
Case development, background investigation, and case administration	4/1/2009	EMD	Draft motion for class certification; review revisions to client declarations.	5.3	\$225.00	\$1,192.50
Pleadings	4/1/2009	DCL	Reviewed the state's motion to dismiss in federal case	0.5	\$125.00	\$62.50
Pleadings	4/1/2009	DCL	Reviewed Realty's answer to complaint and cross claim in federal case	0.3	\$125.00	\$37.50
	4/1/2009	MVG	visit with clients and declarants at KPT for facts and releases	3	\$285.00	\$855.00
	4/1/2009	MVG	emails re M to Dismiss	0.4	\$285.00	\$114.00
	4/1/2009	MVG	rates and CVs of experts	0.4	\$285.00	\$114.00
	4/1/2009	MVG	Review Realty Laua's answer and cross complaint	0.5	\$285.00	\$142.50

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	4/1/2009	MVG	draft class cert motion review	2.4	\$285.00	\$684.00
	4/1/2009	WD	Email re: Motion to Dismiss	0.10	\$225.00	\$22.50
Case development	4/2/2009	DCL	Team conference call (I had to leave early)	1.3	\$125.00	\$162.50
Case development, background investigation, and case administration	4/2/2009	EMD	Team conference call re case strategy; review and analyze motions to dismiss in state and federal cases; call and email opposing counsel regarding access to client files; email regarding Section 504 transition plan and expert preparation; draft testimony in support of resolution to audit HPHA's management contracts.	5.6	\$225.00	\$1,260.00
	4/2/2009	MVG	Lit Team meeting re startegy	1.4	\$285.00	\$399.00

Exhibit "3"

Case development, background investigation, and case administration	4/3/2009	EMD	Email Jee and Peter re toxicologist. Coordinate gathering docs to provide to toxicologist; email re assessment of Section 504 transition; Email providers at KKV re fact investigation; review management contract; revise and submit testimony in support of audit resolution.	6.2	\$225.00	\$1,395.00
Interrogatories, document production, and other written discovery	4/3/2009	DCL	Reviewed doc requests and interrogatories received for federal case	0.5	\$125.00	\$62.50
Pleadings	4/3/2009	DCL	Reviewed Realty's answer to complaint and cross claim in state case	0.3	\$125.00	\$37.50
	4/3/2009	MVG	HPHA transition plan, ADA needs, inventory etc	2.3	\$285.00	\$655.50

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	4/3/2009	MVG	State's discovery requests	1	\$285.00	\$285.00
	4/3/2009	MVG	Asbestos reports from state	1	\$285.00	\$285.00
Case development, background investigation, and case administration	4/6/2009	EMD	misc call with co-counsel regarding ADA expert.	5.8	\$225.00	\$1,305.00
Motions practice	4/6/2009	DCL	Finalized drafts of declarations for federal case and circulated to the team for comment	2.00	\$125.00	\$250.00
Pleadings	4/6/2009	DCL	Finalized drafts of declarations for state case and circulated to the team for comment	2.00	\$125.00	\$250.00
	4/6/2009	MVG	Review Reasonable accommodations forms from state	0.5	\$285.00	\$142.50
	4/6/2009	MVG	Review drafts of delarations	1.6	\$285.00	\$456.00

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Case development, background investigation, and case administration	4/7/2009	EMD	Meet with ADA expert; interview potential fact witnesses at KPT and accompany ADA and KPT and Kuhio Homes site inspection.	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	4/7/2009	DCL	Reviewed and commented on draft version of doc requests	0.50	\$125.00	\$62.50
	4/7/2009	MVG	Document requests draft	0.6	\$285.00	\$171.00
Case development	4/8/2009	DCL	Received invoices for med records, emailed Jason, scanned and sent the invoices to AHFI	0.30	\$125.00	\$37.50

Exhibit "3"

Case development, background investigation, and case administration	4/8/2009	EMD	Calls with ADA expert regardign investigation and access to premises; email to Kokua Kalihi Valley providers regarding patients's needs for accomodations; review Realty Laua's answer and cross-claim; draft document requests; draft email to litigation team ragardign HPHA's systemwide ADA violations; calls with plaintiffs regarding case status and access to units to conduct accessibility survey.	6.3	\$225.00	\$1,417.50
	4/8/2009	MVG	Read scheduling conference notes	0.2	\$285.00	\$57.00
Case development, background investigation, and case administration	4/9/2009	EMD	Site visit with ADA expert, Jeff Mastin; call to opposing coussel regardign access to premises.	6.2	\$225.00	\$1,395.00

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	4/9/2009	MVG	state's request for production of documents	2	\$285.00	\$570.00
	4/9/2009	MVG	Visit Trudy's to see leaking bathroom pipes and damage	1.4	\$285.00	\$399.00
	4/9/2009	MVG	Asbestos proposal	0.4	\$285.00	\$114.00
Case development, background investigation, and case administration	4/10/2009	EMD	Cal with ADA expert regarding site visit; email team members regarding status of motions and fact gathering.	1.8	\$225.00	\$405.00
Case development	4/13/2009	DCL	Phone calls and emails about obtaining medical records for named Plaintiffs	0.50	\$125.00	\$62.50

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Interrogatories, document production, and other written discovery	4/13/2009	EMD	Review Defendant Realty Laua's document requests and interrogatories to plaintiffs; review Rule 16 scheduling conference order; email providers at Kokua Kalihi Valley regarding fact investigation; follow up on requests for medical records.	4.5	\$225.00	\$1,012.50
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Exhibit "3"

Motions practice	4/14/2009	EMD	Review draft motions for class certification and preliminary injunction; review and revise declarations in support of motions; calls with clients and tenants regarding same; call with Jee Young regarding status of class certification motion; call with Bart Ashley regarding review of asbestos surveys; review retention agreement for Bart Ashley.	6.5	\$225.00	\$1,462.50
Motions practice	4/14/2009	JRA	Calling plaintiffs to confirm signing of decs	0.5	\$125.00	\$62.50

			Meet with clients at KPT to review and sign decalrationsfor opposition to Defendants' motion for summary judgment in state case; conference call with ADA expert Jeff Mastin regarding declaration in support of motion for preliminary injunction; call with Jiny Kim, Esq. regarding declarations in support of motion; call with fire expert Manny Muniz regardign document and site visit; draft email to opposing counsel regarding access to premises.			
Motions practice	4/15/2009	EMD		6.3	\$225.00	\$1,417.50
	4/15/2009	MVG	Call with Jeff mastin on ADA issues	0.6	\$285.00	\$171.00

Motions practice	4/16/2009	EMD	Call with Bart Ashley regarding review of asbestos surveys; calls regardign fire reports maintained by state and/ or city and county; emails with Manny Muniz regarding site visit to KPT; call with potential class member regarding need for accomodations.	2.8	\$225.00	\$630.00
Pleadings	4/16/2009	DCL	Organized/reviewed signed decs for state case, copied and hand delivered to AHFI	1	\$125.00	\$125.00
	4/16/2009	MVG	Declarations signed at KPT	2.3	\$285.00	\$655.50
Motions practice	4/17/2009	EMD	Call with ADA expert regarding declaration in support of motion for preliminary injunction.	3.4	\$225.00	\$765.00

	4/17/2009	MVG	Meet with Hazel and Gene re Decs.	1.7	\$285.00	\$484.50
	4/17/2009	MVG	review scheduling order	0.4	\$285.00	\$114.00
	4/17/2009	MVG	Meet with Manny Muniz, expert on fire controls/visit HFD main office for document review	2.5	\$285.00	\$712.50
	4/18/2009	MVG	Meet with Trudy re Decs and inspect stairway and trash chutes	2.1	\$285.00	\$598.50
Motions practice	4/20/2009	EMD	Site visit and meeting with fire expert; conference call with industrial hygenist and health consultants regarding potential health hazards at KPT.	8.2	\$225.00	\$1,845.00

Motions practice	4/21/2009	EMD	Conference call with ADA expert regarding declaration; calls with KPT tenants regarding safety and accomodations issues; identify additional research issues based on call with consultants regarding environmental conditions and begin drafting requests.	4.6	\$225.00	\$1,035.00
Motions practice	4/21/2009	JRA	Research	2.5	\$125.00	\$312.50
	4/21/2009	MVG	Review state's answer	0.3	\$285.00	\$85.50
	4/21/2009	MVG	Review testimony on ADA accomodations needs of HPHA	0.4	\$285.00	\$114.00
Pleadings	4/22/2009	DCL	Reviewed State's answer to cross claim	0.2	\$125.00	\$25.00
	4/22/2009	MVG	review state's answer to cross complaint	0.3	\$285.00	\$85.50

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Motions practice	4/23/2009	DCL	Review of Draft Opp to State's MTD in State case	0.5	\$125.00	\$62.50
Motions practice	4/23/2009	EMD	Call with ADA expert; conduct fact investigation and tenant interviews at KPT.	4.8	\$225.00	\$1,080.00
	4/23/2009	MVG	Meet with Csii re altercation	1.5	\$285.00	\$427.50
Motions practice	4/24/2009	EMD	Calls with ADA and fire code experts; review and comment on opposition to motion to dismiss in state case.	3	\$225.00	\$675.00
	4/24/2009	MVG	Read Jason's brief in opposition	0.7	\$285.00	\$199.50
Interrogatories, document production, and other written discovery	4/27/2009	DCL	Email discussion with Jinny and Elizabeth about responding to discovery and review of sample provided	0.3	\$125.00	\$37.50

Exhibit "3"

Motions practice	4/27/2009	EMD	Conference call with ADA expert;l Review motion for class certification; review and analyze Realy Laua's discovery requests; review letters from opposing counsel regarding federal discovery conference; call with Jason Kim regarding same.	4.7	\$225.00	\$1,057.50
Motions practice	27-Apr	JRA	Dec work	2	\$125.00	\$250.00
	4/27/2009	MVG	Call clients to arrange time to take pictures and discuss response to Def's discovery requests	0.3	\$285.00	\$85.50
	4/27/2009	MVG	Letters re Discovery agreements	0.4	\$285.00	\$114.00

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Interrogatories, document production, and other written discovery	4/28/2009	DCL	Filling in general responses for ROGS and RPOD	1	\$125.00	\$125.00
Interrogatories, document production, and other written discovery	4/28/2009	DCL	Conversation with Plaintiff Strickland RE: ROGS and RPOD	0.7	\$125.00	\$87.50
Interrogatories, document production, and other written discovery	4/28/2009	DCL	Responding to Strickland Discovery Requests	1.1	\$125.00	\$137.50

Exhibit "3"

			Begin preparing objections and responses to Realty Laua's discovery requests to plaintiffs; conference call with Peter Obstler and Jee Young regarding scope of preliminary injunction motion; revise letter to opposing counsel regarding initial disclosures and discovery requests; research case law regarding injunctive relief for hazardous environmental conditions; review photographs from KPT; conference call regarding ADA expert declaration.			
Interrogatories, document production, and other written discovery	4/28/2009	EMD		4.7	\$225.00	\$1,057.50
Motions practice	4/28/2009	JRA	Dec work	2	\$125.00	\$250.00
	4/28/2009	MVG	See clients to get pictures and discuss responses to discovery requests	2.6	\$285.00	\$741.00
	4/28/2009	MVG	Tag and organize pictures	1.3	\$285.00	\$370.50

Interrogatories, document production, and other written discovery	4/29/2009	DCL	Additional edits on Strickland Discovery	0.4	\$125.00	\$50.00
Interrogatories, document production, and other written discovery	4/29/2009	DCL	Review of Jason's draft initial disclosures	0.3	\$125.00	\$37.50
Motions practice	4/29/2009	JRA	Dec work	2	\$125.00	\$250.00
	4/29/2009	MVG	Review research on class cert cases	1.4	\$285.00	\$399.00
	4/29/2009	MVG	Review draft initial disclosures	0.5	\$285.00	\$142.50
Interrogatories, document production, and other written discovery	4/30/2009	DCL	Edits/Responding to Discovery Requests for Plaintiffs McMillon, Strickland, Sommers, and Sabalboro	1.2	\$125.00	\$150.00
Interrogatories, document production, and other written discovery	4/30/2009	DCL	Conversation with Plaintiff McMillon re ROGS and scheduled appt for tomorrow	0.2	\$125.00	\$25.00

Interrogatories, document production, and other written discovery	4/30/2009	EMD	Review initial disclosures; review and revise responses to Realty Laua's interrogatory and document requests; work with ADA expert on declaration; conference with Jason Kim regarding discovery issues; review and analyze motion to dismiss complaint; conference call with fire expert to review and discuss declaration	6.5	\$225.00	\$1,462.50
Motions practice	4/30/2009	DCL	Edits to Plaintiff Sabalboro's Federal Declaration	0.3	\$125.00	\$37.50
Motions practice	5/1/2009	DCL	Final review and edits of discovery requests, forwarded to AHFI for filing	3	\$125.00	\$375.00

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	5/1/2009	MVG	Jason's letter to state on disclosures	0.4	\$285.00	\$114.00
	5/1/2009	MVG	Laua's initial disclosures	0.2	\$285.00	\$57.00
Interrogatories, document production, and other written discovery	5/4/2009	EMD	Meet with clients regarding responses to interrogatories and document requests; work with ADA expert on declaration and report; review and finalize responses to interrogatories and document requests.	7.3	\$225.00	\$1,642.50
	5/4/2009	MVG	Review plaintiff answers to inter and motion to produce	2	\$285.00	\$570.00

Exhibit "3"

Motions practice	5/5/2009	EMD	Review and finalize declaration of ADA expert, Jeff Mastin; Review documents produced as part of Realty Laua's initial disclosures; call with KPT resident Sii Tuia regarding fall in KPT stairwell; draft email to respiratory expert regarding potential declaration in support of claim regarding environmental hazards.	4.2	\$225.00	\$945.00
	5/5/2009	MVG	Call Csii re assault	0.3	\$285.00	\$85.50
Motions practice	5/6/2009	DCL	Edits to Plaintiff McMillon's Federal Declaration	0.4	\$125.00	\$50.00
Motions practice	5/6/2009	DCL	Edits to Plaintiff Vaiola's Federal Declaration	0.4	\$125.00	\$50.00

Motions practice	5/6/2009	EMD	Review case law granting motion for preliminary injunction on ADA access issues; revise motion for class certification.	6.3	\$225.00	\$1,417.50
Motions practice	5/7/2009	DCL	Review of state's reply memo re motion to dismiss in state case	0.4	\$125.00	\$50.00
Motions practice	5/7/2009	EMD	Draft motions for preliminary injunction and class certification.	6.6	\$225.00	\$1,485.00
	5/7/2009	MVG	State's reply to opposition brief to motion to dismiss	3	\$285.00	\$855.00
	5/7/2009	WD	Review State Mtn to Dismiss: Reply	0.30	\$225.00	\$67.50
Interrogatories, document production, and other written discovery	5/8/2009	DCL	Review of tenant files received from Realty	4	\$125.00	\$500.00
Motions practice	5/8/2009	DCL	Review of transition plan provided as a part of initial disclosures	1	\$125.00	\$125.00

Motions practice	5/8/2009	EMD	Research case law regarding defenses to Title II ADA claims; draft motions for preliminary injunction and for class certification	5.2	\$225.00	\$1,170.00
	5/8/2009	MVG	Read Mastin's report on ADA violations	1	\$285.00	\$285.00
	5/8/2009	MVG	Meet with Csii about the assault and her interest in completing a declaration	1.1	\$285.00	\$313.50
	5/8/2009	MVG	Read Muniz declaration on fire control failures	1.3	\$285.00	\$370.50
	5/8/2009	MVG	Read Elizabeth's status memo	0.3	\$285.00	\$85.50
Attending court hearings	5/11/2009	DCL	Hearing before Judge McKenna on State's Motion to Dismiss	1	\$125.00	\$125.00
Interrogatories, document production, and other written discovery	5/11/2009	DCL	Review of Realty's response to doc request	0.3	\$125.00	\$37.50

	5/11/2009	MVG	Laua's response to discovery requests	0.6	\$285.00	\$171.00
Motions practice	5/12/2009	EMD	Revise punitive plaintiff declarations in support of motions for preliminary injunction and class certification; draft motion for preliminary injunction; conference call with Caludia Center, Esq. regarding opposition to motion to dismiss.	7.8	\$225.00	\$1,755.00
Motions practice	5/13/2009	DCL	phone calls to each plaintiff to fact check one last time for declarations	1	\$125.00	\$125.00
Motions practice	5/13/2009	DCL	Final edits to plaintiff declarations and circulation to co counsel	0.3	\$125.00	\$37.50

Motions practice	5/13/2009	EMD	Draft motion for preliminary injunction; research and analyze case law in support of same.	8.6	\$225.00	\$1,935.00
	5/13/2009	MVG	State's response for production	0.7	\$285.00	\$199.50
Interrogatories, document production, and other written discovery	5/14/2009	DCL	Review of State and HPHA's response to doc request	0.3	\$125.00	\$37.50
	5/14/2009	MGVG	Talk to Hazel re problem with management	0.3	\$285.00	\$85.50
	5/14/2009	MVG	Review Draft brief in opposition to mod	2.4	\$285.00	\$684.00
	5/14/2009	MVG	draft of letter to state re discovery disclosures	0.6	\$285.00	\$171.00
	5/14/2009	WD	Review Response to Mtn to Dismiss	0.60	\$225.00	\$135.00
Motions practice	5/15/2009	DCL	Conversation with expert Manny Muniz about fire incident reports and final edits to his declaration	0.5	\$125.00	\$62.50

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	5/15/2009	MVG	read draft PI motion	2.1	\$285.00	\$598.50
	5/16/2009	WD	Reviewing Order	0.30	\$225.00	\$67.50
Motions practice	5/18/2009	JRA	Taking messages about Csii's daughters attack	0.25	\$125.00	\$31.25
	5/18/2009	MVG	Visit plaintiff's to obtain signitures on decs	2.4	\$285.00	\$684.00
Motions practice	5/19/2009	DCL	Downloaded pictures for declarations, labeled, printed	1	\$125.00	\$125.00
Motions practice	5/19/2009		Finalizing Decs for opp	0.5	\$125.00	\$62.50
	5/19/2009	MVG	visit plaintiffs to obtain signitures on decs.	3.4	\$285.00	\$969.00
	5/19/2009	MVG	Elizabeth's conversation with Jarod re disclosures	0.2	\$285.00	\$57.00
	5/19/2009	MVG	Read Mastin's Declaration	0.7	\$285.00	\$199.50
	5/19/2009	MVG	Tour KPT and meet with clients with Advertiser editorial board	1.3	\$285.00	\$370.50
Motions practice	5/20/2009	DCL	Reviewed Fed. Opp. Motion	1	\$125.00	\$125.00
	5/20/2009	WD	Review Response	0.20	\$225.00	\$45.00

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	5/20/2009	WD	Review Declarations of Experts	0.40	\$225.00	\$90.00
Case development	5/21/2009	DCL	Reviewed/Edited Opposition Motion	1	\$125.00	\$125.00
Motions practice	5/21/2009	DCL	Reviewed P and expert declarations, compiled exhibits to attach, finalized for filing	4	\$125.00	\$500.00
	5/21/2009	WD	Set up FTP for Video	0.20	\$225.00	\$45.00
Case development	5/22/2009	DCL	Meeting at McNeil Wilson with Victor to discuss PR	1.5	\$125.00	\$187.50
	5/22/2009	MVG	Review opposition brief	1.4	\$285.00	\$399.00
	5/22/2009	WD	Working on FTP and Video with Delia	0.70	\$225.00	\$157.50

Exhibit "3"

Motions practice	5/25/2009	EMD	Research case law in support of preliminary injunction motion; call with Estelle regarding declaration regarding hazardous environmental conditions at KPT; call with Jason Kim regarding motions and discovery issues.	4.2	\$225.00	\$945.00
Motions practice	5/26/2009	EMD	Review declaration of Rob Scofield; Call with Estelle regarding additions to declaration of Rob Scofield in support of motion for preliminary injunction; revise motion for class certification.	4.6	\$225.00	\$1,035.00
Motions practice	5/27/2009	DCL	Review of draft class cert with Jason's revisions	0.5	\$125.00	\$62.50

Motions practice	5/29/2009	DCL	Review and LEJ discussion re state's reply re motion to dismiss	0.8	\$125.00	\$100.00
Motions practice	5/29/2009	DCL	email discussion re Rob Schofield's declaration with victor and elizabeth	0.3	\$125.00	\$37.50
	5/29/2009	WD	Review Reply to MTD	0.10	\$225.00	\$22.50
Motions practice	6/1/2009	DCL	Review/revisions and circulation to team of class cert draft	2	\$125.00	\$250.00
Motions practice	6/2/2009	DCL	emails/coordination with Donna at AHFI about client declarations with attached exhibits	0.2	\$125.00	\$25.00
Motions practice	6/2/2009	DCL	made copies of signature pages for class cert decs and hand delivered originals to AHFI	0.2	\$125.00	\$25.00
Motions practice	6/2/2009	DCL	Review and edit draft class cert motion	2	\$125.00	\$250.00

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Motions practice	6/3/2009	DCL	Drafted a declaration to use for motion for class cert re LEJ as adequate representation	0.5	\$125.00	\$62.50
	6/3/2009	WD	Draft Declaration for Class Cert	0.20	\$225.00	\$45.00
	6/4/2009	MVG	Visit with clients and Donna Kim from the legislature at KPT to update on hearing	3.1	\$285.00	\$883.50
	6/4/2009	MVG	HPR radio show on KPT with Chad Taniguchi	1.2	\$285.00	\$342.00
Motions practice	6/5/2009	DCL	Review of State's Answer in state case	0.5	\$125.00	\$62.50

Exhibit "3"

Attending court hearings	6/8/2009	EMD	Prepare for and attend hearing on Defendant's motion to dismiss or for summary judgement before Judge Seabright; conference with Claudia Center regarding relief requested in motion for preliminary injunction	3.2	\$225.00	\$720.00
Motions practice	6/8/2009	DCL	Hearing before Judge Seabright on Motion to Dismiss	1	\$125.00	\$125.00
Motions practice	6/8/2009	DCL	Searched through state websites to find documents pertaining to RFPs and bids for KPT elevator repairs	3	\$125.00	\$375.00
	6/8/2009	MVG	Federal court hearing on motion to dismiss	2.5	\$285.00	\$712.50
	6/8/2009	MVG	Meet with team to discuss plans	2	\$285.00	\$570.00

	6/8/2009	WD	Review MPI and research on low/no bond	0.30	\$225.00	\$67.50
Case development, background investigation, and case administration	6/9/2009	EMD	Attend status conference before magistrate judge Judge Kobayashi regarding mediation and settlement	1.5	\$225.00	\$337.50
Motions practice	6/9/2009	DCL	Review of draft MPI	1	\$125.00	\$125.00
	6/9/2009	MVG	review draft on Gene Strickland's parking problem	0.3	\$285.00	\$85.50
	6/9/2009	MVG	Status conference	1.2	\$285.00	\$342.00
Motions practice	6/10/2009	DCL	Conversation with Gene about incident with security and parking, email to Victor and Elizabeth about incident, and revisions to draft letter to OC	1	\$125.00	\$125.00
	6/10/2009	MVG	Finalize Strickland letter	0.6	\$285.00	\$171.00
	6/12/2009	MVG	Medicare implications for settlement	0.4	\$285.00	\$114.00

Motions practice	6/16/2009	DCL	Review of demand letter re injunctive relief	0.3	\$125.00	\$37.50
	6/16/2009	MVG	Review HPHA 5 year plan and offer of settlement	0.5	\$285.00	\$142.50
	6/16/2009	MVG	review draft of settlement letter and comment	0.6	\$285.00	\$171.00
Motions practice	6/17/2009	DCL	Review of Stipulated protective order	0.2	\$125.00	\$25.00
	6/17/2009	MVG	Review draft stip on protective order	0.4	\$285.00	\$114.00
	6/17/2009	MVG	Discuss with Eliz. Gene Strickland's letter	0.4	\$285.00	\$114.00
	6/17/2009	MVG	review and comment on settklement offer	1	\$285.00	\$285.00
	6/17/2009	MVG	Calendar mmediation/settlement conference	0.1	\$285.00	\$28.50
	6/17/2009	MVG	Review email from team on modifications to offer	0.2	\$285.00	\$57.00

	6/17/2009	MVG	Discuss with Eliz. the schedule and coverage for Plaintiffs depositions	0.3	\$285.00	\$85.50
Case development, background investigation, and case administration	6/18/2009	EMD	Email with Bart Ashley regarding invoice and consulting services regarding removal of hazardous environmental conditions at KPT	0.2	\$225.00	\$45.00
Depositions	6/18/2009	EMD	Calls with clients regarding deposition preparation and scheduling; Call with Gene Strickland regarding retaliation by security and management	3.6	\$225.00	\$810.00
	6/18/2009	MVG	Arrange for deposition scheduling	0.3	\$285.00	\$85.50
	6/18/2009	MVG	Review final settlement draft	0.4	\$285.00	\$114.00

	6/18/2009	MVG	Review emails re clean up plans on vermin, garbage etc.	0.2	\$285.00	\$57.00
	6/19/2009	MVG	Read Def. MPI in State case	0.6	\$285.00	\$171.00
	6/19/2009	MVG	Read order on motion to dismiss	1.5	\$285.00	\$427.50
	6/20/2009	WD	Review Fed. Order re: MTD	0.10	\$225.00	\$22.50
	6/22/2009	MVG	review Conference statement and demand letter	1.4	\$285.00	\$399.00
	6/23/2009	MVG		0.7	\$285.00	\$199.50
	6/23/2009	MVG	Review Laua's answer to state	0.1	\$285.00	\$28.50
	6/23/2009	MVG	Review State's amended 3rd party complaint	0.4	\$285.00	\$114.00
Depositions	6/24/2009	EMD	Attend depositions of Trudy Salbalboro and Kathy Vaiola; assist in preparing Kathy Vaiola for deposition	7.2	\$225.00	\$1,620.00
	6/24/2009	MVG	Review email from Elizabeth on fire issues at KPT	0.3	\$285.00	\$85.50

Interrogatories, document production, and other written discovery	6/26/2009	EMD	Draft letter to opposing counsel regarding fire incidents at KPT; work on motion for injunctive relief regarding fire code violations at KPT; email litigation team regarding case status; review letter from opposing counsel in response to demand letter regarding injunctive relief; draft documents requested as part of phased discovery	4.2	\$225.00	\$945.00
	6/26/2009	MVG	Review state's response to settlement terms	0.2	\$285.00	\$57.00
	6/26/2009	MVG	Letter to Def's re fire in Tower A	0.3	\$285.00	\$85.50
	6/29/2009	MVG	Review in preparation of mediation	1.4	\$285.00	\$399.00

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Case development	6/30/2009	DCL	Review of Judge Seabright's order	0.5	\$125.00	\$62.50
Case development	6/30/2009	DCL	Review of email re mediation update and letter from state re our demand letter	1	\$125.00	\$125.00
Interrogatories, document production, and other written discovery	6/30/2009	DCL	Review of emails re KPT depositions, documents filed (Realty's answer to crossclaim, state's 3rd party complaint) and emails between litigation team about confidential mediation discussions from while I was on vacation	2	\$125.00	\$250.00

Exhibit "3"

Interrogatories, document production, and other written discovery	6/30/2009	EMD	Attend settlement conference with Judge Kobayashi and Keith Hunter; strategy meeting with litigation team; draft letter to defense counsel regarding limited document request; draft email to litigation team regarding mediation update		\$225.00	\$ -
	6/30/2009	MVG	Read Elizabeth's email re discovery and state's response	0.2	\$285.00	\$57.00
	6/30/2009	MVG	Team meeting	1	\$285.00	\$285.00
	6/30/2009	MVG	Mediation meeting in Federal Court	4.4	\$285.00	\$1,254.00
	6/30/2009	MVG	Make calls and send emails trying to find a tenant organizer	0.7	\$285.00	\$199.50

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	6/30/2009	MVG	prepare for depositions of Strickland and Sommers	1.4	\$285.00	\$399.00
Case development	7/1/2009	DCL	Review of resident needs assessment dated June 2009	1	\$125.00	\$125.00
Case development	7/1/2009	DCL	Review of email re mediation update and letter re doc requests	0.5	\$125.00	\$62.50
Interrogatories, document production, and other written discovery	7/1/2009	EMD	Draft letter to opposing counsel regarding documents requested in first phase of discovery; email litigation team regarding mediation update; review KPT needs assessment regarding survey provided by FACE; work on identifying potential community organizers.	4.5	\$225.00	\$1,012.50

Exhibit "3"

Motions practice	7/1/2009	EMD	work on motion for injunctive relief regarding state fire code violations	0.5	\$225.00	\$112.50
	7/1/2009	MVG	Depositions of Strickland and Sommers	5.5	\$285.00	\$1,567.50
	7/1/2009	MVG	Read survey on repair needs at KPT by FACE	1	\$285.00	\$285.00
	7/1/2009	MVG	Emails to Elizabeth re Face Survey and Pacific Housing Advisory	0.2	\$285.00	\$57.00
	7/1/2009	MVG	Email to Elizabeth re tenant organizer suggestions from HCF and S. Chandler	0.3	\$285.00	\$85.50
	7/1/2009	MVG	Read Trudy Salaboro's interrogatory answers	0.3	\$285.00	\$85.50
	7/1/2009	WD	Calculating Fees	0.10	\$225.00	\$22.50
	7/1/2009	WD	Review Resident Needs Assessment	0.20	\$225.00	\$45.00

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	7/2/2009	MVG	Read Elizabeth's Summary of mediation meeting	0.1	\$285.00	\$28.50
	7/2/2009	WD	Review Amended Answers to Interrogatories	0.10	\$225.00	\$22.50
Interrogatories, document production, and other written discovery	7/6/2009	EMD	Review letter from R. Aaron Creps regarding plaintiffs' June 26 and July 1, 2009 letters requesting documents; draft letter in response; review letter from John Cregor regarding letter from Oceanic Time Warner Cable service at KPT; work on motion for injunction regarding fire incidents at KPT		\$225.00	\$ -
	7/6/2009	MVG	Talk to Lewers faletogo's sister about his death	0.2	\$285.00	\$57.00

Exhibit "3"

	7/6/2009	MVG	Talk to Elizabeth and email them both about Lewer's	0.2	\$285.00	\$57.00
	7/6/2009	MVG	Talk to Sarah Browning re Tenant meeting at KPT scheduled for tonight	0.2	\$285.00	\$57.00
	7/6/2009	MVG		0.2	\$285.00	\$57.00
Interrogatories, document production, and other written discovery	7/7/2009	EMD	Draft letter in response to Realty Laua's 7-2 letter regarding request for production of certain documents; review HUD regulations regarding lead regulations and enforcement; call with Manny Muniz	2.8	\$225.00	\$630.00
Depositions	7/8/2009	DCL	Prep for McMillon deposition	2	\$125.00	\$250.00

Motions practice	7/8/2009	EMD	Work on motion for injunctive relief; send team email with case update; assist in preparing Hazel McMillon for deposition	1.5	\$225.00	\$337.50
	7/8/2009	MVG	read, comment and sign letter re discovery requests	0.3	\$285.00	\$85.50
	7/8/2009	MVG	Talk to Gene Strickland's wife about his death and email team.	0.4	\$285.00	\$114.00
	7/8/2009	MVG	read eliaabteh's status email	0.2	\$285.00	\$57.00
	7/8/2009	MVG	Read deposition emails for Hazel	0.1	\$285.00	\$28.50
Depositions	7/9/2009	DCL	Meet with client and defend Plaintiff McMillon's Deposition	3	\$125.00	\$375.00

Depositions	7/9/2009	EMD	Meet with and attend deposition of Hazel McMillon; work on drafting FOIA request to HUD; investigate potential lead paint hazards at KPT; call with Dr. Fernandes from Kokua Kalihi Valley Clinic regarding disabled patients at KPT and Kuhio Homes; draft declaration for Dr. Fernandes	4.2	\$225.00	\$945.00
Case development, background investigation, and case administration	7/10/2009	EMD	Work on identifying potential tenant organizers; analyze potential additional plaintiffs for federal case	1.2	\$225.00	\$270.00
Motions practice	7/16/2009	DCL	Review of draft opp to Realty's MSJ	0.5	\$125.00	\$62.50

	7/17/2009	WD	Edit/Review Memo in Opp. to Laua MSJ	0.30	\$225.00	\$67.50
Case development	7/20/2009	DCL	Email discussion to Jason and Elizabeth about deceased plaintiffs	0.2	\$125.00	\$25.00
Case development	7/20/2009	DCL	Discussion with KPT tenant Barbara Coon about eviction from KPT	0.3	\$125.00	\$37.50
Pleadings	7/20/2009	DCL	Review of State's Answer and discussion with LEJ staff	1	\$125.00	\$125.00
Depositions	7/21/2009	DCL	Review of Plaintiff McMillan's Deposition Transcript, Amendment to her Declarations and Interrogatories	3	\$125.00	\$375.00
Depositions	7/21/2009	DCL	Review of Plaintiff Sommers' Deposition Transcript, Amendment to her Declarations	2	\$125.00	\$250.00

Depositions	7/22/2009	EMD	Prepare named plaintiffs for depositions regarding class certification issues.	9.6	\$225.00	\$2,160.00
Depositions	7/23/2009	DCL	Reviewed Deposition transcripts with Plaintiffs Sommers and McMillon	3	\$125.00	\$375.00
Depositions	7/23/2009	DCL	Filled out paperwork for Rosenberg for Sommers and McMillon depositions and hand delivered to their office	1	\$125.00	\$125.00
Motions practice	7/23/2009	DCL	Drafted new declarations for potential MPI based on new facts learned at depos	0.5	\$125.00	\$62.50
Motions practice	7/24/2009	DCL	Reviewed Declaration of Dr. Ritabelle Fernandes from KKV	0.2	\$125.00	\$25.00

Case development	7/27/2009	DCL	Email with Jason and Will about potential for stay of evictions for warranty of habitability issues	0.2	\$125.00	\$25.00
Motions practice	7/27/2009	DCL	Discussion with KPT Tenant about her eviction for nonpayment of rent	0.3	\$125.00	\$37.50
Motions practice	7/27/2009	DCL	Reviewed State's Opposition to class cert	0.5	\$125.00	\$62.50
Motions practice	7/28/2009	DCL	Reviewed Realty Laua's Opposition to class cert	0.5	\$125.00	\$62.50
Motions practice	7/29/2009	DCL	Researched precedent/case law for reply to opp to class cert motions	2	\$125.00	\$250.00
Motions practice	7/29/2009	DCL	Reviewed plaintiff decs and depositions to find facts to rebut opp to class cert motions	3	\$125.00	\$375.00

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Motions practice	7/30/2009	DCL	Reviewed Deposition transcripts with Plaintiffs Vaiola and Sabalboro	3	\$125.00	\$375.00
Motions practice	7/30/2009	DCL	Filled out paperwork for Rosenberg for Vaiola and Sabalboro depositions and hand delivered to their office	1	\$125.00	\$125.00
Motions practice	7/30/2009	DCL	Drafted new declarations for potential MPI based on new facts learned at depos	0.5	\$125.00	\$62.50
Motions practice	7/30/2009	EMD	Work on motion for injunctive relief regarding state fire code violations	0.5	\$225.00	\$112.50

Exhibit "3"

Motions practice	7/30/2009	EMD	Review and analyze defendant HPHA and defendant Realty Laua's oppositions to motion for class certification; work on reply to oppositions; draft; review HPHA's proposed settlement items.	2.5	\$225.00	\$562.50
Motions practice	7/31/2009	DCL	Searched HPHA testimony for Chad's statements about accessible housing	0.5	\$125.00	\$62.50
Motions practice	7/31/2009	EMD	Work on motion for preliminary injunction regarding fire code violations	0.4	\$225.00	\$90.00

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Motions practice	7/31/2009	EMD	Assist in drafting reply to opposition to motion for class certification; research case law regarding standing and class certification.	3.2	\$225.00	\$720.00
Case development, background investigation, and case administration	8/3/2009	EMD	Attend status conference; conference with Jason Kim regarding State's settlement proposal.	1.2	\$225.00	\$270.00
	8/4/2009	WD	Reviewing Class Cert Filings	0.50	\$225.00	\$112.50

Exhibit "3"

Case development, background investigation, and case administration	8/6/2009	EMD	Review State's settlement proposal; correspond with litigation team regarding same; begin drafting response to settlement proposal; email Manny Muniz; fire expert, regarding evacuation plan and interim safety measures.	2.2	\$225.00	\$495.00
Pleadings	8/6/2009	DCL	Reviewed Realty's answer, 3rd party complaint and crossclaim	0.3	\$125.00	\$37.50

Interrogatories, document production, and other written discovery	8/10/2009	EMD	Review various documents on HPHA website related to KPT master plan and feasibility study; draft response to State's settlement items; draft and email letter to opposing counsel regarding meeting to confer re discovery issues.	3.2	\$225.00	\$720.00
Case development, background investigation, and case administration	8/11/2009	EMD	Call with OSHA regarding lead and asbestos hazards	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	8/11/2009	EMD	Draft response to settlement items; call with FACE regarding tenant organizing	5.3	\$225.00	\$1,192.50

Case development	8/12/2009	DCL	Reviewed and discussed with Elizabeth draft settlement response and discussion	1	\$125.00	\$125.00
Case development, background investigation, and case administration	8/12/2009	EMD	Draft response to State's July 28, 2009 proposed settlement items; coordinate meet and confer meeting regarding outstanding discovery issues; call with HACBED regarding willingness to serve as tenant organizer	6.2	\$225.00	\$1,395.00
Pleadings	8/13/2009	DCL	Reviewed 3rd party answer and counterclaim	0.3	\$125.00	\$37.50
Case development	8/14/2009	DCL	Meeting with Jarod Buna, Aaron Creps re Settlement issues	1	\$125.00	\$125.00

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Interrogatories, document production, and other written discovery	8/14/2009	EMD	Discovery meeting.	1	\$225.00	\$225.00
Interrogatories, document production, and other written discovery	8/17/2009	EMD	Team conference call regarding response to state's proposed settlement items; continue revising and drafting settlement response; review and analyze documents related to request for proposal for redevelopment	6.2	\$225.00	\$1,395.00
	8/17/2009	MVG	Litigation conference call with team	1.4	\$285.00	\$399.00
	8/17/2009	MVG	meeting with Elizabeth to discuss case developments and strategiews	0.7	\$285.00	\$199.50
	8/17/2009	MVG		0.5	\$285.00	\$142.50
	8/17/2009	WD	KPT Team Call	0.60	\$225.00	\$135.00

Exhibit "3"

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Case development	8/18/2009	DCL	Reviewed, commented and discussed with Elizabeth the settlement letter	1	\$125.00	\$125.00
Case development	8/18/2009	DCL	Reviewed/edited pre-trial statement	0.2	\$125.00	\$25.00
Case development, background investigation, and case administration	8/18/2009	EMD	Review email correspondence from team regarding revisions to settlement response; revise and finalize response to State's proposed settlement items; email Peter Obstler regarding additional research issues; review 2008 physical needs assessments for KPT and Kuhio Homes. Email fire code expert regarding standing and class certification.	3.2	\$225.00	\$720.00
Trial preparation and attending trial	8/18/2009	EMD	Review and comment on pretrial statement	0.2	\$225.00	\$45.00

Exhibit "3"

	8/18/2009	MVG	Read and reply on draft settlement agreement	0.5	\$285.00	\$142.50
	8/20/2009	MVG	Attend HPHA Board meeting re decision about privatization	3.5	\$285.00	\$997.50
	8/20/2009	mvg	review emails re fire plan	0.2	\$285.00	\$57.00
Motions practice	8/22/2009	DCL	Review of Plaintiffs Opp. To Realty Laua's MSJ	0.5	\$125.00	\$62.50
Case development, background investigation, and case administration	8/24/2009	EMD	Call with Legal Aid regarding evictions of KPT tenants	0.5	\$225.00	\$112.50
Motions practice	8/24/2009	DCL	Research for Elizabeth on housing issues	4	\$125.00	\$500.00
Motions practice	8/25/2009	DCL	Wrote memo to Elizabeth on housing issues	1.5	\$125.00	\$187.50
Motions practice	8/25/2009	DCL	Reviewed Realty Laua fire watch documents and compared to fire incident reports	0.5	\$125.00	\$62.50

Motions practice	8/25/2009	EMD	Review documents provided by Realty Laua regarding fire watch program; call with consultant regarding lead testing at KPT; email health care providers at KKV regarding lead hazards and children at KPT	1.3	\$225.00	\$292.50
Motions practice	8/25/2009	EMD	Call with Jun Yung at FACE regardign redevelopment contract	0.2	\$225.00	\$45.00
Motions practice	8/26/2009	EMD	Call with Pacific Advisors regarding redevelopment proposal for KPT and Kuhio Homes	0.8	\$225.00	\$180.00
	8/27/2009	MVG		0.3	\$285.00	\$85.50
Motions practice	8/31/2009	DCL	Reviewed Realty's reply memo for MSJ	0.3	\$125.00	\$37.50

Case development, background investigation, and case administration	9/2/2009	EMD	Draft email to litigation team regarding case status, strategy, and settlement; review and respond to emails regarding same.	0.7	\$225.00	\$157.50
Case development, background investigation, and case administration	9/3/2009	EMD	Calls with Jinny Kim and Claudia Center regarding case status and strategy; call with courtroom manager regarding status conference.	0.5	\$225.00	\$112.50
	9/3/2009	MVG	discuss case status with Elizabeth	0.4	\$285.00	\$114.00
	9/3/2009	mvg	Review settlement correspondence in prep for settlement conference	0.4	\$285.00	\$114.00

Case development, background investigation, and case administration	9/4/2009	EMD	Participate in strategy meeting and status conference re settlement and case status; calls with attorneys Jinny Kim and Claudia Center regarding same.	1.6	\$225.00	\$360.00
	9/4/2009	MVG	Meet with team to discuss settlement conference	0.4	\$285.00	\$114.00
	9/4/2009	MVG	attend Settlement conference	0.9	\$285.00	\$256.50
	9/5/2009	WD	Update Fees Accountiny	0.20	\$225.00	\$45.00
Case development, background investigation, and case administration	9/9/2009	EMD	Prepare for settlement discussions; review and analyze state's response to settlement items; review draft language for settlement agreement.	1.2	\$225.00	\$270.00
	9/9/2009	MVG	Review State's response and prepare for neg. Session	0.7	\$285.00	\$199.50

Case development, background investigation, and case administration	9/10/2009	EMD	Prepare for and attend settlement conference	3.5	\$225.00	\$787.50
	9/10/2009	MVG	Negotiating session with Keith Hunter	3.3	\$285.00	\$940.50
	9/10/2009	MVG	Research effect of settlement on needs based benefits	0.7	\$285.00	\$199.50
Motions practice	9/14/2009	EMD	Email and call to Peter Obstler and Jinny Kim regarding case status and preliminary injunction motion	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	9/15/2009	EMD	Fact investigation regarding additional potential declarant	0.2	\$225.00	\$45.00
Motions practice	9/15/2009	EMD	Revise federal preliminary injunction motion and email Jinny Kim, Claudia Center regarding same.	0.8	\$225.00	\$180.00

	9/15/2009	WD	Review MSJ Order	0.10	\$225.00	\$22.50
Case development, background investigation, and case administration	9/16/2009	EMD	Correspondence and research regarding substituting deceased plaintiff's estates	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	9/16/2009	EMD	Call with Keith Hunter regarding settlement status	0.2	\$225.00	\$45.00
Motions practice	9/17/2009	EMD	Email with co-counsel regarding additional research for preliminary injunction motion	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	9/21/2009	EMD	Review and respond emails from Judge Kobayashi and Jason Kim regarding settlement status	0.2	\$225.00	\$45.00
Motions practice	10/3/2009	EGJD	Look up Uniform Federal Accessibility Standards Checklist	0.5	\$125.00	\$62.50

Case development, background investigation, and case administration	10/7/2009	EMD	Call with Peter Obstler, Esq. regarding case strategy	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	10/7/2009	EMD	Emails with Jason Kim, Esq. regarding mediation and discovery status	0.3	\$225.00	\$67.50
Motions practice	10/7/2009	EMD	Draft preliminary injunction motion	0.3	\$225.00	\$67.50
Motions practice	10/8/2009	EMD	Calls with plaintiffs to revise and update declarations in support of motion for preliminary injunction	3.2	\$225.00	\$720.00
Motions practice	10/8/2009	EMD	Draft motion for preliminary injunction	2.2	\$225.00	\$495.00
Attending court hearings	10/13/2009	EMD	Attend motion for class certification hearing	0.5	\$225.00	\$112.50

Case development, background investigation, and case administration	10/13/2009	EMD	Litigation team discussion regarding case strategy	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	10/13/2009	EMD	Draft email requesting reasonable accomodations for named plaintiffs	0.5	\$225.00	\$112.50
	10/13/2009	MVG	Attend Motion hearing on class cert	0.5	\$285.00	\$142.50
	10/13/2009	MVG	Team meeting re strategy	0.5	\$285.00	\$142.50
Case development, background investigation, and case administration	10/14/2009	EMD	Email litigation team regarding case status	0.2	\$225.00	\$45.00
Motions practice	10/14/2009	EMD	Review expert witness disclosure	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	10/15/2009	EMD	Call with John Cregor, Esq. regarding reasonable accomodation requests and settlement	0.4	\$225.00	\$90.00

Case development, background investigation, and case administration	10/15/2009	EMD	Emails with litigation team regardign the same as above	0.2	\$225.00	\$45.00
Motions practice	10/15/2009	EMD	Review Manny Muniz's proposed interim safety measures.	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	10/16/2009	EMD	Review emails regarding settlement status	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	10/19/2009	EMD	Calls with John Cregor and John Wong regarding reasonable accomodations to named plaintiffs	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	10/19/2009	EMD	Reviewing HPHA policy on accomodations for persons with disabilities	0.3	\$225.00	\$67.50

Case development, background investigation, and case administration	10/19/2009	EMD	Calls with plaintiffs updating requests for reasonable accomodations	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	10/19/2009	EMD	Draft email to opposing counsel regarding the same	0.4	\$225.00	\$90.00
Interrogatories, document production, and other written discovery	10/19/2009	EMD	Review previous correspondence and draft email to opposing counsel regarding document production	0.3	\$225.00	\$67.50
Motions practice	10/19/2009	EMD	Review proposed interim safety measures and evacuation plan to determine use in preliminary injunction motion	0.5	\$225.00	\$112.50

Case development, background investigation, and case administration	10/20/2009	EMD	Revise and finalize email with to John Wong, Esq. regarding reasonable accomodations for named plaintiffs	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	10/20/2009	EMD	Draft letter to opposing counsel regarding document production	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	10/21/2009	EMD	Review and revise settlement letter	0.2	\$225.00	\$45.00
Motions practice	10/21/2009	EMD	Work with fire expert Manny Muniz regarding preliminary injunction motion	0.2	\$225.00	\$45.00
Motions practice	10/22/2009	EMD	Call and email with Manny Muniz.	0.6	\$225.00	\$135.00

Case development, background investigation, and case administration	10/27/2009	EMD	Follow up on issues discussed during mediation; reviewing report regarding concrete spalling; email litigation team regarding various mediation issues	3.2	\$225.00	\$720.00
Case development, background investigation, and case administration	10/27/2009	EMD	Prepare for and attend mediation.	2.5	\$225.00	\$562.50
	10/27/2009	2.1	Prepare for and Attend Mediation		\$285.00	\$0.00
Case development, background investigation, and case administration	10/29/2009	EMD	Call with Jinny Kim and and Claudia Center regarding Oct. 27 settlement discussions, policy revisions and program access issues	0.7	\$225.00	\$157.50

Case development, background investigation, and case administration	10/29/2009	EMD	Review management contract; draft email to George Playdon, Esq. regarding elevator outages	0.3	\$225.00	\$67.50
Motions practice	10/29/2009	EMD	Call with Manny Muniz regarding more detailed building evacuation plans, review of fire watch logs and other evidence	0.7	\$225.00	\$157.50
	10/29/2009	MVG	Call with Jinny Kim and Claudia Center re remediation and case strategy	0.6	\$285.00	\$171.00
	TOTAL			494.1		\$107,872.25

IV. Preliminary Injunction and Settlement
i. November 1, 2009 through February 28, 2010;

<u>Litigation Phase</u>	<u>Date</u>	<u>Attorney</u>	<u>Brief Description of Activity</u>	<u>Time</u>	<u>Attorney Rate</u>	<u>Fees</u>
Motions practice	11/2/2009	EMD	Review Order granting motion for class certification.	0.2	\$225.00	\$45.00
	11/2/2009	MVG	Legislative hearing on KPT	1.5	\$285.00	\$427.50

Case development, background investigation, and case administration	11/3/2009	EMD	Draft letter regarding documents discussed at 10/27 settlement meeting and fire code issues; review KPT structural survey; work on chart summarizing access issues.	2.9	\$225.00	\$652.50
Case development, background investigation, and case administration	11/4/2009	EMD	Work on chart summarizing access issues.	1.3	\$225.00	\$292.50
Case development, background investigation, and case administration	11/4/2009	EMD	Participate in settlement conference.	2	\$225.00	\$450.00
Case development, background investigation, and case administration	11/5/2009	EMD	Review and revise proposed class notice; confer with opposing counsel regarding same.	1.2	\$225.00	\$270.00

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Case development, background investigation, and case administration	11/10/2009	EMD	Revise, finalizing and send letter to opposing counsel regarding issues discussed at prior mediation.	0.8	\$225.00	\$180.00
Case development, background investigation, and case administration	11/10/2009	EMD	Review class certification notice; call with Jarod Buna regarding same.	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	11/12/2009	EMD	Attend informational briefing regarding privatization.	1.8	\$225.00	\$405.00
Case development, background investigation, and case administration	11/12/2009	EMD	Conference with FACE regarding tenant organization and meeting with members of same.	0.5	\$225.00	\$112.50
	11/14/2009	MVG	Participate in settlement conference	0.2	\$285.00	\$57.00
Case development, background investigation, and case administration	11/18/2009	EMD	Review and revise class certification notice and stipulation regarding same.	0.6	\$225.00	\$135.00

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Case development, background investigation, and case administration	11/18/2009	EMD	Call with opposing counsel regarding same.	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	11/20/2009	EMD	Call with Manny Muniz to finalize second declaration and to discuss proposed building evacuation plans.	0.6	\$225.00	\$135.00
Interrogatories, document production, and other written discovery	11/20/2009	EMD	Draft additional document request.	0.5	\$225.00	\$112.50
Motions practice	11/20/2009	EMD	Review preliminary injunction motion.	4.5	\$225.00	\$1,012.50
Motions practice	11/22/2009	EMD	Revise motion for preliminary injunction.	5.2	\$225.00	\$1,170.00
	11/22/2009	MVG	Review Preliminary Injunction draft	1.2	\$285.00	\$342.00
Interrogatories, document production, and other written discovery	11/24/2009	EMD	Draft additional document requests	0.8	\$225.00	\$180.00

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Case development, background investigation, and case administration	11/25/2009	EMD	Work on coordination translation and distribution of class notice.	0.4	\$225.00	\$90.00
Motions practice	11/25/2009	EMD	Revise preliminary injunction motion.	4.2	\$225.00	\$945.00
Case development, background investigation, and case administration	11/30/2009	EMD	Call with Jarod Buna regarding distribution of class notice.	0.2	\$225.00	\$45.00
Motions practice	11/30/2009	EMD	Draft notice for preliminary injunction.	2.3	\$225.00	\$517.50
Case development, background investigation, and case administration	12/1/2009	EMD	Calls regarding translation of class notice.	0.5	\$225.00	\$112.50
Motions practice	12/1/2009	EMD	Review and analyze research and draft preliminary injunction motion.	1.8	\$225.00	\$405.00

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Case development, background investigation, and case administration	12/2/2009	EMD	Call with translation service to obtain quote to translate class notice.	0.2	\$225.00	\$45.00
Motions practice	12/2/2009	EGJD	conference call to discuss strategy for motion for preliminary injunction	1	\$125.00	\$125.00
Motions practice	12/2/2009	EMD	Conference call regarding preliminary injunction motion with Jason Kim, Jinny Kim, Claudia Center, Victor Geminiani and Erica Dickey.	1.3	\$225.00	\$292.50
Motions practice	12/2/2009	EMD	Emails with Manny Muniz regarding Second Declaration and Fire Code.	0.2	\$225.00	\$45.00
Motions practice	12/2/2009	EMD	Research regarding current Fire Code and anticipated amendments.	0.3	\$225.00	\$67.50

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Motions practice	12/2/2009	EMD	Discuss follow up research issues for preliminary injunction motion with Erica Dickey.	0.2	\$225.00	\$45.00
	12/2/2009	MVG	Call with Jason Kim, Claudia Center, Jinny Kim, Elizabeth Dunne re Preliminary Injunction	1.3	\$285.00	\$370.50
Case development, background investigation, and case administration	12/3/2009	EMD	Review KPT and Kuhio Homes draft intake sheet.	0.1	\$225.00	\$22.50
Case development, background investigation, and case administration	12/3/2009	EMD	Call and email with Pacific Gateway Center regarding class notice translation.	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	12/3/2009	EMD	Review and respond to translation services proposal from Pacific Gateway.	0.4	\$225.00	\$90.00

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Motions practice	12/3/2009	EGJD	research case law for motion for preliminary injunction (reasonable accommodation in PI)	5.8	\$125.00	\$725.00
Motions practice	12/3/2009	EMD	Review case law regarding preliminary injunctive relief for ADA and Section 504 violations.	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	12/4/2009	EMD	Review previous settlement correspondence to incorporate in letter to opposing counsel.	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	12/4/2009	EMD	Gather information regarding previous elevator modernization reports.	0.2	\$225.00	\$45.00
Motions practice	12/4/2009	EGJD	conduct cite checks for declaration citations for MPI	6.2	\$125.00	\$775.00

Motions practice	12/4/2009	EMD	Conference call with Manny Sound regarding revisions to Second Declaration.	0.5	\$225.00	\$112.50
Motions practice	12/6/2009	EMD	Review draft Second Declaration of Jeff Mastin and email Jinny Kim as to comments regarding same.	0.5	\$225.00	\$112.50
Motions practice	12/6/2009	EMD	Continuing drafting motion for preliminary injunction.	3.2	\$225.00	\$720.00
Case development, background investigation, and case administration	12/7/2009	EMD	Revise and email opposing counsel regarding proposed stipulated class definition	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	12/7/2009	EMD	Draft new notice of right to reasonable accommodations.	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	12/7/2009	EMD	Review and revise Second Declaration of Jeff Mastin	0.8	\$225.00	\$180.00

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Motions practice	12/7/2009	EGJD	research case law for motion for preliminary injunction (reasonable accommodation in PI), add citations to expert declarations for MPI	5.7	\$125.00	\$712.50
Motions practice	12/7/2009	EMD	Further revise motion for preliminary injunction.	6.7	\$225.00	\$1,507.50
Motions practice	12/7/2009	EMD	Further revise Second Declaration of Manny Muniz in support of motion.	1.2	\$225.00	\$270.00
Case development, background investigation, and case administration	12/9/2009	EMD	Call with Jinny Kim, Claudia Center and Erica Dickey re final expert declarations; edits to preliminary injunction motion, and discovery plan.	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	12/9/2009	EMD	Work on discovery plan.	0.2	\$225.00	\$45.00

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Motions practice	12/9/2009	EGJD	research case law for motion for preliminary injunction (reasonable accommodation in PI)	6.2	\$125.00	\$775.00
Motions practice	12/9/2009	EMD	Calls and emails with Manny Muniz regarding Second Declaration and interim life and safety measures.	1.3	\$225.00	\$292.50
Motions practice	12/9/2009	EMD	Review State's 12-9 letter in response to LEJ's 12-8 letter regarding motion for injunctive relief and draft response thereto.	0.5	\$225.00	\$112.50
Motions practice	12/9/2009	EMD	Work on motion for preliminary injunction regarding fire code violations.	2.3	\$225.00	\$517.50
Motions practice	12/9/2009	EMD	Meeting with Erica Dickey regarding exhibits to Motion.	0.5	\$225.00	\$112.50

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	12/9/2009	MVG	Review Draft Motion for Preliminary Injunction draft	1.1	\$285.00	\$313.50
Case development, background investigation, and case administration	12/10/2009	EMD	Review research regarding requirements for notice of reasonable accomodations.	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	12/10/2009	EMD	Review email from John Cregor in response to reasonable accomodations requests and email with Paul Alston, Jason Kim, and Victor Geminiani regarding the same.	0.2	\$225.00	\$45.00
Motions practice	12/10/2009	EGJD	research case law for motion for preliminary injunction (reasonable accommodation in PI)	6.8	\$125.00	\$850.00
Motions practice	12/10/2009	EMD	Review email from John Cregor regarding proposed stipulation to class definition	0.2	\$225.00	\$45.00

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Motions practice	12/10/2009	EMD	Email Paul Alston, Jason Kim, Jinny Kim Claudia Center and Victor Geminiani regarding same	0.2	\$225.00	\$45.00
Motions practice	12/10/2009	EMD	Review and finalize letter in response to State's 12-8 letter regarding injunctive relief.	0.3	\$225.00	\$67.50
	12/10/2009	MVG	Read email from Elizabeth Dunne re stip for class cert	0.2	\$285.00	\$57.00
Motions practice	12/14/2009	EGJD	draft attorney declaration, cite check for declaration cites for MPI	3.5	\$125.00	\$437.50
Motions practice	12/14/2009	EMD	Revise and finalize preliminary injunction motion, including attorney declaration.	7.2	\$225.00	\$1,620.00
Case development, background investigation, and case administration	12/15/2009	EMD	Review and respond to email regarding translation of class notice.	0.2	\$225.00	\$45.00

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Motions practice	12/15/2009	EMD	Assist with preparation of exhibits to preliminary injunction motion for filing.	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	12/16/2009	EMD	Revise class notice in Samoan and Chuukese.	0.2	\$225.00	\$45.00
Motions practice	12/16/2009	EMD	Email Manny Muniz regarding invoice and expert disclosure.	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	12/23/2009	EMD	Work on discovery plan.	0.5	\$225.00	\$112.50
Motions practice	1/4/2010	EMD	Conference call with Jinny Kim, Claudia Center, and Jason Kim regarding witness for preliminary injunction hearing and expert disclosures .	0.7	\$225.00	\$157.50

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Interrogatories, document production, and other written discovery	1/5/2010	EMD	Prepare for and attend meet and confer with Jarod Buna and Aaron Creps regarding outstanding document requests and exchange of medical information.	2.2	\$225.00	\$495.00
Case development, background investigation, and case administration	1/8/2010	EMD	Draft second request for production of documents.	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	1/8/2010	EMD	Email Jason Kim, Jinny Kim, Claudia Center and Victor Geminiani regarding 1/5 meeting and confer with opposing counsel.	0.5	\$225.00	\$112.50
Interrogatories, document production, and other written discovery	1/8/2010	EMD	Review and edit first set of interrogatories.	0.3	\$225.00	\$67.50

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	1/8/2010	MVG	Read Elizabeth Dunne's email re document request meeting with state	0.2	\$285.00	\$57.00
Case development, background investigation, and case administration	1/12/2010	DMD	Phone call with KPT tenant Katherine Coon explaining settlement notice posted	0.3	\$75.00	\$22.50
Case development, background investigation, and case administration	1/12/2010	EGJD	conduct intake interview for class participation	0.3	\$125.00	\$37.50
Case development, background investigation, and case administration	1/12/2010	EMD	Coordinate meeting with head of Legal Aid's fair housing unit regarding reasonable accomodation requests in public housing.	1.2	\$225.00	\$270.00
Motions practice	1/12/2010	EGJD	research case law regarding necessary release for producing list of disabled tenants	2.7	\$125.00	\$337.50

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Case development, background investigation, and case administration	1/13/2010	EMD	Review and analyze case law regarding production of personal of medical information.	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	1/13/2010	EMD	Email opposing counsel regarding same.	0.5	\$225.00	\$112.50
Motions practice	1/13/2010	EGJD	research case law regarding applicability of HRS 92F to discovery	1.1	\$125.00	\$137.50
Motions practice	1/18/2010	DMO	Finalize Motion for Attorneys Fees and create Exhibits	3.0	\$75.00	\$225.00
Case development, background investigation, and case administration	1/19/2010	EMD	Pre-status conference with Jason Kim and Jinny Kim to discuss meeting agenda.	1	\$225.00	\$225.00
Case development, background investigation, and case administration	1/19/2010	EMD	Attend status conference.	0.8	\$225.00	\$180.00

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Interrogatories, document production, and other written discovery	1/19/2010	EMD	Email litigation team regarding status conference, deadlines and work assignments.	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	1/19/2010	EMD	Review and respond to email from Aaron Creps regarding discovery requests.	0.3	\$225.00	\$67.50
	1/19/2010	MVG	Attend Status Conference	0.8	\$285.00	\$228.00
Case development, background investigation, and case administration	1/20/2010	EMD	Draft agenda and task list for 1/21 strategy meeting.	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	1/20/2010	EMD	Review tenant file for Kathy Vaiola.	0.3	\$225.00	\$67.50
Interrogatories, document production, and other written discovery	1/20/2010	EMD	Call with Jarod Buna regarding document requests.	0.2	\$225.00	\$45.00

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Motions practice	1/20/2010	EMD	Send request to Honolulu Fire Department for inspection/incident reports from Aug 1, 2009 to present.	0.2	\$225.00	\$45.00
Motions practice	1/20/2010	EMD	Email with Dina Sheck regarding review of KKV files.	0.3	\$225.00	\$67.50
Motions practice	1/20/2010	EMD	Emails with Jinny Kim regarding expert disclosure for Rob Scofield.	0.2	\$225.00	\$45.00
Motions practice	1/20/2010	EMD	Email litigation team regarding scheduling tenant meetings on 1-22.	0.1	\$225.00	\$22.50

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Case development, background investigation, and case administration	1/21/2010	EMD	Prepare for and attend strategy meeting with Jason Kim, Jinny Kim, Claudia Center, Erica Dickey and Victor Geminiani regarding preliminary injunction motion and settlement conference; calls to clients to schedule meeting.	3.2	\$225.00	\$720.00
Motions practice	1/21/2010	EGJD	attend discovery, settlement, strategy meeting	2.1	\$125.00	\$262.50
	1/21/2010	MVG	Meeting with Litigation team re MPI	0.8	\$285.00	\$228.00
Case development, background investigation, and case administration	1/22/2010	EMD	Prepare for and participate in settlement discussions before Judge Kobayashi and Keith Hunter.	3.3	\$225.00	\$742.50

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Interrogatories, document production, and other written discovery	1/22/2010	EMD	Travel to KPT and Kuhio Homes to meet with named plaintiffs regarding case status, preliminary injunction hearing, and supplemental interrogatories.	2.5	\$225.00	\$562.50
Motions practice	1/22/2010	EGJD	meet with named plaintiffs regarding settlement and preliminary injunction hearing	2	\$125.00	\$250.00
Motions practice	1/22/2010	EGJD	prepare documents for plaintiff testimony for PI hearing	2.5	\$125.00	\$312.50
	1/22/2010	MVG	Prepare for settlement conference and attend with Hunter and Judge Kobayashi	2.8	\$285.00	\$798.00
	1/25/2010	WD	Review notes on settlement confernece from Victor	0.10	\$225.00	\$22.50

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Motions practice	1/26/2010	EGJD	review tenant file and review for relevant documents for P testimony at PI hearing	2.5	\$125.00	\$312.50
Interrogatories, document production, and other written discovery	1/27/2010	EGJD	draft supplemental responses to interrogatories	0.7	\$125.00	\$87.50
Motions practice	1/27/2010	EGJD	conduct interviews with residents of KPT and KH to prepare declarations and testimony for PI hearing	1.2	\$125.00	\$150.00
Motions practice	1/27/2010	EGJD	review tenant file for documents for testimony at PI hearing	1	\$125.00	\$125.00
Interrogatories, document production, and other written discovery	1/28/2010	EGJD	draft supplemental responses to interrogatories	1.8	\$125.00	\$225.00
Motions practice	1/28/2010	EGJD	interviews with named plaintiffs to prepare supplemental responses to interrogatories	2.5	\$125.00	\$312.50

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Motions practice	1/28/2010	EGJD	Prepare for meetings with plaintiffs and declarants	0.7	\$125.00	\$87.50
Case development, background investigation, and case administration	1/29/2010	EGJD	phone call with H. McMillon regarding KPT conditions (lack of hot water)	0.1	\$125.00	\$12.50
Motions practice	1/29/2010	EMD	Review and comment on expert disclosures for Manny Muniz, Rob Scofield, and Jeff Mastin	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	1/30/2010	EMD	Meet with named plaintiffs at KPT	1.6	\$225.00	\$360.00
Motions practice	1/30/2010	EMD	Meet with Dina Shek re review of Dr. Debilviss' files for accommodation letters	0.8	\$225.00	\$180.00
Motions practice	1/30/2010	EMD	Email Paul Sheriff re declaration in support of Motion for Preliminary Injunction	0.2	\$225.00	\$45.00

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Case development, background investigation, and case administration	2/1/2010	EGJD	phone call with H. McMillon regarding KPT conditions (elevators broken)	0.1	\$125.00	\$12.50
Motions practice	2/1/2010	EGJD	interview declarant for preliminary motion hearing	0.8	\$125.00	\$100.00
Interrogatories, document production, and other written discovery	2/2/2010	EMD	Email with Jarod Buna and Aaron Creps re document production	0.2	\$225.00	\$45.00
Motions practice	2/2/2010	EGJD	draft declarations for Dr. Fernandes, Dr. DeVilbiss, Serafi Sione	1.1	\$125.00	\$137.50
Motions practice	2/2/2010	EMD	Meet with Sione Serafi at KPT re potential witness for PI hearing	2.2	\$225.00	\$495.00
Motions practice	2/2/2010	EMD	Meet with Erica Dickey to discuss drafting declaration of Sione Serafi in support of PI motion	0.2	\$225.00	\$45.00

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Motions practice	2/2/2010	EMD	Call with Amy Doff re outreach to KPT tenants	0.8	\$225.00	\$180.00
Motions practice	2/2/2010	EMD	Continue drafting protective order	0.6	\$225.00	\$135.00
Motions practice	2/2/2010	EMD	Review and analyze opposition to PI motion filed by Realty Laua	0.3	\$225.00	\$67.50
Motions practice	2/3/2010	EMD	Conference call with Claudia Center, Jinny Kim, and Jason Kim re reply to opp to PI motion	1.2	\$225.00	\$270.00
Motions practice	2/3/2010	EMD	Continue revising protective order	0.5	\$225.00	\$112.50
Motions practice	2/3/2010	EMD	Email litigation team regarding motion to compel	0.2	\$225.00	\$45.00
Motions practice	2/3/2010	EMD	Review and revise declaration for Sione Serafi in support of PI motion	0.4	\$225.00	\$90.00
Motions practice	2/3/2010	EMD	Review and analyze State's opp to PI motion	0.6	\$225.00	\$135.00

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Motions practice	2/3/2010	EMD	Conference call with Jason Kim, Jarod Buna, and Aaron Creps re statement of undisputed facts for PI hearing	1.2	\$225.00	\$270.00
Case development, background investigation, and case administration	2/4/2010	EGJD	phone call with H. McMillon regarding KPT conditions (no hot water)	0.1	\$125.00	\$12.50
Case development, background investigation, and case administration	2/4/2010	EMD	Review and respond to emails re possible settlement	0.8	\$225.00	\$180.00
Motions practice	2/4/2010	EGJD	prepare documents for plaintiff testimony for PI hearing	0.9	\$125.00	\$112.50
Motions practice	2/4/2010	EMD	Work on statement of undisputed facts for PI hearing	0.4	\$225.00	\$90.00
Motions practice	2/4/2010	EMD	Draft fact section of reply to opp to PI motion	6.3	\$225.00	\$1,417.50

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Case development, background investigation, and case administration	2/6/2010	EMD	Conference call with litigation team re reply, preparation for PI hearing, and settlement offer	1.2	\$225.00	\$270.00
	2/6/2010	MVG	Conf. call with litigation team re settlement offer and MPI	0.8	\$285.00	\$228.00
Case development, background investigation, and case administration	2/8/2010	EGJD	phone call with H. McMillon regarding KPT conditions (both elevators broken in building A)	0.1	\$125.00	\$12.50
Motions practice	2/8/2010	EGJD	prepare declarations for Dr. Fernandes, Dr. DeVilbiss, Serafi Sione	0.6	\$125.00	\$75.00
Case development, background investigation, and case administration	2/9/2010	EMD	Conference call with David Lash at OMM re settlement	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	2/9/2010	EMD	Email litigation team summarizing documents produced by State	0.2	\$225.00	\$45.00

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Case development, background investigation, and case administration	2/9/2010	EMD	Meeting with Jason Kim to discuss State's settlement proposal	0.3	\$225.00	\$67.50
Interrogatories, document production, and other written discovery	2/9/2010	EMD	Review documents produced by State	1.2	\$225.00	\$270.00
Motions practice	2/9/2010	EGJD	emails to Dr. Fernandes regarding declaration	0.3	\$125.00	\$37.50
Motions practice	2/9/2010	EGJD	draft declaration for Dr. Fernandes for preliminary injunction hearing	0.6	\$125.00	\$75.00
Motions practice	2/9/2010	EGJD	review correspondence regarding discovery disputes to prepare facts section for motion to compel	0.8	\$125.00	\$100.00
Motions practice	2/9/2010	EMD	Review and revise reply to opp to PI motion	2.2	\$225.00	\$495.00
Motions practice	2/9/2010	EMD	Reivew and finalize declaration for Sione Serafi	0.2	\$225.00	\$45.00

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Motions practice	2/9/2010	EMD	Call with Matalima Filipo's granddaughter re declaration in support of PI hearing	0.5	\$225.00	\$112.50
	2/9/2010	MVG	Call with David Lash re offer and costs	0.6	\$285.00	\$171.00
Case development, background investigation, and case administration	2/10/2010	EGJD	phone call with H McMilon regarding lack of hot water	0.1	\$125.00	\$12.50
Case development, background investigation, and case administration	2/10/2010	EGJD	phone call with H. McMillon regarding KPT conditions (not hot water for a week)	0.1	\$125.00	\$12.50
Case development, background investigation, and case administration	2/10/2010	EMD	Call with Ken Akinak re KPT volunteer to locate disabled tenants	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	2/10/2010	EMD	Call with Matalima Filipo's granddaughter re need for accommodations and hearing status	0.7	\$225.00	\$157.50

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Case development, background investigation, and case administration	2/10/2010	EMD	Email litigation team re scope of injunctive relief prior to moving PI hearing	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	2/10/2010	EMD	Email with litigation team re agreed upon injunctive relief prior to moving PI hearing	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	2/10/2010	EMD	Call with Dina Shek re additional disabled tenants	0.3	\$225.00	\$67.50
Interrogatories, document production, and other written discovery	2/10/2010	EMD	Email with Aaron Creps re interrogatory responses	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	2/10/2010	EMD	Review emails with opposing counsel re outstanding document requests	0.3	\$225.00	\$67.50
Motions practice	2/10/2010	EMD	Review email from Dr. Fernandes regarding changes to Second Declaration	0.2	\$225.00	\$45.00

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Motions practice	2/10/2010	EMD	Meeting with Erica Dickey re motion to compel	0.3	\$225.00	\$67.50
Motions practice	2/10/2010	EMD	Review and revise Second Declaration of Dr. Fernandes	0.5	\$225.00	\$112.50
	2/10/2010	MVG	Read Elizabeth's email re injunctive relief requirements	0.2	\$285.00	\$57.00
Case development, background investigation, and case administration	2/11/2010	EMD	Conference call with John Cregor re agreement on relief requested in PI motion	0.6	\$225.00	\$135.00
Motions practice	2/11/2010	EMD	Review State's witness list for PI hearing	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	2/12/2010	EMD	Review and respond to email from John Cregor re relief requested in PI motion	0.9	\$225.00	\$202.50
Case development, background investigation, and case administration	2/12/2010	EMD	Email Jee Young re case status	0.2	\$225.00	\$45.00

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Case development, background investigation, and case administration	2/12/2010	EMD	Email proposed protective order to opposing counsel	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	2/12/2010	EMD	Call with Ereiki Kaur re outreach to disabled tenants	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	2/12/2010	EMD	Email with Manny Muniz re retainer agreement	0.4	\$225.00	\$90.00
Interrogatories, document production, and other written discovery	2/12/2010	EMD	Call with Jason Kim re document production	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	2/13/2010	EMD	Call with Kathy Vaiola re accommodations	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	2/13/2010	EMD	Call with John Cregor re accommodations for Kathy Vaiola	0.2	\$225.00	\$45.00

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Interrogatories, document production, and other written discovery	2/13/2010	EMD	Call with Jarod Buna re request to produce documents	0.6	\$225.00	\$135.00
Motions practice	2/13/2010	EMD	Call with Manny Muniz re testimony for PI hearing	0.5	\$225.00	\$112.50
Motions practice	2/13/2010	EMD	Review and finalize declaration of Dr. DeVilbiss	0.6	\$225.00	\$135.00
Motions practice	2/13/2010	EMD	Draft motion to compel	0.9	\$225.00	\$202.50
Motions practice	2/13/2010	EMD	Email draft motion to compel and relevant documents to Jee Young	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	2/17/2010	EMD	Participate in settlement meeting with State defendants	1.3	\$225.00	\$292.50
Case development, background investigation, and case administration	2/17/2010	EMD	Participate in settlement conference with Judge Kobayashi	0.7	\$225.00	\$157.50

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Case development, background investigation, and case administration	2/17/2010	EMD	Review and respond to email from State re agreement on injunctive relief	2.3	\$225.00	\$517.50
Motions practice	2/17/2010	EMD	Call with Jee Young and Devin McDonell re motion to compel	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	2/18/2010	EMD	Participate in settlement conference	2.8	\$225.00	\$630.00
Interrogatories, document production, and other written discovery	2/19/2010	EGJD	review documents from Realty Laua (reasonable accommodations log, boiler documents, tenant files)	4.5	\$125.00	\$562.50
Case development, background investigation, and case administration	2/23/2010	EMD	Review documents regarding fire code violations and email John Wong regarding same	1.3	\$225.00	\$292.50

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Case development, background investigation, and case administration	2/23/2010	EMD	Draft settlement agreement	1.2	\$225.00	\$270.00
Motions practice	2/23/2010	EGJD	review management contract	2.0	\$125.00	\$250.00
Case development, background investigation, and case administration	2/24/2010	EMD	Draft settlement agreement	5.4	\$225.00	\$1,215.00
Case development, background investigation, and case administration	2/24/2010	EMD	Meeting with Erica Dickey regarding preparation of conditions exhibit to settlement agreement	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	2/24/2010	EMD	Call with John Wong re transfer of named plaintiffs	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	2/24/2010	EMD	Review named plaintiff files and draft email to John Wong regarding placement on transfer wait list	0.8	\$225.00	\$180.00

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Motions practice	2/24/2010	EGJD	prepare status chart for KPT building conditions	1.5	\$125.00	\$187.50
Motions practice	2/24/2010	EMD	Call with Devin McDonell regarding motion to compel	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	2/25/2010	EMD	Respond to email from John Cregor re fire code violations	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	2/25/2010	EMD	Review relevant case law and respond to email from John Cregor re named plaintiffs placement on transfer wait list	0.8	\$225.00	\$180.00
Case development, background investigation, and case administration	2/25/2010	EMD	Continue drafting settlement agreement	2.6	\$225.00	\$585.00
Motions practice	2/25/2010	EMD	Email opposing counsel regarding stipulated protective order	0.5	\$225.00	\$112.50

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Motions practice	2/25/2010	EMD	Revise and finalize stipulated protective order	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	2/26/2010	EMD	Continue drafting settlement agreement	4.6	\$225.00	\$1,035.00
Case development, background investigation, and case administration	2/26/2010	EMD	Prepare list of access work with proposed time frames; call Jeff Mastin regarding same	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	2/26/2010	EMD	Call with Jarod Buna regarding discovery and changes to Stipulated Protective Order	0.7	\$225.00	\$157.50
Interrogatories, document production, and other written discovery	2/26/2010	EGJD	review documents from Realty Laua (tenant files)	2.5	\$125.00	\$312.50
Case development, background investigation, and case administration	2/27/2010	EMD	Work on list of access issues	0.3	\$225.00	\$67.50

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Case development, background investigation, and case administration	2/27/2010	EMD	Review and respond to email from Jason Kim regarding settlement agreement'	0.2	\$225.00	\$45.00
	2/28/2010	MVG	Review Draft settlement agreement	0.7	\$285.00	\$199.50
	TOTAL			237.4		\$46,414.00

V. Negotiate Settlement, Finalize Settlement, Agreement and Motions

i. March 1, 2010 to the present

<u>Litigation Phase</u>	<u>Date</u>	<u>Attorney</u>	<u>Brief Description of Activity</u>	<u>Time</u>	<u>Attorney Rate</u>	<u>Fees</u>
Case development, background investigation, and case administration	3/1/2010	EGJD	phone call with H. McMillon regarding KPT conditions (elevator broken)	0.1	\$125.00	\$12.50
Case development, background investigation, and case administration	3/1/2010	EMD	Continue drafting settlement agreement	2.2	\$225.00	\$495.00
Interrogatories, document production, and other written discovery	3/1/2010	EGJD	review documents from Realty Laua	0.5	\$125.00	\$62.50
Case development, background investigation, and case administration	3/2/2010	EMD	Continue drafting settlement agreement	5.5	\$225.00	\$1,237.50

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Case development, background investigation, and case administration	3/3/2010	EMD	Continue drafting settlement agreement	5.8	\$225.00	\$1,305.00
	3/4/2010	MVG	Attend settlement conference	1	\$285.00	\$285.00
Attending court hearings	3/5/2010	EMD	Attend settlement conference	1	\$225.00	\$225.00
Case development, background investigation, and case administration	3/9/2010	EMD	Meeting with KPT tenant regarding outreach to disabled Chuuckese tenants	0.8	\$225.00	\$180.00
Case development, background investigation, and case administration	3/9/2010	EMD	Draft exhibit D to Settlement Agreement	1.2	\$225.00	\$270.00
Motions practice	3/9/2010	EMD	Email stipulated protective order to court	0.1	\$225.00	\$22.50
Case development, background investigation, and case administration	3/12/2010	EMD	Email Jee Young regarding case status and research issues regarding liability of management company	0.4	\$225.00	\$90.00

Case development, background investigation, and case administration	3/12/2010	EMD	Call with John Cregor regarding budget bill, revisions to proposed settlement agreement and accommodations for named plaintiffs	0.4	\$225.00	\$90.00
Motions practice	3/12/2010	EMD	Revise stipulated protective order	0.2	\$225.00	\$45.00
Motions practice	3/12/2010	EMD	Email revised stipulated protective order to opposing counsel	0.1	\$225.00	\$22.50
Case development, background investigation, and case administration	3/13/2010	EMD	Draft email to Jee Young regarding case status and additional work	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	3/13/2010	EMD	Research regarding maintain Rule 23(b)(2) class as to management companies only	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	3/16/2010	EMD	Call with Jee Young regarding case status and drafting letter to management companies re liability exposure	0.5	\$225.00	\$112.50

Case development, background investigation, and case administration	3/16/2010	EMD	Email Jee Young re claims against the management companies and case law research regarding same	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	3/16/2010	EMD	Begin drafting case strategy against management companies	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	3/16/2010	EMD	Email Jason Kim regarding estimated expert costs	0.1	\$225.00	\$22.50
Case development, background investigation, and case administration	3/16/2010	EMD	Review federal law regarding lead abatement	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	3/16/2010	EMD	Review asbestos survey for KPT	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/16/2010	EMD	Revise Exhibit D to Settlement Agreement regarding conditions to include lead, asbestos, and concrete spalling	0.5	\$225.00	\$112.50

Case development, background investigation, and case administration	3/17/2010	EMD	Call with John Cregor regarding status of revisions proposed Settlement Agreement	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/17/2010	EMD	Email with Amy Doff regarding review of medical records at KKV	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/17/2010	EMD	Email with Ritabelle Fernandes regarding review of medical records at KKV	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/18/2010	EMD	Meeting with Dr. Ritabelle Fernandes re disabled patients in need of accommodations	2.3	\$225.00	\$517.50
Case development, background investigation, and case administration	3/19/2010	EMD	Email John Wong regarding accommodations for named plaintiffs	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/19/2010	EMD	Review chart of disabled tenants prepared by Amy Doff	0.2	\$225.00	\$45.00

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Case development, background investigation, and case administration	3/19/2010	EMD	Email Jinny Kim regarding case status and follow up with disabled tenants	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/20/2010	EMD	Review draft counter proposal to Settlement Agreement	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	3/20/2010	EMD	Review and revise second request for production of documents to Realty Laua	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	3/20/2010	EMD	Email with John Wong regarding accommodations for named plaintiffs	0.2	\$225.00	\$45.00
Motions practice	3/20/2010	EMD	Revise Motion to Compel	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	3/23/2010	EMD	Call with John Cregor re settlement	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	3/23/2010	EMD	Review and respond to email from Ritabelle Fernandez re evacuation plan for disabled residents	0.3	\$225.00	\$67.50

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Motions practice	3/23/2010	EMD	Email Jason Kim regarding motion to compel and letter brief	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	3/24/2010	EMD	Call with John Wong re settlement issues	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	3/24/2010	EMD	Call with DOJ Disability Rights Section Deputy Director re assistance from DOJ re disability discrimination	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/24/2010	EMD	Call with Kathy Vaiola re transfer to Kaahumanu Homes	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	3/24/2010	EMD	Call with Hazel McMillon re transfer to Kaahumanu Homes	0.3	\$225.00	\$67.50
Attending court hearings	3/25/2010	EMD	Attend status conference re settlement with state	1.5	\$225.00	\$337.50
Case development, background investigation, and case administration	3/25/2010	EMD	Prepare for settlement conference with State	0.3		

Case development, background investigation, and case administration	3/25/2010	EMD	Email litigation team regarding case strategy against management companies	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	3/25/2010	EMD	Emails with Amy Doff re outreach to disabled tenants	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	3/25/2010	EMD	Call with Stephanie Fo re units available for named plaintiffs	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	3/25/2010	EMD	Call with Trudy Sabalboro re possible unit	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	3/25/2010	EMD	Review and revise first request for production to Urban and second request for production to Realty Laua	0.4	\$225.00	\$90.00
	3/25/2010	MVG	Attend status conference	1.5	\$285.00	\$427.50
Case development, background investigation, and case administration	3/26/2010	EMD	Revise state court class certification motion	0.4	\$225.00	\$90.00

Case development, background investigation, and case administration	3/26/2010	EMD	Site visit to accessible units for named plaintiffs	2.5	\$225.00	\$562.50
Interrogatories, document production, and other written discovery	3/26/2010	EMD	Draft letter to opposing counsel re expedited discovery	0.3	\$225.00	\$67.50
Interrogatories, document production, and other written discovery	3/26/2010	EMD	Review and finalize additional discovery requests	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	3/27/2010	EMD	Telephone conference with Victor Geminiani, Jason Kim, Jee Young, and Jinny Kim re case status and strategy as to management company	1.5	\$225.00	\$337.50
	3/27/2010	MVG	Conference call with Litigation team re strategy with management companies	1.5	\$285.00	\$427.50
Attending court hearings	3/30/2010	EMD	Attend status conference re amended scheduling order	0.8	\$225.00	\$180.00
	3/30/2010	MVG	Attend Status conference	0.5	\$285.00	\$142.50

Case development, background investigation, and case administration	3/31/2010	EMD	Email litigation team regarding renewal of Management Contract and assignment of State's claim	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/31/2010	EMD	Review spreadsheet re disabled tenants and KPT and KH	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/31/2010	EMD	Call with Trudy Sabalboro re pictures of possible unit	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	3/31/2010	EMD	Call with Lee Sommers re pictures of possible unit	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	3/31/2010	EMD	Review Management Contract and revise Second Request for Production of Documents to Realty Laua	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	4/1/2010	EMD	Review and analyze State's proposed settlement agreement	1.2	\$225.00	\$270.00

Case development, background investigation, and case administration	4/1/2010	EMD	Review invoice from Jeff Mastin and forward to Jee Young	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	4/1/2010	EMD	Call with Aaron Creps regarding letter briefs and meeting with class members at KPT	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	4/1/2010	EMD	Call with Trudy Sabalboro regarding possible accessible unit	0.2	\$225.00	\$45.00
Interrogatories, document production, and other written discovery	4/1/2010	EGJD	draft document requests to Realty Laua and Urban Management	0.7	\$125.00	\$87.50
Attending court hearings	4/6/2010	EMD	Participate in status conference before Judge Kobayashi	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	4/6/2010	EMD	Meeting with John Wong and John Cregor re settlement	1.3	\$225.00	\$292.50
Interrogatories, document production, and other written discovery	4/6/2010	EGJD	revise document request to Realty Laua and Urban Management	0.2	\$125.00	\$25.00
	4/6/2010	MVG	Attend Status hearing	0.6	\$285.00	\$171.00

	4/6/2010	MVG	Meet with John Wong and Cregor re settlement	1.3	\$285.00	\$370.50
Case development, background investigation, and case administration	4/7/2010	EGJD	research case law regarding ADA claims against management companies	1.4	\$125.00	\$175.00
Case development, background investigation, and case administration	4/13/2010	EMD	Review email from John Wong re transfer wait list for KPT and KH	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	4/13/2010	EMD	Review Jason Kim's revisions to non-injunctive relief portions of settlement agreement	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	4/13/2010	EMD	Email Erica Dickey re accommodations for named plaintiffs	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	4/20/2010	EGJD	contact KPT and KH residents to confirm need for medical transfer	1.2	\$125.00	\$150.00
Case development, background investigation, and case administration	4/20/2010	EGJD	phone call with Stephanie Fo regarding medical transfers for name plaintiffs	0.3	\$125.00	\$37.50

Case development, background investigation, and case administration	4/20/2010	EMD	Review excel spreadsheet listing KPT/KH tenants in need of accommodations	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	4/20/2010	EMD	Email Mary Broughton, Amy Doff, and Jinny Kim re compiling list of tenants in need of accomodations	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	4/21/2010	EGJD	continue to contact KPT and KH residents to confirm need for medical transfer or reasonable accommodation	2.2	\$125.00	\$275.00
Case development, background investigation, and case administration	4/21/2010	EGJD	phone call with H. McMillon regarding KPT conditions (elevator broken)	0.1	\$125.00	\$12.50
Case development, background investigation, and case administration	4/21/2010	EMD	Review and revise state's proposed settlement agreement	2.8	\$225.00	\$630.00
	4/21/2010	MVG	Meet with Jason Kim and Elizabeth Dunne re case strategy after Elizabeth departs	1	\$285.00	\$285.00

Case development, background investigation, and case administration	4/23/2010	EMD	Email John Wong regarding revisions to State's proposed settlement agreement	0.5	\$225.00	\$112.50
Attending court hearings	4/27/2010	EMD	Participate in status conference	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	4/27/2010	EMD	Continue settlement discussions with John Cregor and John Wong	1.2	\$225.00	\$270.00
Case development, background investigation, and case administration	4/27/2010	EMD	Email with Claudia Center regarding comments to settlement agreement	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	4/27/2010	EMD	Call with Carrie Wakai re evacuation plans for KPT and KH tenants	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	4/27/2010	EMD	Email with Amy Doff re doctors letters for disabled tenants	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	4/27/2010	EMD	Review and revise list of additional disabled tenants to provide to State	0.4	\$225.00	\$90.00
	4/27/2010	MVG	Attend Status conference	0.6	\$285.00	\$171.00

	4/27/2010	MVG	Meet with John Wong and Gregor re settlement and discovery	1.2	\$285.00	\$342.00
Case development, background investigation, and case administration	4/28/2010	EGJD	review doctor's letters for submission to state as part of reasonable accommodation requests	0.8	\$125.00	\$100.00
Case development, background investigation, and case administration	4/28/2010	EMD	Meeting with John Gregor and John Wong re settlement	2.1	\$225.00	\$472.50
Case development, background investigation, and case administration	4/28/2010	EMD	Email with Mike Tom re discovery extension	0.1	\$225.00	\$22.50
Case development, background investigation, and case administration	4/29/2010	EMD	Email litigation team re update re settlement with State	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	4/29/2010	EMD	Review and revise list of additional disabled tenants for transfer waiting list	0.7	\$225.00	\$157.50

Case development, background investigation, and case administration	4/29/2010	EMD	Email John Cregor and John Wong re summary of settlement negotiations	0.7	\$225.00	\$157.50
Case development, background investigation, and case administration	4/30/2010	EMD	Email John Cregor and John Wong re reasonable accommodations log and additional disabled tenants for wait list, including doctors' letters	0.8	\$225.00	\$180.00
Case development, background investigation, and case administration	4/30/2010	EMD	Call with Aaron Creps re discovery and lack of hot water at KPT	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/1/2010	EMD	Call with Carrie Wakai re status of evacuation plan	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	5/1/2010	EMD	Call with Lee Sommers re transfer to new unit	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/5/2010	EMD	Call with Stephanie Fo re units for named plaintiffs	0.2	\$225.00	\$45.00

Case development, background investigation, and case administration	5/6/2010	EMD	Mediation with Keith Hunter, Judge Kobayashi and Management companies	2.5	\$225.00	\$562.50
Case development, background investigation, and case administration	5/6/2010	EMD	Email John Cregor and John Wong re status of settlement	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/6/2010	EMD	Call with Lee Sommers re new unit and discovery	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/7/2010	EMD	Review and respond to email from John Wong re stipulation re transfer of named plaintiffs	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	5/7/2010	EMD	Reivew and revise stipulation re placement of named plaintiffs	0.8	\$225.00	\$180.00
Case development, background investigation, and case administration	5/7/2010	EMD	Email Jinny Kim, Claudia Center, Victor Geminani, and Jason Kim re stipulation re placement of named plaintiffs	0.2	\$225.00	\$45.00

Case development, background investigation, and case administration	5/7/2010	EMD	Review HPHA website for compliance with settlement agreement	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/8/2010	EMD	Email John Wong re reasonable accommodation request form and settlement meeting	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/8/2010	EMD	Call with Lee Sommers re transfer to new unit	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/8/2010	EMD	Prepare FOIA request to HUD	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	5/10/2010	EMD	Review and revise outline of outstanding legal and factual issues	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	5/11/2010	EGJD	phone call with Trudy Sabalboro regarding KPT conditions (no hot water)	0.2	\$125.00	\$25.00

Case development, background investigation, and case administration	5/11/2010	EMD	Revise stipulation re named plaintiffs	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	5/11/2010	EMD	Email John Wong re stipulation re named plaintiffs	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/11/2010	EMD	Call with Lee Sommers re elevator outage and moving to new unit	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/11/2010	EMD	Finalize FOIA request to HUD	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	5/13/2010	EGJD	research possibility of ADA claims against management company	2.0	\$125.00	\$250.00
Case development, background investigation, and case administration	5/13/2010	EMD	Review State's revisions to proposed settlement agreement`	0.6	\$225.00	\$135.00

Case development, background investigation, and case administration	5/13/2010	EMD	Settlement meeting with State	2.2	\$225.00	\$495.00
	5/13/2010	MVG	Review and comment on state's draft settlement agreement	0.4	\$285.00	\$114.00
Case development, background investigation, and case administration	5/14/2010	EMD	Email opposing council re follow up to settlement meeting	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	5/14/2010	EMD	Email litigation team re State's revisions to proposed settlement	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	5/14/2010	EMD	Review Realty Laua's responses to second request for production of documents	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/14/2010	EMD	Review and revise stipulation re named plaintiffs	0.4	\$225.00	\$90.00
Case development, background investigation, and case administration	5/14/2010	EMD	Email opposing council re stipulation re named plaintiffs	0.2	\$225.00	\$45.00

	5/17/2010	MVG	Review draft Stip for accommodations for plaintiffs	0.2	\$285.00	\$57.00
Case development, background investigation, and case administration	5/18/2010	EMD	Attend settlement conference with Judge Kobayashi	1.6	\$225.00	\$360.00
Case development, background investigation, and case administration	5/18/2010	EMD	Revise stipulation re named plaintiffs	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	5/18/2010	EMD	Email John Wong and John Gregor re stipulation re named plaintiffs	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	5/18/2010	EMD	Review previous correspondence re settlement	0.6	\$225.00	\$135.00
Case development, background investigation, and case administration	5/18/2010	EMD	Draft email re outstanding settlement issues	0.9	\$225.00	\$202.50
Case development, background investigation, and case administration	5/28/2010	EMD	Review proposed fire evacuation notice	0.2	\$225.00	\$45.00

Case development, background investigation, and case administration	5/28/2010	EMD	Review May 25 letter from John Cregor in response to settlement letter	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	5/29/2010	EMD	Call with Lee Sommers re transfer	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	5/29/2010	EMD	Email John Cregor re transfer of Plaintiffs Sommers and McMillion to accessible units	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	6/1/2010	egjd	email correspondence with John Wong regarding relocation costs for Lee Sommers	0.1	\$125.00	\$12.50
Case development, background investigation, and case administration	6/4/2010	EMD	Cal with Jason Kim regarding State's settlement position and settlement strategy	0.3	\$225.00	\$67.50
Case development, background investigation, and case administration	6/4/2010	EMD	Email litigation team regarding response to State's 5/25 settlement letter	0.4	\$225.00	\$90.00

Case development, background investigation, and case administration	6/5/2010	EMD	Conference call with Jason Kim re strategy for settlement meeting	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	6/7/2010	EGJD	receive response to FOIA request to HUD; review documents	0.5	\$125.00	\$62.50
Case development, background investigation, and case administration	6/8/2010	EGJD	phone call with KPT resident regarding request for reasonable accommodation	0.5	\$125.00	\$62.50
Case development, background investigation, and case administration	6/9/2010	EGJD	phone conference with litigation team	0.7	\$125.00	\$87.50
Case development, background investigation, and case administration	6/9/2010	EMD	Conference call with litigation team re case strategy	0.8	\$225.00	\$180.00
Case development, background investigation, and case administration	6/9/2010	EMD	Call to HUD re FOIA request	0.2	\$225.00	\$45.00
	6/9/2010	MVG	Conference call with Litigation team re strategy	0.8	\$285.00	\$228.00

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Case development, background investigation, and case administration	6/10/2010	EMD	Email with Erica Dickey re email to John Wong and Aaron Creps re reasonable accommodation requests	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	6/14/2010	EGJD	phone call with Lee Sommers regarding relocation costs	0.2	\$125.00	\$25.00
Case development, background investigation, and case administration	6/15/2010	EMD	Review emails from John Wong and Aaron Creps re accommodation forms	0.2	\$225.00	\$45.00
Case development, background investigation, and case administration	6/15/2010	EMD	Email John Wong and Aaron Creps re accomodation forms	0.5	\$225.00	\$112.50
Case development, background investigation, and case administration	6/18/2010	EGJD	phone call with Lee Sommers regarding relocation costs	0.2	\$125.00	\$25.00
Case development, background investigation, and case administration	6/22/2010	EGJD	email correspondence with John Wong regarding relocation costs for Lee Sommers	0.2	\$125.00	\$25.00

Exhibit "3"

Case development, background investigation, and case administration	6/28/2010	egjd	email correspondence to Stephanie Fo regarding moving costs for Lee Sommers	0.1	\$125.00	\$12.50
Case development, background investigation, and case administration	7/1/2010	EGJD	phone call with John Wong regarding relocation costs for Lee Sommers	0.2	\$125.00	\$25.00
Depositions	7/12/2010	EGJD	Discuss document review for deposition preparation	0.2	\$125.00	\$25.00
Depositions	7/13/2010	EGJD	review documents to prepare for deposition	3.5	\$125.00	\$437.50
Case development, background investigation, and case administration	7/14/2010	EGJD	phone conversation with KPT tenant regarding trash accumulation	0.2	\$125.00	\$25.00
Depositions	7/14/2010	EGJD	continue to review documents to prepare for deposition	1.5	\$125.00	\$187.50
Case development, background investigation, and case administration	7/16/2010	EGJD	phone conversation with Lee Sommers re: relocation	0.2	\$125.00	\$25.00

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	7/25/2010	MVG	Review draft settlement and email Jason Kim re it	0.4	\$285.00	\$114.00
Case development, background investigation, and case administration	7/26/2010	EGJD	phone conversation with class member regarding medical transfer	0.1	\$125.00	\$12.50
Case development, background investigation, and case administration	7/28/2010	EGJD	phone conversation with John Wong regarding L. Sommers transfer	0.9	\$125.00	\$112.50
Case development, background investigation, and case administration	7/28/2010	EGJD	phone conversation with L.Sommers regarding move out procedure	0.8	\$125.00	\$100.00
	7/28/2010	MVG	Meet with Erica, review John Wong emails and stategize about how to complete Lee Sommer's move	0.5	\$285.00	\$142.50
Case development, background investigation, and case administration	7/29/2010	EGJD	phone conversation with L. Sommers regarding move out procedure	0.5	\$125.00	\$62.50

Exhibit "3"

Case development, background investigation, and case administration	7/29/2010	EGJD	phone conversation with moving company regarding cleanliness standards	0.4	\$125.00	\$50.00
Case development, background investigation, and case administration	7/29/2010	EGJD	email correspondence with John Wong regarding relocation procedure for L. Sommers	0.2	\$125.00	\$25.00
	7/29/2010	MVG	Meet with Lee Sommers at her apartment to discuss problems with reasonable accommodations and move	0.4	\$285.00	\$114.00
Case development, background investigation, and case administration	7/30/2010	EGJD	meet with L. Sommers regarding moving procedure	0.8	\$125.00	\$100.00
Case development, background investigation, and case administration	8/2/2010	EGJD	email correspondence with John Wong regarding apartment for T. Sabalboro	0.2	\$125.00	\$25.00
Case development, background investigation, and case administration	8/4/2010	EGJD	phone conversation with T. Sabalboro regarding transfer	0.2	\$125.00	\$25.00

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Case development, background investigation, and case administration	8/9/2010	EGJD	email correspondence with John Wong regarding transfer for T. Sabalboro	0.2	\$125.00	\$25.00
	8/9/2010	MVG	Read emails from John Wong and discuss problems with Lee Sommers move with Erica	0.4	\$285.00	\$114.00
Case development, background investigation, and case administration	8/13/2010	DMO	Call to Patrick Mauga to schedule inspection to take photos for new home for Trudy named plaintiff	0.2	\$75.00	\$15.00
Case development, background investigation, and case administration	8/13/2010	DMO	Follow up email to John Wong regarding home inspection	0.25	\$75.00	\$18.75
	8/16/2010	MVG	Review draft settlement agreement	0.5	\$285.00	\$142.50
	8/18/2010	MVG	Discuss with Trudy Sabalboro the offer in Waimanalo and the possible ramifications if she turns it down	0.4	\$285.00	\$114.00

Exhibit "3"

	8/19/2010	MVG	tell John Wong about Trudy's decision to turn the Waimanalo house down	0.2	\$285.00	\$57.00
	8/23/2010	MVG	Email John Wong re accommodations for Trudy Sabalboro and discuss strategy with Erica	0.3	\$285.00	\$85.50
	8/25/2010	MVG	Emails and conversations with Jason Kim and Erica Dickey re drafting preliminary settlement agreement and class cert/notice	0.3	\$285.00	\$85.50
Motions practice	8/26/2010	EGJD	draft notice of motion for approval of settlement	0.3	\$125.00	\$37.50
Motions practice	8/26/2010	EGJD	draft motion for approval of settlement	0.5	\$125.00	\$62.50
Motions practice	8/26/2010	EGJD	draft declaration of Jason Kim in support of motion for approval of settlement	0.8	\$125.00	\$100.00
	8/31/2010	MVG	Discussed status of case with plaintiff Lee Sommers	0.2	\$285.00	\$57.00

	8/31/2010	MVG	Talked to Stephanie Fo re accommodations request for Lee Sommers	0.2	\$285.00	\$57.00
Motions practice	9/1/2010	EGJD	draft memorandum in support of motion for approval of settlement	0.9	\$125.00	\$112.50
Motions practice	9/2/2010	EGJD	draft memorandum in support of motion for approval of settlement	2.1	\$125.00	\$262.50
Motions practice	9/3/2010	EGJD	draft class notice	1.0	\$125.00	\$125.00
Motions practice	9/9/2010	EGJD	continue to draft memorandum in support of motion for approval of settlement	1.8	\$125.00	\$225.00
	9/9/2010	MVG	Meet with OLee Sommers and discuss the problems with the move	1	\$285.00	\$285.00
	9/10/2010	MVG	Conf. call with Peter Obstler and Jason Kim re division of work on the case	0.3	\$285.00	\$85.50

	9/11/2010	MVG	Review Erica's drafts on preliminary approval, motion, class notice	0.7	\$285.00	\$199.50
	9/13/2010	MVG	Discuss settlement agreement with Erica and develop approach with clients	0.2	\$285.00	\$57.00
	9/13/2010	MVG	Review Settlement agreement in preparation for meeting with clients	0.4	\$285.00	\$114.00
	9/13/2010	MVG	Meet with moving company at Lee Sommers apartment to facilitate move	0.8	\$285.00	\$228.00
	9/13/2010	MVG	Meet wit Kathy Viola and Trudy Salaboro to explain the settlement and get signitures	1.2	\$285.00	\$342.00
	9/14/2010	MVG	Meet with Hazel McMillon and Lee Sommers to explain settlement agreement and get signitures	1.5	\$285.00	\$427.50

	9/20/2010	MVG	review letter from Erica to notify tenants with ADA issues of the form to apply for accomodations	0.2	\$285.00	\$57.00
Case development, background investigation, and case administration	9/22/2010	DMO	Phone conversation regarding disability problems with Sirae Fango, tenant at KPT	0.25	\$75.00	\$18.75
Case development, background investigation, and case administration	9/26/2010	DMO	Phone conversation with Reiko Titong regarding disabled mother and problems for wheel-chair bound brother	0.25	\$75.00	\$18.75
Case development, background investigation, and case administration	9/27/2010	DMO	Letter to Reiko Titong regarding reasonable accomondation for to complete	0.25	\$75.00	\$18.75
	10/11/2010	MVG	Emails with Sheila Lippolt from LASH re assisting on ADA requests from KPT	0.3	\$285.00	\$85.50
	10/18/2010	MVG	State's response to Laua requests for admissions	0.4	\$285.00	\$114.00

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Case development, background investigation, and case administration	10/20/2010	DMO	Office Meeting with Sirae Fango to complete request for accomodations	0.7	\$75.00	\$52.50
	10/20/2010	MVG	Worked with Jenn Alebertson on her time records for KPT	0.4	\$285.00	\$114.00
	10/23/2010	MVG	Review Motion for approval of settlement	0.5	\$285.00	\$142.50
Case development, background investigation, and case administration	10/26/2010	DMO	Phone call with Emerine Yerton regarding disabilities of Emily Isikar and possible request for accomodations	0.1	\$75.00	\$7.50
	10/26/2010	MVG	emails with david Lash for OMM expenses and time records		\$285.00	\$0.00
Case development, background investigation, and case administration	11/5/2010	DMO	Meeting with Emerine Yerten at KPT regarding completion of new Request for Reasonable Accomodation Form	0.5	\$75.00	\$37.50
	11/8/2010	MVG	email Peter and david re obtaining their signatures on settlement	0.2	\$285.00	\$57.00

Exhibit "3"

	11/10/2010	MVG	Email exchange with David Lash re signature	0.2	\$285.00	\$57.00
	11/20/2010	MVG	Email with Peter Obstler re signature and forward to Jason	0.2	\$285.00	\$57.00
	11/24/2010	MVG	Read emails from Jason and Wong re: HUD assurances	0.3	\$285.00	\$85.50
	11/24/2010	MVG	Read Urban opposition memo to class cert	0.4	\$285.00	\$114.00
	11/24/2010	MVG	Reads State's no opposition response to class cert	0.2	\$285.00	\$57.00
	11/30/2010	MVG	Talked to Lee Sommers about status of case	0.3	\$285.00	\$85.50
	12/1/2010	MVG	Read Pl's reply on Class cert	0.4	\$285.00	\$114.00
	12/1/2010	MVG	Emails with Dina Shek about continuing problems at KPT and ADA request for accomodations	0.4	\$285.00	\$114.00
	12/13/2010	MVG	Hearing on preliminary approval	0.5	\$285.00	\$142.50
	12/14/2010	MVG	Mediation with Keith Hunter	5	\$285.00	\$1,425.00
	12/16/2010	MVG	Reviewed order on class cert and notice	0.3	\$285.00	\$85.50

	12/16/2010	MVG	Talked to Hazel McMillon about status of notice and distribution	0.4	\$285.00	\$114.00
	12/22/2010	MVG	discussed with John Wong translation and distribution of the notice for Micronesians	0.2	\$285.00	\$57.00
	12/23/2010	MVG	Email from Wong re translation and distribution of notice	0.1	\$285.00	\$28.50
	12/28/2010	MVG	Talked to 4 tenants at KPT re notice	0.8	\$285.00	\$228.00
Case development, background investigation, and case administration	12/29/2010	DMO	Phone call with KPT plaintiff Lee Sommers explaining notice that went out, discussing problems	0.1	\$75.00	\$7.50
Case development, background investigation, and case administration	12/29/2010	DMO	Phone call with KPT tenant Emerine explaining notice that went out, discussing problems	0.1	\$75.00	\$7.50
Case development, background investigation, and case administration	12/29/2010	DMO	Phone call with KPT tenant Paul explaining settlement notice posted	0.25	\$75.00	\$18.75

Case development, background investigation, and case administration	12/29/2010	DMO	Phone call with KPT tenant Kepo explaining settlement notice posted	0.1	\$75.00	\$7.50
Case development, background investigation, and case administration	12/29/2010	DMO	Phone call with KPT tenant Leslie explaining settlement notice posted	0.1	\$75.00	\$7.50
	12/29/2010	MVG	Talked to 3 tenants at KPT re notice	0.7	\$285.00	\$199.50
	12/29/2010	MVG	Talked with Sheila Lippolt at LASH re Lee Sommers	0.2	\$285.00	\$57.00
	12/29/2010	MVG	Arranged with Will to put class notice on our web site	0.3	\$285.00	\$85.50
	12/29/2010	MVG	Emailed Wong re translation of notices	0.1	\$285.00	\$28.50
	12/29/2010	MVG	Met with Micronesians United re assisting Micronesians with translation and understanding of notice	1.2	\$285.00	\$342.00
	12/29/2010	MVG	Talked to Lee Sommers about class notice and rumors she heard were circulating	0.4	\$285.00	\$114.00

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Motions practice	1/13/2011	DMO	Preparation of Victor Declaration for Motion for Attorney Fees	1	\$75.00	\$75.00
	1/13/2011	MVG	Worked with Deja on the declaration and fee time sheets preparation	0.5	\$285.00	\$142.50
	1/13/2011	MVG	Status conference with Judge Kobayashi	0.5	\$285.00	\$142.50
	1/14/2011	MVG	Review and prepare time sheets for submission	1.8	\$285.00	\$513.00
Motions practice	1/17/2011	DMO	Review of Draft Motion for Attorney Fees from Jason Kim	1	\$75.00	\$75.00
Motions practice	1/18/2011	DMO	Preparation of Exhibits 3 and 4 for Motion for Attorney's Fees	4	\$75.00	\$300.00
	TOTAL			153.4		\$32,367.75

SUMMARY

	HOURS	FEES
Beginning of matter through December 31, 2008	323.5	\$73,941.50
January 1, 2009 through March 31, 2009	241.4	\$55,335.00
April 1, 2009 through October 31, 2009	494.1	\$107,872.25
November 1, 2009 through February 28, 2010	237.4	\$46,414.00
March 1, 2010 to the present	153.4	\$32,367.75

TOTAL 1449.8 \$315,930.50

Exhibit "3"

ITEMIZATION OF EXPENSES

RE: *McMillon, et al. v. State of Hawaii, et al.*, Case No. 08-00578 JMS-LEK

Date	Expense	Detail	Amount
2/5/2008	Post Office	Regular Mail K&L project wages	\$521.00
3/11/2008	Hawaii Fire Department	Fire Reports	\$212.25
4/9/2008	Hawaii Fire Department	FOIA	\$5.21
4/11/2008	Will Durham	Travel to KPT	\$22.25
4/27/2008	Office Depot	Camcorder Memory Chip	\$41.87
6/13/2008	Post Office	KPT Mailing	\$45.36
6/16/2008	Post Office	KPT Mailing	\$210.00
6/22/2008	Best Buy	Camcorder	\$426.99
8/13/2008	Recovery Works	KPT Video	\$5,255.00
10/6/2008	Hawaii Fire Department	Fire Report Copies	\$326.50
11/17/2008	Team Meeting	Conference Call	\$78.00
11/24/2008	Ohana Graphics	Printing for KPT mailing	\$62.94
3/17/2009	Post Office	Mailing to David Casl	\$5.32
4/19/2009	Costco	DUD Disks	\$29.99
5/20/2009	Professional Image	Pictures of KPT	\$53.31
7/21/2009	Fire Department	Fire Incident Report	\$15.75
12/2/2009	AT Conference	Conference Call	\$28.30
3/26/2010	AT Conference	Conference Call	\$23.90
	TOTAL		\$7,363.94

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HAZEL MCMILLON; et al.,
Plaintiffs,

vs.

STATE OF HAWAII; et al.,
Defendants.

STATE OF HAWAII; et al.,

Third-Party Plaintiffs,

vs.

URBAN MANAGEMENT
CORPORATION DBA URBAN
REAL ESTATE COMPANY, et al.,

Third-Party
Defendants.

CIVIL NO. CV 08-00578 LEK
Civil Rights Action
Class Action

**DECLARATION OF CLAUDIA
CENTER**

DECLARATION OF CLAUDIA CENTER

Pursuant to 28 U.S.C. § 1746, I declare that:

1. I am a senior staff attorney with the Legal Aid Society – Employment Law Center (“LAS-ELC”), and the director of the LAS-ELC’s disability rights program. I am counsel for Plaintiffs and the class herein.

2. I make this declaration based on my personal knowledge and am competent to testify as to the matters set forth herein.

Time Expended by LAS-ELC Attorneys and Paralegals.

3. The attorneys and paralegals of the LAS-ELC keep billing records in the ordinary course of business, using Timeslips software, at or near the time of the acts, events, conditions or opinions described. I have asked Howard Chen, an LAS-ELC Manager for HR and Administration, to run the billing records in this matter for the following time periods:

Beginning of matter through December 31, 2008;
January 1, 2009 through March 31, 2009;
April 1, 2009 through October 31, 2009;
November 1, 2009 through February 28, 2010;
March 1, 2010 to the present

These billing records are attached hereto as Exhibit 5.

4. The attorneys' fees accrued by the LAS-ELC are reasonable and were necessarily incurred in prosecuting and prevailing on the class claims brought against the Defendants.

5. The following is a brief description of the relevant qualifications, experience, contributions and hourly rates of each attorney for whom fees are claimed in this brief:

Claudia Center. I graduated from University of California at Berkeley Boalt Hall School of Law in 1992. From 1992 to 1993 I was a fellow with the Women's Law & Policy Fellowship Program based at the Georgetown University Law Center. From 1993 to 1995 I was a Staff Attorney at the National Abortion and Reproductive Rights Action League. Since March of 1995, I have been a lawyer with The Legal Aid Society – Employment Law Center. My current title is Senior Staff Attorney. I also direct the LAS-ELC's Disability Rights

Program. From 2002 through 2004, I taught disability rights as an Adjunct Professor at Hastings College of the Law in San Francisco, California. I now teach disability rights as an Adjunct Professor at Berkeley Law. During my 18 years of practice, I have had extensive experience in civil rights litigation. In particular, I have specialized in disability civil rights. In addition to serving as counsel in many individual cases in the trial and appellate courts, I have served as class counsel in several disability discrimination class cases, including this case, *Campos v. San Francisco State University*, No. C-97-02326 MMC (N.D. Cal., settlement reached 2001); *Siddiqi v. Regents of the Univ. of California*, No. C 99-0790 SI, see, e.g., 2000 U.S. Dist. LEXIS 19930 (N.D. Cal. Sept. 6, 2000), 81 F. Supp. 2d 972 (N.D. Cal. 1999) (settlement reached 2002); and *Lopez v. San Francisco Unified School District*, No. C 99-3260 SI (N.D. Cal.). In addition, I have extensive experience as amicus counsel in cases of importance to persons with disabilities. In 2009, the Central District of California confirmed an hourly rate for me of \$400. *Cruz ex rel. Cruz v. Alhambra School Dist.*, 601 F.Supp.2d 1183, 1194 (C.D. Cal. 2009). In 2005, the Northern District of California confirmed an hourly rate for me of \$395.00. *Lopez v. San Francisco Unified School Dist.*, 385 F.Supp.2d 981, 987, 992 (N.D. Cal. 2005).

Jinny Kim. Ms. Kim graduated from University of California at Davis King Hall School of Law in 1999. From 1999 to 2001, Ms. Kim was the Felix Velarde-Munoz litigation fellow at the Legal Aid Society – Employment Law Center where she litigated individual and class action cases covering a range of issues including discrimination on the basis of race, gender, age, disability, pregnancy, sexual orientation, and national origin. From 2001 to 2002, Ms. Kim was a Georgetown Women’s Law and Public Policy fellow and served as Labor Counsel to Senator Edward Kennedy on the Committee for Health, Education Labor and Pensions where she worked on discrimination and equal employment issues. From 2002 to 2004, Ms. Kim was an associate at the law firm of Schneider and Wallace where she litigated individual and class action cases on behalf of plaintiffs with a particular emphasis on disability discrimination cases. Ms. Kim’s current title is Senior Staff Attorney. During her eleven years of practice, Ms. Kim has represented individuals in class action and civil rights cases. She has particular expertise in litigating disability discrimination and architectural barriers cases under the Americans

with Disabilities Act and Section 504 of the Rehabilitation Act having served as counsel of record in dozens of cases including this case, *Campos v. San Francisco State University*, No. C-97-02326 MMC (N.D. Cal., settlement reached 2001); *Siddiqi v. Regents of the Univ. of California*, No. C 99-0790 SI, see, e.g., 2000 U.S. Dist. LEXIS 19930 (N.D. Cal. Sept. 6, 2000), 81 F. Supp. 2d 972 (N.D. Cal. 1999) (settlement reached 2002); and *Lopez v. San Francisco Unified School District*, No. C 99-3260 SI (N.D. Cal.). In 2005, the Northern District of California confirmed an hourly rate for Ms. Kim of \$350.00. *Lopez*, 385 F.Supp.2d at 987, 991.

Mary Broughton. Ms. Broughton has been employed as a paralegal with the LAS-ELC since March 2006. Ms. Broughton has over twenty-one years of experience as a paralegal with particular expertise on complex cases and class actions in the area of civil rights litigation. From 1989 until 2000, Ms. Broughton was a paralegal with the law firm of Goldstein, Demchak, Baller, Borgen & Dardarian where she focused on large class actions. From 2001 until 2006, Ms. Broughton was a paralegal with the Impact Fund, a non-profit organization focusing on impact civil rights litigation. Ms. Broughton is experienced in all aspects of complex litigation including communicating and preparing declarations for class members, cite checking briefs, analyzing documents and preparing for depositions and trial.

Costs Expended by the LAS-ELC.

6. The LAS-ELC keeps accounting records of all expenses incurred in litigation matters. I have asked Thomas Keane, our Finance Manager, to provide me with a complete listing of costs expended in this matter. These expense records are attached hereto as Exhibit 6.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Francisco, California on January 19, 2010.

/s/ Claudia Center
CLAUDIA CENTER

1/18/2011
12:37 PMLegal Aid Society - Employment Law Center
Detail TIME ONLY Report by Attorney and Case

Page 1

Selection Criteria

Slip.Date 1/1/2008 - 12/31/2008
Clie.Selection Include: KPT Towers

Date	Description	Billable Time	Nonbillable Time	Slip ID
<u>Attorney: Claudia Center</u>				
8/5/2008	Confer with Rachel Brill re KPT Towers case	0:12:00	0:00:00	283563
8/5/2008	T/c Victor Gemiani re possible LAS participatiom case re KPT Towers, review memos, provide basic feedback on ADA claims	0:27:00	0:00:00	283565
8/6/2008	Meet with Joan Graff re our possible participation in the case, update Victor Gemiani	0:18:00	0:00:00	283592
8/13/2008	Update Joan on next steps possible participation in case	0:09:00	0:00:00	282911
8/17/2008	Scheduling call -- logistics	0:03:00	0:00:00	282024
8/18/2008	Schedule with Joan and Hawaiicounsel (2x)	0:12:00	0:00:00	282027
8/21/2008	Review file, meet with Joan, participate in conference call with Joan, Victor Geminiani , William Durham, follow up with email	0:42:00	0:00:00	282409
8/22/2008	Discuss O'Melveny participation with Joan Graff	0:18:00	0:00:00	282386
8/22/2008	Email Rachel Brill re interest in case, desire to discuss	0:03:00	0:00:00	282394
8/24/2008	Review file on KPT and draft memo to staff regarding our possible participation in class action against public housing complex -- brainstorm legal theories, review California School for the Blind, email exchange with Linda Kilb, email colleagues on disability rights listserv	1:21:00	0:00:00	282375
8/24/2008	Telephone call with Rachel Brill re KPT case -- strategies re framing	0:13:30	0:00:00	282393
8/25/2008	Review district court order from Shawna Marshall relevant to possible claims against KPT Towers, forward to William Durham with comment	0:18:00	0:00:00	282881
8/25/2008	Confer with Linda Kilb re her information on a HUD opinion re chemical sensitivities, possibly relevant to disability claims in KPT Towers linking lack of habilitability to disability	0:12:00	0:00:00	282890
8/25/2008	Meet with Joan Graff re possible co-counseling with O'Melveny and leave message for Peter Obstler	0:13:30	0:00:00	282894
8/25/2008	Prepare for and attend program meeting re our possible involvement in KPT Towers	1:24:00	0:00:00	282871
8/26/2008	Conference call with Peter Obstler (long) and follow up with names re potential conflicts	0:51:00	0:00:00	282864
8/29/2008	Draft long email to Victor and William re internal process, and Peter Obstler's process	0:18:00	0:00:00	282783
9/2/2008	Confer with Victor Geminiani re status of O'Melveny pro bono assistance	0:03:00	0:00:00	283476
9/3/2008	Confer with Peter Obstler re next steps O'Melveny, update Victor Geminiani re status of our office and OMM, forward draft complaint to Obstler	0:18:00	0:00:00	283450
9/4/2008	T/c Peter Obstler, leave message	0:03:00	0:00:00	283441
9/8/2008	Update Victor Geminiani re status of O'Melveny's agreement	0:06:00	0:00:00	283339
9/17/2008	T/c Peter Obstler re status of conflicts check and update Victor Geminiani and discuss next steps	0:21:00	0:00:00	291896
9/18/2008	Check in with Peter Obstler	0:12:00	0:00:00	284250
9/19/2008	T/c Peter Obstler and email re KPT Towers and next steps	0:13:30	0:00:00	291904
9/23/2008	Review and compile multiple memos and materials and forward to Peter Obstler and David Lash of OMM for review re pro bono participation	0:27:00	0:00:00	284897
9/23/2008	T/c Peter Obstler and David Lash of OMM re next steps pro bono participation in KPT Towers litigation	0:27:00	0:00:00	284906
9/24/2008	T/c Peter Obstler, update Victor Geminiani via email (long)	0:30:00	0:00:00	284864
9/28/2008	Compile and circulate universe of KPT Towers documents to OMM co-counsel	0:18:00	0:00:00	286079
9/29/2008	Arrange for copying of KPT pictures and forward to colleagues at OMM	0:12:00	0:00:00	286075
9/30/2008	Work on scheduling conference call with Peter Obstler and co-counsel in Hawaii	0:03:00	0:00:00	286063
10/2/2008	Discuss with Joan OMM's decision to take on the case re KPT Towers as a pro bono matter, update colleagues in Hawaii, begin process of setting up conference call and discussing next steps with team	0:18:00	0:00:00	285974
10/6/2008	Logistics re conference call re plan of action, next steps, filing of complaint	0:06:00	0:00:00	285930
10/8/2008	Logistics re conference call re plan of action, next steps, filing of complaint	0:12:00	0:00:00	285918
10/9/2008	Logistics re conference call re plan of action, next steps, filing of complaint	0:06:00	0:00:00	285908
10/10/2008	Compile and circulate contacts list to litigation team	0:13:30	0:00:00	291940
10/10/2008	Request code from Tom Keane and Howard Chen	0:03:00	0:00:00	291941
10/10/2008	Conference call with legal team, preliminaries assignments, brainstorming, logistics, next steps	0:54:00	0:00:00	286082
10/17/2008	Update contacts list and circulate (0.2), attend conference call (1.1), legal research re sovereign immunity issues under Tennessee v. Lane and progeny in context of public housing (0.7)	2:00:00	0:00:00	291987
10/28/2008	Confer with Paula Pearlman re Woods v. Alexandria Housing Partners and what kind of class definition they used, review complaint	0:24:00	0:00:00	288796
10/28/2008	Update Delia re contacts list	0:03:00	0:00:00	288861
10/28/2008	Conference call restrategies, complaint, next steps	0:54:00	0:00:00	288866
10/28/2008	Legal research Title II, progam access regulations, comparable 504 regulations, confer with disability colleagues, draft outlines of disability portions of complaint re KPT Towers, fact research defendants	2:06:00	0:00:00	288865
10/29/2008	Confer with Guy Wallace re reviewing and commenting on complaint draft	0:09:00	0:00:00	288779
11/5/2008	Conference call with colleagues restrategies and next steps, review emails	0:48:00	0:00:00	288745
11/11/2008	Review and forward disability portions of complaint to Guy Wallace for review and commentary	0:12:00	0:00:00	288673
11/11/2008	Update colleagues on status of draft of disability sections of complaint	0:06:00	0:00:00	288678
11/12/2008	Conference call, draft complaint	1:06:00	0:00:00	288657

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Date	Description	Billable Time	Nonbillable Time	Slip ID
11/12/2008	Research billable rates and provide to Hawaii co-counsel for co-counseling agreement	0:12:00	0:00:00	288658
11/13/2008	Discuss class allegations with co-counsel, whether one class or more than one	0:13:30	0:00:00	292074
11/14/2008	Draft disability portions of complaint and forward to Linda Kilb for consultation and discussion	1:54:00	0:00:00	292083
11/17/2008	Further draft disability portions of complaint, confer with colleagues	1:54:00	0:00:00	292104
11/18/2008	Further draft disability portions of complaint, circulate to Linda Kilb, Guy Wallace, and co-counsel, confer with colleagues, discuss class definition	1:52:30	0:00:00	292098
11/19/2008	Legal research and confer with colleagues re how to frame class definition in KPT Towers case (architectural barriers plus hazardous conditions) (0.4), review and edit outreach postcard (0.4), legal research and confer with colleagues re 11th amendment immunity and state law damages (0.6), conference call re same (1.0)	2:24:00	0:00:00	292117
11/21/2008	Confer with co-counsel re state law claims (parallel state court action)	0:09:00	0:00:00	292134
11/23/2008	Re-work disability section of complaint extensively based on comments of Linda Kilb including creation of "legal framework" section and legal research re coordinating authority	3:13:30	0:00:00	292155
11/24/2008	Legal research history of section 504 regulations (HEW 1977, HEW 1978 coordination, DOJ 1980 coordination, DOJ 1980, HUD 1988), review NELA materials re ADA Amendments Act, update and draft complaint including legal framework section, confer with Linda Kilb re same	3:27:00	0:00:00	292202
11/25/2008	Confer with Joan Graff re co-counseling agreement	0:09:00	0:00:00	292209
11/25/2008	Legal research re complaint and theories of the case -- section 1983 and the ADA, section 504 and "indirect recipients" such as management companies, update co-counsel	0:48:00	0:00:00	292212
11/25/2008	Research possible experts -- elevator expert, fire safety expert, medical expert re impact of falls on persons with disabilities, t/c colleague re same, review and circulate sample reports filed in other matters	2:55:30	0:00:00	292213
11/25/2008	Confer with Elizabeth Dunne and Delia L'Heureux re adding concept of program access areas meeting ADAAG access standards	0:12:00	0:00:00	292216
11/26/2008	Forward draft complaint to Bill McNeill and discuss with him his suggestions, share with Hawaii co-counsel, including specific allegations re fire hazard	0:18:00	0:00:00	292222
11/26/2008	Further discussion and legal research re complaint -- ADAAG, UFAS, FHAA, allegations related to individual standing	0:31:30	0:00:00	292226
12/1/2008	T/c Peter Obstler to get his availability for conference call and then work with LEJ to schedule call	0:12:00	0:00:00	291711
12/1/2008	Legal research citation re program access an ADAAG and provide to Elizabeth Dunne and other colleagues	0:18:00	0:00:00	291706
12/3/2008	Forward information to Elizabeth Dunne on interference claim	0:13:30	0:00:00	290903
12/4/2008	Conference call re complaint and next steps (1.1) and follow up research re equal protection, con law, suing individuals (.8), review and edit co-counsel agreement (.2)	2:06:00	0:00:00	290796
12/8/2008	Review draft of complaint, provide comments to Peter Obstler and Elizabeth Dunne	0:13:30	0:00:00	290880
12/9/2008	Check in with Elizabeth Dunne re whether she still needs to talk	0:06:00	0:00:00	291660
12/9/2008	Request codes from Howard and Tom	0:03:00	0:00:00	291664
12/10/2008	Forward legal research from Linda Kilb to Elizabeth Dunne with cover note giving my thoughts	0:13:30	0:00:00	291654
12/11/2008	Review and edit press release, confer with Paul Alston and other counsel re quotes and message	0:57:00	0:00:00	291639
12/13/2008	T/c Joan Graff re next steps KPT Towers case, update co-counsel re Jinny Kim participation, forward contacts list to Jinny Kim with update re upcoming events in case, forward Victor's cell phone to Jinny	0:36:00	0:00:00	291625
12/14/2008	T/c Victor Geminiani re status of federal complaint and upcoming meetings and events re filing of complaints	0:12:00	0:00:00	291622
12/14/2008	Email Peter Obstler re his travel plans so that I can go the same days as he, and update Jinny Kim re my plans	0:03:00	0:00:00	291624
12/14/2008	Confer with Joan Graff and Pat Shiu re next steps KPT Towers and possible trip to Hawaii, compile and send documents to Jinny Kim for her to prepare for upcoming Hawaii meetings	0:33:00	0:00:00	291620
12/14/2008	Check in with co-counsel re when will we see next version of complaint	0:03:00	0:00:00	291621
12/15/2008	Work with Djuna Gray and Joan Graff and Jinny Kim re logistics re trip to Hawaii, confer with Jinny Kim re status of different meetings	0:24:00	0:00:00	291607
12/15/2008	Review and edit co-counseling agreement to cover further cost reimbursement issue, circulate to co-counsel for review	0:18:00	0:00:00	291616
12/16/2008	Fly from San Francisco to Hawaii to tour facilities, finalize and file complaint	8:54:00	0:00:00	291595
12/16/2008	Email litigation team to find out status of complaints and related meeting	0:06:00	0:00:00	291601
12/17/2008	Travel with Jinny Kim to meeting with Peter Obstler and Elizabeth Dunne (.5), finalize state and federal complaints and research re same (3.6)	4:06:00	0:00:00	291594
12/18/2008	Meet with clients and co-counsel prior to press conference and discuss/observe conditions (0.8), press conference (0.9), tour of facilities at KPT Towers and at Kuhio Homes (1.6), travel to Alston, Hunt law offices (0.5), litigation team meeting at Alston, Hunt (1.2)	5:00:00	0:00:00	291588
12/18/2008	Review press on case and forward to Jinny Kim, Pat Shiu, and Joan Graff	0:12:00	0:00:00	291580
12/18/2008	Confer with Jason Kim re our pro hac vice application	0:06:00	0:00:00	291582
12/19/2008	Confer with Sonya Rieken (TRC) re using different certified experts in KPT Towers case	0:18:00	0:00:00	291575
12/19/2008	Travel from Hawaii to San Francisco	8:30:00	0:00:00	291579
12/29/2008	Confer with William Durham re request for extension	0:03:00	0:00:00	292276

Total: Claudia Center

74.21

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Date	Description	Billable Time	Nonbillable Time	Slip ID
<u>Attorney: Jinny Kim</u>				
12/14/2008	Review and draft email to C. Center re draft complaint	0:06:00	0:00:00	292379
12/14/2008	Review draft complaint	0:42:00	0:00:00	292378
12/15/2008	Phone call w/V. Geminiani re co-counsel meeting	0:06:00	0:00:00	292374
12/15/2008	Review and draft emails to C. Center re complaint, press conference and co-counsel meeting	0:18:00	0:00:00	292377
12/15/2008	Phone call w/V. Geminiani re press conference	0:06:00	0:00:00	292375
12/17/2008	Meeting with co-counsel re finalizing complaint	4:12:00	0:00:00	292373
12/18/2008	Meeting with co-counsel re strategy	1:30:00	0:00:00	292372
12/18/2008	Inspection at KPT	1:00:00	0:00:00	292371
Total: Jinny Kim		8.00	0.00	
Grand Total		82.21	0.00	

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Selection Criteria

Slip.Date 1/1/2009 - 3/31/2009
Clie.Selection Include: KPT Towers

Date	Description	Billable Time	Nonbillable Time	Slip ID
<u>Attorney: Claudia Center</u>				
1/9/2009	Confer with plaintiffs' counsel re elements to review at mediation	0:12:00	0:00:00	299147
1/13/2009	Confer with co-counsel re upcoming conference call, bring Jinny Kim up to date on case and call	0:13:30	0:00:00	299628
1/14/2009	Reach out to possible expert re environmental health, check in with Jinny Kim re pro hac vice	0:12:00	0:00:00	299701
1/14/2009	Update Jinny Kim on status of case since press conference and upcoming conference call	0:06:00	0:00:00	299690
1/14/2009	Legal research and respond to research questions of litigation team -- scope of injunctive relief, ADA Amendments Act, prior cases re asthma, Title II regulations re notice to plaintiffs of RA obligation, provide citations	0:57:00	0:00:00	299700
1/29/2009	Confer with Elizabeth Dunne re potential access expert Bruce Clark, potential industrial hygiene expert Bart Ashley	0:18:00	0:00:00	298070
2/12/2009	Legal research interaction between accessibility percentages for new construction of housing and percentage of accessibility for program access (and populations requiring higher percentages of access), forward research to Elizabeth Dunne, confer with Jinny Kim re same	0:24:00	0:00:00	295754
2/23/2009	Review email summary from Elizabeth Dunne and respond substantively	0:13:30	0:00:00	295729
2/24/2009	Confer with Elizabeth Dunne re content and scope of settlement documents	0:03:00	0:00:00	297991
2/25/2009	Confer with legal team re content and scheduling of upcoming conference call	0:06:00	0:00:00	297965
2/27/2009	Confer with Joan Graff re upcoming mediation session, confer with Elizabeth Dunne re upcoming mediation and in-progress motion for preliminary injunction	0:18:00	0:00:00	297947
2/27/2009	Conference call with legal team re upcoming mediation and related pre-trial strategies	1:42:00	0:00:00	297963
3/1/2009	Confer (2x) with Jinny Kim re draft settlement documents and need to review and respond to co-counsel re program access, fire safety, elevator repair, etc.	0:16:30	0:00:00	297938
3/2/2009	Confer with Jinny Kim and Howard Chen re fees report	0:06:00	0:00:00	297928
3/3/2009	Confer with Jinny Kim and Tom Keane re fees and costs in KPT Towers for mediation	0:06:00	0:00:00	296215
3/3/2009	Review Jinny's substantive response to Elizabeth Dunne's inquiry and respond	0:12:00	0:00:00	296220
3/4/2009	T/c with Elizabeth Dunne and Jinny Kim re upcoming mediation session and how to address program access issues	1:03:00	0:00:00	296201
3/5/2009	Check in with Elizabeth Dunn et al re status of mediation, t/c Dunne	0:16:30	0:00:00	297835
3/13/2009	Travel to and from O'Melveny offices and participate in conference call re tasks for motion for preliminary injunction and related strategies	2:09:00	0:00:00	297788
3/16/2009	Confer with Jinny Kim re role of Manny Munez (fire safety expert) in upcoming motion for preliminary injunction	0:06:00	0:00:00	297782
3/18/2009	Review documents from Elizabeth Dunne (including notice to tenants) and provide substantive feedback and draft language	0:16:30	0:00:00	297290
3/29/2009	Review and edit draft of PI motion drafted by Jinny Kim	0:57:00	0:00:00	297768
Total: Claudia Center		10.25	0.00	
<u>Attorney: Jinny Kim</u>				
1/14/2009	Conference with C. Center re status of case, preliminary injunction motion	0:12:00	0:00:00	293177
1/15/2009	Research requirements for pro hac vice application	0:18:31	0:00:00	293218
1/29/2009	Phone call to E. Dunne re 504 transition plans, fire evacuation plans, and procedure for reasonable accommodation requests	0:06:00	0:00:00	294195
1/30/2009	Research issue of fire evacuation plans	0:10:45	0:00:00	294253
1/30/2009	Review Lopez stipulated judgment and evacuation plans	0:42:00	0:00:00	294292
1/30/2009	Phone call to E. Dunne re Lopez stipulated judgment and evacuation plans	0:06:00	0:00:00	294293
1/30/2009	Phone call to E. Dunne re fire evacuation plans	0:06:00	0:00:00	294256
2/3/2009	Phone call with E. Dunne re notice to class members, ADA policies	0:12:00	0:00:00	294422
2/3/2009	Conference call with team re preliminary injunction motion, motion for class certification and experts	0:48:10	0:00:00	294392
2/3/2009	Research issues of class certification and preliminary injunction	1:26:11	0:00:00	294421
2/4/2009	Phone call to E. Dunne re reasonable accommodation policy	0:06:00	0:00:00	294500
2/4/2009	Draft policy on reasonable accommodation	1:51:21	0:00:00	294473
2/4/2009	Draft reasonable accommodation policy	1:16:14	0:00:00	294499
2/4/2009	Confer with E. Dunne re reasonable accommodation notice	0:06:00	0:00:00	294577
2/4/2009	Review class certification and preliminary injunction motion samples	0:36:00	0:00:00	294501
2/5/2009	Confer with E. Dunne re mediation, notice to residents	0:18:00	0:00:00	294606
2/5/2009	Review sample PI and class certification motion	0:24:00	0:00:00	294576
2/10/2009	Review email from E. Dunne re 504 settlement issues	0:06:00	0:00:00	294946
2/12/2009	Research 504, Title II issues related to program access and transition plans	1:38:00	0:00:00	295075
2/12/2009	Research re 504, Title II regulations and program access	0:18:48	0:00:00	295032
2/13/2009	Review correspondence, and settlement issues	0:12:00	0:00:00	295122
2/13/2009	Revise protective order; draft email to M. Walsh attaching same	0:26:46	0:00:00	295102
2/13/2009	Confer with E. Dunne re settlement issues, reasonable accommodation requests	0:14:39	0:00:00	295103

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Date	Description	Billable Time	Nonbillable Time	Slip ID
2/23/2009	Review list of settlement issues and state's response	0:10:48	0:00:00	295706
2/25/2009	Confer with E. Dunne re informal mediation	0:12:00	0:00:00	295831
3/2/2009	Research re Title II program access requirements, requirements under UFAS and ADAAG	2:02:17	0:00:00	296036
3/2/2009	Confer with E. Dunne re mediation issues	0:10:38	0:00:00	296039
3/3/2009	Confer with E. Dunne re elevator and safety issues	0:08:28	0:00:00	296126
3/3/2009	Confer with E. Dunne re fees and costs	0:06:00	0:00:00	296099
3/3/2009	Analyze fees and costs for mediation	0:11:58	0:00:00	296091
3/3/2009	Confer with E. Dunne re preliminary injunction proposed order	0:06:00	0:00:00	296154
3/3/2009	Confer with E. Dunne on Title II issues for mediation	0:31:54	0:00:00	296087
3/4/2009	Review correspondence from E. Dunne re plaintiffs' damages	0:06:16	0:00:00	296251
3/4/2009	Conference call with E. Dunne and C. Center re mediation issues	1:17:52	0:00:00	296176
3/4/2009	Review mediation statement	0:05:34	0:00:00	296169
3/4/2009	Review Lopez proposed order on preliminary injunction	0:10:00	0:00:00	296161
3/11/2009	Confer with E. Dunne re strategy meeting	0:06:00	0:00:00	296717
3/12/2009	Confer with E. Dunne re meeting to discuss PI meeting	0:06:00	0:00:00	296803
3/13/2009	Team meeting re mediation, PI motion and class certification motion	1:30:00	0:00:00	296844
3/14/2009	Review Lopez preliminary injunction motion	0:29:02	0:00:00	296846
3/16/2009	Review Lopez preliminary injunction and class certification motions and declarations	0:36:42	0:00:00	296891
3/16/2009	Draft memo to E. Dunne re preliminary injunction motion, class certification motion	0:13:54	0:00:00	296902
3/16/2009	Review Siddiqi class certification brief	0:24:00	0:00:00	296905
3/16/2009	Draft motion for preliminary injunction	0:05:07	0:00:00	296926
3/16/2009	Confer with E. Dunne re settlement terms to communicate to mediator	0:57:24	0:00:00	296937
3/17/2009	Research re preliminary injunction cases in Hawaii	0:33:42	0:00:00	297004
3/17/2009	Review emails from E. Dunne re mediation, program access	0:06:00	0:00:00	297154
3/17/2009	Review Parr v. LL Drive In case	0:30:00	0:00:00	297156
3/17/2009	Review Manny Muniz expert report re fire and safety	0:10:06	0:00:00	296992
3/17/2009	Draft email to E Dunne re Bruce Clark	0:06:00	0:00:00	297157
3/18/2009	Review expert report of Manny Muniz re fire safety and evacuation	0:17:01	0:00:00	297059
3/18/2009	Draft motion for preliminary injunction	1:11:11	0:00:00	297065
3/18/2009	Research re housing discrimination lawsuits in Hawaii and Baltimore	0:58:29	0:00:00	297062
3/18/2009	Phone call to M. Muniz re fire safety planning and evacuations	0:04:06	0:00:00	297060
3/18/2009	Research re Baltimore and Hawaii public housing settlements; program access and reasonable accommodation requirement	1:00:50	0:00:00	297081
3/18/2009	Confer with E. Dunne re expert Bruce Clark	0:11:03	0:00:00	297048
3/18/2009	Research re HUD and Title II program accessibility requirements	0:58:03	0:00:00	297045
3/18/2009	Confer with E. Dunne re declaration of doctor for PI and class cert motion	0:24:19	0:00:00	297040
3/19/2009	Phone call with Manny Muniz re fire and safety issues, evacuation plans	0:18:00	0:00:00	297142
3/19/2009	Confer with E. Dunne and C. Center re Manny Muniz	0:06:00	0:00:00	297143
3/19/2009	Review complaint for preliminary injunction motion	0:47:19	0:00:00	297116
3/19/2009	Research re PI motion	0:08:45	0:00:00	297141
3/23/2009	Confer with E. Dunne re fire and safety expert	0:06:00	0:00:00	297324
3/23/2009	Westlaw research for preliminary injunction motion	1:16:49	0:00:00	297241
3/23/2009	Research for preliminary injunction	0:36:00	0:00:00	297313
3/23/2009	Westlaw research re preliminary injunction motion	0:32:34	0:00:00	297270
3/24/2009	Draft motion for preliminary injunction	2:58:11	0:00:00	297373
3/24/2009	Westlaw research re health and safety violations for preliminary injunction motion	1:45:52	0:00:00	297342
3/25/2009	Review resume and rates for Jeff Mastin and Gary Waters	0:03:39	0:00:00	297415
3/25/2009	Confer with E. Dunne re ADA experts	0:06:01	0:00:00	297416
3/25/2009	Research for motion for preliminary injunction	0:47:25	0:00:00	297424
3/25/2009	Draft motion for preliminary injunction	0:47:27	0:00:00	297450
3/25/2009	Conference call with Jason Kim and E. Dunne re preliminary injunction motion and class certification motion	0:36:00	0:00:00	297459
3/25/2009	Research re preliminary injunction motion	0:28:52	0:00:00	297467
3/25/2009	Westlaw research re preliminary injunction for FHAA claims	0:38:06	0:00:00	297492
3/26/2009	Draft motion for preliminary injunction	0:25:44	0:00:00	297615
3/26/2009	Draft motion for preliminary injunction	1:16:10	0:00:00	297651
3/26/2009	Research re special master appointment	0:12:00	0:00:00	297599
3/26/2009	Draft motion for preliminary injunction	0:59:03	0:00:00	297536
3/27/2009	Draft motion for preliminary injunction	3:58:25	0:00:00	297709
3/27/2009	Review declarations in support of PI motion	0:29:54	0:00:00	297719
3/27/2009	Revise motion for preliminary injunction	0:36:52	0:00:00	297718
3/29/2009	Review C. Center's changes to PI motion	0:06:00	0:00:00	297724
3/30/2009	Revise preliminary injunction motion	0:24:27	0:00:00	297726
3/30/2009	Draft email to E. Dunne re declarations for PI motion	0:19:40	0:00:00	297865
3/30/2009	Revise motion for protective order	1:05:07	0:00:00	297861

Total: Jinny Kim

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Date	Description	Billable Time	Nonbillable Time	Slip ID
<u>Attorney: Patricia Shiu</u>				
2/28/2009	t/c with Joan Graff re mediation in this case next week	0:15:00	0:00:00	296003
3/3/2009	check in with Claudia Center re mediation	0:06:00	0:00:00	296094
<hr/> Total: Patricia Shiu		0.35	0.00	
<hr/> Grand Total		60.54	0.00	

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Selection Criteria

Slip.Date 4/1/2009 - 10/31/2009
Clie.Selection Include: KPT Towers

Date	Description	Billable Time	Nonbillable Time	Slip ID
<u>Attorney: Claudia Center</u>				
4/1/2009	Review pro hac vice application submitted by Peter Obstler and forward to Djuna Gray with instructions to begin drafts for me and for Jinny Kim	0:13:30	0:00:00	297920
4/1/2009	Review state's motion to dismiss and confer with co-counsel re response, confer with Jinny Kim regarding declaration in support of motion for preliminary injunction	0:42:00	0:00:00	297918
4/2/2009	Conference call with attorney team re next steps, pre-trial strategies, review and discuss defendant's motion to dismiss including whether defense counsel would voluntarily withdraw	1:09:00	0:00:00	304428
4/2/2009	Review drafts and begin editing declaration in support of pro hac vice application	0:13:30	0:00:00	304518
4/6/2009	Edit declaration in support of pro hac vice application, and confer with Howard Chen re latest rates for all relevant LAS-ELC attorneys	0:34:30	0:00:00	304547
4/8/2009	Provide response re whether and when to institute system-wide ADA litigation	0:12:00	0:00:00	304589
4/29/2009	Review and comment on draft motion for class certification, forward appendix of cases certifying disability classes	0:48:00	0:00:00	299616
4/29/2009	Legal research and draft plaintiffs' opposition to motion to dismiss in federal case -- review regulations and case law, confer with colleagues, draft	2:54:00	0:00:00	299600
4/30/2009	Track down and circulate appendix of certified disability class actions, confer with Elizabeth Dunne and Jinny Kim re same and how to update and use	0:16:30	0:00:00	299940
4/30/2009	Legal research re Title II entities, program access, and requests for reasonable accommodations or modifications	0:48:00	0:00:00	304786
5/8/2009	Legal research motion to dismiss, draft	2:13:30	0:00:00	306625
5/9/2009	Update co-counsel on status and schedule for opposition to federal motion to dismiss	0:09:00	0:00:00	306627
5/10/2009	Legal research (Westlaw) program access opinions	2:12:00	0:00:00	300637
5/11/2009	Confer with Jinny Kim redividing up portions of the opposition briefforward to Jinny relevant legal research, update co-counsel on schedule for providing draft for review and comment, outline arguments and research re same	0:42:00	0:00:00	300636
5/12/2009	Confer with co-counsel re facts needed to finalize opposition to federal motion to dismiss and provide Elizabeth Dunne with research gathered so far regarding defendants' arguments about whether plaintiffs used proper forms to request reasonable modifications	0:24:00	0:00:00	300643
5/13/2009	Legal research and draft opposition to defendants' motion to dismiss	6:18:00	0:00:00	300612
5/14/2009	Review email from Jinny Kim relating conversation with Jarod Buna	0:12:00	0:00:00	300604
5/14/2009	Draft and edit opposition to motion to dismiss, legal research re same	4:18:00	0:00:00	300599
5/18/2009	Edit memorandum of opposition to federal motion to dismiss and legal research re same	1:51:00	0:00:00	300591
5/19/2009	Edit memorandum of points and authorities, confer with co-counsel (multiple times) re logistics of finalizing and filing	2:42:00	0:00:00	300568
5/20/2009	Supervise finalization of memorandum	0:06:00	0:00:00	300566
5/21/2009	Review declaration, review exhibits and highlights to exhibits to declaration, review and finalize last version of brief including word count and cutting	2:06:00	0:00:00	300563
5/21/2009	Respond to Delia L'Heureux's email re corrections to opposition	0:06:00	0:00:00	306629
5/22/2009	Confer with Jinny Kim and update co-counsel re our planned appearance at upcoming hearing on motion to dismiss	0:09:00	0:00:00	306636
5/26/2009	Arrange for travel to Hawaii, hotel, for hearing on motion to dismiss	0:06:00	0:00:00	306647
5/28/2009	Arrange for travel to Hawaii and update co-counsel re my appearance at hearing on motion to dismiss	0:09:00	0:00:00	306669
5/29/2009	Confer with Jinny Kim re upcoming hearing on motion to dismiss	0:06:00	0:00:00	306675
5/30/2009	Review and forward Peter Obstler update to Joan Graff	0:06:00	0:00:00	301365
6/1/2009	Confer with Jinny Kim re class definition issue	0:09:00	0:00:00	301357
6/1/2009	T/c Elizabeth Dunne re PI motion, class cert motion, motion to dismiss	0:25:10	0:00:00	301346
6/1/2009	Confer with Elizabeth Dunne re upcoming radio show	0:06:00	0:00:00	301358
6/2/2009	Logistics re travel to Honolulu for hearing on motion to dismiss -- research cheapest available flight and hotel	0:09:00	0:00:00	304301
6/2/2009	Review appendix to draft motion for class certification and confer with Jinny Kim (multiple) re same, edit declaration of Claudia Center in support of motion for class certification	0:21:00	0:00:00	304299
6/5/2009	Confer with Elizabeth Dunne re my travel to Hawaii and our meeting prior to motion to dismiss	0:06:00	0:00:00	304327
6/6/2009	Prepare for hearing on motion to dismiss	0:18:00	0:00:00	304328
6/7/2009	Prepare for hearing on motion to dismiss -- review papers, outline issues	1:06:00	0:00:00	304330
6/7/2009	Travel from SF to Oakland airport, fly to Honolulu, travel from airport to hotel	7:06:00	0:00:00	304329
6/8/2009	Travel to offices of LEJ to meet with co-counsel re hearing on motion to dismiss, attend and argue at hearing on motion to dismiss, meet with co-counsel following motion to dismiss	3:06:00	0:00:00	304331
6/8/2009	Travel from downtown Honolulu to airport, flight delayed, then fly to Oakland, travel to San Francisco	7:36:00	0:00:00	304332
6/9/2009	Review motion for preliminary injunction and confer with Jinny Kim re same	0:18:00	0:00:00	304345
6/10/2009	Confer with co-counsel (multiple times) re meaning of minute order with regard to scope of discovery and motion for preliminary injunction	0:16:30	0:00:00	304355
6/18/2009	Confer with Jinny Kim re upcoming depositions, also mediation	0:09:00	0:00:00	302862

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7/9/2009	Respond to news of deaths of plaintiffs, discuss with Jinny Kim	0:09:00	0:00:00	307366
7/31/2009	Confer with colleagues re class cert matters	0:06:00	0:00:00	307556
8/6/2009	Review settlement correspondence, discuss with Jinny Kim, respond to co-counsel via email	0:33:00	0:00:00	306370
8/14/2009	Confer with Elizabeth Dunne re next steps meaningful settlement	0:13:30	0:00:00	306829
8/15/2009	Confer with Jinny Kim re next steps KPT settlement	0:06:00	0:00:00	307080
8/16/2009	Schedule conference call re settlement concerns	0:03:00	0:00:00	307071
8/17/2009	Conference call with co-counsel re settlement strategies and pre-trial strategies including class certification and preliminary injunction, review settlement correspondence re same and provide commentary	1:27:00	0:00:00	306935
8/18/2009	Provide feedback and edits (explicitly delineating terms of settlement) re KPT settlement letter from plaintiffs	0:13:30	0:00:00	307049
9/2/2009	Confer with colleagues re schedule for upcoming settlement session and related conference call	0:06:00	0:00:00	311627
9/3/2009	Review documents to date and prepare list of elements to be included in any draft settlement agreement in advance of conference call	0:57:00	0:00:00	311339
9/4/2009	Confer with Jinny Kim and co-counsel (multiple times) re status conference -- content and next steps	0:16:30	0:00:00	311325
9/4/2009	Confer with co-counsel re status of settlement	0:06:00	0:00:00	311315
9/16/2009	Confer with co-counsel re next steps motion for preliminary relief and impact of death of named plaintiff	0:12:00	0:00:00	311142
10/13/2009	Confer with Elizabeth Dunne (multiple) and Jinny Kim re status of class certification motion and hearing on same	0:13:30	0:00:00	310533
10/28/2009	Confer with Elizabeth Dunne and Jinny Kim re status of settlement conference and next steps including conference call for Thursday afternoon	0:12:00	0:00:00	311792
10/29/2009	Confer with Linda Kilb and with Elizabeth Dunne re carrying as unacceptable for program access under 504	0:24:00	0:00:00	313530
10/29/2009	T/c Elizabeth Dunne re settlement negotiations, remaining substantive disputes, and next steps	0:48:00	0:00:00	312014
10/30/2009	Review and forward authorities from Linda Kilb re carrying as not acceptable for program access under Section 504	0:12:00	0:00:00	313520
10/30/2009	Review and circulate class certification order	0:24:00	0:00:00	313523
Total: Claudia Center		59.72	0.00	

Attorney: Jinny Kim

4/1/2009	Confer with E. Dunne re tenants' declarations	0:09:14	0:00:00	298009
4/1/2009	Review motion to dismiss	0:18:12	0:00:00	297981
4/1/2009	Revise H. McMillon declaration; confer with C. Center	1:00:13	0:00:00	297911
4/1/2009	Confer with G. Waters re ADA survey	0:07:55	0:00:00	297897
4/2/2009	Phone call with Jeff Mastin re KPT site inspections	0:12:00	0:00:00	298110
4/2/2009	Conference call re PI motion, motion for class certification and experts	1:06:00	0:00:00	298087
4/3/2009	Phone call with P. Obstler re retaining experts	0:06:00	0:00:00	298150
4/3/2009	Confer with Phyllis at Manny Muniz office re engagement letter	0:06:00	0:00:00	298149
4/3/2009	Phone call with J.Mastin (x2) re site inspection in Hawaii	0:06:00	0:00:00	298148
4/3/2009	Review pro hac vice application and declarations	0:06:00	0:00:00	298136
4/3/2009	Phone call with J.You re experts	0:06:00	0:00:00	298151
4/3/2009	Confer with D. Gray re pro hac vice application and declaration	0:06:00	0:00:00	298130
4/3/2009	Draft declaration in support of pro hac vice application	0:48:27	0:00:00	298127
4/3/2009	Confer with E. Dunne and J. You re class certification motion and experts	0:29:37	0:00:00	298111
4/3/2009	Phone call with G. Waters re site inspection	0:06:00	0:00:00	298101
4/3/2009	Phone call with Jeff Mastin re site inspection	0:06:00	0:00:00	298107
4/3/2009	Phone call to Phyllis at Manny Muniz's office re engagement letter	0:06:00	0:00:00	298109
4/3/2009	Confer with D. Gray re pro hac vice application and declarations	0:06:00	0:00:00	298137
4/4/2009	Review motion for class certification	0:12:00	0:00:00	298153
4/4/2009	Review documents re legislative action	0:04:53	0:00:00	298152
4/5/2009	Review Jurgen Dostert declaration submitted in Lopez case	0:06:00	0:00:00	298182
4/5/2009	Review declaration of P.Margen in support of interim barrier removal	0:10:27	0:00:00	298181
4/6/2009	Review documents submitted by Defendant in response to motion to dismiss	0:20:58	0:00:00	298243
4/6/2009	Phone call with E. Dunne re Jeff Mastin	0:06:00	0:00:00	298244
4/6/2009	Phone call to J. Mastin re site inspection schedule	0:06:00	0:00:00	298245
4/6/2009	Confer with Peter Obstler re experts	0:12:06	0:00:00	298248
4/7/2009	Draft motion for class certification	1:50:54	0:00:00	298344
4/7/2009	Draft motion for class certification	1:08:07	0:00:00	298352
4/7/2009	Revise pro hac vice declaration	0:07:07	0:00:00	298314
4/8/2009	Draft motion for class certification	1:52:26	0:00:00	298441
4/8/2009	Phone call to Peter Obstler re fire and safety expert	0:06:00	0:00:00	298442
4/8/2009	Confer with Jee Young You re motion for class certification	0:06:00	0:00:00	298443
4/8/2009	Draft and revise motion for class certification	2:12:00	0:00:00	298654
4/9/2009	Phone call with Linda Sarson re expert retainer fee	0:06:00	0:00:00	298652
4/9/2009	Confer with Phyllis at Manny Muniz's office re retainer fee	0:06:00	0:00:00	298653
4/10/2009	Review and revise pro hac vice application	0:12:00	0:00:00	298561
4/10/2009	Confer with E. Dunne re experts Jeff Mastin and Manny Muniz	0:06:57	0:00:00	298585

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Date	Description	Billable Time	Nonbillable Time	Slip ID
4/13/2009	Confer with J. You re class certification motion	0:06:00	0:00:00	298693
4/13/2009	Confer with Delia re responses to interrogatories and RPOD	0:06:00	0:00:00	298694
4/13/2009	Confer with E. Dunne re experts Manny Muniz and Jeff Mastin	0:06:00	0:00:00	298695
4/13/2009	Phone call and email to Manny Muniz office re scheduling expert site visit	0:06:00	0:00:00	298696
4/13/2009	Draft responses to Defendant Realty Laua's interrogatories	0:07:53	0:00:00	298700
4/13/2009	Confer with E. Dunne and J. You re status of preliminary injunction motion	0:06:00	0:00:00	298697
4/14/2009	Review draft of class certification motion; confer with J.You	0:18:00	0:00:00	298768
4/14/2009	Confer with Manny Muniz re schedule and complaint	0:06:00	0:00:00	298765
4/14/2009	Confer with E. Dunne re Manny Muniz	0:06:00	0:00:00	298764
4/14/2009	Confer with Manny Muniz re scheduling and Hawaii case complaint	0:06:00	0:00:00	298759
4/14/2009	Phone call with Manny Muniz re scheduling of site inspection	0:06:00	0:00:00	298731
4/14/2009	Review declarations in support of preliminary injunction motion	0:07:39	0:00:00	298730
4/14/2009	Revise fact section of class certification motion	0:48:00	0:00:00	298842
4/15/2009	Research re motion for preliminary injunction	0:30:00	0:00:00	298837
4/15/2009	Phone call with E. Dunne re preliminary injunction motion, declarations and opposition to motion to dismiss	0:18:00	0:00:00	298835
4/15/2009	Conference call with E. Dunne and Jeff Mastin	1:38:10	0:00:00	298830
4/15/2009	Review preliminary injunction motion	0:12:00	0:00:00	298825
4/15/2009	Confer with Donna Ahuna re pro hac vice applications	0:06:00	0:00:00	298798
4/15/2009	Review declaration of Peter Margen from Lopez case	0:18:00	0:00:00	298819
4/15/2009	Confer with J.You re class certification motion	0:07:50	0:00:00	298817
4/15/2009	Draft letter to D. Ahuna re pro hac vice application	0:06:00	0:00:00	298801
4/15/2009	Confer with E. Dunne re PI motion and declarations	0:06:00	0:00:00	298800
4/16/2009	Draft declaration of Hazel McMillon in support of motion for preliminary injunction	0:08:37	0:00:00	298857
4/16/2009	Revise declarations in support of PI motion; confer with E. Dunne	1:50:51	0:00:00	298872
4/16/2009	Confer with E. Dunne re settlement agreement in Woods v. Alexandria Housing	0:06:00	0:00:00	298852
4/16/2009	Review motion and order re PI in Woods v. Alexandria Hotel	0:36:01	0:00:00	298856
4/16/2009	Review settlement agreement in Woods v. Alexandria Housing	0:07:17	0:00:00	298851
4/16/2009	Review Woods v. Alexandria Housing Partners case file re motion for PI and settlement agreement	0:33:10	0:00:00	298850
4/17/2009	Draft motion for preliminary injunction	1:29:32	0:00:00	298915
4/17/2009	Conference call with Jeff Mastin and Elizabeth Dunne re expert declaration	3:13:50	0:00:00	298950
4/18/2009	Confer with J. You and E. Dunne re class certification motion	0:12:00	0:00:00	298983
4/18/2009	Review draft of class certification motion	0:30:00	0:00:00	298982
4/19/2009	Revise motion for preliminary injunction	0:29:34	0:00:00	298984
4/20/2009	Review Rule 16 scheduling order and Compulaw calendar	0:48:00	0:00:00	299105
4/20/2009	Review Defendant's legislative testimony in opposition to bill	0:07:42	0:00:00	299097
4/21/2009	Review Rule 16 scheduling order and check all dates	0:16:40	0:00:00	299106
4/21/2009	Confer with E. Dunne re Jeff Mastin's declaration	0:06:00	0:00:00	299098
4/21/2009	Draft response to Defendants objection to pro hac vice applications	0:58:16	0:00:00	299079
4/21/2009	Conference with Jeff Mastin re declaration and report	1:38:05	0:00:00	299081
4/21/2009	Draft and revise response to objection to pro hac vice application	0:57:35	0:00:00	299091
4/22/2009	Draft motion for preliminary injunctio	1:19:39	0:00:00	299220
4/22/2009	Draft answers to request for production of documents	0:50:38	0:00:00	299127
4/22/2009	Confer with D. Gray re Rule 16 scheduling order	0:12:00	0:00:00	299198
4/22/2009	Draft motion for preliminary injunction	1:37:27	0:00:00	299197
4/22/2009	Review Pacer re pro hac vice application	0:06:00	0:00:00	299129
4/23/2009	Phone call to E. Dunne re status of PI motion and class cert motion	0:06:00	0:00:00	299261
4/23/2009	Review email from Jason Kim re discovery conference	0:06:00	0:00:00	299262
4/23/2009	Conference call with E. Dunne and J. Mastin	1:48:00	0:00:00	299260
4/24/2009	Conference call with Manny Muniz	0:48:00	0:00:00	299326
4/24/2009	Conference call with Jeff Mastin and Elizabeth Dunne re expert declaration	0:42:16	0:00:00	299333
4/24/2009	Draft motion for preliminary injunction	1:12:00	0:00:00	299352
4/25/2009	Confer with C. Center re motion for class cert	0:06:00	0:00:00	299374
4/25/2009	Confer with J. You and E. Dunne re motion for class certification	0:06:00	0:00:00	299373
4/25/2009	review motion for class certification	0:18:00	0:00:00	299372
4/26/2009	Draft responses to interrogatories and requests for production of documents	0:59:05	0:00:00	299389
4/27/2009	Draft responses to Hazel McMillon's special interrogatories and requests for production of documents	1:48:48	0:00:00	299428
4/27/2009	Conference call with E. Dunne and J. Mastin re expert declaration	2:24:39	0:00:00	299461
4/27/2009	Draft responses to special interrogatories and request for production of documents	0:52:25	0:00:00	299481
4/27/2009	Confer with Delia and Elizabeth re responses to interrogatories and RPODs	0:32:25	0:00:00	299482
4/28/2009	Review local rules re filing motions	0:07:57	0:00:00	299539
4/28/2009	Revise motion for class certification	0:10:56	0:00:00	299537
4/28/2009	Confer with Jenn, Delia and Elizabeth re response to interrogatory no. 10	0:31:19	0:00:00	299535
4/28/2009	Revise motion for class certification	0:37:41	0:00:00	299513
4/29/2009	Confer with E. Dunne, J. Kim and J.You re numerosity and class representatives	0:06:00	0:00:00	299653
4/29/2009	Phone call with Manny Muniz re declaration	0:06:00	0:00:00	299647
4/29/2009	Revise motion for class certification	4:36:52	0:00:00	299646
4/30/2009	Revise motion for class certification	1:31:12	0:00:00	299674
4/30/2009	Conference call with Manny Muniz and Elizabeth Dunne re declaration	0:42:00	0:00:00	299675
4/30/2009	Revise motion for class certification	3:50:50	0:00:00	299727

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Date	Description	Billable Time	Nonbillable Time	Slip ID
4/30/2009	Revise motion for class certification	1:21:28	0:00:00	299741
5/5/2009	Review declaration of Jeff Mastin	2:36:00	0:00:00	300024
5/5/2009	Confer with E. Dunne re declaration of Jeff Mastin	0:06:00	0:00:00	300025
5/11/2009	Review Defendant Realty Laua's responses to request for production of documents	0:06:00	0:00:00	300023
5/12/2009	Review transition plan for KPT and Kuhio Homes	0:21:50	0:00:00	300063
5/12/2009	Review motion to dismiss, declarations and exhibits submitted by state	1:06:02	0:00:00	300070
5/12/2009	Review HUD policy re request for reasonable accommodation; HPHA policy on RA	0:26:00	0:00:00	300104
5/13/2009	Draft opposition to motion to dismiss	4:48:50	0:00:00	300164
5/13/2009	Phone call to Jarod Buna re reasonable accommodation policy	0:06:00	0:00:00	300165
5/13/2009	Research reasonable modification and Title II	0:27:56	0:00:00	300189
5/14/2009	Research re reasonable accommodation process	1:27:57	0:00:00	300246
5/14/2009	Confer with E. Dunne re expert declarations	0:06:00	0:00:00	300191
5/14/2009	Phone call with Jarod Buna (x 2) re reasonable accommodation policy	0:12:00	0:00:00	300247
5/14/2009	Draft opposition to motion to dismiss	0:18:26	0:00:00	300266
5/14/2009	Revise declaration of Manny Muniz	1:35:45	0:00:00	300221
5/14/2009	Confer with E. Dunne re declaration of Manny Muniz	0:06:00	0:00:00	300223
5/14/2009	Confer with E. Dunne re preliminary injunction motion and declaration of Manny Muniz	0:24:00	0:00:00	300222
5/15/2009	Review and revise declaration of Manny Muniz	0:36:12	0:00:00	300267
5/15/2009	Draft opposition to motion to dismiss	3:56:18	0:00:00	300298
5/15/2009	Phone call with Jeff Mastin re expert report	0:12:00	0:00:00	300315
5/17/2009	Revise declaration of Jeff Mastin	1:21:55	0:00:00	300319
5/17/2009	Revise declaration of Jeff Mastin	1:08:17	0:00:00	300322
5/18/2009	Draft opposition to motion to dismiss	0:46:11	0:00:00	300457
5/18/2009	Review declaration testimony for opposition to motion to dismiss	1:50:58	0:00:00	300462
5/18/2009	Draft opposition to motion to dismiss	1:48:19	0:00:00	300361
5/18/2009	Phone call with E. Dunne re opposition to motion to dismiss	0:12:00	0:00:00	300364
5/19/2009	Draft opposition to defendants motion to dismiss	4:18:27	0:00:00	300496
5/19/2009	Confer with E. Dunne re logistics of filing opposition to motion to dismiss	0:06:00	0:00:00	300463
5/19/2009	Confer with co-counsel re filing opposition brief	0:41:52	0:00:00	300527
5/19/2009	Draft opposition to motion to dismiss	0:12:10	0:00:00	300521
5/20/2009	Draft opposition to motion to dismiss	7:49:52	0:00:00	300544
5/28/2009	Review draft of class certification motion	0:12:00	0:00:00	300893
5/28/2009	Review draft of class certification motion	0:12:00	0:00:00	300891
5/30/2009	Review draft of class certification motion	0:33:48	0:00:00	301067
6/1/2009	Revise appendix of class cases	1:40:05	0:00:00	301377
6/1/2009	Revise appendix of disability cases	0:46:25	0:00:00	301320
6/1/2009	Phone call with E. Dunne re PI motion and scope of relief	0:24:00	0:00:00	301347
6/2/2009	Revise motion for class certification; confer with Jason Kim	0:51:43	0:00:00	301497
6/2/2009	Review declaration of C. Center in support of class cert; confer with Jason Kim	0:03:08	0:00:00	301496
6/2/2009	Revise motion for class certification	0:36:00	0:00:00	301470
6/2/2009	Review and revise motion for class certification	0:25:42	0:00:00	301430
6/2/2009	Draft and revise declaration of C. Center in support of motion for class certification	0:40:57	0:00:00	301465
6/2/2009	Revise appendix of class cases; confer with Jason Kim	0:15:06	0:00:00	301498
6/3/2009	Review and revise motion for preliminary injunction	0:18:00	0:00:00	301518
6/3/2009	Research re preliminary injunction and toxins	0:31:34	0:00:00	301559
6/3/2009	Revise appendix of class cases	2:36:04	0:00:00	301513
6/4/2009	Review declaration of Jeff Mastin re expert bill	0:18:00	0:00:00	301683
6/4/2009	Review and revise motion for preliminary injunction	0:18:52	0:00:00	301691
6/4/2009	Draft email to R. Edwards re file transfer to Bingham McCutcheon	0:18:00	0:00:00	301660
6/4/2009	Phone call to David Lash re expert bill	0:06:00	0:00:00	301661
6/4/2009	Draft plaintiff's initial disclosures	1:15:52	0:00:00	301632
6/4/2009	Phone call to E. Dunne re preliminary injunction motion	0:21:24	0:00:00	301646
6/5/2009	Prepare for hearing on motion to dismiss	1:48:32	0:00:00	301721
6/5/2009	Draft requested relief section for preliminary injunction motion	3:36:18	0:00:00	301786
6/8/2009	Confer with C. Center re hearing on motion to dismiss	0:12:00	0:00:00	301876
6/8/2009	Research for preliminary injunction motion	2:12:00	0:00:00	301858
6/10/2009	Review cases on preliminary injunction and environmental conditons	0:14:25	0:00:00	302103
6/10/2009	Research re preliminary injunction issues and toxins, environmental conditions; confer with E. Dunne	2:15:21	0:00:00	302090
6/15/2009	Research re FHAA claims and individual liability	0:54:00	0:00:00	302352
6/16/2009	Review injunctive relief letter to Defendants; confer with E. Dunne	0:18:00	0:00:00	302382
6/17/2009	Review email from Victor G re revisions to letter re injunctive relief	0:06:00	0:00:00	302631
6/18/2009	Confer with C. Center re defending depositions and settlement conference	0:06:00	0:00:00	302626
6/18/2009	Review emails from E. Dunne re defending depositions	0:06:00	0:00:00	302630
6/19/2009	Review correspondence re industrial hygienist	0:01:17	0:00:00	302695
6/19/2009	Review demand letter to Defendant re injunctive relief	0:04:01	0:00:00	302696
6/19/2009	Research re evacuation plan and segregation	0:06:06	0:00:00	302711
6/19/2009	Review letter from KKV doctor re additional declarant	0:06:00	0:00:00	302750
6/19/2009	Phone call with E. Dunne re deposition scheduling	0:24:00	0:00:00	302748
6/19/2009	Review motion for summary judgment filed in state case	0:03:39	0:00:00	302755
6/22/2009	Confer with D. Lash re expert fees	0:06:00	0:00:00	302827

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Date	Description	Billable Time	Nonbillable Time	Slip ID
6/22/2009	Review KPT file in preparation for mediation	0:35:04	0:00:00	302843
6/22/2009	Review stipulated protective order and Judge Kobayashi's orders	0:08:41	0:00:00	302870
6/23/2009	Review local rules re confidential settlement statement	0:17:07	0:00:00	302889
6/23/2009	Draft plaintiffs' settlement conference statement	3:04:01	0:00:00	302933
6/24/2009	Review class certification motions in preparation for settlement conference	0:43:38	0:00:00	302965
6/24/2009	Review amended notices of deposition	0:06:00	0:00:00	303046
6/26/2009	Review materials in preparation for settlement conference	0:41:40	0:00:00	303162
6/26/2009	Confer with C. Center re settlement conference	0:12:00	0:00:00	303150
6/26/2009	Confer with co-counsel re class representative depositions	0:12:00	0:00:00	303142
6/28/2009	Travel from SF to Honolulu	5:30:00	0:00:00	303643
6/29/2009	Prepare for settlement conference	0:42:51	0:00:00	303293
6/30/2009	Meeting with Jason Kim, Victor G and Elizabeth Dunne prior to settlement conference	0:42:00	0:00:00	303632
6/30/2009	Attend settlement conference	4:12:00	0:00:00	303631
6/30/2009	Prepare for deposition of Gene Strickland	0:48:00	0:00:00	303635
6/30/2009	Meeting with Jason Kim, Victor Geminiani and Elizabeth Dunne re settlement conference	0:48:00	0:00:00	303634
7/1/2009	Defend deposition of Gene Strickland	2:18:00	0:00:00	303636
7/1/2009	Meeting with Gene Strickland prior to depo	0:24:00	0:00:00	303637
7/1/2009	Defend deposition of Lee Sommers	2:06:00	0:00:00	303641
7/1/2009	Discussion with Lee Sommers re deposition	0:24:00	0:00:00	303642
7/2/2009	Travel from Honolulu to SF	6:30:00	0:00:00	303647
7/6/2009	Review tenants needs assessment survey	0:05:39	0:00:00	303532
7/6/2009	Confer with Elizabeth Dunne re Strickland and Sommers depo	0:06:00	0:00:00	303609
7/7/2009	Confer with E. Dunne re Gene Strickland deposition	0:06:00	0:00:00	303696
7/7/2009	Research re National Center for Housing Management	0:08:31	0:00:00	303785
7/7/2009	Review Lonberg v. City of Riverside	0:18:00	0:00:00	303693
7/10/2009	Review calendar re expert disclosures and dispositive motions	0:12:00	0:00:00	304074
7/15/2009	Research re National Center for Housing Management; draft email to ADRC listserve	0:31:01	0:00:00	304437
7/20/2009	Review Answer and third party complaint against Realty Laua	0:06:00	0:00:00	304853
7/27/2009	Confer with David Lash re payment for Manny Muniz and Jeff Mastin	0:06:02	0:00:00	305317
7/27/2009	Confer with Jason Kim re reply brief for class certification	0:06:00	0:00:00	305345
7/28/2009	Draft reply motion for class certification	4:20:34	0:00:00	305420
7/28/2009	Confer with Jason Kim re scope of NCHM work	0:06:00	0:00:00	305433
7/30/2009	Research re lack of need for reply brief on class certification	3:30:24	0:00:00	305524
7/30/2009	Research re need requirement for class certification for reply to motion for class certification	0:46:26	0:00:00	305552
7/30/2009	Research issue of necessity doctrine for reply motion on class certification	0:07:11	0:00:00	305476
7/31/2009	Review and revise reply motion for class certification	1:22:55	0:00:00	305633
7/31/2009	Research Pacer re appendix of class cases	0:06:09	0:00:00	305645
8/4/2009	Research re scope of work of NCHM	1:12:34	0:00:00	305765
8/4/2009	Confer with Jason Kim re NCHM and settlement proposal	0:53:05	0:00:00	305790
8/13/2009	Confer with E. Dunne re settlement letter to state and Realty Laua	0:07:24	0:00:00	306777
8/17/2009	Conference call re settlement response	1:15:00	0:00:00	306919
9/2/2009	Review KPT privatization and emails re settlement agreement	0:15:22	0:00:00	308211
9/3/2009	Confer with C. Center re settlement agreement	0:06:00	0:00:00	308237
9/3/2009	Confer with C. Center re status conference	0:06:00	0:00:00	308262
9/4/2009	Conference call with C. Center and E. Dunne re settlement conference	0:12:00	0:00:00	308354
9/4/2009	Conference call with Jason, Victor and Elizabeth re status conference	0:48:00	0:00:00	308338
9/4/2009	Attend status conference by telephone	0:42:00	0:00:00	308337
9/8/2009	Confer with E. Dunne re Jeff Mastin's invoice	0:06:00	0:00:00	308473
9/8/2009	Review fees and cost records; confer with E. Dunne and C. Center	0:12:18	0:00:00	308451
9/8/2009	Review dispute resolution procedure in Lopez; confer with E. Dunne and Jason Kim	0:24:09	0:00:00	308470
9/10/2009	Review calendar of upcoming dates	0:06:00	0:00:00	308605
9/10/2009	Review settlement response from defendant	0:18:00	0:00:00	308619
9/10/2009	Attend settlement conference by phone	1:03:07	0:00:00	308646
9/10/2009	Confer with David Lash re expert invoice	0:06:00	0:00:00	308597
9/10/2009	Phone call to E. Dunne re settlement conference	0:06:00	0:00:00	308658
9/15/2009	Review draft of preliminary injunction motion	0:08:02	0:00:00	308983
9/16/2009	Draft motion for preliminary injunction	3:56:33	0:00:00	309042
9/17/2009	Draft motion for preliminary injunction	1:03:47	0:00:00	309105
9/17/2009	Draft motion for preliminary injunction	0:54:15	0:00:00	309087
9/17/2009	Revise motion for preliminary injunction	0:12:30	0:00:00	309093
9/18/2009	Confer with E. Dunne re motion for preliminary injunction	0:12:00	0:00:00	309171
9/18/2009	Revise motion for preliminary injunction	1:44:40	0:00:00	309170
9/18/2009	Draft motion for preliminary injunction - review caselaw on PI standard	2:24:54	0:00:00	309137
10/9/2009	Draft email to David Lash re expert invoice	0:06:00	0:00:00	310287
10/21/2009	Review second declaration of Manny Muniz	0:10:51	0:00:00	311243
10/21/2009	Review letter from Jason Kim to Judge Kobayashi and Keith Hunter	0:05:39	0:00:00	311241
10/29/2009	Conference call with C. Center and E. Dunne re settlement conference	0:48:00	0:00:00	311885
10/29/2009	Review order on class certification	0:12:00	0:00:00	311884

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Date	Description	Billable Time	Nonbillable Time	Slip ID
Total: Jinny Kim		190.85	0.00	
<u>Attorney: Sam Goldberg (Summer 2009)</u>				
5/27/2009	Compiling list of class cert granted in disability cases	0:25:32	0:00:00	300872
5/28/2009	Research federal disability cases in which court granted class cert	2:16:41	0:00:00	300896
5/29/2009		1:49:05	0:00:00	301011
Total: Sam Goldberg (Summer 2009)		4.53	0.00	
Grand Total		255.10	0.00	

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Selection Criteria

Slip.Date 11/1/2009 - 2/28/2010
Clie.Selection Include: KPT Towers

Date	Description	Billable Time	Nonbillable Time	Slip ID
<u>Attorney: Claudia Center</u>				
11/2/2009	Review and respond to draft reasonable accommodation policy, confer with Jinny Kim re provisions	0:16:30	0:00:00	313516
11/4/2009	Review draft notice to class, provide suggested edits, forward class declaration to Mary Broughton, contact person for class	0:43:30	0:00:00	313499
11/9/2009	Review court order on discovery, discuss with Jinny Kim and Joan Graff	0:13:30	0:00:00	313456
12/1/2009	Confer re conference call re motion for preliminary injunction	0:03:00	0:00:00	313799
12/2/2009	Conference call re motion for preliminary injunction and next steps, division of labor	1:12:00	0:00:00	313798
12/10/2009	Legal research obligation to post notice of rights including right to seek reasonable modifications, edit MPAs for style and to reach word count limitation	2:27:00	0:00:00	315031
12/14/2009	Confer with Elizabeth Dunne re question re settlement information in PI motion, re other questions	0:09:00	0:00:00	315045
1/4/2010	Conference call with Jinny Kim, Elizabeth Dunne, Jason Kim, re live testimony for PI hearing, upcoming expert disclosures, discovery plan, upcoming settlement conference	0:45:00	0:00:00	314953
1/5/2010	Confer with Jinny Kim re status of co-counseling agreement	0:06:00	0:00:00	325485
1/7/2010	Forward contact and experience information re expert witness to Elizabeth Dunne	0:06:00	0:00:00	325971
1/8/2010	Confer with Elizabeth Dunne re expert visit by Bart Ashley	0:06:00	0:00:00	333152
1/11/2010	Update Jinny Kim re travel plans	0:06:00	0:00:00	337354
1/11/2010	Confer with co-counsel re upcoming settlement conference, prepare for travel and participation	0:18:00	0:00:00	333153
1/14/2010	Conference call with co-counsel re upcoming settlement conference	0:15:00	0:00:00	333155
1/19/2010	Logistics for trip	0:06:00	0:00:00	338150
1/20/2010	Travel to Honolulu from Bay Area to participate in settlement conference	7:42:00	0:00:00	333158
1/20/2010	Travel to Honolulu from San Francisco to meet with co-counsel and clients, to attend settlement conference	7:33:00	0:00:00	322493
1/21/2010	Meeting with co-counsel re PI hearing, settlement conference and discovery	3:00:00	0:00:00	322499
1/22/2010	Meeting with tenants re claims, status of purported remedies, travel to and from KPT	2:42:00	0:00:00	322498
1/22/2010	Attend settlement conference, travel to and from	3:12:00	0:00:00	322497
1/23/2010	Review January 21, 2010 letters to defendants, confer with co-counsel re opposing views re settlement structures, draft email to co-counsel outlining issues and proposing solutions	0:57:00	0:00:00	322490
1/24/2010	Travel from Honolulu to San Francisco from meetings, settlement conference	7:36:00	0:00:00	322501
1/24/2010	Confer with Denise Hulett re Allston Hunt letter and various settlement approaches	0:13:30	0:00:00	322488
1/25/2010	Further confer with Denise Hulett re settlement	0:09:00	0:00:00	333160
1/25/2010	Confer with Victor Geminiani re next steps settlement	0:13:30	0:00:00	333159
1/28/2010	Confer multiple times with co-counsel re settlement approaches	0:18:00	0:00:00	333161
2/1/2010	Schedule call with Elizabeth Dunne, confer with Denise Hulett re status of settlement and forward emails and discuss in person)	0:33:00	0:00:00	317926
2/2/2010	Review defendants' oppositions to plaintiffs' motion for preliminary injunction (.3), conference call with co-counsel re reply and preparing for hearing (1.0), begin drafting argument portion of reply (.8), attend conference call with opposing counsel re stipulated facts (.95)	3:03:00	0:00:00	317909
2/3/2010	Legal research and draft reply brief, and confer with colleagues (ADRC and Guy Wallace) re latest "program access" cases, confer with co-counsel re brief, read cases	3:54:00	0:00:00	317898
2/4/2010	Review state's opposition to plaintiff's motion for preliminary injunction and draft reply, legal research re same, update co-counsel on areas of importance/concern	4:24:00	0:00:00	317885
2/4/2010	Attend settlement conference by telephone	0:46:30	0:00:00	317886
2/4/2010	Confer with Jinny Kim re pluses and minuses of settlement proposal/offer	0:12:00	0:00:00	317887
2/4/2010	Review defendant's stipulated facts, forward comments	0:12:00	0:00:00	317889
2/5/2010	Conference call with co-counsel re proposed settlement and related matters	1:06:00	0:00:00	317878
2/5/2010	Review and respond via email to latest email proposal re settlement	0:15:00	0:00:00	317881
2/5/2010	Edit reply brief re motion for preliminary injunction, incorporate drafts from Jinny Kim and Elizabeth Dunne, legal research re same, review defendants' opposition papers	4:06:00	0:00:00	317877
2/7/2010	Review and respond to Jason Kim's comments on state's stipulation	0:12:00	0:00:00	322518
2/8/2010	Draft, edit, shorten reply brief	3:12:00	0:00:00	333162
2/10/2010	Discuss with co-counsel status of PI motion and scope of injunctive relief to seek as a prerequisite for moving hearing	0:39:00	0:00:00	318421
2/10/2010	Confer with Jinny Kim re Manny Muniz	0:00:00	0:06:00	318431
2/11/2010	Confer with co-counsel re expert payments	0:07:30	0:00:00	318409
2/12/2010	Confer with colleagues and with Manny Muniz re new retainer, draft letter to Muniz	0:54:00	0:00:00	318377
2/15/2010	Review correspondence re status of pre-hearing settlement talks, respond to co-counsel re same	0:13:30	0:00:00	318362
2/17/2010	Confer with co-counsel re status of settlement discussions and next steps, review "Exhibit A" re interim measures	0:18:00	0:00:00	333163
Total: Claudia Center		64.64	0.10	

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Date	Description	Billable Time	Nonbillable Time	Slip ID
<u>Attorney: Jinny Kim</u>				
11/2/2009	Confer with Elizabeth Dunne re sample reasonable accommodation policy	0:06:00	0:00:00	312090
11/2/2009	Draft reasonable accommodation policy	2:02:21	0:00:00	312057
11/3/2009	Draft class notice	1:53:14	0:00:00	312162
11/4/2009	Confer with C. Center re class notice	0:06:00	0:00:00	312296
11/4/2009	Revise class notice	0:12:00	0:00:00	312295
11/4/2009	Revise class notice	0:20:08	0:00:00	312287
11/4/2009	Confer with E. Dunne re class notice	0:06:00	0:00:00	312297
11/4/2009	Confer with Jason Kim re meeting and conferring re class notice	0:06:00	0:00:00	312318
11/4/2009	Confer with Jason Kim re meeting and conferring re class notice	0:06:00	0:00:00	312325
11/4/2009	Confer with Elizabeth Dunne re settlement conference and class notice	0:12:00	0:00:00	312317
11/9/2009	Revise program access chart and confer with Elizabeth Dunne re changes	0:19:47	0:00:00	312523
11/9/2009	Review draft program access chart; confer with Elizabeth Dunne	0:44:37	0:00:00	312489
11/10/2009	Confer with E. Dunne and C. Center re publishing class order	0:06:00	0:00:00	312602
11/10/2009	Confer with Djuna Gray re publishing class certification order	0:06:00	0:00:00	312601
11/10/2009	Confer with Chris Todd re toll free number for class notice	0:06:00	0:00:00	312576
11/17/2009	Draft email to Westlaw attaching class certification order	0:12:00	0:00:00	312943
11/18/2009	Review Pacer re Urban Management Company and class notice	0:12:00	0:00:00	312980
11/19/2009	Review caselaw re discovery of class members	0:26:25	0:00:00	313013
11/19/2009	Research re discovery of class list	0:12:00	0:00:00	313031
11/20/2009	Review discovery file; confer with Elizabeth re first request for production of documents	0:12:00	0:00:00	313062
11/20/2009	Draft discovery plan	0:18:32	0:00:00	313070
11/20/2009	Confer with Donna Ahuna re first request for production of documents	0:06:00	0:00:00	313071
11/20/2009	Draft first set of interrogatories	0:07:45	0:00:00	313087
11/21/2009	Draft first request for special interrogatories	0:41:55	0:00:00	313152
11/23/2009	Draft first set of special interrogatories	0:24:58	0:00:00	313175
11/23/2009	Review motion for preliminary injunction	0:26:47	0:00:00	313172
11/25/2009	Review sample interrogatories for first set of special interrogatories	0:06:29	0:00:00	313289
11/30/2009	Draft first set of special interrogatories	0:43:02	0:00:00	313605
12/2/2009	Draft intake form for class contacts	0:04:28	0:00:00	313682
12/2/2009	Review motion for preliminary injunction, declaration of Jeff Mastin and reasonable accommodations policy	0:35:53	0:00:00	313664
12/2/2009	Conference call re preliminary injunction motion	1:18:00	0:00:00	313669
12/2/2009	Phone call to Jeff Mastin re possible declaration for preliminary injunction motion	0:18:00	0:00:00	313671
12/2/2009	Draft declaration of Jeff Mastin in support of motion for preliminary injunction	0:18:00	0:00:00	313681
12/2/2009	Draft intake form for class member contacts	0:30:45	0:00:00	313697
12/3/2009	Revise declaration of Jeff Mastin	0:15:16	0:00:00	313761
12/3/2009	Confer with Mary Broughton re class notice	0:12:00	0:00:00	313762
12/3/2009	Phone call with Jeff Mastin re declaration in support of preliminary injunction	0:18:00	0:00:00	313744
12/3/2009	Draft declaration of Jeff Mastin in support of preliminary injunction	0:26:18	0:00:00	313743
12/3/2009	Draft intake form	0:46:14	0:00:00	313708
12/4/2009	Review and comment on declaration of Jeff Mastin	1:13:19	0:00:00	313776
12/7/2009	Revise declaration of Jeff Mastin	0:14:31	0:00:00	313914
12/7/2009	Confer with Elizabeth Dunne re Declaration of Jeff Mastin	0:12:00	0:00:00	313915
12/7/2009	Revise declaration of Jeff Mastin	1:00:00	0:00:00	313870
12/7/2009	Draft declaration of Jeff Mastin in support of motion for preliminary injunction	0:34:05	0:00:00	313857
12/7/2009	Revise declaration of Jeff Mastin in support of motion for preliminary injunction	0:32:05	0:00:00	313902
12/8/2009	Revise declaration of Jeff Mastin	0:28:27	0:00:00	313924
12/8/2009	Review and revise second declaration of Manny Muniz, confer with Elizabeth Dunne	0:37:42	0:00:00	313934
12/8/2009	Review and revise motion for preliminary injunction	1:40:28	0:00:00	313982
12/8/2009	Revise intake form per comments from Elizabeth Dunne and Mary Broughton	0:10:57	0:00:00	313985
12/9/2009	Conference call re motion for preliminary injunction, discovery plan and experts	0:48:00	0:00:00	314039
12/9/2009	Confer with Jeff Mastin re declaration in support of PI motion	0:03:05	0:00:00	314040
12/9/2009	Phone call with Jeff Mastin re declaration in support of preliminary injunction	0:06:00	0:00:00	314042
12/9/2009	Review initial disclosures of state of hawaii, revise discovery plan	0:06:57	0:00:00	314080
12/10/2009	Review and revise motion for preliminary injunction	5:08:31	0:00:00	314213
12/10/2009	Review and revise motion for preliminary injunction	5:08:31	0:00:00	314119
12/14/2009	Review motion for preliminary injunction motion	0:45:51	0:00:00	314224
12/14/2009	Confer with Elizabeth Dunne re revisions to preliminary injunction motion	0:18:00	0:00:00	314230
12/14/2009	Research re notices of settlement conferences for PI motion	0:17:26	0:00:00	314235
12/15/2009	Review final preliminary injunction motion	0:33:17	0:00:00	314256
12/18/2009	Review emails and documents re potential experts	0:12:00	0:00:00	314476
12/18/2009	Confer with co-counsel re discovery plan, special rogs	0:12:00	0:00:00	314475
12/18/2009	Confer with team re special interrogatories	0:12:11	0:00:00	314492
12/18/2009	Review and revise discovery plan	0:33:50	0:00:00	314474
1/4/2010	Conference call re preliminary injunction hearing	0:48:00	0:00:00	314990
1/4/2010	Review emails from E. Dunne re discovery meeting, class notices and co-counseling agreement	0:06:00	0:00:00	314991
1/5/2010	Confer with co-counsel re co-counseling agreement	0:06:00	0:00:00	315004
1/6/2010	Revise first set of special interrogatories per comments from Victor G.	0:08:14	0:00:00	315174
1/6/2010	Review expert disclosure of Paul Guillory for KPT case	0:10:44	0:00:00	315173

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Date	Description	Billable Time	Nonbillable Time	Slip ID
1/7/2010	Confer with co-counsel re first set of special interrogatories	0:06:00	0:00:00	315209
1/11/2010	Revise first set of interrogatories	0:29:47	0:00:00	315466
1/13/2010	Draft settlement conference statement	0:41:33	0:00:00	315669
1/13/2010	review confidential settlement conference statement; confer with Elizabeth and Jason	0:12:00	0:00:00	315659
1/14/2010	Draft settlement conference statement	2:13:50	0:00:00	315719
1/19/2010	Draft email to Jeff Mastin re PI motion	0:06:00	0:00:00	316992
1/19/2010	Attend status conference re PI hearing	0:42:00	0:00:00	316993
1/19/2010	Meeting with Jason Kim and Elizabeth Dunne re status conference	1:00:00	0:00:00	316994
1/19/2010	Draft email to Manny Muniz re PI hearing	0:06:00	0:00:00	316991
1/20/2010	Email with Jeff Mastin re videoconferencing and PI motion	0:06:00	0:00:00	316990
1/21/2010	Phone call with Mary Broughton re intakes with class members	0:06:00	0:00:00	316989
1/21/2010	Meeting with co-counsel re PI hearing, settlement conference and discovery	3:00:00	0:00:00	316988
1/22/2010	Attend settlement conference	3:00:00	0:00:00	317088
1/22/2010	Meeting with tenants re class claims	2:30:00	0:00:00	317089
1/25/2010	Draft expert designation of Manny Muniz	0:10:31	0:00:00	317192
1/25/2010	Draft email to Robert Scofield re designation and file	0:06:00	0:00:00	317194
1/25/2010	Draft email to co-counsel attaching expert designation and report for Manny Muniz	0:05:42	0:00:00	317193
1/25/2010	Draft memo and email to Elizabeth re tenant information	0:46:37	0:00:00	317223
1/25/2010	Draft expert report of Manny Muniz	4:10:23	0:00:00	317189
1/26/2010	Review emails from Jason Kim re expert report, disclosures and settlement	0:12:00	0:00:00	317372
1/26/2010	Draft email to Alan Delorme re transfer of files to Robert	0:03:40	0:00:00	317256
1/26/2010	Draft email to Manny Muniz re expert report and disclosures	0:06:00	0:00:00	317371
1/26/2010	Draft expert report for Jeff Mastin	2:02:49	0:00:00	317301
1/26/2010	Draft expert disclosures for non-retained experts	0:30:52	0:00:00	317269
1/26/2010	Draft email to Jeff re expert disclosures and file	0:06:00	0:00:00	317257
1/26/2010	Revise non-retained expert designation	0:28:31	0:00:00	317316
1/26/2010	Phone call to Robert Scofield re expert disclosures	0:06:00	0:00:00	317350
1/26/2010	Draft expert report of Jeff Mastin	0:15:07	0:00:00	317267
1/26/2010	Draft expert disclosure of Jeff Mastin	0:07:04	0:00:00	317260
1/26/2010	Draft email to Manny re expert disclosures and payment	0:06:00	0:00:00	317258
1/27/2010	Draft settlement agreement	0:15:58	0:00:00	317421
1/27/2010	Review email from Manny Muniz re publications; draft email in response	0:03:03	0:00:00	317414
1/27/2010	Draft expert designation of Robert Scofield	0:03:52	0:00:00	317405
1/27/2010	Phone call with Kelly at AHFI re Trudy's treating physician for expert designation	0:06:00	0:00:00	317392
1/27/2010	Revise expert designation of non-retained experts	0:05:55	0:00:00	317391
1/27/2010	Revise expert report of Jeff Mastin	1:41:12	0:00:00	317388
1/27/2010	Phone call with Jeff Mastin re expert disclosures and PI motion hearing	0:18:00	0:00:00	317374
1/27/2010	Revise expert designation of Jeff Mastin	0:08:55	0:00:00	317373
1/27/2010	Draft expert report of Robert Scofield	1:09:03	0:00:00	317413
1/28/2010	Draft email to Robert Scofield re expert report and disclosure	0:06:00	0:00:00	317475
1/28/2010	Draft stipulated judgment s	1:35:32	0:00:00	317504
1/28/2010	Revise expert report per email from Jeff Mastin	0:10:43	0:00:00	317474
1/29/2010	Revise expert report of Jeff Mastin; phone call with Mastin re changes	0:36:00	0:00:00	317560
1/29/2010	Revise expert report and phone call with Robert Scofield re expert report	0:11:01	0:00:00	317551
1/29/2010	Revise expert report and draft email to Manny Muniz attaching final expert report	0:12:00	0:00:00	317535
1/29/2010	Draft stipulated judgment	0:25:43	0:00:00	317534
1/29/2010	Phone call with Manny Muniz re status of expert report	0:06:00	0:00:00	317529
1/29/2010	Revise non-retained expert designation	0:48:00	0:00:00	317559
2/1/2010	Draft email to Jason re Robert Scofield expert disclosure	0:06:00	0:00:00	317681
2/1/2010	Draft email to Robert Scofield re expert disclosure	0:06:00	0:00:00	317595
2/1/2010	Draft settlement agreement	3:01:58	0:00:00	317659
2/1/2010	Draft email to Robert Scofield re expert disclosures	0:06:00	0:00:00	317683
2/2/2010	Revise settlement agreement	2:43:56	0:00:00	317709
2/2/2010	Team meeting re reply brief for PI motion	1:04:29	0:00:00	317720
2/2/2010	Conference call with opposing counsel re stipulation of uncontested facts	0:30:00	0:00:00	317748
2/3/2010	Research re reply brief	0:50:32	0:00:00	317809
2/3/2010	Draft reply brief re voluntary cessation of conduct	1:37:36	0:00:00	317766
2/3/2010	Draft reply brief re mootness argument	0:32:02	0:00:00	317798
2/4/2010	Phone call with Jeff Mastin re Alper and Camacho declarations	0:48:00	0:00:00	317831
2/4/2010	Research and draft reply motion for preliminary injunction	4:15:21	0:00:00	317828
2/5/2010	Revise reply brief on preliminary injunction motion	0:41:54	0:00:00	317951
2/5/2010	Review reply brief; discussion with C. Center and E. Dunne	0:24:00	0:00:00	317925
2/5/2010	Team conference call re settlement and preliminary injunction reply brief	1:06:00	0:00:00	317891
2/6/2010	Revise reply brief	0:36:00	0:00:00	318045
2/8/2010	Draft reply motion	0:06:00	0:00:00	318042
2/11/2010	Confer with team re Manny Muniz	0:06:00	0:00:00	318322
2/12/2010	Confer with Jeff Mastin re direct testimony for PI hearing	0:06:00	0:00:00	318321
2/16/2010	Review emails about settlement position and confer with C. Center re same	0:12:00	0:00:00	318484

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Date	Description	Billable Time	Nonbillable Time	Slip ID
Total: Jinny Kim		88.96	0.00	
<u>Attorney: Mary Broughton</u>				
11/3/2009	Review Declarations to Motion for Class Cert.	0:30:00	0:00:00	312319
12/3/2009	Reviews declarations to class cert brief.	1:30:00	0:00:00	313834
12/4/2009	Review case documents and class cert order.	2:00:00	0:00:00	313836
12/4/2009	Review various documents re class cert order, including intake form and email from Jimmy.	1:30:00	0:00:00	313838
12/7/2009	Meet with Jinny todiscuss intake procedure and case issues.	0:18:00	0:00:00	313918
12/10/2009	Review case materials and class cert Order.	1:30:00	0:00:00	314239
1/21/2010	Intake with potential class memebr Paul Susco.	1:00:00	0:00:00	317084
Total: Mary Broughton		8.30	0.00	
Grand Total		161.90	0.10	

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Detail TIME ONLY Report by Attorney and Case

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Selection Criteria

Slip.Date 3/1/2010 - Latest
Clie.Selection Include: KPT Towers

Date	Description	Billable Time	Nonbillable Time	Slip ID
<u>Attorney: Claudia Center</u>				
3/2/2010	Confer with Jinny Kim re status of settlement agreement and our comments	0:12:00	0:00:00	319180
4/1/2010	Confer with Elizabeth Dunne re status of settlement discussions	0:06:00	0:00:00	321221
4/20/2010	Review settlement agreement, confer with co-counsel re language re disputes and prevailing party	0:33:00	0:00:00	331868
4/26/2010	Review and comment on draft settlement agreement	0:51:00	0:00:00	331917
5/26/2010	Confer with Victor Geminiani	0:06:00	0:00:00	331729
6/2/2010	T/c Victor Geminiani re next steps settlement	0:18:00	0:00:00	328054
6/3/2010	Confer with Elizabeth Dunne re next steps management companies	0:12:00	0:00:00	328043
6/8/2010	Conference call re status of settlement efforts, upcoming discovery	0:24:00	0:00:00	325982
6/9/2010	Confer with Jinny Kim re Hawaii depositions	0:06:00	0:00:00	325943
7/8/2010	Confer with co-counsel re management company's motion for summary judgment	0:06:00	0:00:00	328068
8/25/2010	Conference call with co-counsel	0:45:00	0:00:00	330838
8/31/2010	Email to Peter Obstler re next steps	0:06:00	0:00:00	331672
10/6/2010	Review and provide summary fees report to Victor Geminiani and Jason Kim, timeslips, request cost report	0:39:00	0:00:00	333170
10/7/2010	Review and forward cost report	0:03:00	0:00:00	333355
12/14/2010	Update Denise Hulett, email Victor Geminiani re division of fees	0:06:00	0:00:00	336350
12/21/2010	Fees information to Victor Geminiani	0:12:00	0:00:00	336785
Total: Claudia Center		4.75	0.00	
<u>Attorney: Jinny Kim</u>				
3/2/2010	Review settlement agreement and language from Jeff's declaration re access to freight elevator; draft email to Elizabeth Dunne	0:18:00	0:00:00	319117
3/2/2010	Draft email to team re draft settlement agreement	0:12:00	0:00:00	319100
3/2/2010	Review draft settlement agreement	0:36:00	0:00:00	319099
3/22/2010	Confer with Elizabeth and Mary Broughton re tenant issues	0:06:00	0:00:00	320450
3/22/2010	Review email and spreadsheet of tenant information sent by Elizabeth Dunne; confer with	0:06:00	0:00:00	320449
3/22/2010	Review redlined version of settlement agreement	0:06:00	0:00:00	320459
3/23/2010	Confer with Mary Broughton re tenant intakes	0:06:00	0:00:00	320784
3/23/2010	Confer with Mary Broughton re intakes	0:06:00	0:00:00	320564
3/24/2010	Confer with co-counsel re status conference and settlement	0:06:00	0:00:00	320783
3/24/2010	Review settlement agreement and confer with team re state's comments	0:36:44	0:00:00	320707
3/26/2010	Conference call re next steps on case	0:46:36	0:00:00	320927
3/29/2010	Review correspondence of Elizabeth Dunne re discovery disputes	0:06:00	0:00:00	321026
3/29/2010	Research re ADA interference claim	0:19:48	0:00:00	321012
4/1/2010	Review settlement agreement draft from state	0:07:42	0:00:00	321265
4/6/2010	Phone call with Devin re claims against Urban	0:24:03	0:00:00	321630
4/7/2010	Research interference claim against mgmt company	0:46:07	0:00:00	321629
5/10/2010	Review discovery propounded by Urban Realty	0:12:00	0:00:00	323682
5/18/2010	Review discovery responses of Urban and Realty Laua	0:20:50	0:00:00	324095
6/8/2010	Conference call re status of settlement agreement, depositions of mgmt company	0:54:36	0:00:00	325416
6/8/2010	Conference call re status of settlement agreement, depositions of mgmt company	0:54:36	0:00:00	325415
8/25/2010	Conference call re settlement against management company	0:48:00	0:00:00	330820
Total: Jinny Kim		7.99	0.00	
<u>Attorney: Mary Broughton</u>				
3/23/2010	Phone call with Elizabeth Dunne re intakes (.2); train volunteer David in intake procedure (.4); review excel chart of potential class members (.2); phone calls with same (.1).	0:54:00	0:00:00	320640
3/24/2010	Intake phone calls (.5); update chart re same (.3); phone call with Amy Doff from Lawyers for Equal Justice re intake procedure (.2).	1:00:00	0:00:00	321485
3/25/2010	Intakes calls and update chart of same.	0:42:00	0:00:00	320959
4/5/2010	Intake phone calls and update chart with info.	0:48:00	0:00:00	321665
4/6/2010	Update Intake chart (.3); email to E. Dunne re same (.1); phone calls with intakes (.4; email to A. Dorf re intake procedure and status of intakes (.2).	1:00:00	0:00:00	321944
4/15/2010	Update intake chart and phone calls with itakes re accomdations; cross reference pltf's intake chart with def's chart of medical wait lists.	2:30:00	0:00:00	322575
4/20/2010	Review def's chart of medical transfers and draft new chart of tenants not on def's list; email to Dunne and Dorf re same; phone call with Dunne re case status and various accomdation lists.	2:42:00	0:00:00	322680

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12:48 PM

Legal Aid Society - Employment Law Center
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Date	Description	Billable Time	Nonbillable Time	Slip ID
Total: Mary Broughton		9.60	0.00	
Grand Total		22.34	0.00	

The Legal Aid Society Employment Law**Job Ledger Report****For the Period From Jan 1, 2008 to Jan 14, 2011**

Filter Criteria includes: 1) IDs from 761 to 761. Report order is by ID. Report is printed

Job ID	GL Acct Description	Trx Date	Trans Description	Amount	Totals
761	Telephone - KPT Tower	1/12/10	Long distance prior month	0.78	
		1/12/10	Switched 800/888	0.20	
		2/12/10	Long distance prior month	10.82	
		2/12/10	Switched 800/888	0.10	
		3/12/10	Long distance prior month	0.32	
		4/12/10	Long distance prior month	4.98	
		4/12/10	Long distance prior month	0.19	
		5/12/10	Long distance prior month	2.77	
		5/12/10	Long distance prior month	0.02	
		6/12/10	Long distance prior month	0.10	
		7/12/10	Switched 800/888	0.12	
		10/12/10	Long distance prior month	0.10	
					20.50
	Library - KPT Towers	4/20/09	CompuLaw LLC - US District Court Rules for the District of Hawaii (KPT Towers case)	130.31	
					130.31
	Internet general - KPT T	3/31/10	Jan to Mar 2010 Pacer billing	34.64	
		6/30/10	Pacer billing current QTR	2.24	
		12/31/10	Jan to Mar 2010 Pacer billing	10.08	
					46.96
	Printing inside - KPT To	3/31/10	Quarter Copier expense	7.38	
		6/30/10	Quarter Copier expense	12.58	
		9/30/10	Quarter Copier expense	6.47	
					26.43

The Legal Aid Society of Employment Law
Job Ledger Report

For the Period From Jan 1, 2008 to Jan 14, 2011

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Job ID	GL Acct Description	Trx Date	Trans Description	Amount	Totals
	Lit fees expert - KPT To	2/11/10	Manny Muniz Associates, LLC - Late fee for services rendered per agreement Alston Hunt Floyd & Ind payment was late	66.00	
					66.00
	Lit fees Court/Jury - KP1	4/2/09	Clerk, US District Court - Pro Hac Vice fee for Jinny Kim USDC Hawaii	225.00	
		4/2/09	Clerk, US District Court - Pro Hac Vice fee for Claudia Center USDC Hawaii KPT Towers	225.00	
					450.00
	Travel major - KPT Tow	12/30/08	Wells Fargo Bank - 12/15/08 ORB US Orbitz plane ticket fee Claudia Center case 761	6.99	
		12/30/08	Wells Fargo Bank - 12/15/08 Hawaiian Air OAK to Honolulu RT for 12/16/08 to correct case number from 2008	483.46	
		7/29/09	should be 761 not 716	-490.45	
	Travel major - KPT Tow	6/29/09	Wells Fargo Bank - 5/28/09 Hawaiian Airlines Claudia Center Oakland to Honolulu RT KPT Towers	736.20	
		6/30/09	Jinny Kim - 06/19/09 UAL Flight to Honolulu	655.71	
		6/30/09	Jinny Kim - 06/28/09 Baggage charges	15.00	
		6/30/09	Jinny Kim - 07/02/09 Baggage charges	15.00	
		7/29/09	to correct case number from 2008 should be 761 not 716	490.45	

The Legal Aid Society Employment Law

Job Ledger Report

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Job ID	GL Acct Description	Trx Date	Trans Description	Amount	Totals
		1/29/10	Wells Fargo Bank - 01/11/10 United Airlinez SFO to Honolulu KPT Towers for 1/20/10 Flight	399.60	
		2/28/10	UAL flight 1/16/10 to Honolulu for KPT towers case paid on 12/21/09 for Jinny Kim	389.20	
					2,701.16
	Travel lodging - KPT To	6/29/09	Wells Fargo Bank - 6/04/09 Prince Hotels Honolulu KPT Towers	173.54	
		6/29/09	Wells Fargo Bank - 6/07/09 Halekulani Hotel-House Honolulu KPT Towers	46.59	
		6/29/09	Wells Fargo Bank - 06/09/09 Prince Hotels Honolulu	37.97	
					258.10
	Travel ground - KPT To	12/30/08	Wells Fargo Bank - 12/16/08 Supershuttle SF Hawaii trip case 761 to correct case number from 2008	31.86	
		7/29/09	should be 761 not 716	-31.86	
	Travel ground - KPT To	6/25/09	Claudia Center - 06/07/09 Mileage Oakland Airport 20.98 KPT case	11.54	
		6/25/09	Claudia Center - 6/7/09 Shuttle to hotel from Honolulu Airport	9.00	
		6/25/09	Claudia Center - 06/07/09 Taxi from meeting with co-counsel to hotel	12.00	
		6/25/09	Claudia Center - 06/08/09 Taxi from hotel to court	10.00	
		6/25/09	Claudia Center - 06/08/09 Taxi from co-counsel office to Honolulu airport	28.00	

**The Legal Aid Society Employment Law
Job Ledger Report**

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Job ID	GL Acct Description	Trx Date	Trans Description	Amount	Totals
		6/25/09	Claudia Center - 06/08/09 Mileage from Oakland Airport 20.98 KPT	11.54	
		6/25/09	Claudia Center - 06/08/09 Toll - Bay bridge KPT	4.00	
		6/29/09	Wells Fargo Bank - 06/08/09 Five star Parking Oakland	32.00	
		7/29/09	to correct case number from 2008 should be 761 not 716	31.86	
		3/25/10	Jinny Kim - 1/19/10 parking for status conference case 761	10.00	
		3/25/10	Jinny Kim - 1/22/10 parking for settlement conference	10.00	
					169.94
	Travel meals - KPT Tow	6/25/09	Claudia Center - 6/7/09 Breakfast at Oakland Airport KPT	5.36	
		6/29/09	Wells Fargo Bank - 06/08/09 Lahaina Chicke Honolulu	18.62	
					23.98
					3,893.38
					3,893.38
					3,893.38

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Report

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the dates and methods of service noted below, as true and correct copy of the foregoing was served on the following at their last known address:

Served Electronically through CM/ECF:

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January 19, 2011

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January 19, 2011

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January 19, 2011

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URBAN REAL ESTATE

DATED: Honolulu, Hawai`i, January 19, 2011.

/s/ Jason H. Kim

PAUL ALSTON

JASON H. KIM

Attorneys for Plaintiffs